

From: [Seth Molen \(molen.seth@turnagainherbco.com\)](mailto:molen.seth@turnagainherbco.com)
To: [Marijuana, CED ABC \(CED sponsored\)](#); [Marijuana Licensing \(CED sponsored\)](#)
Subject: Turnagain Manufacturing Company (#12815) MJ-15 Submission
Date: Tuesday, February 05, 2019 4:52:57 PM
Attachments: [Cover Sheet.pdf](#)
[mj_05_name_change2.pdf](#)
[MJ-01- p15 - section2.pdf](#)
[MJ-15.pdf](#)

Good afternoon.

In order to follow up on my physical submission of form MJ-15, and it's fee payment, this morning to the AMCO office, please see the attached files for your records.

In summary, with the submission of this MJ-15 we are requesting three items:

1. Approval for a name change to two of our products. As described in the form, the reason for this change is that we would like move away from the word "Giggle" as it could be perceived to appeal to adolescents. The two products that we are requesting the name change for are "Giggle Bursts" and "Giggle Drops". We are requesting that Giggle Bursts are to be changed to "Turnagain High Chews". We are requesting that Giggle Drops are to be changed to "Denali Drops". We understand name changes are required to be brought before the board. With that said we are requesting a temporary approval from the Director.
2. We are requesting approval to increase the citric acid content within each of the "Turnagain High Chews" and "Denali Drops" and offer them as "sour". The production method and ingredients are the same in regards to the Turnagain High Chews, Denali Drops, Turnagain High Chews Sour, Denali Drops Sour. The only difference is the amount of citric acid used within said recipes. We understand changes to products are to be brought before the board. With that said we are requesting a temporary approval from the Director.
3. Approval to add an additional compliant option when it comes to the company's method to lock and transport marijuana and/or marijuana products. We are seeking to add less cumbersome lockable duffles as well as more manageable lockable boxes that were not manufactured by KNAACK to our approved transportation method(s) for use by us wehn transporting small amounts of marijuana or marijuana products. We understand changes to products are to be brought before the board. With that said we are requesting a temporary approval from the Director.

Thank you for your time and attention.

Kindest regards,

Seth Molen
Turnagain Herb Co
Girdwood Alaska



Alaska Marijuana Control Board

Alcohol & 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

Cover Sheet for Marijuana Establishment Applications

What is this form?

This cover sheet **must** be completed and submitted any time a document, payment, or other marijuana establishment application item is emailed, mailed, or hand-delivered to AMCO's main office.

Items that are submitted without this page will be returned in the manner in which they were received.

Section 1 – Establishment Information

Enter information for the business seeking to be licensed, as identified on the license application.

Licensee:	Turnagain Manufacturing Company	License Number:	12815		
License Type:	Marijuana Product Manufacturing Facility				
Doing Business As:	TURNAGAIN MANUFACTURING COMPANY				
Physical Address:	524 E 48th Ave, Unit 1				
City:	Anchorage	State:	AK	Zip Code:	99503 - 0000
Designated Licensee:	Seth Molen				
Email Address:	molen.seth@turnagainherbco.com				

Section 2 – Attached Items

List all documents, payments, and other items that are being submitted along with this page.

Attached Items:	MJ-15 MJ-01 MJ-05 MJ-15 and associated payment submitted in person this morning (2.5.19).
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OFFICE USE ONLY

Received Date:		Payment Submitted Y/N:		Transaction #:	
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Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

What is this form?

This operating plan supplemental form is required for all applicants seeking a marijuana product manufacturing facility license and must accompany the **Marijuana Establishment Operating Plan (Form MJ-01)**, per 3 AAC 306.020(b)(11). Applicants should review **Chapter 306: Article 5** of the **Alaska Administrative Code**. This form will be used to document how an applicant intends to meet the requirements of those 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 306.520(3).

What additional information is required for product manufacturing facilities?

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

- Prohibitions
- Equipment, compounds, and processes to be used
- Proposed marijuana concentrates and marijuana products
- Proposed product packaging and sample labels
- Waste disposal plan
- Testing

This form must be submitted to AMCO's main office before any marijuana product manufacturing facility license application will be considered complete.

Section 1 – Establishment Information

Enter information for the business seeking to be licensed, as identified on the license application.

Licensee:	Turnagain Manufacturing Company	License Number:	12815		
License Type:	Marijuana Product Manufacturing Facility				
Doing Business As:	Turnagain Manufacturing Company				
Premises Address:	524 E 48th Ave, Unit 1				
City:	Anchorage	State:	ALASKA	ZIP:	99503



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

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

Section 2 – Prohibitions

Applicants should review 3 AAC 306.510 and be able to answer “Agree” to all items below.

The marijuana product manufacturing facility will not:

Agree Disagree

Sell, deliver, distribute, or transfer any marijuana, marijuana concentrate, or a marijuana product directly to a consumer, with or without compensation

☒☐

Allow any person, including a licensee, employee, or agent, to consume marijuana, marijuana concentrate, or a marijuana product on its licenses premises

☒☐

The marijuana product manufacturing facility will not manufacture or sell any product that:

Agree Disagree

Is an adulterated food or drink

☒☐

Closely resembles a familiar food or drink item including candy

☒☐

Is packaged to look like candy, or in bright colors or with cartoon characters or other pictures or images that would appeal to children

☒☐

Section 3 – Equipment, Compounds, and Processes to be Used

Review the requirements under 3 AAC 306.555, and identify how the proposed premises will meet the listed requirements.

Describe the equipment and solvents, gases, chemicals, and other compounds the marijuana product manufacturing facility will use to create marijuana concentrates:

Please see attached document titled "MJ-05 Section 3 Creation MJ Concentrates" which has been included at the end of this document.

To summarize the attached document, Turnagain Manufacturing Company will extract marijuana oil from marijuana plant material and fresh marijuana flower utilizing a closed-loop, modular liquid pure CO2 extraction machine. Said machine will operate in closed loop or single-use solvent method. Ethanol and D-lemonine will be used as solvents. TMC will continuously look for other natural volatile organic compounds to use as co-solvents.



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Describe the processes to be used to create marijuana concentrates:

We will utilize marijuana material, marijuana trim or fresh/dried marijuana flower to create our concentrates at the Turnagain Manufacturing Company. We will receive and document marijuana transfer. If any trimming of product is needed we will take care of this prior to extraction.

If making rosin or live resin, we will press dried or fresh flower while applying heat. We will catch this runoff, rosin/live resin.

If we are making bubble hash we will use dry, fresh or frozen plant material. This tumbling system will use ice to agitate the marijuana trichomes to be filtered through a series of micron screens. Once extract is collected, it will be dried/cured and packaged for sale.

If not making rosin or live resin, we will grind our material and extract the oil utilizing our closed-loop CO2 extraction system. Said system will separate oil and plant terpenes from the plant material. We will collect the terpenes for potential use later. It is at this point that we are able to specify what type of product we would like to create by varying and fine tuning the temperature, pressure, solvent-to-feed ratio and the flow rate during the extraction process. From here we can further refine the oil or transfer it to our kitchen to create edibles or topicals.

We will distill some oil utilizing our proprietary fractional distillation process to further remove any additional terpenes and/or impurities (including ethanol and other VOCs) as well as to separate any remaining plant material (fats, lipids, etc.). Next we will vacuum the oil to finalize the removal of any and all impurities that may have lasted within our oil.

If making cartridges we will re-introduce any additional terpenes as desired for the cartridges then fill said cartridges using our automated system.

Turnagain Manufacturing Company will utilize the Xact Xtract model LM2 machine for the company's operations. The Xact Xtract model LM2 is a manually operated extraction system that uses liquid phase carbon dioxide (CO2) to selectively extract components of botanical material. The LM2 uses high pressure collectors and separators which do not require a pressure drop between vessels.



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products

Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Aww Snaps
Type:	Marijuana Edible

Product Description: Details must include the color, shape, and texture.	Small, round, light to dark cinnamon color. Crisp texture. Aww Snaps are ginger snaps and are gluten free and vegan.
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Ingredients: This box is not applicable to marijuana concentrates	Ground flax, water, coconut sugar/brown sugar, baking soda, salt, coconut oil/cbd/thc concentrate, almond flour or corn meal, vanilla extract, molasses, ground ginger, cinnamon
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Standard Production Procedure and Detailed Manufacturing Process:	Cream sugar and fat, including cbd/thc oil. Mix in additional ingredients and mix thoroughly. Portion, bake at 350 degrees and cool. Package for sale.
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Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	
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Alaska Marijuana Control Board


Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 5 – Proposed Product Packaging and Sample Labels

Review the requirements under 3 AAC 306.520 and 3 AAC 306.565 – 3 AAC 306.570, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Aww Snaps
Type:	Marijuana Edible

Packaging Description: Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Attached photos, drawings, or graphic representations are preferred.	Clear or opaque individual cookie wrapper, opaque branded box with opaque branded child-resistant ATSM bag. Cookies will be approximately 2" in diameter, box approximately 4" x 4" x 4", ATSM bag up to 6" x 9". Amount of THC and CBD will vary with strain. Product will be offered in 25mg and 50mg packages. For 25mg box of cookies, individual serving size will be one cookie. One cookie in 25mg box will be 5mg THC. For 50mg box of cookies, individual serving size will be one half cookie. One cookie in the 50mg box will be marked to show two equal halves. One cookie in 50mg box will be 10mg THC. Each of the pack sizes will offer 5 cookies within the box. This package complies with potency limits, this package does not contain or utilize any images that specifically target individuals under the age of 21. The packaging material protects the product from contamination and does not impart any toxic or damaging substances to the product. This package contains multiple servings; said product delineates individual servings by the cookie. Label will denote portion size. 10Mg cookies will show 2 equal portions. This package will
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Sample Labels: Provide sample labels showing how the labeling information required in 3 AAC 306.570 will be set out.	<p>Ingredients: Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed diam nonummy nibh euismod tincidunt ut laoreet dolore magna aliquam erat volutpat. Ut wisi enim ad minim veniam, quis nostrud exercitation ullamcorper suscipit lobortis nisl ut aliquip ex ea commodo consequat. Duis autem vel eum iriure dolor</p> <p>CONTAINS (ALLERGY INFO LISTED HERE).</p> 
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Alaska Marijuana Control Board

Operating Plan Supplemental

Form MJ-05: Marijuana Product Manufacturing Facility

Alcohol and Marijuana Control Office

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Phone: 907.269.0350

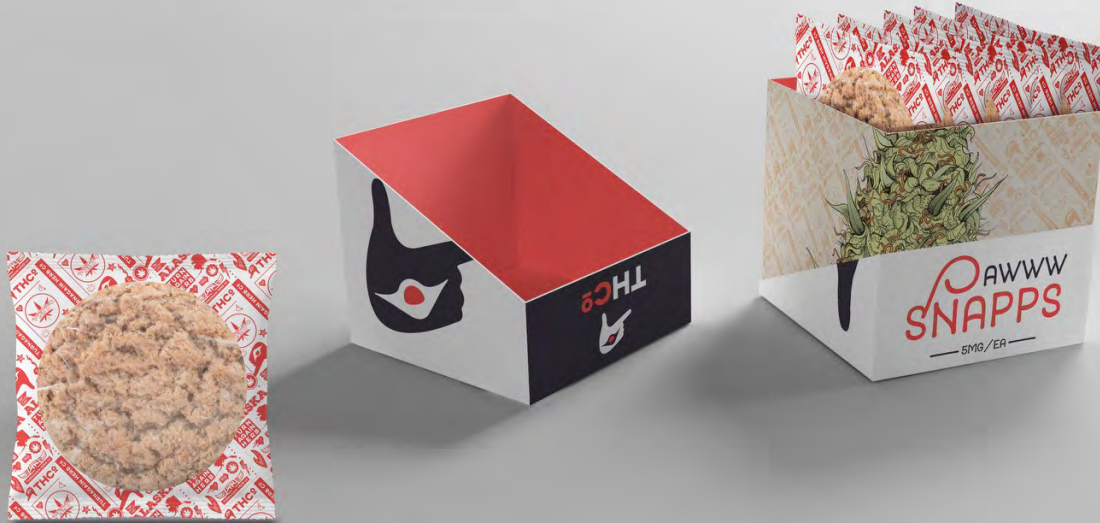
(Additional Space as Needed):

Aww Snaps:

top: product and packaging images.

middle: testing results.

bottom two: product label (5 servings vs. 10 servings)



This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD:0.2%, CBDA:0.82%, CBN:0.19%, Product homogenous: yes. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.



AWW SNAPS | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska | Production Lot 12345 | Net Wt: 0.75oz | Serving Size: 1 cookie (5mg THC) | Number of Servings: 10

TURNAGAIN MANUFACTURING CO



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.



AWW SNAPS | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska | Production Lot 12345 | Net Wt: 0.75oz | Serving Size: 1 cookie (5mg THC) | Number of Servings: 5

TURNAGAIN MANUFACTURING CO



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.



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products

Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	CannaCapsule
Type:	Marijuana Concentrate - edible

Product Description: Details must include the color, shape, and texture.	Vegetable glycerin, pill-shaped capsule, contents will be clear to yellow to orange to gold, even green or purple in color. Texture is soft gel capsule, very much like other gel capsules on the market today. Each capsule will be 5mg THC. Capsule THC and CBD potency will vary with strain.
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Ingredients: This box is not applicable to marijuana concentrates	N/A
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Standard Production Procedure and Detailed Manufacturing Process:	Grind trim. Process Trim with CO2 extraction machine. Depending on the strain and desire of final product we may, or may not, process this oil through our distillation system. If not, we will portion and fill the capsules with this oil. If we choose to process through our distillation system we will do so at this time. Said system uses a mantle heated system to separate the plant material from the oil by applying heat and vacuum to the material. We then inject our oil using an automated process that also seals and caps the capsules. Then it is on to shipping.
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Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	
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Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 5 – Proposed Product Packaging and Sample Labels

Review the requirements under 3 AAC 306.520 and 3 AAC 306.565 – 3 AAC 306.570, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Canna Caps
Type:	Concentrate - Edible

Packaging Description: Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Attached photos, drawings, or graphic representations are preferred.	<p>Clear glass jar, white pressure seal liner with black child-resistant cap. The height without lid: 5.1cm; width: 3.85cm; volume 1oz. Jar will be placed within logo'd a-frame style cardboard packaging.</p> <p>Individual serving size: One capsule (5mg THC) Pack size: offered in two pack sizes, 25mg pack total (5 capsules) and 50mg pack total (10 capsules). Amount of THC and CBD will vary with strain.</p> <p>Packaging complies with potency limits, package does not contain or utilize any images that specifically target individuals under the age of 21, packaging protects the product from contamination and does not impart any toxic or damaging substances to the product, and the product serving size is clearly denoted. This package will include a tracking label generated by TMC's inventory tracking system.</p>
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Sample Labels: Provide sample labels showing how the labeling information required in 3 AAC 306.570 will be set out.	<p>Package and label images have been included on the page.</p> <p>*Opaque Pinch N Slide ASTM Child Resistant Exit Bags will be provided to each retail facility who sells this product. This product will be placed in said opaque Pinch N Slide ASTM Child Resistant Exit Bags prior to customer leaving retail facility with product. Image of said ASTM has been included at the end of this document.</p>
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Alaska Marijuana Control Board

Operating Plan Supplemental


Form MJ-05: Marijuana Product Manufacturing Facility

(Additional Space as Needed):

Canna Caps:



top left: product and jar images.
top right: package image.
middle: testing results.
bottom two: product labels (5
servings vs. 10 servings)

 This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD:0.2%, CBDA:0.82%, CBN:0.19%, Product homogenous: yes. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.



CANNA CAPS | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot 12345

Serving Size: 1 capsule (5mg THC)

Number of Servings: 5

TURNAGAIN MANUFACTURING CO



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.



CANNA CAPS | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot 12345

Serving Size: 1 capsule (5mg THC)

Number of Servings: 10

TURNAGAIN MANUFACTURING CO



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.



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products

Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Crumble
Type:	Marijuana Concentrate - for inhalation

Product Description: Details must include the color, shape, and texture.	Opaque yellow to gold color in appearance. Airy texture, crumbles when touched. Shape sits on itself; this is free form. Each strain used to produce this product will offer varying THC and CBD levels. Estimated expiration date is eight to twelve months. This product is used for inhalation.
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Ingredients: This box is not applicable to marijuana concentrates	N/A
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Standard Production Procedure and Detailed Manufacturing Process:	Grind trim. Process Trim with CO2 extraction machine. Our crumble is produced by varying and fine tuning the temperature, pressure, solvent-to-feed ratio and the flow rate during the extraction process. Portion. Package.
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Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	
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Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

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marijuana.licensing@alaska.gov
<https://www.commerce.alaska.gov/web/amco>
Phone: 907.269.0350

Section 5 – Proposed Product Packaging and Sample Labels

Review the requirements under 3 AAC 306.520 and 3 AAC 306.565 – 3 AAC 306.570, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Crumble
Type:	Marijuana Concentrate - for inhalation

Packaging Description: Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Attached photos, drawings, or graphic representations are preferred.	Branded label, clear jar, black lid placed within A-frame style cardboard housing then placed into branded child-resistant ATSM bag. Jar will be 3" in diameter, 1.5" tall or less, bag will be <= 6"x9". Amount of THC and CBD will vary with strain. Crumble will be offered in 0.5g, 1g and 1.5g package sizes. This package complies with potency limits, this package does not contain or utilize any images that specifically target individuals under the age of 21. The packaging material protects the product from contamination and does not impart any toxic or damaging substances to the product. This package will include a tracking label generated by TMCo's inventory tracking system.
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Sample Labels: Provide sample labels showing how the labeling information required in 3 AAC 306.570 will be set out.	
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CRUMBLE | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot: 12345 Net Wt: 1.0g

TURNAGAIN MANUFACTURING CO



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.



Alaska Marijuana Control Board

Operating Plan Supplemental

Form MJ-05: Marijuana Product Manufacturing Facility

(Additional Space as Needed):

Crumble:

*top: product image. right: package image.
middle: jar image 2nd from bottom: testing results.
bottom: product label



This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD:0.2%, CBDA:0.82%, CBN:0.19%. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.



CRUMBLE | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot:12345 Net Wt: 1.0g

TURNAGAIN MANUFACTURING CO



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.





Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products

Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Turnagain High Chews (formally known as GiggleBurst)
Type:	Edible
Product Description: Details must include the color, shape, and texture.	One portion = one candy. One candy = 5mg THC. Colors will range according to the ingredients used. No color will be added. Candies will be stamped with our hand logo. Candies are small coin shape and chewy in texture. Candies will be offered in the following flavors: blueberry, butter-rum, butterscotch, caramel apple, cherry cola, chocolate banana, cinnamon apple, coconut, cotton candy, cranberry, eggnog, fireweed, ginger bacon, grape, huckleberry, huckleberry bacon, huckleberry ginger, lemon, lime, mandarin, maple bacon, orange, pear ginger, peppermint, pineapple, plum passion, pumpkin pie, raspberry, raspberry , root beer , salmonberry , strawberry and cherry. *Sour line to be offered -- only difference between the regular and the sour will be the amount of citric acid.
Ingredients: This box is not applicable to marijuana concentrates	Sugar, corn syrup, water, butter, thc/cbd concentrate, flavor's essential oil/ flavor extract, citric acid.
Standard Production Procedure and Detailed Manufacturing Process:	Line pan with foil and spraying the foil with nonstick cooking spray. Combine the butter, corn syrup, and granulated sugar in a medium saucepan over medium-high heat. Stir until the butter and sugar dissolve, then wash down the sides of the pan with a wet pastry brush to prevent sugar crystals from forming. Insert a candy thermometer. Cook the candy, stirring occasionally, until the thermometer reads 245 F (118 C). As soon as it reaches the proper temperature, remove the pan from the heat and stir in the flavor extract, thc/cbd concentrate. Stir until the ingredients are well dispersed, then pour the candy into the molds and allow to cool. Separate from molds and package.
Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	 



Alaska Marijuana Control Board

Operating Plan Supplemental

Form MJ-05: Marijuana Product Manufacturing Facility

(Additional Space as Needed):

Turnagain High Chews:

right: product and packaging image.
far right: sour product package image
middle: testing results.
bottom two: product labels (5 servings
vs. 10 servings)



This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD:0.2%, CBDA:0.82%, CBN:0.19%, Product homogenous: yes. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.

Turnagain High Chews HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot: 12345

Net Wt: 3.5g

Serving Size: 1 candy (5mg THC)

Number of Servings: 5

TURNAGAIN MANUFACTURING CO



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.

Turnagain High Chews HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot: 12345

Net Wt: 3.5g

Serving Size: 1 candy (5mg THC)

Number of Servings: 10

TURNAGAIN MANUFACTURING CO



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.





Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products

Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Denali Drops (formally GiggleDrops)
Type:	Marijuana Edible
Product Description: Details must include the color, shape, and texture.	One portion = one candy. One candy = 5mg THC. Colors will range according to ingredients used. No color will be added. Candies are small coin shape and hard in texture. Candies will be stamped with our hand logo. Candies will be offered in the following flavors: blueberry, butter-rum, butterscotch, caramel apple, cherry cola, chocolate banana, cinnamon apple, coconut, cotton candy, cranberry, eggnog, fireweed, ginger bacon, grape, huckleberry, huckleberry bacon, huckleberry ginger, lemon, lime, mandarin, maple bacon, orange, pear ginger, peppermint, pineapple, plum passion, pumpkin pie, raspberry, raspberry , root beer , salmonberry , strawberry and cherry. *Sour line to be offered -- only difference between the regular and the sour will be the amount of citric acid.
Ingredients: This box is not applicable to marijuana concentrates	Sugar, corn syrup, water, butter, thc/cbd concentrate, flavor's essential oil/ flavor extract, citric acid.
Standard Production Procedure and Detailed Manufacturing Process:	Line pan with foil and spraying the foil with nonstick cooking spray. Combine the butter, corn syrup, and granulated sugar in a medium saucepan over medium-high heat. Stir until the butter and sugar dissolve, then wash down the sides of the pan with a wet pastry brush to prevent sugar crystals from forming. Insert a candy thermometer. Cook the candy, stirring occasionally, until the thermometer reads 245 F (118 C). As soon as it reaches the proper temperature, remove the pan from the heat and stir in the flavor extract, thc/cbd concentrate. Stir until the ingredients are well dispersed, then pour the candy into the molds and allow to cool. Separate from molds and package.
Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	 



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 5 – Proposed Product Packaging and Sample Labels

Review the requirements under 3 AAC 306.520 and 3 AAC 306.565 – 3 AAC 306.570, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Denali Drops (formally GiggleDrops)
Type:	Marijuana Edible

Packaging Description: Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Attached photos, drawings, or graphic representations are preferred.	Clear or opaque individually wrapped candy wrapper, opaque branded box with opaque branded child-resistant ATSM bag. Candies will be sphere shaped and approximately 0.75" in diameter and described as hard candy. Box will be approximately 2" x 6" x 2". Bag will be up to 6" x 9". Wax or plastic paper wrapper, cardboard box. Potency of THC and CBD will vary with strain. Product will be offered in 25mg and 50mg packages. One candy will be one portion. One candy = 5mg THC. This package complies with potency limits, this package does not contain or utilize any images that specifically target individuals under the age of 21, the packaging material protects the product from contamination and does not impart any toxic or damaging substances to the product. This package contains a product with multiple servings; said product delineates individual servings by the candy. One candy = one portion. One portion = 5mg THC. This package will include a tracking label generated by TMC's inventory tracking system.
--	--

Sample Labels: Provide sample labels showing how the labeling information required in 3 AAC 306.570 will be set out.	*additional labels and images provided on the next page.
--	--

Ingredients: Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed diam nonummy nibh euismod tincidunt ut laoreet dolore magna aliquam erat volutpat. Ut wisi enim ad minim veniam, quis nostrud exerci tation ullamcorper suscipit lobortis nisl ut aliquip ex ea commodo consequat. Duis autem vel eum iriure dolor

CONTAINS (ALLERGY INFO LISTED HERE).





Alaska Marijuana Control Board

Operating Plan Supplemental

Form MJ-05: Marijuana Product Manufacturing Facility

(Additional Space as Needed):

Denali Drops:

right: product and package image.

far right: sour package image.

middle: testing results.

bottom two: product label (5 servings vs 10 servings)



This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD:0.2%, CBDA:0.82%, CBN:0.19%, Product homogenous: yes. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.

Denali Drops | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot 12345

Net Wt: 3.5g

Serving Size: 1 candy (5mg THC)

Number of Servings: 5

TURNAGAIN MANUFACTURING CO



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.

Denali Drops | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot 12345

Net Wt: 3.5g

Serving Size: 1 candy (5mg THC)

Number of Servings: 10

TURNAGAIN MANUFACTURING CO



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.



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products

Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Resin
Type:	Marijuana Concentrate - for inhalation

Product Description: Details must include the color, shape, and texture.	Press fresh frozen marijuana within our Rosin Press which applies heat and pressure to the marijuana product and produces a runoff directly from the marijuana product known as Resin. This runoff is collected and allowed to cool into as flat a sheet as possible. Next we will portion and package.
--	---

Ingredients: This box is not applicable to marijuana concentrates	N/A
---	-----

Standard Production Procedure and Detailed Manufacturing Process:	Grind trim. Process Trim with CO2 extraction machine. Our solvent-less shatter is produced by varying and fine tuning the temperature, pressure, solvent-to-feed ratio and the flow rate during the extraction process. We will pour said warm liquid into a flat sheet and allow to cool and harden. Next we will portion and package.
--	---

Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	
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Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 5 – Proposed Product Packaging and Sample Labels

Review the requirements under 3 AAC 306.520 and 3 AAC 306.565 – 3 AAC 306.570, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Resin
Type:	Marijuana Concentrate - for inhalation

Packaging Description: Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Attached photos, drawings, or graphic representations are preferred.	Branded paper, branded opaque box, placed within branded ATSM child-resistant security bag. Box will be 5" x 5" x 1.5" or less, bag will be <= 6" x 9". Amount of THC and CBD will vary with strain. Resin will be offered in 0.5g, 1g, and 1.5g package sizes. This package complies with potency limits, this package does not contain or utilize any images that specifically target individuals under the age of 21. The packaging material protects the product from contamination and does not impart any toxic or damaging substances to the product. This package will include a tracking label generated by TMC's inventory tracking system.
--	---

Sample Labels: Provide sample labels showing how the labeling information required in 3 AAC 306.570 will be set out.	<p>*additional samples provided on the next page.</p> <div><div><div>RESIN</div><div>HINDU KUSH - INDICA</div><div><i>Proudly manufactured in the great state of Alaska</i></div><div>TURNAGAIN MANUFACTURING CO</div><div><div>Production Lot 12345 Net Wt: 1.0g</div><div>License No. 12815</div></div></div></div> <div><p>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.</p></div>
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Alaska Marijuana Control Board

Operating Plan Supplemental


Form MJ-05: Marijuana Product Manufacturing Facility

(Additional Space as Needed):

Resin:

*top image: product image on left, package image on right. middle: testing results.
Bottom: product label



 This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD:0.2%, CBDA:0.82%, CBN:0.19%. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.



RESIN

HINDU KUSH - INDICA

Proudly manufactured in the great state of Alaska

TURNAGAIN MANUFACTURING Co

Production Lot 12345 Net Wt: 1.0g

License No. 12815

[Form MJ-05] (rev 02/05/2016)

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.



Page 8 of 8



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products

Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Rosin
Type:	Marijuana Concentrate - for inhalation

Product Description: Details must include the color, shape, and texture.	Clear to yellow to gold, green or purple color in appearance. Smooth glass-like texture ranging to sticky rounded texture similar to balled-up rubber cement. Has been poured out and allowed to cool and harden (semi-firm). Each strain used to produce this product will offer varying THC and CBD levels. Estimated expiration date is eight to twelve months. This product is used for inhalation.
--	---

Ingredients: This box is not applicable to marijuana concentrates	N/A
---	-----

Standard Production Procedure and Detailed Manufacturing Process:	Press dried marijuana within our Rosin Press which applies heat and pressure to the marijuana product and produces a runoff directly from the marijuana product known as Rosin. This runoff is collected and allowed to cool into as flat a sheet as possible. Next we will portion and package.
--	--

Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	
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Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 5 – Proposed Product Packaging and Sample Labels

Review the requirements under 3 AAC 306.520 and 3 AAC 306.565 – 3 AAC 306.570, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Rosin
Type:	Marijuana Concentrate - for inhalation

Packaging Description: Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Attached photos, drawings, or graphic representations are preferred.	Branded paper, branded opaque box, placed within branded ATSM child-resistant security bag. Box will be 5" x 5" x 1.5" or less, bag will be <= 6" x 9". Amount of THC and CBD will vary with strain. Rosin will be offered in 0.5g, 1g, and 1.5g package sizes. This package complies with potency limits, this package does not contain or utilize any images that specifically target individuals under the age of 21. The packaging material protects the product from contamination and does not impart any toxic or damaging substances to the product. This package will include a tracking label generated by TMC's inventory tracking system.
--	---

Sample Labels: Provide sample labels showing how the labeling information required in 3 AAC 306.570 will be set out.	<p>*additional samples provided on the next page.</p> <p>ROSIN HINDU KUSH - INDICA</p> <p><i>Proudly manufactured in the great state of Alaska</i></p> <p>TURNAGAIN MANUFACTURING CO</p> <p>Production Lot 12345 Net Wt: 1.0g License No. 12815</p> <p>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.</p>
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Alaska Marijuana Control Board

Operating Plan Supplemental

Form MJ-05: Marijuana Product Manufacturing Facility

(Additional Space as Needed):

Resin:

*top image: product image on left, package image on right. middle: testing results.
Bottom: product label



This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD:0.2%, CBDA:0.82%, CBN:0.19%. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.



ROSIN

HINDU KUSH - INDICA

Proudly manufactured in the great state of Alaska

TURNAGAIN MANUFACTURING CO.

Production Lot 12345 Net Wt: 1.0g

License No. 12815

[Form MJ-05] (rev 02/05/2016)

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.



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Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products


Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Shatter
Type:	Marijuana Concentrate - for inhalation

Product Description: Details must include the color, shape, and texture.	Clear to yellow to gold, green or purple color in appearance. Smooth glass-like texture and brittle. Has been poured flat and allowed to cool and harden. Each strain used to produce this product will offer varying THC and CBD levels. Estimated expiration date is eight to twelve months. This product is used for inhalation.
--	---

Ingredients: This box is not applicable to marijuana concentrates	N/A
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Standard Production Procedure and Detailed Manufacturing Process:	Grind trim. Process Trim with CO2 extraction machine. Our solvent-less shatter is produced by varying and fine tuning the temperature, pressure, solvent-to-feed ratio and the flow rate during the extraction process. We will pour said warm liquid into a flat sheet and allow to cool and harden. Next we will portion and package.
--	---

Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	
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Alaska Marijuana Control Board



Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 5 – Proposed Product Packaging and Sample Labels

Review the requirements under 3 AAC 306.520 and 3 AAC 306.565 – 3 AAC 306.570, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Shatter
Type:	Marijuana Concentrate - for inhalation

Packaging Description: Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Attached photos, drawings, or graphic representations are preferred.	Branded paper, branded opaque box, placed within branded ATSM child-resistant security bag. Box will be 5" x 5" x 1.5" or less, bag will be <= 6" x 9". Amount of THC and CBD will vary with strain. Shatter will be offered in 0.5g, 1g, and 1.5g package sizes. This package complies with potency limits, this package does not contain or utilize any images that specifically target individuals under the age of 21. The packaging material protects the product from contamination and does not impart any toxic or damaging substances to the product. This package will include a tracking label generated by TMC's inventory tracking system.
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Sample Labels: Provide sample labels showing how the labeling information required in 3 AAC 306.570 will be set out.	<p>*additional samples provided at the end of this document.</p> <div><div>SHATTER HINDU KUSH - INDICA <i>Proudly manufactured in the great state of Alaska</i> TURNAGAIN MANUFACTURING CO Production Lot 12345 Net Wt: 1.0g License No. 12815</div></div> <p>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.</p> 
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Alaska Marijuana Control Board

Operating Plan Supplemental

Form MJ-05: Marijuana Product Manufacturing Facility

(Additional Space as Needed):



This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD: 0.2%, CBDA: 0.82%, CBN: 0.19%. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.



SHATTER

HINDU KUSH - **INDICA**

Proudly manufactured in the great state of Alaska

TURNAGAIN MANUFACTURING CO.

Production Lot 12345 Net Wt: 1.0g

License No. 12815

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.





Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products

Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Vape Cartridge
Type:	Marijuana Concentrate - for inhalation

Product Description: Details must include the color, shape, and texture.	Clear and smooth glass or plastic housing, cylinder shape, mouthpiece included. Visible oil will be clear to yellow to amber in color. The texture of the oil is sticky and viscous and will take the shape of the container it is placed in as it is a viscous liquid. Oil for the cartridges will be offered in a variety of strains and varying THC & CBD levels ranging up to 99.9%.
--	--

Ingredients: This box is not applicable to marijuana concentrates	N/A
---	-----

Standard Production Procedure and Detailed Manufacturing Process:	Grind trim. Process Trim with CO2 extraction machine. Depending on the strain and desire of final product we may, or may not, process this oil through our distillation system. If not, we will portion and fill the cartridges with this oil. If we choose to process through our distillation system to remove additional impurities, we will do so at this time. Said system uses a mantle heated system to separate the plant material from the oil by applying heat and vacuum to the material. We then inject our oil seal and cap the cartridges. Then it is on to shipping.
--	---

Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	
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Alaska Marijuana Control Board

Operating Plan Supplemental

Form MJ-05: Marijuana Product Manufacturing Facility

Section 5 – Proposed Product Packaging and Sample Labels

Review the requirements under 3 AAC 306.520 and 3 AAC 306.565 – 3 AAC 306.570, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

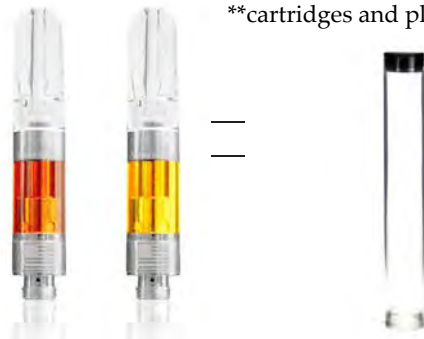
Product Name:	Vape Cartridge
Type:	Marijuana Concentrate - for inhalation

Packaging Description:

Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Attached photos, drawings, or graphic representations are preferred.

Clear plastic tube with black, white or clear cap. Cartridge itself will be approximately 20mm in length. Cartridges will be offered in different volumes: 0.25g, 0.5g, 1.0g, 1.5g, and 2g. An opaque child-resistant ATSM bag will be used to ensure packaging compliancy. This packaging complies with potency limits, this package does not contain or utilize any images that specifically target individuals under the age of 21. The packaging material protects the product from contamination and does not impart any toxic or damaging substances to the product. This product will include a tracking label generated by TMC's inventory tracking system.

**cartridges and plastic tube pictured .



Sample Labels:

Provide sample labels showing how the labeling information required in 3 AAC 306.570 will be set out.



VAPE CARTRIDGE | **HINDU KUSH - INDICA**

Proudly manufactured in the great state of Alaska

TURNAGAIN MANUFACTURING CO

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.

License No. 12815

Production Lot 12345 Net Wt: 1.0g



This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD:0.2%, CBDA:0.82%, CBN:0.19%. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products

Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Vape Pen - disposable
Type:	Marijuana Concentrate

Product Description: Details must include the color, shape, and texture.	Black, white or silver opaque cylinder, smooth texture, battery included. Our logo will be visible on the unit.
--	---

Ingredients: This box is not applicable to marijuana concentrates	N/A
---	-----

Standard Production Procedure and Detailed Manufacturing Process:	Grind trim. Process Trim with CO2 extraction machine. Said CO2 extraction machine outputs plant waste (lipids, fats, etc.) as well as winterized oil. Next we will process the winterized oil through our distillation system. Next it is on to our rotovaporization process where we rotovape and vaccum any remaining impurities. We inject our oil using an automated process that also seals the cartridges. Then it is on to shipping.
--	---

Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	
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Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 5 – Proposed Product Packaging and Sample Labels

Review the requirements under 3 AAC 306.520 and 3 AAC 306.565 – 3 AAC 306.570, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Vape Pen - Disposable
Type:	Marijuana Concentrate - for inhalation

Packaging Description: Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Attached photos, drawings, or graphic representations are preferred.	This cartridge comes pre-loaded within our disposable vape pen. It will be approximately 10mm x 8mm x 100mm in size. This product will be offered with a cartridge capacity of 0.5 g. The color of the pen will be white, black or silver. Disposable pen will come in a logo'd cardboard box measuring approximately 4"x2"x7". Amount of THC and CBD will vary with strain. An opaque child-resistant ATSM bag will be used to ensure packaging compliancy. This packaging complies with potency limits, this package does not contain or utilize any images that specifically target individuals under the age of 21. The packaging material protects the product from contamination and does not impart any toxic or damaging substances to the product. This product will include a tracking label generated by TMC's inventory tracking system.
--	--

Sample Labels: Provide sample labels showing how the labeling information required in 3 AAC 306.570 will be set out.	*images included on the next page.
--	------------------------------------

**cartridges and plastic tube pictured .



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

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

(Additional Space as Needed):

Vape pen - disposable:

top right: product image.
top left: packaging image.
middle: testing results.
bottom: package label.



This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD:0.2%, CBDA:0.82%, CBN:0.19%. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.

VAPE PEN - DISPOSABLE | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot 12345 Net Wt: 0.5g

TURNAGAIN MANUFACTURING CO



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.



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 4 – Proposed Marijuana Concentrates and Marijuana Products


Review the requirements under 3 AAC 306.520 - 3 AAC 306.525 and 3 AAC 306.560, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Wax
Type:	Marijuana Concentrate - for inhalation

Product Description: Details must include the color, shape, and texture.	Green to yellow to gold, green or purple colored wax. Texture will range from earwax or peanut butter in appearance. Sticky texture. Free form shape.
--	---

Ingredients: This box is not applicable to marijuana concentrates	N/A
---	-----

Standard Production Procedure and Detailed Manufacturing Process:	Grind trim. Process Trim with CO2 extraction machine. Our wax is produced by varying and fine tuning the temperature, pressure, solvent-to-feed ratio and the flow rate during the extraction process. Once processed, portion and package.
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Depiction: Provide a photograph, drawing, or graphic representation of the expected appearance of the final product.	
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Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

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

Section 5 – Proposed Product Packaging and Sample Labels

Review the requirements under 3 AAC 306.520 and 3 AAC 306.565 – 3 AAC 306.570, and identify how the proposed establishment will meet the listed requirements. **Attach a completed copy of this page for each proposed marijuana concentrate or marijuana product.**

Product Name:	Wax
Type:	Marijuana Concentrate - for inhalation

Packaging Description: Details must include the color(s), size, packaging materials used, total amount of THC, individual serving sizes (if multiple), and other specifics showing compliance with 3 AAC 306.565. Attached photos, drawings, or graphic representations are preferred.	Branded label, clear jar, black lid placed within branded child-resistant ATSM bag. Jar will be 3" in diameter, 1.5" tall or less, bag will be <= 6"x9". Amount of THC and CBD will vary with strain. Wax will be offered in 0.5g, 1g and 1.5g package sizes. This package complies with potency limits, this package does not contain or utilize any images that specifically target individuals under the age of 21. The packaging material protects the product from contamination and does not impart any toxic or damaging substances to the product. This package will include a tracking label generated by TMC's inventory tracking system.
--	---

Sample Labels: Provide sample labels showing how the labeling information required in 3 AAC 306.570 will be set out.	*additional labels and images have been included on the next page.
--	--



WAX | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot 12345 Net Wt: 1.0g

TURNAGAIN MANUFACTURING CO



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.



Alaska Marijuana Control Board

Operating Plan Supplemental

Form MJ-05: Marijuana Product Manufacturing Facility

(Additional Space as Needed):

Wax:

top left: product image.

right: package image.

bottom left: jar image.

second from bottom:

testing results.

bottom: product label.



This marijuana product has been tested by ABC Labs, Inc Anchorage Alaska. Test results are as follows: THC: 35%, THCA: 20%, CBD:0.2%, CBDA:0.82%, CBN:0.19%. Microbial level testing of the following and their results: Shiga-toxin: acceptable, Salmonella: acceptable, Aspergillus (fumigatus, flavus, niger): acceptable. Residual solvent testing results: Butanes: none, Heptanes: none, Benzene: none, Toluene: none, Hexane: none.



WAX | HINDU KUSH - INDICA

License No. 12815

Proudly manufactured in the great state of Alaska

Production Lot 12345 Net Wt: 1.0g

TURNAGAIN MANUFACTURING CO



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.



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

(Additional Space as Needed):



*above image shows the front and back sides of our resealable, child-resistant, opaque ASTM bag. These bags will be offered in different sizes to accommodate different size products. Turnagain Manufacturing Company will supply these bags to all retail stores that carry the company's products.

*image on the right shows a sample label a retail store has affixed at the bottom to show where the product was purchased, all necessary warnings as well as the retail store's license number.



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

Section 6 – Waste Disposal Plan

Review the requirements under 3 AAC 306.520, and identify how the proposed premises will meet the listed requirements.

Describe the marijuana product manufacturing facility's plan for disposal of any expired or outdated marijuana or marijuana product that is not sold or transferred to another licensed marijuana establishment:

It is a goal of the Turnagain Manufacturing Company to minimize waste. In the event that we have expired or outdated marijuana or marijuana product we will secure the items on site and notify the board of our need to dispose of the items.

We will grind the solid materials and incorporate twice as much ground organic or non-organic material so that the entire lot will not be more than half marijuana or marijuana product. We will then schedule a secure trash pickup and transfer the waste material to the locked trash dumpster on site when we confirm aforementioned scheduled waste pickup. A waste log will be kept to document the items that were disposed of as well as the method(s) for disposal. Also included on this log will be when the board was notified of our need to dispose of the items as well as the final resting place of said waste.



Alaska Marijuana Control Board

Operating Plan Supplemental Form MJ-05: Marijuana Product Manufacturing Facility

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

Section 7 – Testing

The area where in-house testing will occur must be identified on the premises diagram, per 3 AAC 306.520(2).

Yes

No

Will the marijuana product manufacturing facility perform in-house testing (as defined in 3 AAC 306.990(b)(20))?

☒☐

Applicants should review 3 AAC 306.550 and be able to answer “Agree” to the item below.

The marijuana cultivation facility applicant has:

Agree

Disagree

Read and understands and agrees to the required laboratory testing set forth in 3 AAC 306.550

☒☐

I declare under penalty of perjury that I have examined this form, including all accompanying schedules and statements, and to the best of my knowledge and belief find it to be true, correct, and complete.

Signature of licensee

Printed name

Subscribed and sworn to before me this ____ day of _____, 20____.

Notary Public in and for the State of Alaska.

My commission expires: _____

Turnagain Manufacturing Company ("TMCo")

Physical Address:

524 E 48th Ave

Anchorage AK 99503

Mailing Address:

PO Box 994

Girdwood AK 99587

EQUIPMENT, SOLVENTS, GASES, CHEMICALS AND OTHER COMPOUNDS USED DURING MARIJUANA CONCENTRATE PRODUCTION

MJ-05

Section 3 – Equipment, Compounds, and Processes to be Used

Being a Marijuana Manufacturing Facility, Turnagain Manufacturing Company is subject to AMC 21.03.105C.3.c.i; TMCo is also required to provide a description of the type of products to be processed and the equipment to be used, including a list of any solvents, gases, chemicals, or other compounds that will be used, kept, or created at the manufacturing facility, the location of such materials, and the equipment used throughout the process of creating marijuana concentrates.

Turnagain Manufacturing Company will extract marijuana oil from marijuana plant material and fresh marijuana flower utilizing a closed-loop, modular liquid pure CO2 extraction machine. Said machine will operate in closed loop or single use solvent method. CO2 storage is built into the machine with 200 liters of on-board storage. The safe and proven technology used in this machine is the same technology currently in use around the world for extracting essential oils and de-caffinating coffee beans. This machine will recycle and reuse the CO2 used during the extraction process. Turnagain Manufacturing Company might utilize 95% laboratory-grade ethanol, D-Limonene or other natural Volatile Organic Compounds as co-solvents for use during the extraction process. This machine requires no power.

Turnagain Manufacturing Company will store less than five gallons of ethanol on site. The storage location of said ethanol is clearly denoted within the Turnagain Manufacturing Company site plan. TMCo will compliantly store the secured ethanol on the second floor of the facility, in the room labeled "Extraction Room."

Turnagain Manufacturing Company will purchase legal and compliant marijuana flower and marijuana material from other legal entities authorized by the state and municipality to sell said marijuana and marijuana flower. Marijuana flower and material will be finely ground on-site, in the room labeled "Extraction Room" on the TMCo Site Plan, prior to being processed in the CO2 extraction machine.



1/2

TMCo will process ground material within their CO2 Extraction Machine. Make and model of said extraction machine is an LM2 Xact Xtract machine manufactured here in the USA by Azoth Solutions. The LM2 is a modular Liquid Co2 Extractor. The LM2 model will operate in closed loop or single use solvent method. Co2 Storage is built into the machine at 450 liters. Turnagain Manufacturing Company might utilize 95% laboratory-grade ethanol, D-Limonene or other natural Volatile Organic Compounds as co-solvents for use during the extraction process.

Once the material has been processed and the oil extracted from the material, waste material will be compliantly disposed of as described in Turnagain Manufacturing Company's Waste Disposal Plan.

Turnagain Manufacturing Company may also use another type of extraction device. This device will use ice to agitate the material in a tumbler machine to make a product known as "bubble hash." This device uses micron screen bags to separate the extract from the plant material. The tumbler will use either dry or fresh plant material. Once extracted, product will be dried/cured and packaged for sale. The tumbler does not require solvents.

Marijuana oil refinement will occur on site, as well, in order to rid the extracted oil of any remaining impurities. Once oil is extracted using our CO2 extraction machine, the oil will be processed through our proprietary refinement process that includes the use of fractional distillation and is finished after it gets processed through our rotovape machine. Fractional distillation will be used to isolate and separate selected/specified terpenes as well to remove any ethanol or other VOC and also to separate any leftover plant fats or lipids from the oil. Once the oil has been cleansed through the proprietary fractional distillation process, a process that involves slowly heating the oil using an electric mantle and capturing the distilled oil, the oil will then be processed through our rotovape machine. Said machine will rotate in place while being heated through the use of an electric mantle. While the oil is rotating, vacuum pressure draws, and separates any remaining impurities out of the oil. Once processed through all of this, Turnagain Manufacturing Company's oil will be ready to be used within it's manufactured products. The entire oil refinement process that TMCo will utilize will be clean; no hazardous chemicals will be used. Only gentle heat and vacuum pressure will be used for any oil refinement.

Products made with described oil will include edibles, topicals and inhalants. Edibles will include products such as candies, sweet pastries, savory chips and sauces such as pesto. Topicals will include lotions, salves, hair care products, ointments and soap. Inhalants will include, but also include but not be limited to, products ranging from vape pen cartridges to wax, shatter, rosin and hash.

Turnagain Manufacturing Company will also infuse cooking fats such as coconut oil, olive oil and butter. This process steeps marijuana material within said fat. Once the steeping has been completed, marijuana material is strained and compliantly disposed of by documenting, grinding, mixing and disposing.



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:

- Security
- Inventory tracking of all marijuana and marijuana product on the premises
- Employee qualification and training
- Waste disposal
- Transportation and delivery of marijuana and marijuana products
- Signage and advertising
- Control plan for persons under the age of 21

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 Information

Enter information for the business seeking to be licensed, as identified on the license application.

Licensee:	Turnagain Manufacturing Company	License Number:	12815		
License Type:	Marijuana Product Manufacturing Facility				
Doing Business As:	Turnagain Manufacturing Company				
Premises Address:	524 E 48th Ave, Unit 1				
City:	Anchorage	State:		ZIP:	99503

Mailing Address:	PO Box 994				
City:	Girdwood	State:		ZIP:	99587

Primary Contact:	Seth Molen				
Main Phone:	907.306.0905	Cell Phone:	907.306.0905		
Email:	Molen.Seth@TurnagainHerbCo.com				



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Section 2 – Security

Review the requirements under 3 AAC 306.710 – 3 AAC 306.720 and 3 AAC 306.755, and identify how the proposed premises will meet the listed requirements.

Describe how the proposed premises will comply with each of the following:

Restricted Access Areas (3 AAC 306.710):

Describe how you will prevent unescorted members of the public from entering restricted access areas:

At Turnagain Manufacturing Company, we will post signage accordingly and compliantly throughout our facility as it pertains to 3 AAC 306.710. TMC Co will utilize the northwest-most door at the building as the company's employee and visitor entrance. This door will remain locked from the outside and be posted with signage telling potential visitors that they must be 21 years of age or older to enter; the company will require all potential visitors to have been pre-approved by the company and the company will expect the entrance/arrival of all visitors. This entrance opens into a small reception area that utilizes safety glass and a locked door to prevent any person not approved from entering the facility. Identification is checked through the safety glass. The locked interior door of this area will be posted with signage indicating that the area beyond is considered a "Restricted Access Area. Visitors must be escorted." Our premises will be actively monitored utilizing our surveillance cameras, both inside and outside of the facility and TMC Co will take an active role in preventing loitering.

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

At the Turnagain Manufacturing Company, almost all areas of the premises are classified as restricted access areas. Only employees and escorted visitors will be permitted. TMC Co will utilize the Northwest-most door at the building as the company's employee and visitor entrance. This door will remain locked from the outside; once opened, an individual seeking to enter the facility will be required to have their identification checked to ensure the individual is legal to enter the restricted access area(s). This will take place through security glass. If approved, the visitor will be asked to sign/initial the company's visitors log to verify date and time of entry. The individual will be issued a Visitor's Badge and will then be escorted through our facility. If the visitor is not approved to enter the restricted access area the visitor will be asked to leave through the same door through which they entered. Once inside the facility, the visitor will be escorted at all times by an employee, agent or licensee of TMC Co. When the visitor's business has been concluded, the visitor will be escorted to the reception area where they had their identification checked and will return their badge, sign the visitor's log to confirm time and date of exit and will then vacate the premises.



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Describe your recordkeeping of visitors who are escorted into restricted access areas:

We will confirm name, date of birth and compliancy of identification. Along with this, we will also record the time the visitor entered the facility and the time the visitor leaves the facility. The visitor will initial our visitor log upon entrance and exit of the facility in order to confirm the record.

Provide a copy of a sample identification badge to be displayed by each licensee, employee, or agent while on the premises:





Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

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

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

Our facility currently has exterior lighting in place that will assist in the surveillance requirement(s) needed for us to be compliant. TMC Co will utilize the northwest-most door of the building as the employee entrance. This entrance is currently utilizing exterior lighting to help facilitate surveillance. These exterior lights are bright enough to capture the identity of any person within twenty feet of this door.

An alarm system is required for all license types. Describe the security alarm system for the proposed premises:

In addition to the CCTV footage that we record and retain, our security system includes window and exterior door sensors, shatter sensors, motion sensors and commercial grade locks. We will also have window bars and coded interior doors in place. Our premises will be monitored by our alarm monitoring company every hour of every day.

The Turnagain Manufacturing Company will have the following:

- (1) exterior lighting to facilitate surveillance
- (2) a security alarm system on all exterior doors and windows; and
- (3) continuous video monitoring as provided in 3 AAC 306.720

The alarm system for our premises will be monitored 24 hours per day, seven days per week and 52 weeks per year. It will feature sensors on all windows and doors, it will include motion sensors, shatter sensors and panic/duress switches within the building. President and Vice President of Turnagain Manufacturing Company will maintain communication with monitoring service and management and licensees of the facility will have access codes for daily operations. In the event that the alarm is triggered, the monitoring service will immediately notify authorities and company licensees.

The alarm system must be activated on all exterior doors and windows when the licensed premises is closed for business. Describe how the security alarm system meets this requirement:

The alarm system will be activated on all exterior doors and windows when the licensed premises is closed for business. We will be able to manually control when the alarm is on and off. We will have direct communication feed available on our computers and phones as well as simultaneous video feeds viewable at this location in addition to our retail location in Girdwood.

Upon closing the business each day, the final duty by the management will be to secure the premises. Securing of the premises includes ensuring each door is locked and the security system is showing all zones as ready to be armed. Once this check is complete, management will arm the system and vacate the premises.



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Describe your policies and procedures for preventing diversion of marijuana or marijuana product:

We will monitor activities of employees and visitors within our establishment to monitor for diversion, theft and sales manipulations. Sales manipulations will be monitored through our internal inventory audits. General employees will not have access to details regarding our security protocols in order to help stymie potential assisted robberies. It is in our businesses' best interest to keep and maintain good employee satisfaction. We do not want any employee turnover; it is the strong and healthy company culture that will help ensure the employees personal responsibility for compliance and inventory control.

As a product manufacturing facility, TMCo will utilize compliant packaging for all product sold and compliant labeling telling of what is contained within each package. This is done so that no product may be mistakenly diverted or mishandled. We will only sell to those legally able to purchase our marijuana and marijuana products- legal marijuana licensees.

Inventory audits will be conducted by at least two employees working together- discrepancies investigated immediately. We will establish and maintain a strict inventory counting schedule.

Describe your policies and procedures for preventing loitering:

Turnagain Manufacturing Company will not allow solicitation, loitering or trespassing on the licensed premises.

Turnagain Manufacturing Company will not allow loitering on our premises. Our employees and security personnel will be trained to stymie and prevent loitering. We will approach any, and all, loiterers and ask them to enter or vacate the premises, whichever may be relevant to the individual. We will post compliant signs stating that loitering is prohibited. Our security cameras will also assist us in watching for loiterers. Our exterior lighting plan will also help in deterring loitering.

Describe your policies and procedures regarding the use of any additional security device, such as a motion detector, pressure switch, and duress, panic, or hold-up alarm to enhance security of the proposed premises:

Our security system will include the use of motion detectors within the interior of our facility. We will utilize panic buttons as well, these will be located in the office area, secure storage area, as well as in the other various rooms within the premises.



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Describe your policies and procedures regarding the actions to be taken by a licensee, employee, or agent when any automatic or electronic notification system alerts a local law enforcement agency of an unauthorized breach of security:

The owner of this business will be notified alongside the authorities in the event that there has been a breach of security. The owner will contact the local law enforcement agency to confirm the breach which we will have already confirmed for ourselves through the use of our video surveillance system. We will act in tandem with the authorities in order to maintain safety for all involved. In the event the owner is unable to be reached, our management will be designated to receive said notification of security breach and act as previously described above. Turnagain Manufacturing Company has a standard operating procedure for events of this nature established that will be used in training for those necessitating such training.

Video Surveillance (3 AAC 306.720):

All licensed marijuana establishments must meet minimum standards for surveillance equipment. Applicants should be able to answer "Yes" to all items below.

Video surveillance and camera recording system covers the following areas of the premises:	Yes	No
Each restricted access area and each entrance to a restricted access area	<input type="checkbox"/>	<input type="checkbox"/>
Both the interior and exterior of each entrance to the facility	<input type="checkbox"/>	<input type="checkbox"/>
Each point of sale area	<input type="checkbox"/>	<input type="checkbox"/>

Each video surveillance recording:	Yes	No
Is preserved for a minimum of 40 days, in a format that can be easily accessed for viewing	<input type="checkbox"/>	<input type="checkbox"/>
Clearly and accurately displays the time and date	<input type="checkbox"/>	<input type="checkbox"/>
Is archived in a format that does not permit alteration of the recorded image, so that the images can readily be authenticated	<input type="checkbox"/>	<input type="checkbox"/>



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

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:

Turnagain Manufacturing Company will be able to capture the identity of an individual inside the licensed premises as well as within 20 feet of each entrance and exit to our premises. We will utilize high definition video cameras complete with infrared and/or night vision on the exterior of the entrance to our facility so that any, and every, one within 20 feet of the entrance/exit will be captured on/within our system. We will have a video camera placed above the entrance so that it is able to capture wide-angle footage and allow us to identify individuals within 20 feet. We will also have one positioned inside the reception area to capture anyone entering the facility. Cameras will be placed throughout the facility in order to compliantly capture/record and identify any, and all, individuals within the marijuana product manufacturing facility's restricted access areas.

Describe the locked and secure area where video surveillance recording equipment and 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 board:

Turnagain Manufacturing Company will utilize a secure storage area within our building to house and store video surveillance recording equipment and digital records. The door to this area will be accessible to those that have access to the cultivation facility on the same premises. Said secure storage area is located in the southeast corner of Turnagain Horticulture Company's facility; this facility is located on the same property. Turnagain Horticulture Company has an address of 524 E 48th Ave, Unit 2 Anchorage 99503. The door to this secure storage area will be secured using either an electronic lock that utilizes a scan card to gain access or by utilizing a keypad lock. Only necessary employees will have access to this area. Business and digital records records will be housed within TMC's own secure storage area, this area is located in the office of our premises and records will be stored for a minimum of six months.

Location of Surveillance Equipment and Video Surveillance Records:

Yes No

Surveillance room or area is clearly defined on the premises diagram

☐ ☐

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

☐ ☐

Surveillance recording equipment access is limited to a marijuana establishment licensee or authorized employee, and to law enforcement personnel including an agent of the board

☐ ☐

Video surveillance records are stored off-site

☐ ☐



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Business Records (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. Applicants should be able to answer "Yes" to all items below.

Business Records Maintained and Kept on the Licensed Premises:

Yes No

All books and records necessary to fully account for each business transaction conducted under its license for the current year and three preceding calendar years; records for the last six months are maintained on the marijuana establishment's licensed premises; older records may be archived on or off-premises

☐ ☐

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

☐ ☐

The business contact information for vendors that maintain video surveillance systems and security alarm systems for the licensed premises

☐ ☐

Records related to advertising and marketing

☐ ☐

A current diagram of the licensed premises including each restricted access area

☐ ☐

A log recording the name, and date and time of entry of each visitor permitted into a restricted access area

☐ ☐

All records normally retained for tax purposes

☐ ☐

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

☐ ☐

Transportation records for marijuana and marijuana product as required under 3 AAC 306.750(f)

☐ ☐



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

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:

Turnagain Manufacturing Company will utilize a locked, fireproof storage container within a locked storage area that will be monitored and recorded for historical accuracy. Said area will be on-site and accessible.

We will utilize a secure storage area within our building to house and store video surveillance recording equipment as well as digital and paper records. The door to this area will be accessible to those that have access to the cultivation facility on the same premises. Said door will be secured using either an electronic lock that utilizes a scan card to gain access or by utilizing a keypad lock. Only necessary employees will have access to this area.

Within the secured storage area, we will utilize locked file cabinets, safes and secured computer networking racks to keep our property secure.

Digital records will be kept on our servers here on-site. Said servers will be located with our video surveillance recording equipment within our locked and monitored room. Digital records will be made accessible to authorized personnel, law enforcement or an agent of the board as needed.

Within the secured storage area, we will utilize locked file cabinets for all printed records, safes and secured computer networking racks to keep our physical and digital property secure. We will store all digital records to ensure availability and accessibility when needed as well as to maintain compliance.



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Section 3 – Inventory Tracking of All Marijuana and Marijuana Product

Review the requirements under 3 AAC 306.730, and identify how the proposed establishment will meet the listed requirements.

All licensed marijuana establishments must use a marijuana inventory tracking system capable of sharing information with the system the board implements 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 propagated from seed or cutting, through transfer to another licensed marijuana establishment, or use in manufacturing a product, to a completed sale of marijuana or marijuana product, or disposal of the harvest batch of marijuana or production lot of marijuana product.

Applicants should be able to answer “Yes” to all items below.

Marijuana Tracking and Weighing:

Yes No

A marijuana inventory tracking system, capable of sharing information with the system the board implements to ensure tracking for the reasons listed above, will be used

☐ ☐

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

☐ ☐

Describe the marijuana tracking system that you plan to use and how you will ensure that it is capable of sharing information with the system the board implements:

We have been in discussions with companies in Colorado, Oregon and Washington that have had experience with the marijuana inventories and the METRC system by Franwell. For our solutions(s) we have decided to go with a company known as Green Bits POS.

Green Bits is a point-of-sale system that allows seamless interaction between the point of sale, a register, CSB formatted sales reporting, lot tracking, batches and package IDs that have been designed to monitor multiple SKU's within the same product. Green Bits automatically syncs with the state API to automatically upload compliance data--sales, inventory transfers, adjustments and taxes. It also allows the download of transport manifests from other processors, cultivation facilities or from retail stores to ensure Turnagain Manufacturing Company remains in sync with the state.

We will also interface directly with the METRC system. We will use QuickBooks and Excel in our back-office for our recording keeping.



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Section 4 – Employee Qualification and Training

Review the requirements under 3 AAC 306.700, and identify how the proposed establishment will meet the listed requirements.

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, shall obtain a marijuana handler permit from the board before being licensed or beginning employment at a marijuana establishment.

Applicants should be able to answer “Yes” to all items below.

Marijuana Handler Permit:

Yes No

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

☐ ☐

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 premises of a retail marijuana store, marijuana cultivation facility, or marijuana product manufacturing facility) when on the licensed premises

☐ ☐

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

☐ ☐

Describe how your establishment will meet the requirements for employee qualifications and training:

Once we interview, ensure clean background check and approve an individual for employment, we will require the individual to obtain, and maintain, his/her marijuana handler permit. The employee will have their marijuana handler permit on their person at all times while on the premises. We will also keep a photocopy in-house for our records. Any employee whose permit is allowed to expire will not be permitted to work until their permit is brought back into good standing and a current copy is given to the company to update the permit records.

Employee training will include safety training and standard operating procedures as well as company practices as it pertains to compliance, safety and product excellence. We will maintain ongoing product and procedural training as long as the employee is employed with us. Said training includes educational classes outside of our facility.



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Section 5 – Waste Disposal

Review the requirements under 3 AAC 306.740, and identify how the proposed establishment will meet the listed requirements.

Applicants should be able to answer “Yes” to the statement below.

Marijuana Waste Disposal:

Yes No

The marijuana establishment shall give the board at least 3 days notice in the marijuana inventory tracking system required under 3 AAC 306.730 before making the waste unusable and disposing of it

☐ ☐

Describe how you will store, manage, and dispose of any solid or liquid waste, including wastewater generated during marijuana cultivation, production, process, testing, or retail sales, in compliance with applicable federal, state, and local laws and regulations:

Being a Marijuana Product Manufacturing facility, we will notify the board at least three days prior to rendering marijuana waste unusable and disposing of it. We will store all marijuana waste within our secure storage area within our building. We will grind all solid product material and mix it with soil or ground organic/non-organic material so that no more than 50 percent of the end product is marijuana product. Liquids will be mixed with soil or ground organic/non-organic material so that no more than 50 percent of the end product is marijuana product. We will ensure that all waste is rendered unusable for any purpose for which it was grown or produced. Said waste will be stored behind a locked door on site and will be monitored via surveillance system until disposed of. We will then dispose the waste into our locked dumpster located on the north side of our premises. Waste records will include the location of the final place of disposal for said waste.

Describe what material or materials you will mix with the ground marijuana waste to make it unusable:

Turnagain Manufacturing Company will utilize soil, cardboard and/or paper to mix with the marijuana waste to make it unusable.

We will utilize organics and non-organics as mixing agents in order to render the material unusable pursuant to 3 AAC 306.740.

Organic material might include soil, sand or compost. Non-organic material might include paper, plastic or cardboard.

Our mixing agents will be finely ground prior to mixing with the ground or liquid marijuana waste.



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Marijuana waste must be rendered unusable for any purpose for which it was grown or produced before it leaves the marijuana establishment. Describe the process or processes that you will use to make the marijuana plant waste unusable:

We will grind the product and mix it with ground cardboard, ground paper and/or soil in order to render the marijuana product unusable.

Marijuana plant waste, solid forms, will be finely ground and diluted.

Marijuana plant waste, liquid forms, will be mixed/diluted.

Both solid and liquid forms of marijuana plant waste will be mixed with either organic and/or inorganic material to a percentage such that the final material is no more than 50 percent marijuana waste.



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Section 6 – Transportation and Delivery of Marijuana and Marijuana Products

Review the requirements under 3 AAC 306.750, and identify how the proposed establishment will meet the listed requirements.

Applicants should be able to answer “Yes” to all items below.

Marijuana Transportation:

Yes No

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

☐ ☐

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

☐ ☐

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

☐ ☐

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

☐ ☐

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

☐ ☐

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

☐ ☐

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

☐ ☐



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Describe how marijuana or marijuana product will be prepared, packaged, and secured for shipment:

Products that are packaged and ready for resale will be compliant in regards to packaging and labeling regulations. These individual products will be bundled within cardboard boxes, or other sealed package, for transport. Said package will be labeled and compliant with a detailed and itemized inventory included within the marijuana transport manifest that will be included with each shipment of marijuana or marijuana product. Transport manifest will also include the name of the transporter, the time of departure and expected delivery, as well as the make, model, and license plate number of the transporting vehicle. We will utilize tamper-evident tape to secure said cardboard boxes.

Describe the type of locked, safe, and secure storage compartments that will be used in any vehicles transporting marijuana or marijuana product:

Turnagain Manufacturing Company will utilize KNAACK lockable job-site boxes within transport vehicles in order to keep marijuana and/or marijuana product secure while in transit. KNAACK boxes will not be accessible from outside the vehicles. In the event that Turnagain Manufacturing Company does not utilize a KNAACK box when transporting marijuana or marijuana product, Turnagain Manufacturing Company shall use a lockable duffle-style bag or lockable box (other than those manufactured by KNAACK) in order to make the carrying of said product(s) easier and less cumbersome. This bag/box will be used when small amounts of product(s) are being transported."



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Section 7 – Signage and Advertising

Describe any signs that you intend to post on your establishment with your business name, including quantity and dimensions:

The company's business is such that the company does not need to announce itself loudly to general passers-by of the facility. The company name "Turnagain Manufacturing Company" will not be printed on any signage that is posted on the establishment.

Turnagain Manufacturing Company will only place part of it's company logo next to the street number that is printed on the front facade of the awning that covers the two doors on the north side of the facility. Part of the company logo to be included on said awning is the hand that has the eye in the middle of the image. This partial logo will be approximately 6 square inches in size, or less. There will only be one partial logo printed on the awning. The company name will not be printed on the awning.

*partial logo:



If you are not applying for a retail marijuana store license, you do not need to complete the rest of Section 7, including Page 17.

Restriction on advertising of marijuana and marijuana products (3 AAC 306.360):

All licensed retail marijuana stores must meet minimum standards for signage and advertising.

Applicants should be able to answer "Agree" to all items below.

No advertisement for marijuana or marijuana product will contain any statement or illustration that:

Agree Disagree

Is false or misleading

☐ ☐

Promotes excessive consumption

☐ ☐

Represents that the use of marijuana has curative or therapeutic effects

☐ ☐

Depicts a person under the age of 21 consuming marijuana

☐ ☐

Includes an object or character, including a toy, a cartoon character, or any other depiction designed to appeal to a child or other person under the age of 21, that promotes consumption of marijuana

☐ ☐



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

No advertisement for marijuana or marijuana product will be placed:

Agree Disagree

Within one thousand feet of the perimeter of any child-centered facility, including a school, childcare facility, or other facility providing services to children, a playground or recreation center, a public park, a library, or a game arcade that is open to persons under the age of 21

☐ ☐

On or in a public transit vehicle or public transit shelter

☐ ☐

On or in a publicly owned or operated property

☐ ☐

Within 1000 feet of a substance abuse or treatment facility

☐ ☐

On a campus for post-secondary education

☐ ☐

Signage and Promotional Materials:

Agree Disagree

I understand and agree to follow the limitations for signs under 3 AAC 306.360(a)

☐ ☐

The retail marijuana store will not use giveaway coupons as promotional materials, or conduct promotional activities such as games or competitions to encourage sale of marijuana or marijuana products

☐ ☐

All advertising for marijuana or any marijuana product will contain the warnings required under 3 AAC 306.360(e)

☐ ☐



Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

Section 8 – Control Plan for Persons Under the Age of 21

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:

Doors will be locked, secured and monitored/recorded via CCTV. We will prevent all persons not permitted within the facility from entering the facility. All employees and visitors will be verified to be at least 21 years of age prior to being allowed to enter the facility. Visitors will be scheduled/expected prior to their arrival at the facility.

I declare under penalty of perjury that I have examined this form, including all accompanying schedules and statements, and to the best of my knowledge and belief find it to be true, correct, and complete.

Signature of licensee

Printed name

Subscribed and sworn to before me this ____ day of _____, 20 ____.

Notary Public in and for the State of Alaska.

My commission expires: _____



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

(Additional Space as Needed):



Alaska Marijuana Control Board

Form MJ-15: Operating Plan Change

What is this form?

This operating plan change form is required for all marijuana establishment licensees seeking to change a licensed marijuana establishment's existing operating plan, as required by 3 AAC 306.100. With this form, a licensee may request changes to as much or as little as desired of Form MJ-01 and/or the corresponding operating plan supplemental for the establishment's license type.

The required \$250 change fee may be made by check, cashier's check, or money order.

Please complete and submit with this form the pages of Form MJ-01 and/or the corresponding operating plan supplemental that contain sections that you are requesting to change. **All fields must be completed of any page for which you are requesting changes** – upon board approval, the submitted pages will replace those currently on file. If your current, approved operating plan is on the original version of the forms, you may be required to complete and submit the new operating plan forms in their entirety.

The form(s) that I am requesting board approval to change is:

- ☐ **Form MJ-01:** Marijuana Establishment Operating Plan
- ☐ **Form MJ-03:** Retail Marijuana Store Operating Plan Supplemental
- ☐ **Form MJ-04:** Marijuana Cultivation Facility Operating Plan Supplemental
- ☐ **Form MJ-05:** Marijuana Product Manufacturing Facility Operating Plan Supplemental
- ☐ **Form MJ-06:** Marijuana Testing Facility Operating Plan Supplemental

This form must be completed and submitted to AMCO's main office prior to changing existing operations. The licensed establishment's operations may not be altered unless and until the director has given temporary approval or the Marijuana Control Board (MCB) has given final approval of the changes. Please note that licensees seeking to change operating plans for multiple licenses must submit a separate completed copy of this form for each license.

Section 1 – Establishment Information

Enter information for the business seeking to be licensed, as identified on the license application.

Licensee:		MJ License #:			
License Type:					
Doing Business As:					
Premises Address:					
City:		State:	Alaska	ZIP:	



Alaska Marijuana Control Board

Form MJ-15: Operating Plan Change

Section 2 – Summary of Changes

Provide a summary of the changes for which you are requesting approval.

Section 3 – Declarations

Read each statement below, and then sign your initials in the corresponding box to the right: Initials

The proposed changes conform to all applicable public health, fire, and safety laws.

I understand that any temporary approval granted by the director is pending a final decision by the MCB; therefore, any investment I make, based upon temporary approval, is at my own risk.

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

Signature of licensee Notary Public in and for the State of Alaska.

Printed name of licensee My commission expires:

Subscribed and sworn to before me this ____ day of _____, 20____.

AMCO Director Review for Temporary Approval Pending Final MCB Decision: Approved Disapproved

Printed name of Director Date

Signature of Director

Director Comments:

From: [High, Mike](#)
To: [McConnell, Erika B \(CED\)](#)
Cc: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: RE: Cannabis Track and Trace Blockchain Solution
Date: Wednesday, February 06, 2019 12:04:50 PM

Hi Ms. McConnell,

Following up regarding the email below. We would love to connect to discuss the benefits this solution could provide to the Alaska cannabis industry and it's members.

If you have any questions prior to setting up a call, we can provide further insight into any questions or concerns.

We look forward to hearing from you,

Thank you,

Michael High
Crowe LLP
Office: 954.202.8600 | Cell: 954.805.2190
mike.high@crowe.com
www.crowe.com

Note: Effective June 4, my firm has changed its name to Crowe LLP. Please update your records accordingly to include my firm's new name and my new email address mike.high@crowe.com

From: High, Mike
Sent: Tuesday, January 29, 2019 1:19 PM
To: 'erika.mcconnell@alaska.gov' <erika.mcconnell@alaska.gov>
Cc: 'marijuana@alaska.gov' <marijuana@alaska.gov>; Uhryniak, Dave <David.Uhryniak@crowe.com>
Subject: Cannabis Track and Trace Blockchain Solution

Ms. McConnell,

My name is Mike High and I am with Crowe's Blockchain Practice. Our team has developed a cannabis track and trace system that leverages blockchain technology. The goal for our cannabis track and trace system is to provide all individuals within the cannabis supply chain ecosystem a seamless, end-to-end tracking software that brings value to everyone involved.

As you play a critical role within the compliance and regulatory aspects of the cannabis industry, we would enjoy connecting with you or someone on your team to provide further insight into the model and to gain a better understanding of the cannabis regulations in Alaska.

Please let us know a convenient time to speak and we will arrange a call.

Best,

Michael High
Crowe LLP
Office: 954.202.8600 | Cell: 954.805.2190
mike.high@crowe.com

www.crowe.com

Note: Effective June 4, my firm has changed its name to Crowe LLP. Please update your records accordingly to include my firm's new name and my new email address mike.high@crowe.com

This email message is from Crowe LLP or one of its subsidiaries and may contain privileged or confidential information or other information exempt from disclosure under applicable law. If you are not the intended recipient, please notify the sender by reply email immediately and delete this message without reading further or forwarding to others. This email is not intended to be a contract or other legally binding obligation, and any tax advice expressed in this email should not be construed as a formal tax opinion unless expressly stated. Visit www.crowe.com/disclosure for more information about Crowe LLP and its subsidiaries.

2-5-19

The initial frustration with the new MJ-25 comes from the amount of time involved to re-record information that is already entered into METRC and available to enforcement to view at any time. It is also recorded in a daily log, master log, separate waste log, and in an email. Now we must log it again for the 6th time. FORM MJ-25 should consist of the first half of page 1, containing facility information, "From – To" dates, and total weight being removed. There is just no purpose to burden licensees with the redundancy of adding a 6th detailed waste log simply because AMCO does not want to take the time to review the information already entered into the tracking system, as required. This is costing me hours and hours every month re-documenting information that you already have. Please consider the amount of time you are requesting from licensees each time a new form or regulation is implemented. There are only so many hours in a day.

AMCO is doing their best to create sensible regulations, and for the most part is doing a great job. However, regulation 306.740(c) WASTE DISPOSAL which requires waste to be held for a minimum of three days before making unusable is a wolf in sheep's clothing. It looks good as written, but when implemented in a cultivation facility it causes not only a major public health and safety risk, but health risks to facility owners and staff. It also compromises all product in the facility risking great financial loss.

The safety of this regulation is what is most concerning. For whatever reason, enforcement believes that licensees are going to divert waste to the black market and have made the waste reporting into an entirely new beast. Trust me, if someone wanted to sell on the black market they certainly would not go through the trouble and expense of becoming a licensed facility! The regulation language requires that waste must not be made unusable for at least 3 days after notifying AMCO. Sounds great until you see the decomposing moldy waste that we are now expected to grind inside our facility, spreading *Aspergillus* mold spores, mycotoxins, pathogens and other contaminants throughout the entire facility. This is extremely dangerous! AMCO is supposed to develop sensible and safe regulations, and this one really misses the mark. 306.740(c) should be reviewed and amended immediately in the interest of Public Health and Safety. Waste should be ground and mixed immediately, not after decomposition has taken place.

Licensed business owners should expect a certain level of trust, but even when waste is ground and mixed it is still clear what type of waste it was (stems, leaves, bud etc.) It is not ground to a powder. In fact, since almost all cultivation waste is wet it turns into a green sloppy mess. Either way enforcement would still be able to determine if it was leaves or bud. As a licensee, I cannot morally, in good conscience, wait to grind up my waste. It is absolutely not in the best interest of my health, the health of my staff or the health of the public. Not to mention the exposure to AMCO enforcement personnel when they come for an inspection.

This is how waste is safely and responsibly handled in my facility:

Waste is collected from trimming or destruction of plants.

It is weighed and logged into the daily log.

It is ground up and placed in a 45 gal trash bin (with a bag liner).

Each day, all waste recorded in daily log is entered into Metrc and a Master log.

Used coco coir is added periodically to ensure no decomposing materials or molds are stirred up and made airborne.

Once the bin is about $\frac{3}{4}$ full, usually 10 days or more, more coco coir is added and mixed and the bag is sealed up and set aside for 3 days while AMCO is notified of intent to remove.

3 days later waste is removed from facility and taken to refuse dumpsite.

10 day old waste should never be stirred up and exposed to the facility, as the spores of some varieties of mold can begin to germinate in as little as 4 to 12 hours.

I have included pictures of my waste as well as documentation regarding the growth of mold and the dangers it presents.

MOLD BASICS

Kathleen Parrott, Ph.D.

Professor of Housing, Virginia Tech

Molds require a high moisture level to germinate and begin growing. Most molds require a water content of the material of 70% to 90% to begin growing. Mold spores that have been dormant for years can begin growing if adequate humidity or moisture is provided. If the air is very humid, it can provide adequate moisture for mold to start growing. After the mold has begun growing, many varieties of mold can survive at lower moisture levels, as low as 60%. The temperature at which molds will grow is somewhat dependent on the type of mold. However, most molds will grow at a temperature range of 40 to 100 degrees Fahrenheit.

Mold can grow very quickly. **The spores of some varieties can begin to germinate in as little as 4 to 12 hours**, if the environmental conditions are favorable. It can be assumed that when building materials get wet, mold growth is likely to start immediately.

Aspergillus sp. <https://www.moldtestingma.com/resources/common-molds/>

There are more than 160 species of Aspergillus, 16 of which have been documented as etiological agents of human disease. They are among the most common groups of environmental fungi. Many species are isolated from a variety of substrates, including grains, nuts, cotton, **organic debris** and water damaged, organic building materials. The most frequently encountered opportunistic Aspergillus pathogen is *A. fumigatus* and is **seen most abundantly in decomposing organic materials. Aspergillus fumigatus and A. niger have been identified as the more harmful species of the Aspergillus group.**

Aspergillus is considered a common environmental mold that can pose health risks when it is present in elevated levels. Health problems due to Aspergillus exposure may include headaches, eye and skin irritation, asthma, aggravation of existing respiratory conditions, other typical allergic symptoms, and hypersensitivity pneumonitis. Hypersensitivity and allergic responses can be triggered by minimal exposure and especially in people who have an existing sensitivity to mold allergens and toxins or who have compromised or suppressed immune function. **Aspergillus can proliferate successfully indoors**

when conditions become favorable resulting in an increase in the number of spores, and therefore, mycotoxin concentrations that can be harmful.

Commonly Found on or in Grains, nuts, cotton, spices, coffee, cereal, and **decomposing, organic debris.**

How the Spores are Spread **Dry spores are easily spread through the air as well as carried by water.**

Allergenic? **Major allergen. Type I allergies (hay fever, asthma), hypersensitivity pneumonitis.**

Disease Causing? **Aspergillosis may be in the form of invasive infection, colonization (growth) in the body, or toxicoses.**

Occurs Indoors on the Following Materials: One of the most common groups of environmental molds found indoors on a wide variety of wet or water damaged building materials, **in humidifiers, HVAC units, house dust.**

Toxins Produced? **YES**

I am in no way trying to be difficult, circumvent adopted regulations, or attempting to divert marijuana to the black market. I am doing my due diligence to stay compliant and run a successful business that produces a safe product, but this health and safety issue causes me great concern. I would like to work together to address the issue of creating unsanitary conditions in a cultivation facility.

Please consider this issue carefully, it is the responsibility of the MCB to adopt sensible and safe regulations. This one needs immediate attention.

Thank you for your time,
Dollynda Phelps, Peace Frog Botanicals LIC#10041
907-252-8026



Alaska Marijuana Control Board

Form MJ-25: Waste Disposal Notice

What is this form?

A waste disposal notice must be completed and submitted by a marijuana establishment licensee to the Alcohol and Marijuana Control Office (AMCO), at least three days before making any marijuana waste unusable and disposing of it in accordance with the approved methods in the current operating plan. The waste must also be recorded in the marijuana inventory tracking system, to include a record of the final destination of the unusable waste, as set forth under 3 AAC 306.740(c).

This form must be completed and emailed to mj.waste@alaska.gov before any marijuana waste may be made unusable and/or disposed of.

Section 1 – Establishment Information

Enter information for the licensed business.

DBA:	Peace Frog Botanicals LLC	License Number:	10041
License Type:	Limited Cultivation		
Employee Completing Form:	Dollynda Phelps		

Section 2 – Waste Log

Waste Date Range	
TO FROM	FROM TO
1-11-19	2-2-19

DATE CREATED	ROOM / PLANT / ITEM TAG #	TYPE OF WASTE (LEAF, TRIM, STEMS, PRODUCT ETC.)	WEIGHT (GRAMS)	NOTES (if additional notes include another page)	DATE TO RENDER UNUSABLE/ DESTROY
1-11-19	#782	Clone	6		1-11-19
1-11-19	#776	Clone	13.5		1-11-19
1-11-19	Prop Rm	trim	73		1-11-19
1-11-19	M Rm	Plant	9g		1-11-19
1-12-19	7880	Clone	9g		1-12-19



Alaska Marijuana Control Board

Form MJ-25: Waste Disposal Notice

DATE CREATED	ROOM / PLANT / ITEM TAG #	TYPE OF WASTE (LEAF, TRIM, STEMS, PRODUCT ETC.)	WEIGHT (GRAMS)	NOTES (if additional notes include another page)	DATE TO RENDER UNUSABLE/ DESTROY
1-12-19	789	Clone	7		1-12-19
1-12-19	790	Clone	3.5		1-12-19
1-14-19	Trim Rm	trim	3		1-14-19
1-16-19	PHC HD 7-8-19	trim	268.5		1-16-19
1-16-19	HM MEGA HD 1-7-19	trim	52		1-16-19
1-21-19	Prop Rm	leaf	6		1-21-19
1-21-19	M. Rm	leaf	2		1-21-19
1-22-19	Prop Rm	leaf	4		1-22-19
1-22-19	HM Mega HD 1-21-19	trim	3		1-22-19
1-27-19	Flower Rm	leaf	1139		1-27-19
1-31-19	PHC HD 1-31-19	leaf	6321.5		1-31-19
1-31-19	Prop Rm	leaf	17.5		1-31-19
2-1-19	Prop Rm	leaf	2030		2-1-19
2-1-19	PHC HD 1-31-19	stem	30		2-1-19
2-2-19	759	Plant	448.5		2-2-19
2-2-19	758	Plant	389		2-2-19
2-2-19	797	Plant	10		2-2-19



Alaska Marijuana Control Board

Form MJ-25: Waste Disposal Notice

DATE CREATED	ROOM / PLANT / ITEM TAG #	TYPE OF WASTE (LEAF, TRIM, STEMS, PRODUCT ETC.)	WEIGHT (GRAMS)	NOTES (if additional notes include another page)	DATE TO RENDER UNUSABLE/ DESTROY
2-2-19	792	plant	35		2-2-19
2-2-19	807	plant	11		2-2-19
2-2-19	803	Plant	7.5		2-2-19
2-2-19	PROP Rm	leaf	110		2-2-19
2-2-19	M. Rm	leaf	98		2-2-19
2-4-19	PROP Rm	leaf	220		2-4-19
2-4-19	etc HDI-31-19	Stem	2		2-4-19
2-5-19	PROP Rm	leaf	3		2-5-19
2-5-19	M. Rm	leaf	179g		2-5-19

Reply Reply All Forward


Tue 2/5/2019 3:54 PM



dollynda Phelps <jeffndol@yahoo.com>

3-day waste disposal

To Marijuana Waste Disposal (CED sponsored)

 You replied to this message on 2/6/2019 11:17 AM.



02051903.PDF
493 KB



MOLD DOCS.docx
20 KB

Please see attachments...

Dollynda Phelps

907-252-8026

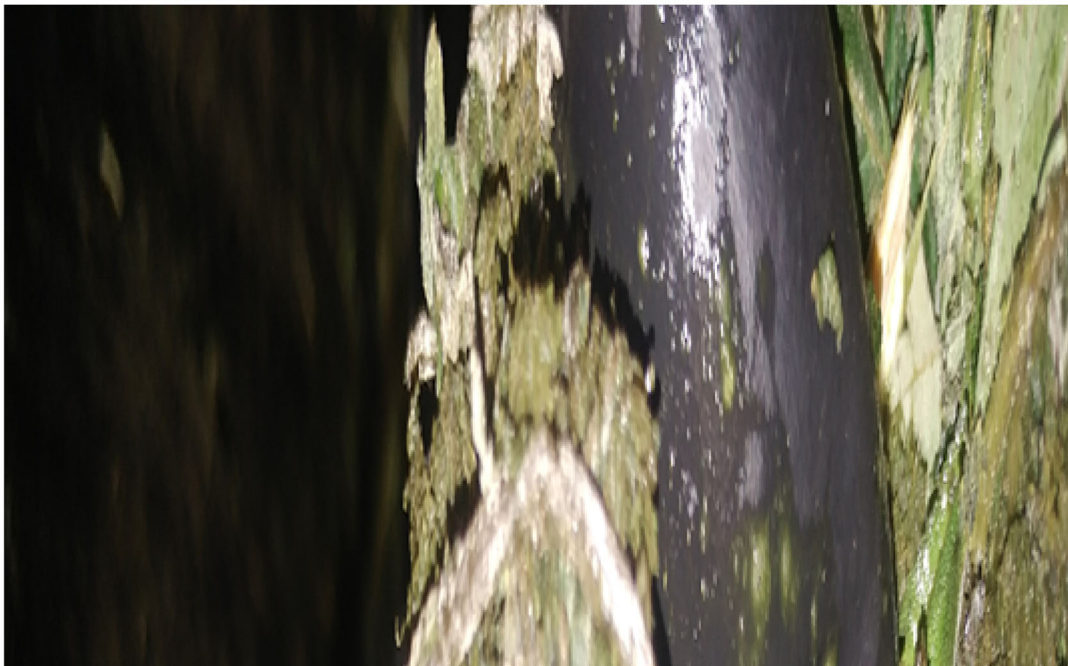
----- Forwarded Message -----

From: dollynda Phelps <jeffndol@yahoo.com>

To: dollynda Phelps <jeffndol@yahoo.com>

Sent: Tuesday, February 5, 2019, 3:47:38 PM AKST

Subject: Pics



From: [dollynda Phelps](#)
To: [Marijuana Waste Disposal \(CED sponsored\)](#)
Subject: 3-day waste disposal
Date: Tuesday, February 5, 2019 4:07:05 PM
Attachments: [02051903.PDF](#)
[MOLD DOCS.docx](#)

Please see attachments...

Dollynda Phelps

907-252-8026

----- Forwarded Message -----

From: dollynda Phelps <jeffndol@yahoo.com>
To: dollynda Phelps <jeffndol@yahoo.com>
Sent: Tuesday, February 5, 2019, 3:47:38 PM AKST
Subject: Pics





[Sent from Yahoo Mail on Android](#)

From: [CED AMCO REGS \(CED sponsored\)](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: FW: Opposition to Vivian Stiver Appointment to AMCO
Date: Tuesday, February 12, 2019 9:32:52 AM

From: Dwight Haak <coppertree32@hotmail.com>
Sent: Monday, February 11, 2019 2:32 PM
To: CED AMCO REGS (CED sponsored) <amco.regs@alaska.gov>
Subject: Opposition to Vivian Stiver Appointment to AMCO

Dear Representatives of the State of Alaska,

My name is Dwight Haak, and I am from Palmer, Alaska. I am taking time from out of my day to vociferously oppose the appointment of Vivian Stiver to the Alaska Marijuana Control Board (MCB). It is upsetting, as an individual struggling in the industry, to see yet another road block placed in my way in the form of a Cannabis Prohibitionist positioned in a seat of power directly overseeing me. I am frustrated by Governor Dunleavy's decision, and formally ask that he reconsider his appointment of Ms. Stiver, especially considering the abundance of knowledgeable candidates within the Cannabis Industry desiring to fill the Cannabis Industry seat on the MCB (myself included).

The reasons for my opposition are numerous, and quite frankly, I cannot think of ANY reasons why Vivian Stiver should be on the MCB. Ms. Stiver has yet to show the Cannabis Industry that she has any knowledge on the subject of Cannabis, besides running a campaign to ban Cannabis in her locality, post-legalization. From what I can ascertain from information available about Ms. Stiver, and from her own admissions, I see an antithetical knowledge of Cannabis. Cannabis equated to bad, and Ms. Stiver's knowledge on the subject has only ever been a collection of the supposed negatives, dangers, and ills of Cannabis.

The vacant position Ms. Stiver would be filling on the MCB is a Cannabis Industry position. I am opposed to Ms. Stiver taking this seat as it is an attempt to deprive the Cannabis Industry of a representative by converting it to a "Public Seat". The public is already collectively represented at the MCB by the non-industry positions on the MCB; the Public Safety Seat, the Health Seat, and the Rural Seat. Also, to create an additional "Public Seat" out of a Cannabis Industry Seat will skew the perspective and balance of the MCB, especially in the vein of Cannabis knowledge. The MCB needs two Cannabis Industry representatives to provide the rest of the board with enough knowledge to make educated decisions because the subject of Cannabis growth, processing, and sales is too large to be handled by a single Cannabis Industry representative. I know this intuitively, even considering the breadth of my own knowledge. As well, people within the Cannabis Industry have varying opinions from one another. It would be myopic to limit the Cannabis Industry to one opinion held through one individual representative. We, as an industry, need a debate and possible conflict between two representatives in order to make the best decision for the industry.

The MCB has already had a prohibitionist on its board, Peter Mlynarik, who made an attempt, while sitting on the MCB, to prohibit the Cannabis Industry on the Kenai Peninsula. While technically legal, this action was highly unethical as he held a position with the stated purpose of developing an industry, not undercutting it. Mr. Mlynarik's record on the MCB, and even his departure, reflected his prohibitionist attitude. The same will hold true with Ms. Stiver, and Alaskans do not deserve veiled obstructionism in their government. Proof exists in Ms. Stiver's own words. In her reflections to the ADN just recently, Ms. Stiver expressed her opinion that the MCB and the Cannabis Industry has moved too fast and needs to slow down. In reality, the MCB is operating at the correct speed and has a lot on its plate to work through. I do believe I am correct in stating that there is a bit backlog at the MCB, I have heard as much from multiple sources, and I do not have faith that a Prohibitionist will lessen the backlog, only increase it. In the same ADN article from the past week, Ms. Stiver made it seem that she had not even talked to the Governor concerning her appointment to the MCB, and this is highly suspect to me. The only logical conclusion I can come to for Ms. Stiver's appointment is that she earned her position on the MCB because of her prohibitionist activities in Fairbanks. Once again, I must reiterate that a person diligently opposed to the subject of a state board has an ethical responsibility to Alaskans not to serve on that particular board.

Why should I, Dwight Haak, have my opinion heard and validated? Because prohibitionist like Ms. Stiver, Mr. Mlynarik, Mr. Larry Devilbiss, and others have been able to exercise power to curtail the process and have hurt Alaska and Alaskan residents in the process. I am in fact one of those Alaskans injured by having the legal framework co-opted by prohibitionists. In the process of starting my business, I had the unfortunate happenstance to be in the Matanuska Valley and be forced to wait beyond the State of Alaska's legal starting date, over seven months, for a second election. While others across Alaska were happily plugging away at opening their businesses, I stagnated. And I stagnated. And I stagnated. Right before the second vote in the Matanuska Valley, well after legalization, I had an Alaskan State Trooper enter my household without a search warrant, ignore my invocation of the 4th Amendment, and destroy my life. My Autistic daughter was taken from me and put in Foster Care for nine-and-a-half months, my wife was briefly fired from her job for three weeks, both my wife and I were forced into Rehab and a year worth of random weekly urine testing, and we watched our debt balloon and our credit get destroyed as we paid for Rehab, child support, jumping through hoops, etc. This only scratches the surface of how I was violated, and it never should have happened. The court vindicated me 2 years, 3 months and 5 days later, but the damage was done.

What do I know? That prohibitionists in the process will make decisions that hurt people, especially people involved in the Cannabis Industry. Cannabis enthusiasts have gone through the proper Democratic steps to establish the legality of their consumption and deserve a period of time where we don't have to worry about losing legality, or taking a step backward. Ms. Stiver, as a prohibitionist, represents a large step backward. The thought of Ms. Stiver on

the MCB dredges up feelings of persecution, and I, as well as all my other Cannabis enthusiasts, need to be past this emotion. I want to be able to enjoy how wonderful my life is. Alaska simply needs someone better on the MCB than Vivian Stiver.

Sincerely,

Dwight Haak

**carolyn V Brown MD MPH
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13 February 2019

Erika McConnell
Director
Marijuana Control Board
554 West 7th Avenue
Ste 1600
Anchorage Alaska 995091

Dear Erika:

As I continue to follow the science of marijuana use, I am ever more eager to find some firm science on both sides of the divide that addresses the issues.

I thought this article by Alex Berenson in a publication from Hillsdale College most interesting. I appreciate that the MCB may get thousands of pieces of paper and the triage of useful and garbage may be difficult. I thought Berenson's presentation was engaging and represented a number of peer-reviewed journals.

Berenson, Alex. Marijuana, Mental Illness, and Violence. Imprimis. Volume 48:No 1. (January) 2019. Hillsdale College.

I will appreciate your sharing this with the MCB for their review as appropriate.

I have understood from Loren Jones that the MCB will meet soon in Juneau and I would very much appreciate more information about that meeting. I believe I have understood that meeting is open to the public (to listen but not speak).

Thank you for these considerations.

Sincerely,



carolyn V Brown MD MPH

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Marijuana, Mental Illness, and Violence

Alex Berenson

Author, *Tell Your Children: The Truth About Marijuana, Mental Illness, and Violence*



ALEX BERENSON is a graduate of Yale University with degrees in history and economics. He began his career in journalism in 1994 as a business reporter for the *Denver Post*, joined the financial news website TheStreet.com in 1996, and worked as an investigative reporter for *The New York Times* from 1999 to 2010, during which time he also served two stints as an Iraq War correspondent. In 2006 he published *The Faithful Spy*, which won the 2007 Edgar Award for best first novel from the Mystery

Writers of America. He has published ten additional novels and two nonfiction books, *The Number: How the Drive for Quarterly Earnings Corrupted Wall Street and Corporate America* and *Tell Your Children: The Truth About Marijuana, Mental Illness, and Violence*.

The following is adapted from a speech delivered on January 15, 2019 at Hillsdale College's Allan P. Kirby, Jr. Center for Constitutional Studies and Citizenship in Washington, D.C.

Seventy miles northwest of New York City is a hospital that looks like a prison, its drab brick buildings wrapped in layers of fencing and barbed wire. This grim facility is called the Mid-Hudson Forensic Psychiatric Institute. It's one of three places the state of New York sends the criminally mentally ill—defendants judged not guilty by reason of insanity.

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Until recently, my wife Jackie—Dr. Jacqueline Berenson—was a senior psychiatrist there. Many of Mid-Hudson's 300 patients are killers and arsonists. At least one is a cannibal. Most have been diagnosed with psychotic disorders like schizophrenia that provoked them to violence against family members or strangers.

A couple of years ago, Jackie was telling me about a patient. In passing, she said something like, *Of course he'd been smoking pot his whole life.*

Of course? I said.

Yes, they all smoke.

So marijuana causes schizophrenia?

I was surprised, to say the least. I tended to be a libertarian on drugs. Years before, I'd covered the pharmaceutical industry for *The New York Times*. I was aware of the claims about marijuana as medicine, and I'd watched the slow spread of legalized cannabis without much interest.

Jackie would have been within her rights to say, *I know what I'm talking about, unlike you.* Instead she offered something neutral like, *I think that's what the big studies say. You should read them.*

So I did. The big studies, the little ones, and all the rest. I read everything I could find. I talked to every psychiatrist and brain scientist who would talk to me. And I soon realized that in all my years as a journalist I had never seen a story where the gap between insider and outsider knowledge was so great, or the stakes so high.

I began to wonder why—with the stocks of cannabis companies soaring

and politicians promoting legalization as a low-risk way to raise tax revenue and reduce crime—I had never heard the truth about marijuana, mental illness, and violence.

Over the last 30 years, psychiatrists and epidemiologists have turned speculation about marijuana's dangers into science. Yet over the same period, a shrewd and expensive lobbying campaign has pushed public attitudes about marijuana the other way. And the effects are now becoming apparent.

Almost everything you think you know about the health effects of cannabis, almost everything advocates and the media have told you for a generation, is *wrong*.

They've told you marijuana has many different medical uses. In reality marijuana and THC, its active ingredient, have been shown to work only in a few narrow conditions. They are most commonly prescribed for *pain relief*.

But they are rarely tested against other pain relief drugs like ibuprofen—and in July, a large four-year study of patients with chronic pain in Australia showed cannabis use was associated with *greater* pain over time.

They've told you cannabis can stem opioid use—“Two new studies show how marijuana can help fight the opioid epidemic,” according to Wonkblog, a *Washington Post* website, in April 2018—and that marijuana's effects as a painkiller make it a potential substitute for opiates. In reality, like alcohol,

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[Latin]: in the first place

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marijuana is too weak as a painkiller to work for most people who truly need opiates, such as terminal cancer patients. Even cannabis advocates, like Rob Kampia, the co-founder of the Marijuana Policy Project, acknowledge that they have always viewed medical marijuana laws primarily as a way to protect recreational users.

After an exhaustive review, the National Academy of Medicine found in 2017 that “cannabis use is likely to increase the risk of developing schizophrenia and other psychoses; the higher the use, the greater the risk.”

As for the marijuana-reduces-opiate-use theory, it is based largely on a single paper comparing overdose deaths by state before 2010 to the spread of medical marijuana laws—and the paper’s finding is probably a result of simple geographic coincidence. The opiate epidemic began in Appalachia, while the first states to legalize medical marijuana were in the West. Since 2010, as both the epidemic and medical marijuana laws have spread nationally, the finding has vanished. And the United States, the Western country with the most cannabis use, also has by far the worst problem with opioids.

Research on individual users—a better way to trace cause and effect than looking at aggregate state-level data—consistently shows that marijuana use leads to other drug use. For example, a January 2018 paper in the *American Journal of Psychiatry* showed that people who used cannabis in 2001 were almost three times as likely to use opiates three years later, even after adjusting for other potential risks.

Most of all, advocates have told you that marijuana is not just safe for people with psychiatric problems like depression, but that it is a potential treatment for those patients. On its website, the cannabis delivery service Eaze offers the “Best Marijuana

Strains and Products for Treating Anxiety.” “How Does Cannabis Help Depression?” is the topic of an article on Leafly, the largest cannabis website. But a mountain of peer-reviewed research in top medical journals shows that marijuana can cause or worsen severe mental illness, especially psychosis, the medical term for a break from reality. Teenagers who smoke marijuana regularly are about three times as likely to develop schizophrenia, the most devastating psychotic disorder.

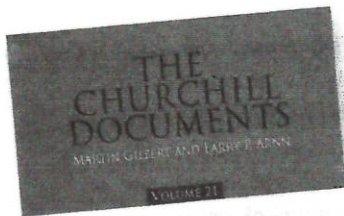
After an exhaustive review, the National Academy of Medicine found in 2017 that “cannabis use is likely to increase the risk of developing schizophrenia and other psychoses; the higher the use, the greater the risk.” Also that “regular cannabis use is likely to increase the risk for developing social anxiety disorder.”

Over the past decade, as legalization has spread, patterns of marijuana use—and the drug itself—have changed in dangerous ways.

Legalization has not led to a huge increase in people using the drug casually. About 15 percent of Americans used cannabis at least once in 2017, up from ten percent in 2006, according to a large federal study called the National Survey on Drug Use and Health. (By contrast, about 65 percent of Americans had a drink in the last year.) But the number of Americans who use cannabis heavily is soaring. In 2006, about three million Americans reported using cannabis at least 300 times a year, the standard for daily use. By 2017, that number had nearly tripled, to eight million, approaching the twelve million Americans who drank alcohol every day. Put another way, one in 15 drinkers consumed alcohol daily; about one in five marijuana users used cannabis that often.

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Cannabis users today are also consuming a drug that is far more potent than ever before, as measured by the amount of THC—delta-9-tetrahydrocannabinol, the chemical in cannabis responsible for its psychoactive effects—it contains. In the 1970s, the last time this many Americans used cannabis, most marijuana contained less than two percent THC. Today, marijuana routinely contains 20 to 25 percent THC, thanks to sophisticated farming and cloning techniques—as well as to a demand by users for cannabis that produces a stronger high more quickly. In states where cannabis is legal, many users prefer extracts that are nearly pure THC. Think of the difference between near-beer and a martini, or even grain alcohol, to understand the difference.

These new patterns of use have caused problems with the drug to soar. In 2014, people who had diagnosable cannabis use disorder, the medical term for marijuana abuse or addiction, made up about 1.5 percent of Americans. But they accounted for eleven percent of all the psychosis cases in emergency rooms—90,000 cases, 250 a day, triple the number in 2006.

In states like Colorado, emergency room physicians have become experts on dealing with cannabis-induced psychosis.

Cannabis advocates often argue that the drug can't be as neurotoxic as studies suggest, because otherwise Western countries would have seen population-wide increases in psychosis alongside rising use. In reality, accurately tracking psychosis cases is impossible in the United States. The government carefully tracks diseases like cancer with central registries, but no such registry exists for schizophrenia or other severe mental illnesses.

On the other hand, research from Finland and Denmark, two countries that track mental illness more comprehensively, shows a significant increase in psychosis since 2000, following an increase in cannabis use. And in September of last year, a large federal survey found a rise in serious mental illness in the United States as well, especially among young adults, the heaviest users of cannabis.

According to this latter study, 7.5 percent of adults age 18-25 met the criteria for serious mental illness in 2017, double the rate in 2008. What's

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especially striking is that adolescents age 12-17 don't show these increases in cannabis use and severe mental illness.

A caveat: this federal survey doesn't count individual cases, and it lumps psychosis with other severe mental illness. So it isn't as accurate as the Finnish or Danish studies. Nor do any of these studies prove that rising cannabis use has caused population-wide increases in psychosis or other mental illness. The most that can be said is that they offer intriguing evidence of a link.

Advocates for people with mental illness do not like discussing the link between schizophrenia and crime. They fear it will stigmatize people with the disease. "Most people with mental illness are not violent," the National Alliance on Mental Illness (NAMI) explains on its website. But wishing away the link can't make it disappear. In truth, psychosis is a shockingly high risk factor for violence. The best analysis came in a 2009 paper in *PLOS Medicine* by Dr. Seena Fazel, an Oxford University psychiatrist and epidemiologist. Drawing on earlier studies, the paper found that people with schizophrenia are five times as likely to commit violent crimes as healthy people, and almost 20 times as likely to commit homicide.

NAMI's statement that most people with mental illness are not violent is of course accurate, given that "most" simply means "more than half"; but it is deeply misleading. Schizophrenia is rare. But people with the disorder commit an appreciable fraction of all murders, in the range of six to nine percent.

"The best way to deal with the stigma is to reduce the violence," says Dr. Sheilagh Hodgins, a professor at the University of Montreal who has studied mental illness and violence for more than 30 years.

The marijuana-psychosis-violence connection is even stronger than those figures suggest. People with

schizophrenia are only moderately more likely to become violent than healthy people when they are taking antipsychotic medicine and avoiding recreational drugs. But when they use drugs, their risk of violence skyrockets. "You don't just have an increased risk of one thing—these things occur in clusters," Dr. Fazel told me.

Along with alcohol, the drug that psychotic patients use more than any other is cannabis: a 2010 review of earlier studies in *Schizophrenia Bulletin* found that 27 percent of people with schizophrenia had been diagnosed with cannabis use disorder in their lives. And unfortunately—despite its reputation for making users relaxed and calm—cannabis appears to provoke many of them to violence.

A Swiss study of 265 psychotic patients published in *Frontiers of Forensic Psychiatry* last June found that over a three-year period, young men with psychosis who used cannabis had a 50 percent chance of becoming violent. That risk was four times higher than for those with psychosis who didn't use, even after adjusting for factors such as alcohol use. Other researchers have produced similar findings. A 2013 paper in an Italian psychiatric journal examined almost 1,600 psychiatric patients in southern Italy and found that cannabis use was associated with a ten-fold increase in violence.

The most obvious way that cannabis fuels violence in psychotic people is through its tendency to cause paranoia—something even cannabis advocates acknowledge the drug can cause. The risk is so obvious that users joke about it and dispensaries advertise certain strains as less likely to induce paranoia. And for people with psychotic disorders, paranoia can fuel extreme violence. A 2007 paper in the Medical Journal of Australia on 88 defendants who had committed homicide during psychotic episodes found that most believed they were in danger from the victim, and almost two-thirds reported misusing cannabis—more than alcohol

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and amphetamines combined.

Yet the link between marijuana and violence doesn't appear limited to people with preexisting psychosis. Researchers have studied alcohol and violence for generations, proving that alcohol is a risk factor for domestic abuse, assault, and even murder. Far less work has been done on marijuana, in part because advocates have stigmatized anyone who raises the issue. But studies showing that marijuana use is a significant risk factor for violence have quietly piled up. Many of them weren't even designed to catch the link, but they did. Dozens of such studies exist, covering everything from bullying by high school students to fighting among vacationers in Spain.

In most cases, studies find that the risk is at least as significant as with alcohol. A 2012 paper in the *Journal of Interpersonal Violence* examined a federal survey of more than 9,000 adolescents and found that marijuana use was associated with a doubling of domestic violence; a 2017 paper in *Social Psychiatry and Psychiatric Epidemiology* examined drivers of violence among 6,000 British and Chinese men and found that drug use—the drug nearly always being cannabis—translated into a five-fold increase in violence.

Today that risk is translating into real-world impacts. Before states legalized recreational cannabis, advocates said that legalization would let police focus on hardened criminals rather than marijuana smokers and thus reduce violent crime. Some advocates go so far as to claim that legalization has reduced violent crime. In a 2017 speech calling for federal legalization, U.S. Senator Cory Booker said that “states [that have legalized marijuana] are seeing decreases in violent crime.” He was wrong.

The first four states to legalize marijuana for recreational use were

Colorado and Washington in 2014 and Alaska and Oregon in 2015. Combined, those four states had about 450 murders and 30,300 aggravated assaults in 2013. Last year, they had almost 620 murders and 38,000 aggravated assaults—an increase of 37 percent for murders and 25 percent for aggravated assaults, far greater than the national increase, even after accounting for differences in population growth.

Knowing exactly how much of the increase is related to cannabis is impossible without researching every crime. But police reports, news stories, and arrest warrants suggest a close link in many cases. For example, last September, police in Longmont, Colorado, arrested Daniel Lopez for stabbing his brother Thomas to death as a neighbor watched. Daniel Lopez had been diagnosed with schizophrenia and was “self-medicating” with marijuana, according to an arrest affidavit.

Far less work has been done on marijuana than on alcohol, in part because advocates have stigmatized anyone who raises the issue. But studies showing that marijuana use is a significant risk factor for violence have quietly piled up.

In every state, not just those where marijuana is legal, cases like Lopez's are far more common than either cannabis or mental illness advocates acknowledge. Cannabis is also associated with a disturbing number of child deaths from abuse and neglect—many more than alcohol, and more than cocaine, methamphetamines, and opioids combined—according to reports from Texas, one of the few states to provide detailed information on drug use by perpetrators.

These crimes rarely receive more than local attention. Psychosis-induced violence takes particularly ugly forms and is frequently directed at helpless family members. The elite national media prefers to ignore the crimes as

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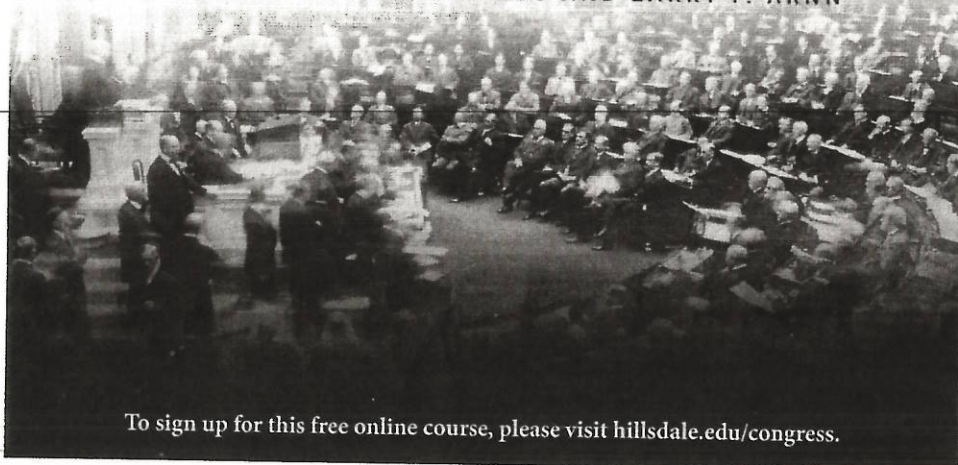
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tabloid fodder. Even police departments, which see this violence up close, have been slow to recognize the trend, in part because the epidemic of opioid overdose deaths has overwhelmed them.

So the black tide of psychosis and the red tide of violence are rising steadily, almost unnoticed, on a slow green wave.

For centuries, people worldwide have understood that cannabis causes mental illness and violence—just as they've known that opiates cause addiction and overdose. Hard data on the relationship between marijuana and madness dates back 150 years, to British asylum registers in India. Yet 20 years ago, the United States moved to encourage wider use of cannabis and opiates.

In both cases, we decided we could outsmart these drugs—that we could have their benefits without their costs. And in both cases we were wrong. ? Opiates are riskier, and the overdose deaths they cause a more imminent crisis, so we have focused on those. But soon enough the mental illness and violence that follow cannabis use will also

be too widespread to ignore.

Whether to use cannabis, or any drug, is a personal decision. Whether cannabis should be legal is a political issue. But its precise legal status is far less important than making sure that anyone who uses it is aware of its risks. Most cigarette smokers don't die of lung cancer. But we have made it widely known that cigarettes cause cancer, full stop. Most people who drink and drive don't have fatal accidents. But we have highlighted the cases of those who do.

We need equally unambiguous and well-funded advertising campaigns on the risks of cannabis. Instead, we are now in the worst of all worlds. Marijuana is legal in some states, illegal in others, dangerously potent, and sold without warnings everywhere.

But before we can do anything, we—especially cannabis advocates and those in the elite media who have for too long credulously accepted their claims—need to come to terms with the truth about the science on marijuana. That adjustment may be painful. But the alternative is far worse, as the patients at Mid-Hudson Forensic Psychiatric Institute—and their victims—know. ■

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From: [Louisa Alvarez](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: CBD Oil
Date: Tuesday, March 05, 2019 11:13:33 AM

Good afternoon,

I am trying to obtain some information regarding CBD Oil and its legalities in the state of Alaska. Can you provide any insight on whether or not the state has released any information or regulations regarding CBD?

--

Louisa Alvarez
Office Coordinator
ENDOCA, LLC
Mobile: 1-203-721-0428
Email: la@endoca.com



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From: [david.straub](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: Cultivator tax agreements
Date: Saturday, March 23, 2019 1:24:15 PM

With cultivators having to make tax agreements it's evident that the tax structure must need adjusting. Retailers going to Hawaii and cultivators making tax arrangements should be an eye opener. I know I work about 18 hours a day in this industry. When I sell product for \$6 a gram or 660 the state receives a \$1.77

Then sold for 18 to 20 dollars a gram at retail.

I bare all growing expense and tax.

An extractor creates a product and gets way 15 dollars is sold for 50.

Only 1.77 of tax from me on a much larger item.

At the retail it would be if you want 15 % it be 7.50. On that not 1.77 from folks having to do all the labor of the industry.

Retailers would buy the best which sells the quickest. We gotten to where we grow for tourists.

The black market also have hit bottom at 150 per ounce. And I receive 187.50 with a 50 dollar tax. (3000@pound w/tax.

Seem that cultivators would sell for less without tax burden and retailers would buy the best not the cheapest. Would desire the finest not seed and immature flower.

And not fare folks cheat taxes. Their again taxes aren't normally 25 to 28.5 %

At 2800 a pound. Its impossible to address

Electric

Renewals

Burrow taxes

Labor cost

Metrics tags

Growing material at medium.

Always cost notes be taken into consideration to grow a quality product thank you for your time David Straub

I appreciate the time and energy of took to help the industry thank you very much

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From: [Anita Burke](#)
To: [McConnell, Erika B \(CED\)](#); [Marijuana, CED ABC \(CED sponsored\)](#)
Cc: [John Mc](#)
Subject: REQUEST : May 1-3, 2019 AMCO Board Meeting - HTBX Alaska - OnSite Consumption Solution
Date: Wednesday, April 10, 2019 4:04:29 PM
Importance: High

Dear Ms. McConnell and the AMCO Board ,

HTBX International is a retail service-based organization bringing people together for the safe, legal and responsible consumption of cannabis. Our product, "The HTBX", thehtbx.com, is an agile, accessible and sustainable solution. We convert up-cycled modified shipping containers into consumption facilities, which adhere to all local zoning requirements. The individual unit can be placed either temporarily for special events, or for longer term installations and the entire structure is operated with a "leave no trace" ethos. All of these factors are beneficial for municipalities that want to determine specifically when, where and for how long consumption takes place. The HTBX is a uniquely designed shared solution, providing neighborhoods and businesses a safe and responsible location for individuals (ages 21 and over) to consume cannabis.

In January 2019, HTBX International, submitted the first-ever Special Event Designated Consumption Application to be accepted by the City of Denver. Due to our unique approach, we were able to address the requirements for safety, compliance, intoxication and operating procedures. After carefully reviewing Alaska's State and emergent Municipal programs and ongoing concerns, we are eager to provide experienced input into the process from other locations that have been paving the way in social cannabis.

The HTBX solution has been developed in partnership with the City of Denver and associated regulatory agencies. Working within the framework of existing regulatory requirements, without modification, we have gained the full support of all parties involved.

In addition to the structure itself, this partnership has brought about the development of the nation's first, standardized cannabis-intoxication certification program. Already mandated across the country for alcohol, our program is being considered the next standard for service and sales in the cannabis industry. As an adjunct purpose, the HTBX offers a perfect "laboratory" to gain empirical evidence in social implication research. Our organization has begun working with scientists and research organizations to leverage these opportunities.

We have fully committed to the Alaska market place and our local team is poised to assist both retailers and government agencies navigate social consumption. We have extensive regulatory and design/build experience that we are eager to share with the Alaska community. Our

regulatory partners in Colorado are standing by to be available to you for peer to peer discussions about their process.

We are requesting a brief 5-10 minutes of the Boards time at the upcoming May 1-3 Board Meeting in Anchorage.

Please feel free to contact us at any time if there are additional questions and/or you would like to meet with us to explore this further.

Many Thanks,

Anita M. Burke

COO - HTBX International

Co-Founder - HTBXAlaska

thehtbx.com

720-375-4408

anita@thehtbx.com

CC: John McCaskil - CEO Founder

From: [Jana Weltzin](#)
To: [McConnell, Erika B \(CED\)](#); [Smith, Jedediah R \(CED\)](#); [Dinegar, Harriet C \(LAW\)](#)
Cc: [Marijuana, CED ABC \(CED sponsored\)](#); [Hoelscher, James C \(CED\)](#); [Valerie Mastolier](#); [Jana Weltzin](#); [Brenda Mills](#); [Marijuana Licensing \(CED sponsored\)](#)
Subject: Public Comment for April Meeting RE Breast Feeding and MJ Regs
Date: Friday, April 12, 2019 12:08:33 PM
Attachments: [JDW Public Comment re Breast Feeding in Facilities April 12 2019.pdf](#)

Hello AMCO team – pls include this in the marijuana mail box for public comment for the May Meeting. Thanks so much for your hard work,

Jana D. Weltzin, Esq.
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Principal Owner
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*Licensed in Alaska and Arizona

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Jana D. Weltzin
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April 12, 2019

MCB Board
Director McConnell
Chief James Hoelscher

Sent Via Electronic Mail

Re: Rights of Breast-Feeding Mothers and Negative Impact on Gender Equality.

Dear Honorable MCB Members, Director McConnell and Chief Hoelscher:

Thank you all for your hard work and dedication to the industry. As the industry matures and develops, the variety of issues the Board and AMCO team faces develops as well. I wanted to take this opportunity to address a few issues that I feel are important to maintaining a sustainable industry.

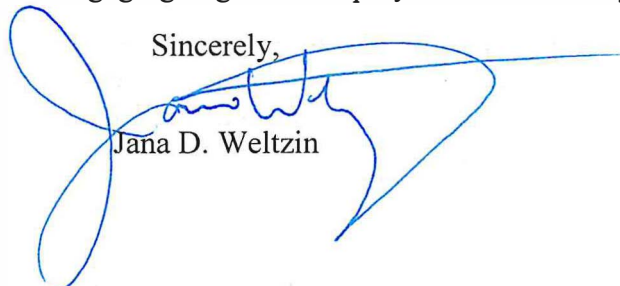
Restriction of no babies allowed in facility: Unlike alcohol, our regulations provide no exception to the rule of no minors in the facility. Now, we all understand the rationale for this – keep children away from marijuana as marijuana use at an early age can be detrimental to the development of a child's brain and health. However, well intended the baseline rationale is for this hard and steadfast line that this Board has drawn, it has the unintended consequence of discriminating against working mothers. I have had a plethora of clients bring this issue up to me and explain how it negatively impacts their employees and, in some cases, their own baby's health and wellbeing. For example, imagine you are a single mom and you finally got a job with great pay, team environment, and you love what you do. Except there's one catch, unlike most businesses, there is zero way for you to naturally feed your baby inside your place of employment. A client of mine explained the story to me as follows:

I love my employee, she is great – she just had a baby and she really wanted to get back to work and I love her go getter attitude. She asked me if she could have her baby (which is only a few months old) in the office with her while she does the books, paperwork and other

administrative tasks. I told her I have to talk to you, my attorney, before I say yes. You told me that based on the rules I couldn't have her bring the baby into the licensed premises at all... I explained the baby is so young it only sees shapes and colors and you still said no... So, much to my employees disappointed I relied the news. She was not pleased but she said she'd try to make it work by having her mother bring the baby every two hours to the facility to feed. So, in the dead of winter my employee goes and sits in the car with her baby and feeds. I hate that I cannot provide a designated space for her to feed her infant inside the facility. Eventually, my employee's mother couldn't keep up with having to drive in the winter to the facility every two hours to feed, so my employee had to quit, as it was ultimately hurting the well being of the baby. Isn't there a better solution? Couldn't the MCB come up with a more creative way to address restricting children to facilities but still allowing an employee the basic human right of feeding their infant?

Well – I didn't have a good answer or solution to my client's problem because there simply is no wiggle room in the regulations to allow for breast feeding in the facility. I think this has to change – we already have an economy that historically values women less than men, and prohibiting breast feeding in marijuana facilities, it furthers the incredibly discriminate impact on women in the work place – lower wages¹, hiring discrimination against pregnant or single mothers, etc. According to the National Partnership for Women and Families, in the state of Alaska more than 28,000 household families are headed by women, and about 21% of those 28,000 families fall below the poverty line. Does it really make sense for this industry to essentially prohibit new mothers from employment in this new industry by not providing a regulatory exception for breastfeeding mothers?

Your role as regulators is to regulate this industry in a manner that protects health and public safety, foster business growth and diversification of our economy. You cannot fulfill this role if your regulations discriminate against women. Period. To be part of the solution vs. part of the problem, the regulations need to be amended in manner that doesn't force licensees to engage in employment practices that have the effect of fostering gender-based occupational segregation by excluding new working moms from engaging in gainful employment in the marijuana industry.

Sincerely,

Jana D. Weltzin

¹ Woman in Alaska are paid 78 cents per every dollar paid to men, which amounts to annual wage gap of \$12,297.00. <http://www.nationalpartnership.org/our-work/resources/workplace/fair-pay/4-2017-ak-wage-gap.pdf>
See attached Fact Sheet for more stats.

Alaska Women and the Wage Gap

APRIL 2017

In Alaska, median annual pay for a woman who holds a full-time, year-round job is \$43,455 while median annual pay for a man who holds a full-time, year-round job is \$55,752. **This means that women in Alaska are paid 78 cents for every dollar paid to men, amounting to an annual wage gap of \$12,297.¹**

The wage gap can be even larger for women of color. **Among Alaska women who hold full-time, year-round jobs, Latinas are paid 58 cents and Asian women are paid 52 cents for every dollar paid to white, non-Hispanic men.²**

What Does the Wage Gap Mean for Alaska's Women?

On average, Alaska women who are employed full time lose a combined total of **more than \$1.6 billion every year** due to the wage gap.³ These lost wages mean women and their families have less money to support themselves, save and invest for the future, and spend on goods and services. Families, businesses and the economy suffer as a result.

If the annual wage gap were eliminated, on average, a working woman in Alaska would have enough money for:

- ▶ Nearly 14 more months of child care;⁴
- ▶ Nearly two additional years of tuition and fees for a four-year public university;⁵
- ▶ Approximately 82 more weeks of food for her family (1.6 years' worth);⁶
- ▶ Nearly seven more months of mortgage and utilities payments;⁷ or
- ▶ More than 10.5 additional months of rent.⁸

Alaska Women and Families Cannot Afford Discrimination and Lower Wages

- ▶ In the United States, mothers are breadwinners in half of families with children under 18, including half of white mothers, 53 percent of Latina mothers, 81 percent of Black mothers and 44 percent of Asian/Pacific Islander mothers.⁹ Yet the wage gap for mothers is larger than for women overall. Mothers with full-time, year-round jobs are paid 71 cents for every dollar paid to fathers.¹⁰
- ▶ **In Alaska, more than 28,000 family households are headed by women.¹¹ About 21 percent of those families, or 5,810 family households, have incomes that fall below**

the poverty level.¹² Eliminating the wage gap would provide much-needed income to women whose wages sustain their households.

Nationally, the Wage Gap Cannot Be Explained By Choices

- ▶ **The wage gap persists regardless of industry.** In the civilian industries that employ the most full-time employees – health care and social assistance, manufacturing, retail trade and educational services – women are paid less than men. In the health care and social assistance industry, women are paid just 72 cents for every dollar paid to men. In manufacturing, just 76 cents. In retail trade, 79 cents. And in educational services, 87 cents. Across all industries, women are paid lower salaries than men.¹³
- ▶ **The wage gap is present within occupations.** Among the occupations with the most people working full time, year-round – sales, production, management, and office and administrative support – women are paid less than men. In sales, women are paid just 63 cents for every dollar paid to men. In production, just 72 cents. In management, 80 cents. And in office and administrative support occupations, 87 cents.¹⁴
- ▶ **The wage gap exists regardless of education level.** Women with master's degrees working full time, year-round are paid just 72 cents for every dollar paid to men with master's degrees. Further, among full-time, year-round workers, women with doctoral degrees are paid less than men with master's degrees, and women with master's degrees are paid less than men with bachelor's degrees.¹⁵
- ▶ **Discrimination and bias still contribute to the wage gap.** Statistical analysis shows that 62 percent of the wage gap can be attributed to occupational and industry differences; differences in experience and education; and factors such as race, region and unionization. That leaves 38 percent of the gap unaccounted for, leading researchers to conclude that factors such as discrimination and unconscious bias continue to affect women's wages.¹⁶

America's Women Are Concerned About Unfair Pay

- ▶ **Women consider equal pay a top workplace issue.** Nearly six in 10 women (58 percent) in the United States identify equal pay as one of the most important issues facing women in the workplace. When compared to women in most other leading, high-wealth countries, a substantially higher share of U.S. women list equal pay as one of the most important issues women face at work.¹⁷
- ▶ **Less than one-third of women believe they are paid fairly.** Just 28 percent of U.S. working women say they are confident they are paid the same salaries as their male counterparts. Forty-three percent say they do not believe they are paid the same – a substantially higher share than in most other leading, high-wealth countries.¹⁸
- ▶ **Women are more likely to support a candidate for office who supports pay equity.** Seventy percent of Republican women, 83 percent of independent women and 88 percent of Democratic women say they would be more likely to vote for a candidate who supports equal pay for women.¹⁹

A Path Toward Closing the Wage Gap

Despite the federal Equal Pay Act of 1963 and other federal and state workplace protections for women, experts warn that women and men will not reach pay parity until 2059²⁰ – unless something changes. Fortunately, there are policies that would help, including: **protections that help identify and challenge discriminatory pay and employment practices and address gender-based occupational segregation; minimum wage increases; family friendly workplace supports like paid family and medical leave and paid sick days; affordable child care; and access to comprehensive reproductive health care.**

Several states and localities have taken steps to advance these policies, and federal proposals are before Congress. Together, these policies create a path toward closing the gap between the wages of women and men by helping to ensure that women have access to good and decent-paying jobs, the support they need to stay and advance in their careers, and fair and nondiscriminatory treatment wherever they work and in whatever jobs they hold.

Learn more about fair pay at NationalPartnership.org/Gap.

1 U.S. Census Bureau. (2016). *American Community Survey 1-Year Estimates 2015, Geographies: All States within United States and Puerto Rico, Table B20017: Median Earnings in the Past 12 Months (in 2015 Inflation-Adjusted Dollars) by Sex by Work Experience in the Past 12 Months for the Population 16 Years and Over with Earnings in the Past 12 Months*. Retrieved 21 March 2017, from https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_1YR_B20017&prodType=table; Nationally, women who work full time, year-round are paid, on average, just 80 cents for every dollar paid to men; U.S. Census Bureau. (2016). *Current Population Survey, Annual Social and Economic (ASEC) Supplement: Table PINC-05: Work Experience in 2015 – People 15 Years Old and Over by Total Money Earnings in 2015, Age, Race, Hispanic Origin, Sex, and Disability Status*. Retrieved 21 March 2017, from <https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pinc/pinc-05.html> (Unpublished calculation based on the median annual pay for all women and men who worked full time, year-round in 2015)

2 U.S. Census Bureau. (2016). *American Community Survey 5-Year Estimates 2011–2015, Geographies: All States within United States and Puerto Rico, Table B20017B, B20017D and B20017I: Median Earnings in the Past 12 Months (in 2015 Inflation-Adjusted Dollars) by Sex by Work Experience in the Past 12 Months for the Population 16 Years and Over with Earnings*. Retrieved 21 March 2017, from https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_B20017&prodType=table. Nationally, Black women are typically paid 63 cents and Latinas are typically paid 54 cents for every dollar paid to white, non-Hispanic men, while Asian women in the United States are typically paid 85 cents for every dollar paid to white, non-Hispanic men; U.S. Census Bureau. (2016). *Current Population Survey, Annual Social and Economic (ASEC) Supplement: Table PINC-05: Work Experience in 2015 – People 15 Years Old and Over by Total Money Earnings in 2015, Age, Race, Hispanic Origin, Sex, and Disability Status*. Retrieved 21 March 2017, from <https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pinc/pinc-05.html> (Unpublished calculation based on the median annual pay for all women and men who worked full time, year-round in 2015); Despite an overall wage gap for Asian women in the United States that is smaller than for other groups of women, analysis by the National Asian Pacific American Women's Forum shows there are substantial variations in the wage gap between particular ethnic groups of Asian women and white, non-Hispanic men, with many subpopulations of Asian women facing significantly greater wage penalties. For more information, see: https://napawf.org/wp-content/uploads/2017/03/FIGHTING-INVISIBILITY_FINAL.pdf

3 U.S. Census Bureau. (2016). *American Community Survey 1-Year Estimates 2015, Geographies: All States within United States and Puerto Rico, Table S2001: Earnings in the Past 12 Months (in 2015 Inflation-Adjusted Dollars)*. Retrieved 21 March 2017, from https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_1YR_S2001&prodType=table; U.S. Census Bureau. (2016). *American Community Survey 1-Year Estimates 2015, Table B20005: Sex By Work Experience in the Past 12 Months by Earnings in the Past 12 Months (in 2015 Inflation-Adjusted Dollars) for the Population 16 Years and Over*. Retrieved 21 March 2017, from https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_1YR_B20005&prodType=table (Unpublished calculation based on the mean annual pay for all women and men who worked full time, year-round in 2015, multiplied by the total number of women working full time, year-round in 2015)

4 Child Care Aware of America. (2016). *Parents and the High Cost of Child Care*. Retrieved 21 March 2017, from http://usa.childcareaware.org/wp-content/uploads/2017/01/CCA_High_Cost_Report_01-17-17_final.pdf

5 The College Board. (2017). *Tuition and Fees by Sector and State over Time: Table 5: Average Published Tuition and Fees by State in Current Dollars and in 2016 Dollars, 2004–05 to 2016–17*. Retrieved 21 March 2017, from <https://trends.collegeboard.org/college-pricing/figures-tables/tuition-fees-sector-state-over-time>

6 U.S. Bureau of Labor Statistics. (2016, August). *Consumer Expenditure Survey, Table 1800. Region of residence: Annual expenditure means, shares, standard errors, and coefficient of variation, 2015*. Retrieved 21 March 2017, from <http://www.bls.gov/cex/2015/combined/region.pdf> (Calculation uses overall average “food” cost for the region in which the state is located)

7 U.S. Census Bureau. (2016). *American Community Survey 1-Year Estimates 2015, Table GCT2511: Median Monthly Housing Costs for Owner-Occupied Housing Units with a Mortgage (Dollars) – United States – States; and Puerto Rico*. Retrieved 21 March 2017, from https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_1YR_GCT2511.US01PR&prodType=table (Calculation uses median monthly housing costs for owner-occupied housing units with a mortgage for each state)

8 U.S. Census Bureau. (2016). *American Community Survey 1-Year Estimates 2015, Table GCT2514: Median Monthly Housing Costs for Renter-Occupied Housing Units (Dollars) – United States – States; and Puerto Rico*. Retrieved 21 March 2017, from

https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_1YR_GCT2514.US01PR&prodType=table (Calculation uses median gross rent for state)

9 Anderson, J. (2016, September 8). *Breadwinner Mothers by Race/Ethnicity and State*. Institute for Women's Policy Research Publication. Retrieved 21 March 2017, from <https://iwpr.org/publications/breadwinner-mothers-by-raceethnicity-and-state/> (Breadwinner mothers are defined as single mothers who head a household or married mothers who generate at least 40 percent of a household's joint income)

10 National Women's Law Center (2016, November). *The Wage Gap for Mothers, State by State*. Retrieved 21 March 2017, from <https://nwlc.org/wp-content/uploads/2016/05/Wage-Gap-for-Mothers-State-By-State-1.pdf>

11 U.S. Census Bureau. (2016). *American Community Survey 1-Year Estimates 2015, Table DP02: Selected Social Characteristics in the United States*. Retrieved 21 March 2017, from https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_1YR_DP02&prodType=table (Calculation uses family households headed by females living in a household with family and no husband; a family household includes a householder, one or more people living in the same household who are related to the householder, and anyone else living in the same household)

12 U.S. Census Bureau. (2016). *American Community Survey 1-Year Estimates 2015, Geographies: United States, Table DP03: Selected Economic Characteristics*. Retrieved 21 March 2017, from https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_1YR_DP03&prodType=table (To determine whether a household falls below the poverty level, the U.S. Census Bureau considers the income of the householder, size of family, number of related children, and, for one- and two-person families, age of householder. The poverty threshold in 2015 was \$19,096 for a single householder and two children under 18.)

13 U.S. Census Bureau. (2016). *American Community Survey 1-Year Estimates 2015, Table S2404: Industry by Sex and Median Earnings in the Past 12 Months for the Full-Time, Year-Round Civilian Employed Population 16 Years and Over*. Retrieved 21 March 2017, from https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_1YR_S2404&prodType=table

14 U.S. Census Bureau. (2016). *Current Population Survey, Annual Social and Economic (ASEC) Supplement: Table PINC-06 Occupation of Longest Job-People 15 Years Old and Over, by Total Money Earnings, Work Experience, Race, Hispanic Origin, and Sex*. Retrieved 21 March 2017, from <https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pinc/pinc-06.html>

15 U.S. Census Bureau. (2016). *Educational Attainment-People 25 Years Old and Over, by Total Money Earnings, Work Experience, Age, Race, Hispanic Origin, and Sex*. Retrieved 21 March 2017, from <https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pinc/pinc-03.html>

16 Blau, F. D., & Kahn, L.M. (2016, January). *The Gender Wage Gap: Extent, Trends, and Explanations*. IZA Discussion Paper No. 9656. Retrieved 21 March 2017, from <http://ftp.iza.org/dp9656.pdf> (See Table 4: *Decomposition of Gender Wage Gap, 1980 and 2010 (PSID)* for the full breakdown of explanatory variables)

17 Thomson Reuters Foundation. (2015). *The 5 key issues facing women working in the G20*. Retrieved 21 March 2017, from <http://www.womenatworkpoll.com> (Ipsos Global @dvisor conducted an international survey among 9,501 women across 19 countries. Surveys were conducted from July 24 – August 7, 2015. The margin of error between two country sample sizes of 500 is roughly 6 percent at the 95 percent confidence interval. Data are weighted to match the population profile of each country by age, region and household income.)

18 Ibid.

19 Greenberg Quinlan Rosner Research. (2016, February 17). *Winning Women in 2016: Findings from a Web Survey of American Adults*. Retrieved 21 March 2017, from <http://www.americanwomen.org/research/document/American-Women-Survey-Millennial-Memo-02.18.16.pdf> (Greenberg Quinlan Rosner Research conducted a national online survey of 800 registered voters, with an oversample of 200 millennial women (ages 18-35) voters, for a total sample size of 1,000 registered voters, weighted to be representative of registered voters nationally. The survey was conducted from December 7 – 10, 2015.)

20 Institute for Women's Policy Research. (2016, September 13). *Women's Median Earnings as a Percent of Men's Median Earnings, 1960-2015 (Full-time, Year-round Workers) with Projection for Pay Equity in 2059*. Retrieved 21 March 2017, from <https://iwpr.org/publications/womens-median-earnings-as-a-percent-of-mens-median-earnings-1960-2015-full-time-year-round-workers-with-projection-for-pay-equity-in-2059/>

The National Partnership for Women & Families is a nonprofit, nonpartisan advocacy group dedicated to promoting fairness in the workplace, access to quality health care and policies that help women and men meet the dual demands of work and family. More information is available at NationalPartnership.org.

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From: [Ryan T](#)
To: [McConnell, Erika B \(CED\)](#)
Cc: [Smith, Jedediah R \(CED\)](#); [Dinegar, Harriet C \(LAW\)](#); [Marijuana, CED ABC \(CED sponsored\)](#); [Hoelscher, James C \(CED\)](#); [CED AMCO REGS \(CED sponsored\)](#)
Subject: Fine Comments
Date: Friday, April 12, 2019 12:52:30 PM
Attachments: [Fine Comments \(East Rip\).pdf](#)

Director McConnell & Staff,

Please find my comments related to the AMCO fine and fee schedule.

Thank you for your consideration.

Best Regards,

Ryan Tunseth
President, East-Rip Lic#13382



AMCO & MCB,

I am urging you to not approve the fine and fee schedule as written. Instead, I am requesting that the department and board delay any action on this subject until a more robust compliance and enforcement program can be developed. I would certainly be willing to help with this process in work sessions or any other format that the board and administration would consider.

I worked most of my career in regulatory compliance. As a Certified Safety and Risk Management Professional, I have seen and worked within numerous compliance and enforcement programs. As written, this proposal lacks the ability to both: 1) prevent violations and 2) encourage communication with regulators. This one size fits all hammer does not allow the agency the flexibility it needs to manage compliance, and does not provide the industry with a fair regulatory playing field. I would offer up the following things to consider:

- How does the Governors administrative action placing enforcement under the Dept. Of Law impact this? Does Law already have something they use? Will Law honor the schedule that AMCO develops? Perhaps waiting until the task force has been developed, and engaging law on this matter is appropriate.
- Does this take into account the size of the violator? Does business willingness to tolerance risk change based on how much money they make? What was the financial benefit of the risk taken? Is that considered?
- Severity of the violation should be the bucket that individual violations fall under, not specifically trying to address every possible situation with a table. OSHA has operated a very successful model that places violations in buckets of severity and those severity limits have fines, based on the type and repetitive frequency of the violation.
- Does this plan offer any ability to mitigate fines through beneficial or supplemental projects instead of simply monetary gain for the state? Are there corrective action plans or other avenues that a business could take instead of simply paying a fine?
- Why should a business be shut down for any amount of time? In my opinion, a business is either deemed fit to operate or not. What would change after 5 days of closure that makes the business more fit to operate? Again, this is just another bulky hammer. And it is one that equally penalizes the State.

If the goal is to achieve compliance in a new industry; “Actual compliance” ... Then there is absolutely no chance of success with this document as written. If the goal of this is to achieve “perceived compliance” then this document is nearly perfect. Please take another look at this and help the industry by developing something realistic and sustainable. In that absence of that, you are going to get the “walking wounded”. Business and industry that is hurt, but afraid to say anything.

Thank you kindly for your consideration,

Ryan Tunseth
President
East-Rip (13382)

From: [Jana Weltzin](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Cc: [Smith, Jedediah R \(CED\)](#); [Jana Weltzin](#); [Valerie Mastolier](#); [Brenda Mills](#)
Subject: Public Comment for Proposed Fine Schedule Regulation Project
Date: Friday, April 12, 2019 3:47:33 PM
Attachments: [MCB comment JDW re Fine Schedule proposed april 12 2019.pdf](#)

Attached!

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Think green, please don't print unnecessarily



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April 12, 2019

MCB Board
Director McConnell
Chief James Hoelscher

Sent Via Electronic Mail

Re: Fine Schedule Proposed Regulation

Dear Honorable MCB Members, Director McConnell and Chief Hoelscher:

Thank you for your hard work furthering the growth and sustainability of our thriving marijuana industry. As an initial matter, I want to make it clear that I am in support of an Enforcement Fine Schedule. However, I am not in support of the proposed fine schedule and would urge members of the Board to rethink and redraft this regulation project.

I think the starting point for crafting an effective Fine Schedule for Enforcement should be first determining what is the goal of the fines. Is it compliance? Punishment? A chilling effect on new ideas and new business development? I believe Enforcement wants a tool to help foster compliance – I believe that is the intent behind this regulation project. However, the way it is currently crafted would lead one to assume that the goal is for punishment or chilling of new business ideas and concepts. The fine schedule should be a tool that makes licensees afraid when Enforcement walks into their facility – when licensees see Enforcement currently, they by and large see Enforcement as their team mate and look to them for guidance and assistance. I would urge the Board to not destroy this important relationship between Enforcement and the licensees. I feel adopting this fine schedule as is would result in the destruction of that relationship.

Its not just the fine schedule that renders this proposed regulation change harmful to the industry – it's the entire regulation project:

Amending 3 AAC 306.805 – changes propose the following:

3 AAC 306.805. Report [OR NOTICE OF VIOLATION]. (a) The director, an enforcement agent, an employee of the board, or a peace officer acting in an official capacity, may issue an inspection report or [,] an advisory report [, OR A NOTICE OF VIOLATION BEFORE TAKING ACTION TO SUSPEND OR REVOKE A MARIJUANA ESTABLISHMENT LICENSE].

The proposed regulation change gets rid of NOVs in their entirety and replaces the NOV process with the fine report. The NOV process has been a useful tool for the MCB members to stay abreast of the evolving regulatory issues and the unintended effects on licensees. The NOV process allows for a *dialogue* between the licensee, enforcement and the ultimate decision maker – the Marijuana Control Board. The removal of the NOV process usurps the MCB control component and replaces it with Enforcement control and fines. This is not acceptable to the industry and it shouldn't be acceptable to the public either. In the current process, the MCB reviews all NOVs and responses and then from there determines whether additional criminal punishments need to occur – this regulation project would remove this process and the MCB would not see responses to NOVs (because there wouldn't be any responses from Licenses) and they would only see the matter if the licensee appealed the fine to the MCB. This is an inefficient method of encouraging compliance and it also removes the MCB from the conversation.

Second change to the regulation adds a new section:

3 AAC 306 is amended by adding a new section to read: 3 AAC 306.807. Citation of Violation. (a) The director, an enforcement agent, an employee of the board, or a peace officer acting in an official capacity may issue a citation of violation if an inspection report or other credible information shows a marijuana establishment is in violation of as 17.38, this chapter, or other law relating to marijuana. The citation of violation must be delivered to the marijuana establishment either at the electronic mail address required in 3 AAC 306.020(b)(6) or at its licensed premises, and to the board. The citation must describe any violation, and cite the applicable statute, regulation, or order of the board.

In addition to my concerns illustrated above regarding the usurping of authority from the MCB to the staff of the board, this new proposed section creates standard of proof that is not legally recognized as any known burden of proof. The new section tries to create a subjective standard of proof that is not recognized in any legal theory – “citation of violation if an inspection report or other credible information shows a marijuana establishment is in violation.” If the Board decides to move forward with this regulation, it would be wise to consider adopting one of the three recognized standards of proof instead of attempting to recreate the wheel. In every legal proceeding (and yes, a citation that effects a person or business in this manner is a legal proceeding) there are evidentiary standards that the parties must adhered to – below are the three standards for civil/administrative proceedings:

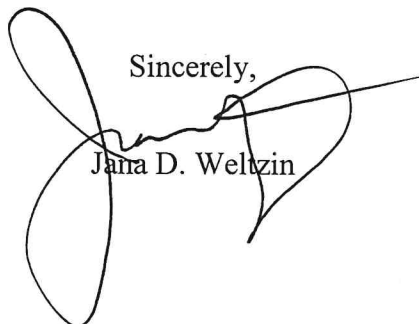
Preponderance of the Evidence: The burden of proof would be on the state to present evidence that amounts to a determination that more likely than not, the offence occurred based on the weight of the evidence presented.

Clear and Convincing Evidence: This burden of proof requires the state to provide evidence that the particular facts of the situation are more likely than not to be true – it sets a higher standard than preponderance of the evidence, but does not rise to the level of the criminal standard, beyond a reasonable doubt.

Substantial Evidence: This would require Enforcement to provide substantial evidence that would lead a reasonable mind to accept the evidence as adequate support for the particular citation.

According to George F. Indest III, J.D., M.P.A., LL.M., a leading attorney who represents individuals in licensing matters, he opines that the standard burden for administrative licensure matters should be clear and convincing evidence¹. If the Board is inclined to accept the incredibly hefty punishment schedule proposed in this regulation project, I would strongly urge the Board to require clear and convincing evidence as opposed to just the investigative report and other “credible information.” The fine schedule proposed, provides enforcement to issue massive fines and suspensions purely on “creditable evidence” and while a licensee could appeal that fine and/or suspension it would take time, energy and money to hire counsel or step away from their new businesses to defend themselves. And all of this damage would be imposed on the licensee, regardless of the outcome of the appeal, purely on the assertion of “credible information”? This is not a reasonable regulation project and if adopted by this Board there will be a legal challenge to its validity.

The proposed chart needs to be reworked into fines that are lower and provide for warnings for most 1st offender violations. The way the fines and suspensions are structured in the proposed fine schedule will lead licensees to appeal nearly every citation, creating an incredibly inefficient system that will suck up precious time and resources from AMCO administrative staff, Enforcement staff and this honorable Board. We have better use for their time and resources and do not need to waste it on appeals that will undoubtedly occur over these stiff penalties. The fines & suspension periods proposed need to be reduced.

Sincerely,

Jara D. Weltzin

¹ <https://www.thehealthlawfirm.com/blog/>

From: [Trevor Haynes](#)
To: [CED AMCO REGS \(CED sponsored\)](#)
Cc: [Marijuana, CED ABC \(CED sponsored\)](#); [McConnell, Erika B \(CED\)](#); [Hoelscher, James C \(CED\)](#)
Subject: Proposed changes on violation fine schedules - Public Comment
Date: Friday, April 12, 2019 3:47:46 PM
Attachments: [Fines Schedule Public Comment .pdf](#)

Dear Marijuana Control Board and AMCO Staff,
Please find attached my public comment RE: Proposed Changes to the Fine Schedule.
Thank you for your consideration,
Trevor Haynes
General Manager, GOOD
907-888-3367



Dear MCB and AMCO Staff,

April 12, 2019

I strongly object to the proposed changes on violation fine schedules. The proposed schedule would be ineffective in gaining industry compliance. In fact, it would have the opposite of the desired effect.

Because punishments under this fine schedule are overly and arbitrarily severe, the proposed fine schedule will:

- 1) discourage self-reporting and decrease transparency,
- 2) lead to severe punishments for good actors, and
- 3) burden and shutdown companies that are trying to abide by the regulations.

We are working under new and complex regulations that are rapidly changing. These proposed regulations will not gain industry compliance or promote best business practices. Because punishments are so severe, even good actors doing their best to maintain compliance will have strong incentive not to self report. Transparency will not be maintained.

Although I have examined this proposal closely, I will not get into the details of the inherent problems because it is generally flawed and needs to be completely revised. This will require AMCO work with industry and non-industry groups (e.g., form a working group). This group will be required to create regulations that promote best business practices and compliance, effectively punishes bad actors, and increases transparency and self-reporting.

As a start, this AMCO working group should:

- 1) Consider existing compliance models and determine which are most effective and transferable to the marijuana industry.
- 2) Use current data on violations to analyze how proposed fine schedules affect businesses. This will ensure punishments are not arbitrarily hash. AMCO could examine proposed fine schedules with current data to analyze punishment consequences. For example:
 - How many businesses would have had their licenses revoked at this point in time?
 - What would the average annual fine burden be for a business?

Understanding the consequences of proposed punishments in this manner will be the only way to build effective compliance regulations in the industry.

To reiterate - the proposed fine schedule is worse than ineffective and needs to be completely revised. It discourages self reporting, decreases transparency, provides punishments that are too severe, and does not appear to be based on data or existing effective models. I strongly object to these proposed changes.

Sincerely,

Trevor Haynes

General Manager, GOOD

907-888-3367

356 Old Steese Hwy
Fairbanks, Alaska 99701
907-452-KIND (5463)



goodalaska.com
@goodakcannabis
info@goodalaska.com

From: [Haley Essig](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Cc: [Hoelscher, James C \(CED\)](#); [McConnell, Erika B \(CED\)](#); [Jana Weltzin](#)
Subject: Letter to MCB Board - Breastfeeding in a licensed premise.
Date: Friday, April 12, 2019 4:20:00 PM
Attachments: [Letter to MCB-Breastfeeding in a licensed facility.pdf](#)

Hello,

Please see attached my letter/public comment addressed to the Marijuana Control Board to be considered in the May meeting regarding breastfeeding in a licensed premise.

Thank you
Haley Essig



Regards,

Haley Essig

GM & Co-Founder

P: 907.317.7346



April 12th, 2019

To: MCB Board

From: Haley Essig

Owner, ThirdState and Pipe & Leaf

(907) 317-7346

haley@thirdstate.co

CC: Director McConnell, Chief James Hoelscher

Dear MCB Members, Director McConnell and Chief Hoelscher:

My name is Haley Essig, I own and operate a licensed cannabis cultivation facility and have an approved-pending inspection retail facility opening shortly. I am only 26 years old, and just starting out in my entrepreneurial journey. I am also beginning my journey as a mother. I have a two-year-old and I am 6 months pregnant. Due to current regulations, I find that I will have to choose between providing the proper care for my newborn baby and being a responsible and successful licensee and business owner.

I started the licensing process for my cultivation while on maternity leave with my daughter. As a new mother, starting my own business gave me the flexibility to work while giving my baby the attention she required and deserved. It was my passion for cannabis, and my own relationship with the plant as a cure for my postpartum depression and anxiety that inspired me to become a business owner in this industry. For the first year and a half of my daughter's life I had her with me every day, she was part of every meeting with my investor, real estate agent, contractors, lawyers, and accountants. I was able to breastfeed and bond with her and still develop my own career and business successfully. I received my license in May of 2017, my daughter was one and a half, and we were both ready for her to go to daycare.

Fast-forward to now. My cultivation and my two-year-old are both thriving, and I am now on to my next business and my next child. However, now I find that I will be unable to care for my newborn baby AND be at my current and new businesses. My newborn baby will be under the age of 21 and will

therefore not be allowed in any licensed establishment. This puts any woman who owns or works at a licensed marijuana establishment in a situation that men in the industry do not have to face. Do I deprive my baby of the attention he/she needs or do I abandon my businesses I have devoted the last three years creating?

I understand the point of the regulation, children under twenty-one should not be consuming cannabis. However, a newborn baby is unable to lift its own head, how could he/she possibly consume cannabis? This regulation hurts women and their children more than it protects them. It limits young women with young families from entering into this industry and it forces their children to be put in childcare facilities before they or the mother are ready to be separated.

I am not asking for the under twenty-one regulations to be lifted. I am asking for new regulation to be adopted that considers breastfeeding women who are licensees or working in the industry. I suggest we allow breastfeeding babies to be allowed in the administrative and office areas of a licensed facility. Thank you for taking the time to read and consider this.

Sincerely,

Haley Essig