

Date: 1/12/2023

To: Alaska Marijuana Control Board (MCB)
amco.regs@alaska.gov

From: Alaska Marijuana Industry Association (AMIA)
president@alaskamia.org



Re: General Public Comment to the Marijuana Control Board

The Alaska Marijuana Industry Association (AMIA) would like to acknowledge this last year's regulatory work. The Marijuana Control Office and Board has made leaps and bounds in regulatory changes that are helping cannabis businesses and facilitating economic growth. While we still have changes and obstacles to overcome in the coming years this body of government is truly working together and creating a better regulatory framework. Thank you AMCO and board members!

In the last few months changes to regulations, such as, introduction of seeds and clones and being able to revoke acceptance of cannabis and cannabis products have gone into place and our helping facilitate commerce. There has only been one issue raised recently and that's the language of "without compensation" in 3 AAC 306.405(a)(9). We believe the intent of the board is to create regulations that promote honorable commerce. This language of the regulation, while having good intent of preventing diversion, has also effectively created a scenario where in order to purchase reputable genetics from legal sources either an owner or staff member must pay and must give it to the company without reimbursement. What other industries operate this way and was this the intent of the board?

The issue of individual plant tags is still a high priority for our membership. Many states have transitioned regulatory language that does not require individual radio frequency tags on each plant. Instead, allowing a batch of plants to be under a single tag. The current tags are not perfect either. We know that moisture affects these tags and can make them inoperable for scanning. And while the board did open a regulations project to change tagging height requirements, it still only addresses the issue partially. We believe that our industry is capable of maintaining excellent seed to sale tracking, without such a heavy cost to cultivators. A single cultivation business can spend upwards of 5 thousand dollars in a single year on METRC tags alone!

Lastly, we want to again acknowledge all the hard work and public service provided by Nick Miller and Eliza Muse. We would not be where we are at as an Alaskan cannabis industry without your effort to understand and create regulations that facilitate commerce while keeping public health and safety in mind. These shoes will not be filled easily, you both have gone above and beyond in your roles as regulators, and we want to take a moment to acknowledge both of you. Thank you for your service!

It was also brought to our attention that the head of enforcement, Mr. James Hoelscher has found a new position as Director of VPSO. We know he will be a great fit for that program and sincerely appreciate the time Mr. Hoelscher took to educate himself in a new industry and facilitate a culture where self-reporting was rewarded. Mr. Hoelscher has been a very important voice for public safety, helping to guide our nascent industry. Thank you, James.

We would also like to give a nod of sincere gratitude to Ms. Carrie Craig for her excellence while with the AMCO office. Carrie's dedication to not only the program but the people within it, will be missed. We have appreciated you and the respect you have shown to our industry. Thank you Carrie!

In conclusion, we are proud of where we are at as an industry. We are committed to working hard alongside you to solve our challenges. The efforts of the AMCO staff, Director Wilson, and this board is truly appreciated. Thank you.

Respectfully,

AMIA Board of Directors
Ryan Tunseth, President



Date: 01/11/2024

To: Eliza Muse
Alaska Marijuana Control Board

From: Alaska Marijuana Industry Association (AMIA)
Board of Directors

Dear Ms. Muse,

We are writing to express our sincere gratitude for your dedicated service to the Alaska Marijuana Control Board, public health seat. Your commitment to promoting public health and ensuring the responsible regulation of the marijuana industry has not gone unnoticed, and we at the Alaska Marijuana Industry Association are truly thankful for your valuable contributions.

Your expertise in addressing the complex issues surrounding marijuana regulation have played a pivotal role in fostering a balanced and well-regulated industry. Your dedication to public health and safety has not only strengthened the foundation of our industry but has also helped build trust among stakeholders and the community at large.

We appreciate the open lines of communication that you have maintained with industry members, taking the time to understand our concerns and perspectives. Your approachability and willingness to collaborate have been instrumental in creating a cooperative environment that benefits both the industry and the public.

As a representative of the cannabis industry in Alaska, I want to acknowledge and commend your outstanding contributions to our industry. As you know, we were initially opposed to your appointment. That was a mistake. You certainly have won us over with your knowledge, grace, and kind temperament. You have always treated everyone in our industry with the utmost respect.

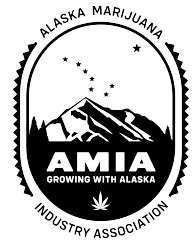
Thank you, Ms. Muse, for your unwavering dedication to public service and your role on the Alaska Marijuana Control Board. We look forward to continued collaboration and the positive advancements that your leadership will undoubtedly bring to our industry.

If there is anything we can do to support your efforts or if you have any specific concerns from the industry that you would like to discuss further, please do not hesitate to reach out.

Best Regards,

A handwritten signature in blue ink that reads "Ryan Tunseth". The signature is fluid and cursive, with the first name "Ryan" being more prominent than the last name "Tunseth".

Ryan Tunseth
President, AMIA
Board of Directors



Date: 1/11/24

To: Mr. Nick Miller
Chair, Alaska Marijuana Control Board

From: Alaska Marijuana Industry Association
Board of Directors

Re: Heartfelt Thanks for Your Service as Chair of the Alaska Marijuana Control Board

Dear Mr. Miller,

On behalf of the Alaska Marijuana Industry Association (AMIA), we extend our deepest gratitude and appreciation for your exemplary service and dedicated tenure as the Chair of the Alaska Marijuana Control Board.

Your leadership has been instrumental in shaping the regulatory landscape for the cannabis industry in our state. Throughout your term, you have demonstrated a steadfast commitment to fostering a responsible and sustainable cannabis industry while ensuring public safety and welfare. Your tireless efforts and dedication have not gone unnoticed, and the impact of your leadership will resonate within our community for years to come.

Under your guidance, the Alaska Marijuana Control Board has successfully navigated complex challenges, and your ability to balance the interests of industry stakeholders, regulatory requirements, and community concerns has been commendable. Your inclusive approach has created an environment of collaboration, enabling meaningful dialogue and progress within the cannabis sector.

We also want to express our appreciation for your accessibility and openness to dialogue with industry representatives. Your willingness to engage with stakeholders, listen to concerns, and work towards solutions has strengthened the relationship between the board and the cannabis community.

As you transition from your role as Chair, please accept this letter as a small token of our immense appreciation for your service. Your legacy as Chair of the Alaska Marijuana Control Board is one of integrity, dedication, and positive impact. We wish you continued success in your future endeavors.

Once again, thank you, Mr. Miller, for your outstanding service to the Alaska's cannabis industry.

Sincerely,

Ryan Tunseth
President
Alaska Marijuana Industry Association

From: Tyler Rifley <sales@hempcoak.com>
Sent: Tuesday, January 23, 2024 4:08 AM
To: AMCO Admin (CED sponsored)
Cc: CED AMCO Enforcement (CED sponsored); Marijuana Licensing (CED sponsored)
Subject: New Regs/Industrial Hemp

Categories: Green Category

You don't often get email from sales@hempcoak.com. Learn why this is important
<<https://aka.ms/LearnAboutSenderIdentification>>

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello! My name is Tyler, I own a cannabis company in Anchorage called Rolling Stoned Hemp Co. We do delivery! Cool right? We're rolling in more than just one way. See what I did there?

We're going to be advertising that message across Alaska radio, and other public platforms soon as well. Almost verbatim. Can't wait!!! Exciting right? Good thing it's federally legal! DAMN that's really really gonna piss some people off in the "real" cannabis industry! Am I right? Im sure you guys will reach out to stations to try and shut that down so this will be wonderfully fun!

The fine gents running the hemp program mentioned to me amco walked all over them and forced these new rules into place. They also mentioned to me that you guys wouldn't even be able to figure out how to write up a fine! So I guess we'll see if the goons show up. But seriously, be better than that guys! Enough with your criminal prosecution and fine threats which I've already received two of from the hemp program.

You should know, I've had my fair share of legal run ins. Look me up! I'm sure you'll be just fucking thrilled you gotta deal with this! LOTS of people know I am not afraid to get down and dirty with the government! Hell I even won a federal criminal trial! And I give ZERO craps.. about what it might cost in money, time, or even my freedom to prove my point. My point here is that Im no longer a criminal. I know the law and follow it. I'm someone who got out of the system, got a college education, started multiple business, and am part of the small percentage of people that get out of the system and become successful.

I know I'm in the right. I know that you'll want to come kick my door down because you're a bunch of overzealous tyrants. But you won't! Or maybe you will? See why this is so much fun! Now I get to be surprised!!

I think you won't though. Because the activities my company engages in are covered under the 2018 farm bill! Otherwise I wouldn't have started this business a few months ago, even after being advised not to by the hemp people because of what was coming down the pike. :)

Here's a couple copy and pastes of the legal information you should be aware.

1.

Under federal law, Delta 9 THC is classified as a Schedule I drug, making it illegal in the United States. However, hemp-derived Delta 9 THC is allowed under federal law as long as it has less than 0.3% Delta 9 THC on a dry-weight basis.

2.

The Supremacy Clause of the Constitution of the United States

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fen.m.wikipedia.org%2Fwiki%2FConstitution_of_the_United_States&data=05%7C02%7Cmarijuana.licensing%40alaska.gov%7C19d29727c592485a0cb308dc1c146b14%7C20030bf67ad942f7927359ea83fca38%7C0%7C0%7C638416122230884217%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C62000%7C%7C%7C&sdata=NyJNOMgarFsLIFAKxr3wLXambLNr7ym2BCFWwpujr4g%3D&reserved=0> (Article VI, Clause 2

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fen.m.wikipedia.org%2Fwiki%2FArticle_Six_of_the_United_States_Constitution%23Supremacy&data=05%7C02%7Cmarijuana.licensing%40alaska.gov%7C19d29727c592485a0cb308dc1c146b14%7C20030bf67ad942f7927359ea83fca38%7C0%7C0%7C638416122230892423%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C62000%7C%7C%7C&sdata=GpaNvfWpZ%2BmdZakDMXY3Pp16B8tflpG19xnEHDne%2BA%3D&reserved=0>) establishes that the Constitution, federal laws

<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fen.m.wikipedia.org%2Fwiki%2FLaw_of_the_United_States&data=05%7C02%7Cmarijuana.licensing%40alaska.gov%7C19d29727c592485a0cb308dc1c146b14%7C20030bf67ad942f7927359ea83fca38%7C0%7C0%7C63841612223089888%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C62000%7C%7C%7C&sdata=XzDxrZiG3b3Mf12%2FaK55UDQS9Eg134kPMV21xZhweow%3D&reserved=0> made pursuant to it, and treaties

<<https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fen.m.wikipedia.org%2Fwiki%2FTreaty&data=05%7C02%7Cmarijuana.licensing%40alaska.gov%7C19d29727c592485a0cb308dc1c146b14%7C20030bf67ad942f7927359ea83fca38%7C0%7C0%7C638416122230904156%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C62000%7C%7C%7C&sdata=oL4mgipNT5RXXM90ZEjvFUhUpQah6Fg5AGqYkvDGQ%3D&reserved=0>> made under its authority, constitute the "supreme Law of the Land", and thus take priority over any conflicting state laws

<[https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fen.m.wikipedia.org%2Fwiki%2FState_law_\(United_States\)&data=05%7C02%7Cmarijuana.licensing%40alaska.gov%7C19d29727c592485a0cb308dc1c146b14%7C20030bf67ad942f7927359ea83fca38%7C0%7C0%7C638416122230913015%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C62000%7C%7C%7C&sdata=%2BGu4BvWXABiyEuN83iMCJu4%2FV%2F10VCIX2aWw1Qoviw0%3D&reserved=0](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fen.m.wikipedia.org%2Fwiki%2FState_law_(United_States)&data=05%7C02%7Cmarijuana.licensing%40alaska.gov%7C19d29727c592485a0cb308dc1c146b14%7C20030bf67ad942f7927359ea83fca38%7C0%7C0%7C638416122230913015%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I1haWwiLCJXVCi6Mn0%3D%7C62000%7C%7C%7C&sdata=%2BGu4BvWXABiyEuN83iMCJu4%2FV%2F10VCIX2aWw1Qoviw0%3D&reserved=0)> .

CONCLUSION

YOU CANNOT DO SHIT!

At least.. in the long run. I guess we'll see how you guys play this in the short run.

Anyhow, just wanted to drop by and say as long as it remains federally legal, which it currently is, we will continue to do and sell whatever products we please, with or without Alaska's permission since we don't need it. 😊 fancy that. (provided that they're cleared federally, which as of this writing all of our products are).

As soon as Alaska comes into compliance with the Supreme Law of The Land, which makes all my shit supremely fucking legal... we will once again apply and pay for a license from the Hemp program here. Until then, not much you guys can do to stop me. I'm not regulated by you. Nor am I regulated by the hemp people anymore.. since their new regs, (that

AMCO PUBLICLY ADMITTED BEING INVOLVED IN DRAWING UP) coincidentally, bans all hemp derived thc products and in turn violates federal law.

Joan Joan Joan. Regulation by enforcement doesn't work. you're attempting to crush a FEDERALLY LEGAL thriving industry because it's disrupting and replacing one that you regulate, and (I've heard from some birdies, you may even have investments in) Conflict ya think?

A copy of this email will be with my attorneys as well.

Much wow.



Tyler Rifley - CEO
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