Alcohol and Marijuana Control Office
550 W 7th Avenue, Suite 1600
Anchorage, AK 99501
marijuana.licensing@alaska.gov
https://www.commerce.alaska.gov/web/amco
Phone: 907.269.0350

Alaska Marijuana Control Board

Form MJ-01: Marijuana Establishment Operating Plan

What is this form?

An operating plan is required for all marijuana establishment license applications. Applicants should review **Title 17.38** of **Alaska Statutes** and **Chapter 306** of the **Alaska Administrative Code.** This form will be used to document how an applicant intends to meet the requirements of those statutes and regulations. If your business has a formal operating plan, you may include a copy of that operating plan with your application, but all fields of this form must still be completed per 3 AAC 306.020(c).

What must be covered in an operating plan?

Applicants must identify how the proposed premises will comply with applicable statutes and regulations regarding the following:

- Control plan for persons under the age of 21
- Security
- Business records
- Inventory tracking of all marijuana and marijuana product on the premises
- Employee qualification and training
- Health and safety standards
- Transportation and delivery of marijuana and marijuana products
- Signage and advertising

Applicants must also complete the corresponding operating plan supplemental forms (**Form MJ-03, Form MJ-04, Form MJ-05,** or **Form MJ-06)** to meet the additional operating plan requirements for each license type.

Section 1 – Establishment & Contact Information

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

Licensee:	Primo Farms North, LLC	**MJ License #:**	24383		
License Type:	Retail Marijuana Store				
Doing Business As:	Primo				
Premises Address:	12870 Old Seward Highway, Space 105				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99515

Mailing Address:	5313 Arctic Blvd., Suite 202				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99518

Designated Licensee:	Dan Ferguson		
Main Phone:	907-529-2062	**Cell Phone:**	
Email:	dan@primoak.com		

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Section 2 – Control Plan for Persons Under the Age of 21

2.1. Describe how the marijuana establishment will prevent persons under the age of 21 from gaining access to any portion of the licensed premises and marijuana items:

Primo will refuse entrance to any person who does not produce a form of valid photo identification showing that person is twenty-one (21) years of age or older. A valid form of identification includes: (1) an unexpired, unaltered passport; (2) an unexpired, unaltered driver's license; instruction permit, or identification card of any state or territory of the United States, the District of Columbia, or a province of Canada; and (3) an identification card issued by a federal or state agency authorized to issue a driver's license or identification card. At no time will a person under the age of twenty-one (21) be permitted to remain on the premises. If at any time, an employee suspects that a person is a minor, the employee will refuse access and have the individual escorted off the premises. A designated employee will request from all customers for government-issued, photo identification and will thoroughly examine the ID before allowing entrance into the retail store. Continued pg. 11

Section 3 – Security

Restricted Access Areas (3 AAC 306.710):

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

The retail store will be equipped with 24 hour monitoring alarm system, exterior lighting, and video surveillance. To maintain the security of the facility and all marijuana products, restricted access areas of the store will be monitored and restricted at all times. Access will only be granted to employees and ownership, with the limited exception of scheduled, pre-approved visitors (not to include AMCO enforcement, law enforcement and other duly authorized agents). Each entry point to a restricted access area will have signs prominently posted stating that the area is restricted and for employees only. Primo will install a key card/keypad secure door to the restricted access area. The door in the back of the restricted access area is an emergency exit only and will remain locked at all times but easily exited from the inside incase of emergency. Distinct and apparent cameras will be placed throughout and around the store to discourage the public from attempting access.

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

All visitors, in order to tour the facility, must be escorted into restricted access areas, with the exception of AMCO and duly authorized law enforcement agents. Each visitor will sign into the visitor's log indicating their name, the date, time in and out of the restricted access area, and purpose of the visit. All visitors will be required to sign in, and to provide valid, government issued, photo identification. Each visitor (with the exception of law enforcement, AMCO Enforcement or other duly authorized agents) will be issued a visitor badge and will be instructed to clearly display it on their person while on the licensed premises and return the badge upon exit. At this time, the employee or ownership will brief the visitor on the company's policy's regarding hygiene, safety, regulatory compliance and any other pertinent information the visitor should be aware of while inside the restricted access areas of the retail store. Continued pg. 11

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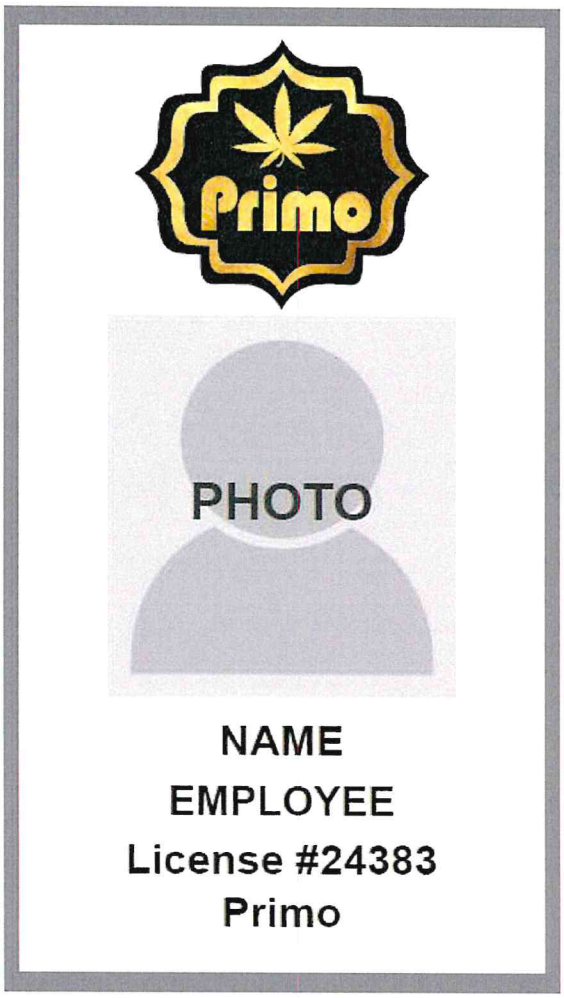
3.3. Provide samples of licensee-produced identification badges that will be displayed by each licensee, employee, or agent while on the premises, and of visitor identification badges that will be worn by all visitors while in restricted access areas:



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

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

The exterior lighting fixtures of the retail facility will be designed and installed to deter nuisance activity and enhance surveillance, while minimizing any sort of neighborhood nuisance. Additional lighting will be used to increase picture quality and brightness for security related documentation. The camera system and lighting will be constantly calibrated to maximize the quality of any recorded images, and to also discourage theft and/or trespassing. The lighting fixtures will be installed to insure there are no dark spots around the perimeter, or any of the entrances to the facility. All outdoor lighting will be weather proof and vandal proof.

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3.5. An alarm system is required for all license types that must be activated on all exterior doors and windows when the licensed premises is closed for business. Describe the security alarm system for the proposed premises, explain how it will meet all regulatory requirements, and outline your policies and procedures regarding the actions to be taken by a licensee, employee, or agent when the alarm system alerts of an unauthorized breach:

Primo will contract with a third party security company to install the alarm system, maintain the equipment, periodically test the devices and continuously monitor the facility at an off-site security monitoring center. The alarm system will be set up to monitor for intrusions with motion detectors in all areas of the building, active during closed hours, as well as a door sensor on the exterior door and glass break sensors on each exterior window. If triggered, an automatic, electronic alert will be sent to the security monitoring center as well as to the Licensee and manager's phones. This will also trigger an audible alarm to help deter potential intruders. Live security footage will also be accessible to the Licensee and/or Manager via their cellular phones so they may keep an eye on the facility even when they are away. The alarm system will be active at all times that the store is closed. The last manager or employee to leave the facility each night will activate the alarm system and the first manager or employee to arrive in the morning will deactivate the system. In the event of an unauthorized breach, the management team will evacuate the building (if it's safe to do and necessary) to a pre-determined safe location. A designated employee will take a head count of employees and any visitors that may have been on the premises to ensure everyone is accounted for. Management will await instruction from law enforcement and comply with all directives. Once it is safe to do so, employees will return to the facility and inspect for property damage, theft, take inventory and submit all necessary and requested documentation to law enforcement officials and to AMCO enforcement. Additionally, any event that occurs on the licensed premises that involves local law enforcement will be promptly reported to AMCO Enforcement electronically. In the case of the establishments knowledge of evidence or circumstances that reasonably indicate theft, diversion, or unexplained disappearance of marijuana, marijuana products or money from the licensed premises; or any unauthorized access to the licensed premises, The Licensee or manager will notify AMCO and Enforcement as soon as possible and in any event, not more than 24 hours

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

Only the licensee, manager and designated employees will have access to marijuana storage areas. Continuous video surveillance will record and monitor all employees and licensees of Primo that handle, package, or distribute marijuana. All video will be stored for the required 40 days. All security recording equipment will be stored in the secured office. All employees and the manager will be taught about methods of diversion and how to be aware of them including theft from employees or the public. Employees will be trained on handling and labeling products and how to properly use our inventory tracking system in place. Inventory and accounts will be reconciled on a regular basis in order to identify and investigate any irregularities in monetary accounts or Inventory.

3.7. Describe your policies and procedures for preventing loitering:

Signage stating "No Loitering" and that the premises is under video surveillance will be prominently posted around the facility. Designated employee(s) will be trained to perform routine, but unscheduled patrols of the premises to check for individuals with no official business on the property. Individuals found to be loitering on the premises will be met with a verbal request to exit the premises per the no loitering policy and if they do not comply law enforcement will be contacted for back up.

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

3.8. I certify that if any additional security devices are used, such as a motion detector, pressure switch, and duress, panic, or hold-up alarm, to enhance security of the licensed premises, I will have written policies and procedures describing their use.

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Video Surveillance (3 AAC 306.720):

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

3.9. The video surveillance and camera recording system for the licensed premises covers each restricted access area, and both the interior and exterior of each entrance to the facility. DF

3.10. Each video surveillance recording: is preserved for a minimum of 40 days, in a format that can be easily accessed for viewing (consistent with the Alcohol & Marijuana Control Office's approved format list); clearly and accurately displays the time and date; and is archived in a format that does not permit alteration of the recorded image. DF

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

3.12. Surveillance recording equipment and video surveillance records are housed in a designated, locked, and secure area or in a lock box, cabinet, closet or other secure area where access is limited to the licensee(s), an authorized employee, and law enforcement personnel (including an agent of the Marijuana Control Board). DF

3.13. Describe how the video cameras will be placed to produce a clear view adequate to identify any individual inside the licensed premises, or within 20 feet of each entrance to the licensed premises:

Video cameras will be used in order to record all areas of the retail store, inside and out, at multiple angles and at a height that will provide a clear, unobstructed view. Cameras will be carefully placed to prevent any obstruction from fixtures, display cases or equipment. All security cameras will be installed in such a manner as to get the best facial image of anyone present within the building and within twenty (20) feet of the exterior entrance. The front entrance door of the facility as well as any emergency exits will have cameras documenting the face of any person entering or exiting the facility. All restricted access areas will have coverage to clearly identify the face of anyone present. Cameras will also be placed on the on the exterior of the building to monitor all activities outside the licensed premises including, but not limited to, the parking lot and main entrance. Footage from security cameras will be accessible remotely, allowing the Licensee or manager to view operations from anywhere. A failure notification system will be installed to provide audible and visual notification of any failure in the electronic monitoring system. During a power outage, all video cameras and recording equipment will be run on emergency power with a battery backup system to ensure continued operation for at least one (1) hour.

3.14. Describe the locked and secure area where video surveillance recording equipment and original copies of surveillance records will be housed and stored, and how you will ensure the area is accessible only to authorized personnel, law enforcement, or an agent of the Marijuana Control Board. If you will be using an offsite monitoring service and offsite storage of video surveillance records, your response must include how the offsite facility will meet these security requirements:

Primo will store all video surveillance recordings inside the locked office and on the "Cloud". The office will be locked at all times and only accessible to authorized personnel. Business records will only be accessible to the Licensee, the manager and AMCO agents or law enforcement. The Licensee will have remote access to surveillance recordings to monitor operations virtually. The security system will be password protected to prevent any data tampering, and recorded data will be stored for a minimum of forty (40) days as an official business record. All surveillance footage will be accessible for upload to a separate hard drive in the event that it must be stored longer for criminal, civil, or administrative investigations. All recordings will be time and date stamped, and archived in a format that prevents alteration of the recorded image. Recordings and surveillance data will be available to AMCO, AMCO Enforcement and local law enforcement upon request.

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Section 4 – Business Records

Review the requirements under 3 AAC 306.755. All licensed marijuana establishments must maintain, in a format that is readily understood by a reasonably prudent business person, certain business records.

4.1. I certify that the following business records will be maintained and kept on the licensed premises: Initials

a. **all books and records necessary to fully account for each business transaction conducted under my license for the current year and three preceding calendar years** *(records for the last six months must be maintained on the licensed premises; older records may be archived on or off-premises)*; DF

b. **a current employee list setting out the full name and marijuana handler permit number of each licensee, employee, and agent who works at the marijuana establishment;** DF

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

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

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

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

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

h. **accurate and comprehensive inventory tracking records that account for all marijuana inventory activity from seed or immature plant stage until the retail marijuana or retail marijuana product is sold to a consumer, to another marijuana establishment, or destroyed;** DF

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

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

4.2. A marijuana establishment is required to exercise due diligence in preserving and maintaining all required records. Describe how you will prevent records and data, including electronically maintained records, from being lost or destroyed:

All business records, including operational and regulatory documents, recordings, surveillance, financial books, inventory and employment records, logs, manifests, and communications and marketing documents will be stored on-site in the office, and backed up daily to a cloud-based drive to protect from loss and destruction and to allow the Licensee and designated authorities access at any time. Hard copies (if original hard copy is needed to be kept in addition to electronic versions such as Visitors Logs) will be kept in the shared office, for six (6) months. All other facility records will be stored off site in a separate locked enclosure that is accessible only to the licensee and designated employees. Facility records will be managed by authorized agents in accordance with standard retention policies to ensure that business records are stored in a consistent and search-able manner.

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Section 5 – Inventory Tracking of All Marijuana and Marijuana Product

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

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

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

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

5.3. My marijuana establishment will use registered scales in compliance with AS 45.75.080 (Weights and Measures Act), as required by 3 AAC 306.745. DF

Section 6 – Employee Qualification and Training

Review the requirements under 3 AAC 306.700. All licensees, and every employee or agent of the marijuana establishment who sells, cultivates, manufactures, tests, or transports marijuana or a marijuana product, or who checks the identification of a consumer or visitor, must obtain a marijuana handler permit from the board before being licensed or beginning employment at a marijuana establishment.

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

6.1. All licensees, and each 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. DF

6.2. Each licensee, employee, or agent who is required to have a marijuana handler permit shall keep that person's marijuana handler permit card in that person's immediate possession (or a valid copy on file on the licensed premises) when on the licensed premises. DF

6.3. Each licensee, employee, or agent who is required to have a marijuana handler permit shall ensure that that person's marijuana handler permit card is valid and has not expired. DF

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

All employees will be required to attend mandatory in-house training. All employees will be required to be trained in their particular positions. All employees will be required to take the training and to obtain their marijuana handler's card. Employees will receive evaluations from the Licensee and/or manager on a regular basis that will help determine and correct any deficiencies regarding understanding of material previously trained on. Training topics will include latest industry topics and updates in statutes and regulations, recall product plan, health and safety, food handling and proper equipment use. Theft and legal issues will also be reviewed. Employees will have to demonstrate their knowledge of Alaska's laws and regulations (including DEC), codes, company standards and protocols, Marijuana handling, and how to recognize and handle impairment and underage customers. The Manager will be trained on cash handling procedures and POS operations. All new hires will start with a strict probationary period of 6 months.

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Section 7 – Health and Safety Standards

Review the requirements under 3 AAC 306.735.

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

7.1. I understand that a marijuana establishment is subject to inspection by the local fire department, building inspector, or code enforcement officer to confirm that health or safety concerns are not present. DF

7.2. I have policies regarding health and safety standards (including: ensuring a person with an illness or infection does not come into contact with marijuana or marijuana product; good hygienic practices; cleaning and maintenance of equipment and the premises; pest deterrence; chemical storage; sanitation principles; and proper handling of marijuana and marijuana product) and will take all reasonable measures and precautions to ensure that they are met or exceeded. DF

7.3. I have policies to ensure that any marijuana or marijuana product that has been stored beyond its usable life, or was stored improperly, is not salvaged and returned to the marketplace. DF

7.4. I have policies to ensure that in the event information about the age or storage conditions of marijuana or marijuana product is unreliable, the marijuana or marijuana product will be handled in accordance with 3 AAC 306.735(d). DF

Answer "Yes" or "No" to each of the following questions:	Yes	No
7.5. Adequate and readily accessible toilet facilities that are maintained and in good repair and sanitary condition are clearly indicated on my Form MJ-02: Premises Diagram.	✓	
7.6. Convenient handwashing facilities with running water at a suitable temperature are clearly indicated on my Form MJ-02: Premises Diagram.	✓	

7.7. If you answered "No" to either 7.5 or 7.6 above, describe how toilet and/or handwashing facilities are made accessible, as required by 3 AAC 306.735(b)(2):

Section 8 – Transportation and Delivery of Marijuana and Marijuana Products

Review the requirements under 3 AAC 306.750.

8.1. Describe how marijuana or marijuana product will be prepared, packaged, and secured for shipment. Include a description of the type of locked, safe, and secure storage compartments to be used in vehicles transporting marijuana or marijuana product:

Primo does not anticipate transporting marijuana or marijuana product from the retail store however, if the need arises, Primo will transport all marijuana or marijuana product in the following ways: Once the marijuana or marijuana product is ready to be delivered to another licensed facility, Primo will weigh and package the product into airtight, food safe, tamper-evident shipping containers to protect from opening or contamination. Packages will be sealed in such a way that they cannot be opened during transport. Affixed to the shipment will be a transportation manifest to include the date, product information, lot numbers, test results and weights as well as the delivery transporter's name and the vehicle's description, license plate number and the expected delivery times. Shipments will be delivered by a Primo employee or third party transport company, in a locked, safe, and secure storage compartment that is secured in the delivery vehicle. When transporting secured products, the Primo employee or a third-party transport company will travel directly from our facility to the receiver without any unnecessary stops. All of the above will be recorded and entered into Metrc.

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

8.2. The marijuana establishment from which a shipment of marijuana or marijuana product originates will ensure that any individual transporting marijuana shall have a marijuana handler permit required under 3 AAC 306.700. LF

8.3. The marijuana establishment that originates the transport of any marijuana or marijuana product will use the marijuana inventory tracking system to record the type, amount, and weight of marijuana or marijuana product being transported, the name of the transporter, the time of departure and expected delivery, and the make, model, and license plate number of the transporting vehicle. DF

8.4. The marijuana establishment that originates the transport of any marijuana or marijuana product will ensure that a complete printed transport manifest on a form prescribed by the board must be kept with the marijuana or marijuana product at all times during transport. DF

8.5. During transport, any marijuana or marijuana product will be in a sealed package or container in a locked, safe, and secure storage compartment in the vehicle transporting the marijuana or marijuana product, and the sealed package will not be opened during transport. DF

8.6. Any vehicle transporting marijuana or marijuana product will travel directly from the shipping marijuana establishment to the receiving marijuana establishment, and will not make any unnecessary stops in between except to deliver or pick up marijuana or marijuana product at any other licensed marijuana establishment. DF

8.7. When the marijuana establishment receives marijuana or marijuana product from another licensed marijuana establishment, the recipient of the shipment will use the marijuana inventory tracking system to report the type, amount, and weight of marijuana or marijuana product received. DF

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

Section 9 – Signage and Advertising

Review the requirements under 3 AAC 306.770.

9.1. Describe any signs that you intend to post on your establishment, including quantity, dimensions, graphics, and location on your establishment (photos or drawings may be attached):

Primo may have no more than three signs that are visible to the general public from the public right-of-way. Two of the three signs may only be placed in the marijuana facility's window or attached to the outside of the licensed premises. The size of each sign may not exceed 4,800 square inches. All signs that may be displayed on Primo's retail store will not contain any form of advertising or promotions. One sign is in place directly above the entrance door and is under 7' x 4' in size, there will also be a sign in the street side structure that is going to be built for the mall. Because Primo is NOT the owner of the mall, there is no information regarding the dimensions of the signage however, as the municipality of Anchorage has strict codes, Primo will practice rigid adherence and comply with all requirements.

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

Primo plans to utilize the following medium types when distributing advertisements:

- Newspaper Ads
- Radio Ads
- Social Media to feature specific strains
- Magazine ads
- Platforms such as; LeafLinks
- Sponsorship of sporting or other events
- Text message programs with an opt out function

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

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

Signature of licensee

Dan Ferguson

Printed name of licensee

AIMEE ROCUSH My Commission NOTARY PUBLIC Expires 08-29-2023 STATE OF ALASKA

Aimee Rocush

Notary Public in and for the State of Alaska

My commission expires: 8/29/2023

Subscribed and sworn to before me this 27th day of February, 2020.

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(Additional Space as Needed):

2.1 Continued: In addition to passing the Marijuana Handler's Card course, employees in this position will be trained to spot the inconsistencies of forged identifications, and they will be given an ID guide to help them recognize IDs from other states and countries. Signage will be posted at the main entry door stating, "No one under 21 years of age allowed". The sign will be twelve (12) inches long and twelve (12) inches wide, and the letters will be one half inch in height in high contrast to the background of the sign.

3.2 Continued: A designated employee, manager or licensee will escort and actively supervise the visitor(s) during the entire visit. At no time will there be more than 5 visitors per supervising employee, manager or licensee on the premises. Once the visit has concluded, all visitors will be required to exit the premises and return their visitor badges. The visitors log will be kept and stored in the locked storage room or the locked office as an official business record. The visitors will be escorted by an employee at all times while in the restricted access area. This visitor log will be made available to AMCO upon request. The records will be stored in the secured storage room located adjacent to the sales counter. After 7 years the hard copy may be destroyed.

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