

From: [Lisa Coates](#)
To: [Marijuana_CED ABC \(CED sponsored\)](#)
Subject: Trim being sold to consumers should require testing
Date: Thursday, October 22, 2020 3:48:07 PM
Attachments: [Comparison of flower test results vs trim extraction data.png](#)

Dear members of the Alaska Marijuana Control Board,

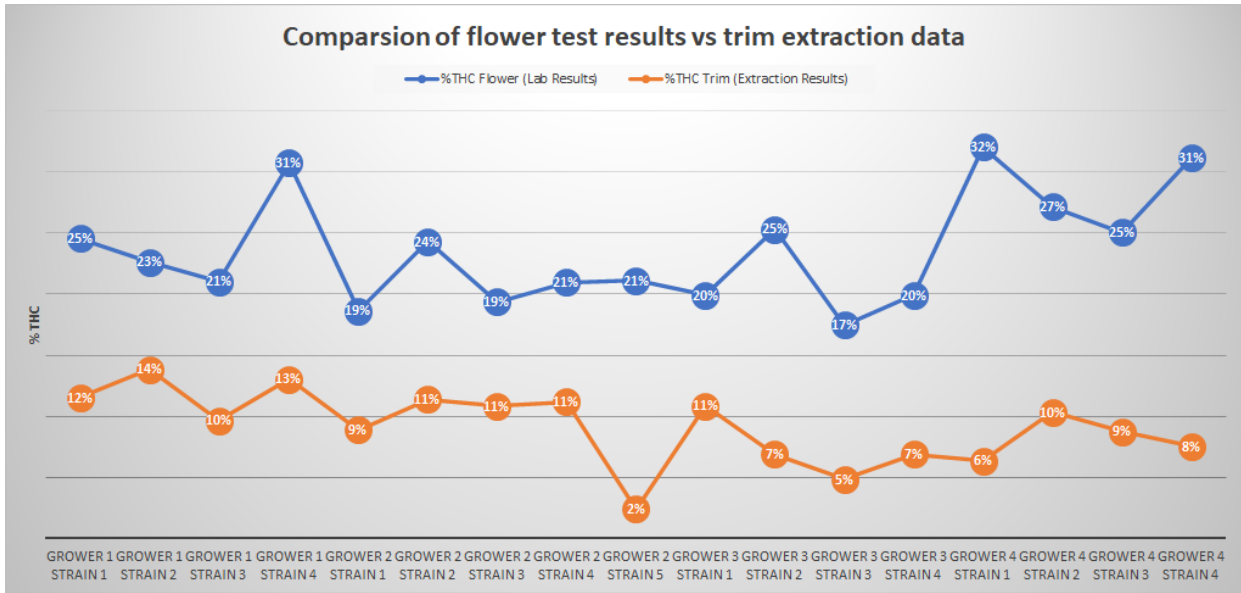
Please consider a regulation that would require trim to be tested if it is going to be sold to the consumer as trim or preroll. Trim test results do not correlate very much with the testing result of the flower. The current cannabis regulations do not require trim to be tested. Only the flower. I realize that this was a regulation that you voted on in the past, and that the board decided flower results were good enough to submit to the wholesale buyer. The reasoning I believe is because the trim is usually sold for extraction and the final product would need to pass testing before it is sold to a retailer or consumer, so requiring trim to be tested could be seen as an unnecessary expense. This does not happen when it is sold to the consumer. Some retailers sell trim with the test results of the flower on the package. The consumer gets fleeced when the trim is sold in prerolls and flower test results are what the consumer thinks they are purchasing. I would hazard a guess and say that prerolls are the number 1 product sold in Alaska's cannabis retail stores.

As we are in the business of extracting, buying trim is what we do. We have purchased and seen a wide variety in the quality of trim. We do not put too much value in flower test results because they do not correlate to the quality of the trim sold to us in most cases.

I have included a graph to demonstrate the wide variety of trim quality. The graph is based on 4 different growers with 4 or 5 different strains per grower. Based on all of our extraction data and final test results on the oil produced, we can back calculate and get a rough idea of what the actual THC percentage is in the trim we purchased. As you can see on the graph, it demonstrates that THC trim values can vary greatly when compared to the THC value in the flower. It is simply not fair to the consumer. It could be solved by simply requiring trim or trim products that are sold to the consumer be tested. It is transparent and the right thing to do.

Thank you for your time and consideration regarding this issue that in our opinion plagues the Alaska recreational marijuana industry.

Sincerely,
Lisa Coates
Herban Extracts llc, lic 14432



From: [Klinkhart, Glen Edward \(CED\)](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Cc: aaronbean28@gmail.com
Subject: RE: Juneau's Green Garden consideration October 2020 meeting
Date: Thursday, October 29, 2020 10:38:56 AM

This concern has been forwarded the board members for their review.

Glen Klinkhart

Interim Director

Alcohol & Marijuana Control Board

550 W 7th Ave #1600, Anchorage, AK 99501

Office (907) 269-0350

glen.klinkhart@alaska.gov

From: Aaron Bean [<mailto:aaronbean28@gmail.com>]
Sent: Thursday, October 29, 2020 10:19 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Mike Scarcelli <michael.scarcelli77@gmail.com>; Elizabeth Romanoski <elizabethromanoski28@yahoo.com>; Jonathan Kreiss-Tomkins <jonathan.s.kt@gmail.com>
Subject: Juneau's Green Garden consideration October 2020 meeting

Amco,

This email is document the fact I showed up to your meeting as requested, and the board made the decision not to ask any "pending inspection" licensees questions. By the sounds of the discussion, the board wasn't expecting me to be present.

This was a waste of my valuable time. Before you ask me to spend two days listening to a meeting please be sure I am in fact going to be expected to be heard. The lack of communication with the board is a serious problem.

Can you please share the current emails of the seated board members?

From: [Alexandra Pepper](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: Retail samples
Date: Wednesday, November 11, 2020 5:38:51 PM

To whom it may concern,

When reviewing the regulations I noticed there is no route for retail stores to give their employees samples. This is unfortunate because many breweries and wineries (and even distributors) REQUIRE their employees to sample their product to better serve their customer, but under current regulations for a retail marijuana store to do so it has to be bought. There is no alternative method in the regulations like there is for cultivations and manufacturing, however quality control is just as important, if not more, to make sure employees have all the needed knowledge to help customers make informed decisions.

Thank you for your consideration.

From: [CED AMCO REGS \(CED sponsored\)](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: FW: Curbside
Date: Tuesday, November 17, 2020 2:36:46 PM

Please put this in the board's packet for January.

Thank you
Jane

From: AKO FARMS [mailto:akofarmsllc@gmail.com]
Sent: Tuesday, November 17, 2020 2:33 PM
To: CED AMCO REGS (CED sponsored) <amco.regs@alaska.gov>
Subject: Curbside

Hi there,
Wasn't sure who to write...so your it..We just got a letter from enforcement stating that Curb side HAS NOT been extended.
We need it more then ever right now. With the numbers of outbreaks going up , now is not the time to stop curbside.
Thank you,
Liza Martin

Sent from [Mail](#) for Windows 10

Liza Martin
Founder/CEO
AKO FARMS
1210 Beardslee Way
P O Box 2426
Sitka, Alaska 99835
907-623-0417



From: [Cheryl Bowie](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: Dreams come true
Date: Friday, December 4, 2020 12:44:59 AM

I'm living in Colorado now .. I suggest supporting all aspects of updating drug laws to ensure competition. I had just accepted a fellowship through my former employer, Indian Health Service CDC joint management of the Viral Hepatitis Program at the Alaska Native Medical Center. Next time someone like me is in your area I'd suggest supporting them and their work.

Anyhow. I completed my degree in part by completing a two semester practicum at the Alaska Native Medical Center in 1995 and worked on the nutuqsiivik program which they now call Nuka but it's their flagship program for southcentral Foundation of which I am not a shareholder and they're solely owned by Cook Inlet Region Inc and they are manipulating the laws and programs and the collection and billing of peoples biological material for their economies gain.

I now live in Colorado and really encourage you supporting medical marijuana, research and manufacturing in all areas but as an industry person I neas very disappointed in the Alaska Marijuana Control Office and their lack of inclusion and anticompetitive practices; had I known the information I sent would be used for your members sole economic gain I would have never supported this effort. I only support limiting regulations in drug management and development.

I supported recreational because me and some of my colleagues saw the benefits of developing this area based on sound economic principles of competition and quality which go hand in hand plus Alaska won't be able to support the lack of economic development for the environmentalist political platforms.

I suggest you find a way to increase domestic manufacturing, stop price gouging patients and identify regulations that will improve pharmaceutical/drug management and oversight to increase our value in the market.

I was the research assistant at the time when the primary investigators were creating the hepatitis c guidelines the healthcare industry depends on, that's who works in Alaska, the marijuana control board was late to the game but your antics regardless of what people think about me showed more about you and your unethical leadership and business practices.

Comment from Cheryl Bowie: This is a Comment on the Food and Drug Administration <https://www.regulations.gov/document?D=FDA-2019-N-0767-3583>

Listen to my testimony starting at 2:13:36 (Cheryl Bowie with @dreamgbutterfly botanicals). 2018 Farm Bill Webinar on Domestic Hemp Production Program Follow-up <https://t.co/baq9KFTOs5> <https://t.co/QxZeN7uHDh>

I wish you luck in the future but you are also why I no longer live in Alaska and I am from the Arctic. Support oil development. I recently attended the promoting competition in the life sciences through the department of justice and I suggest you learn healthier practices in order to keep businesses in Alaska.

Peace,

Cheryl Bowie
dreambutterfly botanicals

From: [Anthony Blair](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Subject: Does not meet standards of medical quality
Date: Monday, December 7, 2020 6:59:50 PM

Hello, i have been a medical marijuana card holder for about 10 years and the weed now a days sucks ass. It is all dirt weed and smells the same. You chumps have never had real chronic and are ruining the strains with the crossbreeding. I have worked as a bud tender and at a farm in grays harbor and it is all poopy butt grunian shwag. I am going to tell everyone i know to find someone who sells black market and help them find a guy, because this is bullshit. I will be going to a actuall medical hoint from now on once a month for only state recognized medical card holders to get my meds. You ruined it all and grow bammer weeds and they way you guys allow them to grow or make dabs is wrong and needs to be cleaned the right way. You suck!!!! Government and weed dont mix.

Sent from my iPhone

From: [Cheryl Bowie](#)
To: [Marijuana, CED ABC \(CED sponsored\)](#)
Date: Saturday, December 12, 2020 3:49:25 AM

Please support medical marijuana and research and competing marijuana sectors if you are going to be board members supposedly representing voters and consumers...

I left Alaska because I cannot work in Alaska under your culture or rules and I have experience...

This work, although published in 2001 was completed by Indian Health Service, The Veterans Administration and the Centers for Disease Control and Prevention and the manufacturers between 1997 to 1999 by the government. No tribal affiliation.

<https://t.co/uM8ew8PxZw> <https://t.co/grXagJXuGY>

Sincerely,

Cheryl Bowie



Jana D. Weltzin
Licensed in Alaska & Arizona
901 Photo Avenue, Second Floor
Anchorage, Alaska 99503
Phone 907-231-3750
JDW Counsel
jana@jdwcounsel.com

December 23, 2020

Re: Proposal for New Type of Marijuana Business License, Distributor Licenses

Dear Honorable Members of the Alaska Marijuana Control Board:

Please consider the following proposal for a new class of Marijuana business licenses, the Marijuana Distributor license. This new license would require all those who transport marijuana within state lines to be licensed with AMCO, including those who transport marijuana from outside state lines¹. With Federal legalization looming, it is more important than ever that we take steps to protect local small businesses and regulate incoming commerce. Creating Distributor licenses will be the first step towards ensuring the sustainability of the local Alaskan market when trade opens to the rest of the nation and ultimately the world.

Many recreational marijuana states already have Distributor or Transporter licenses, though the definitions and privileges of such vary, and the variations of this license type does not mirror the proposal below. These states include Michigan, Illinois, California, Massachusetts, Washington, and Colorado.

In the liquor industry, there exists a wholesale distributor license type – this license type is common amongst the various states and has federal requirements to follow as well. The liquor distributor license allows the license to purchase from manufacturers varying types of liquor products, and then the liquor distributor in turn sells these products to a variety of companies that sell liquor to end user consumers (i.e. bars, restaurants, liquor stores, etc.). The proposal I respectfully request this Board consider is similar, but not identical, to the liquor distributing model.

Currently, businesses that are transporting marijuana between licensed facilities are not required to be separately certified. Marijuana transporters must have AMCO Marijuana Handler Cards, but they are not required to be licensed.

¹ Once Federally legal to do so.



Jana D. Weltzin
Licensed in Alaska & Arizona
901 Photo Avenue, Second Floor
Anchorage, Alaska 99503
Phone 907-231-3750
JDW Counsel
jana@jdwcounsel.com

Creating a distributor license is not intended to impact those transporting marijuana to and from Alaska state licensed operators, it is intended to create new Alaskan business opportunities, and, to put it bluntly, provide Alaskan businesses with an advantage over out-of-state businesses post-Federal legalization. Pre-Federal legalization, the distributor license would be intended to allow a facility to purchase marijuana and marijuana products from varying licensed operators, as a hub/distribution center. The distributor would then have the ability to repackage marijuana and marijuana products, roll joints, create new branding, and simplify the process for smaller operators. For example, a limited cultivator might not want to perform (or be the best at) marketing with retailers across the state, and might not have the logistical prowess to transport to multiple retailers, package their small harvest into consumer ready packaging, and might be more viable as a business model if there were facilities where they could sell, in bulk, each harvest, and then let the distributor trim the marijuana, test the marijuana, handle the tax filings under the distributor's license, and then package and brand the marijuana for direct consumer sale. This would also allow a distributor to re-direct bud/flower/trim to manufacturer in a manner that would be efficient and make the most business sense instead of being strong armed by the regulations, which have restrictions such as a retailer cannot transport flower/trim to a manufacturer. All of these details and a discussion about what would be best for the industry, while protecting consumer health and safety, would be ideally flushed out in the public comment and Board deliberation process. All of these same benefits could apply to manufacturers whom need a distributor to market their product and transport to retailers. *I would recommend that any existing marijuana licensee be able, within 24 months of enacting this new license type, be permitted to apply for a license (or be automatically endorsed by the State as a distributor) at no license fee cost and then thereafter, a limited amount of distributor licenses be granted on a merit-based system annually.* Merit based considerations would be based on the applicant's ability to demonstrate clear understanding of the applicable regulations, health and safety codes, and tax compliance, in addition to any other areas the Board would like to impose or as generated by Public Comment. I would recommend that after the initial year of this license type being available, that the board only issue additional distributors' licenses as needed, and in any case no more than two (2) per year.

An important provision to include in the regulations would be to address how this license would impact interstate commerce Post-Federal legalization. Post-



Jana D. Weltzin
Licensed in Alaska & Arizona
901 Photo Avenue, Second Floor
Anchorage, Alaska 99503
Phone 907-231-3750
JDW Counsel
jana@jdwcounsel.com

Federal Legalization, I propose that the regulations require that only distributors that are licensed by this Board be allowed/authorized to import and export marijuana and marijuana products to and from the state of Alaska, just as wholesale distributor AMCO licenses are required for the wholesale distribution of liquor products. Post-Federal legalization, the landscape of the marijuana industry will greatly change, and our Alaskan businesses may be negatively impacted if there are not some safeguards put in place. I believe that creating a limited entry distributor license, with a 24-month window for existing Alaskan licensees to be able to apply and obtain at no cost, would force out of state operators to engage with our Alaskan businesses in order to gain access to the Alaskan marketplace. This layer of protection offered by distributor licenses ensures that post Federal legalization, large out of state corporations cannot come into Alaska and dominate the Alaskan marketplace with no need to contract or do business with existing marijuana licensees. Allowing for 24 months of existing marijuana operators to become distributors gives our existing Alaskan licensees a leg up, without running afoul of the interstate commerce clause. If we create this new license type, big corporations will have to engage in business with our existing Alaskan licensees to compliantly get access to marijuana and marijuana products, because all Marijuana and Marijuana Products would have to be “distributed” through a licensed marijuana distributor.

Much of the infrastructure needed to support distributor licenses already exists. Licensees are already required to submit a transportation plan during the initial licensing process, and Metrc creates trip manifests which accompany marijuana in transit. Both of these structures can be easily adapted to meet new licensing requirements.

Let me be clear, I absolutely believe we still need a capped licensed system in Alaska to protect Alaskans’ investments and to create an industry where locally owned businesses can survive. I also believe we should cap the number of licenses owned by one entity or person(s). I feel if this does not happen, Alaska will fail to protect its only Alaskan owned industry and that would be a huge disservice. Therefore, I present this distributor concept with the understanding that capping the licenses has its pros, cons, supporters, and dissenters, and that little traction or discourse on the topic has occurred, at the very least this proposal will provide some economic protection to existing licensees. Additionally, even when one does not consider the impact Federal Legalization will have on this industry, creating a distributor license type has business benefits to existing operators. When federal



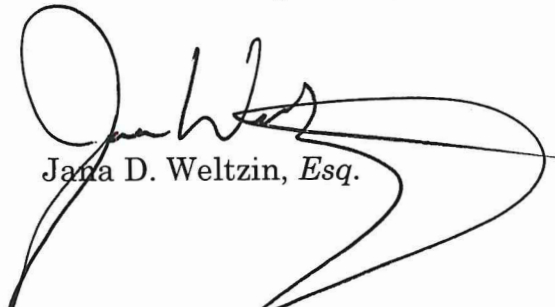
Jana D. Weltzin
Licensed in Alaska & Arizona
901 Photo Avenue, Second Floor
Anchorage, Alaska 99503
Phone 907-231-3750
JDW Counsel
jana@jdwcounsel.com

legalization happens, and it will happen, small Alaskan businesses will be forced to compete with multi-million dollar corporations, who will be able to over saturate the market with product grown and produced at much lower costs, driving down prices to fractions, until they force mom n' pop shops out of business. This will be **especially** harmful to local cultivators and manufacturers, as large corporations will be able to ship in vast quantities of cannabis and sell directly to retail stores. Small producers, who are unable to compete with low overseas wages, increased regulatory oversight, and bulk discounts, will be cut out of the market. Mom n' Pop businesses are a cornerstone of the Alaska economy, circulating money directly back into their local economies, supporting local businesses, and local causes. Small business owners eventually retire, staying in Alaska and supporting our diverse economy. Outside corporations send their profits to out-of-state and foreign shareholders, draining money from Alaska. Force these out-of-state operators to engage in meaningful business with our Alaskan licensees by creating the license type "Distributors" – require all marijuana and marijuana products that come from out of the state after Federal legalization to only come through via the use of Distributors.

Your role as regulators is to regulate this industry in a manner that protects health, families and public safety, foster business growth and diversification of our economy. You cannot fulfill this role if small businesses are quashed by outside investments. To be part of the solution vs. part of the problem, the regulations need to be amended in a manner that will require out-of-state importers to be accountable.

Thank you for your consideration and thank you for your continued hard work, dedication, and commitment to the success of this regulated industry.

Truly and Sincerely Yours,



Jana D. Weltzin, Esq.