

Advisory Notice

(3AAC 306.805)

Date: 6-4-18

Licensee:

DBA:

License #/Type: All Marijuana Licensees

Address:

This is a notice to you as licensee that an incident has occurred or a defect is noted that could result in a violation of a statute, regulation or municipal ordinance.

Note: This is not an accusation or a criminal complaint.

1. A reminder to all cultivators that if you give a sample of your product to a retailer, you must track it in METRC and create a manifest.

Your attention is directed to 3 AAC 306.405: Standard marijuana cultivation facility: privileges and prohibited acts, 3 AAC 306.435: Marijuana inventory tracking system, 3 AAC 306.750: Transportation and 3 AAC 306.755: Business records

2. Regulations regarding quality control samples - effective 5-25-18.

The Marijuana Control Board will be reviewing a quality control form during the upcoming June 2018 meeting. In order to stay in compliance with regulation, licensees will need to wait until the form is approved by the board prior to providing samples for quality control.

Your attention is directed to 3 AAC 306.460(d): Samples; 3 AAC 306.557: Quality Control sampling;

3. Regulation regarding reporting theft and similar activities on licensed premises - effective 5-25-18.

Licensees will notify AMCO as soon as reasonably practical and in any case no more than 24 hours after any unauthorized access to the premises or the establishment's knowledge of evidence or circumstances that reasonably indicate theft, diversion or unexplained disappearance of marijuana, marijuana products, or money from the licensed premises.

Your attention is directed to 3 AAC 306.715(e): Security alarm systems and lock standards

Approved: James Hoelscher

Issuing Investigator: J. Hamilton

Received by:

SIGNATURE:

SIGNATURE:

Delivered VIA: Email

Date:

Byron Mallott
Lieutenant Governor
State Capitol
Juneau, Alaska 99811
907.465.3520
WWW.LTGOV.ALASKA.GOV



530 West 7th Ave, Suite 1700
Anchorage, Alaska 99501
907.269.7460
LT.GOVERNOR@ALASKA.GOV

**OFFICE OF THE LIEUTENANT GOVERNOR
ALASKA**

MEMORANDUM

TO: Micaela Fowler
Department of Commerce, Community & Economic Development

FROM: Scott Meriwether, Office of the Lieutenant Governor
465.4081

A handwritten signature in blue ink, appearing to read "Scott Meriwether".

DATE: April 25, 2018

RE: Filed Permanent Regulations: Marijuana Control Board

Marijuana Control Board: Regulations re: quality control samples and reporting theft and similar activities on licensed premises (3 AAC 306.460(d); 3 AAC 306.557; 3 AAC 306.715(e))

Attorney General File:	JU2017200542
Regulation Filed:	4/25/2018
Effective Date:	5/25/2018
Print:	226, July 2018

cc with enclosures:

Linda Miller, Department of Law
Judy Herndon, LexisNexis

ORDER CERTIFYING THE CHANGES TO
REGULATIONS OF THE MARIJUANA CONTROL BOARD

The attached three pages of regulations, dealing quality control of marijuana and reporting of a crime on the licensed premises, are certified to be a correct copy of the regulation changes that the Marijuana Control Board adopted at its November 29, 2017 meeting, under the authority of AS 17.38.121 and after compliance with the Administrative Procedure Act (AS 44.62), specifically including notice under AS 44.62.190 and 44.62.200 and opportunity for public comment under AS 44.62.210.

This action is not expected to require an increased appropriation.

On the record, in considering public comments, the Marijuana Control Board paid special attention to the cost to private persons of the regulatory action being taken.

The regulation changes described in this order take effect on the 30th day after they have been filed by the lieutenant governor, as provided in AS 44.62.180.

Date: 2/13/18



Erika McConnell, Director

FILING CERTIFICATION

I, Byron Mallott, Lieutenant Governor for the State of Alaska, certify that on

April 25, 2018 at 9 A.m., I filed the attached regulations according to the provisions of AS 44.62.040 - 44.62.120.



Lieutenant Governor

Effective: May 25, 2018.

Register: 226, July 2018

3 AAC 306.460 is amended by adding a new subsection to read:

(d) A ~~licensed~~ ^{who} marijuana cultivation facility may provide a sample of marijuana to an employee of the facility, ~~that~~ ^{who} is in possession of a valid marijuana handler card for the purpose of quality control only if ^{do}

(1) samples provided to employees for quality control ~~does~~ ^{do} not exceed a cumulative total of one ounce per 30-day period;

(2) each sample is registered and tracked using the marijuana inventory tracking system in accordance with 3 AAC 306.730;

(3) consumption of marijuana does not occur on the licensed premises;

^{provided under this subsection} (4) no sample is ~~resold~~ ^{or given} to another licensee or consumer;

(5) each employee who receives a marijuana sample for the purpose of quality control completes a quality control form ^{approved} ~~prescribed~~ by the board for each sample; ~~and~~

(6) the licensee maintains copies of completed forms required under (5) of this subsection in accordance with 3 AAC 306.755; ^{is; and}

^{samples} (7) ~~marijuana~~ ^{are} that leaves ^{is} the licensed premises ~~must be~~ packaged in opaque, resealable, child-resistant packaging and clearly marked or labeled "For Quality Control" and the packaging ~~must be~~ ^{is} designed or constructed to be significantly difficult for children under five years of age to open, but not normally difficult for adults to use properly. (Eff. 5/25/2018)

Register 226)

Authority: AS 17.38.010 AS 17.38.150 AS 17.38.200
AS 17.38.070 AS 17.38.190 AS 17.38.900
AS 17.38.121

3 AAC 306 is amended by adding a new section to read:

3 AAC 306.557, Quality Control sampling, ^{lowercase} (a) A ^{add the period} licensed marijuana product manufacturing facility may provide a sample of marijuana concentrate or other marijuana product to an employee of the facility, ^{who} that is in possession of a valid marijuana handler card for the purpose of quality control only if:

^{lowercase} (1) Samples provided to employees for quality control do not exceed a cumulative total set out in 3 AAC 306.355 in a 30-day period;

(2) each sample is registered and tracked using the marijuana inventory tracking system in accordance with 3 AAC 306.730;

^{provided under this section} (3) consumption of marijuana does not occur on the licensed premises;

^{or given} (4) no sample is ~~resold~~ to another licensee or consumer;

(5) each employee who receives a marijuana sample for the purpose of quality control completes a quality control form ^{approved} prescribed by the board for each sample; ~~and~~

(6) the marijuana cultivation facility licensee maintains copies of completed forms required under (5) of this subsection in accordance with 3 AAC 306.755 ^{and}

^{samples} (7) ~~marijuana~~ that leaves the licensed premises ^{are} must be packaged in opaque, resealable, child-resistant packaging and clearly marked or labeled "For Quality Control" and the packaging ^{is} must be designed or constructed to be significantly difficult for children under five years of age to open, but not normally difficult for adults to use properly. (Eff. 5/25/2018)

Register 226)

Authority:	AS 17.38.010	AS 17.38.150	AS 17.38.200
	AS 17.38.070	AS 17.38.190	AS 17.38.900
	AS 17.38.121		

3 AAC 306.715 is amended by adding a new subsection to read:

(e) A marijuana establishment ^{shall} will notify the ^{Department of Commerce, Community, and Economic Development,} Alcohol and Marijuana Control Office as soon ^{any} ^{not} as reasonably practical and in ~~no~~ case more than 24 hours after any unauthorized access to the premises or the establishment's knowledge of evidence or circumstances that reasonably indicate theft, diversion or unexplained disappearance of marijuana, marijuana products, or money from the licensed premises. (Eff 2/21/2016, Register 217; am 5/25/2018, Register 226)

Authority: AS 17.38.010 AS 17.38.150 AS 17.38.200
AS 17.38.070 AS 17.38.190 AS 17.38.900
AS 17.38.121

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: Wednesday, May 30th, 2018.

License #/Type: Lic. #10959 Standard Marijuana Cultivation

Licensee: Troy Millhouse

Address: 101 Post Rd. Anchorage, AK 99501

DBA: Green Go, LLC

AMCO Case #: AB18-0616

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On Wednesday, May 30th, 2018 at approximately 9:00 am, the State of Alaska Alcohol & Marijuana Control Enforcement Investigators were in the neighborhood of Green Go, LLC on Post road in Anchorage, AK and did detect a strong odor of marijuana coming from the ventilation system attached to Green Go's licensed premises. The strong odor of marijuana was easily detected outside of the facility and on the public right of way. Vegetative marijuana plants were improperly tagged in the Green Go, LLC facility and an unapproved pesticide containing bicycloheptene dicarboximide was being used throughout the vegetative plant rooms.

Please regard this Notice of Violation as Enforcements directive that Green Go, LLC will ensure that any marijuana at the facility does not emit an odor that is detectable by the public outside of the marijuana cultivation facility, place all RFID tags onto the vegetative marijuana plants that can support the tag and all marijuana plants must be tracked in METRC, use only State of Alaska approved Insecticides in accordance to your operation plan.

Your attention is directed to:

- 3 AAC 306.430 Restricted access area. (c)(2)
- 3 AAC 306.420. Application for marijuana cultivation facility license(2)(B)(C)
- 3 AAC 306.405. Standard marijuana cultivation facility: privileges and prohibited acts(a) (4)
- 3 AAC 306.435. Marijuana inventory tracking system(a)

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: K. Whiteman

Received by:

SIGNATURE: 

SIGNATURE:

Delivered VIA: Mail

Date:

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. *f*

**Green Go, LLC
101 Post Rd
Anchorage, AK 99501**



9590 9402 3271 7196 4206 24

2. Article Number (Transfer from service label)

PS Form 3811, July 2015 PSN 7530-02-000-9053

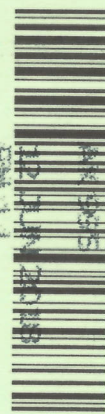
COMPLETE THIS SECTION ON DELIVERY

- A. Signature *[Signature]* ☐ Agent ☒ Address
- B. Received by (Printed Name) *Trey Miller* C. Date of Delivery *6-12-18*
- D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type
- ☐ Priority Mail Express®
 - ☐ Registered Mail™
 - ☐ Registered Mail Restricted Delivery
 - ☐ Certified Mail®
 - ☐ Certified Mail Restricted Delivery
 - ☐ Collect on Delivery
 - ☐ Collect on Delivery Restricted Delivery
 - ☐ Insured Mail
 - ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

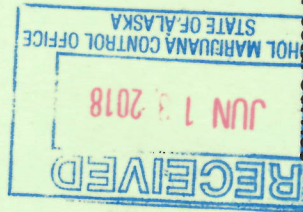
USPS TRACKING#



9590 9402 3271 7196 4206 24

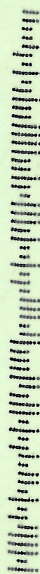
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

**United States
Postal Service**



• Sender: Please print your name, address, and ZIP+4® in this box.

**Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501**



Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 05/31/2018

Licensee: Aurora Blaze, LLC

DBA: Aurora Blaze, LLC

License #/Type: 12328 / Standard Marijuana Cultivation Facility

Address: 2693 Arla Street, Fairbanks, AK 99709

AMCO Case #: AB18-0517

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 05/07/2018, AMCO Enforcement received information from METRC reporting entries of marijuana plants in your METRC inventory showing a plant life cycle of less than 14 days. In a review of the your METRC inventory I found 30 plants of the Rollex OG strain that were all listed as planted on 01/04/2018, they were all reported in vegetative stage on 02/21/2018 and then all 30 plants were placed in flowering stage on 02/22/2018. This indicates the 30 plants all shared a one day vegetative stage.

I spoke with Brittany GITSCHEL. She informed me the plants were entered into vegetative stage late because of a communication error between their growers and office personnel. GITSCHEL said the batch should have moved into vegetative state 01/18/2018 rather than 02/21/2018. GITSCHEL said the plants were tagged at the appropriate time. GITSCHEL said the reported flowering stage date of 02/22/2018 was correct.

Your attention is directed to:

3 AAC 306.435 (a) Marijuana inventory tracking system

3 AAC 306.730 (a) Marijuana inventory tracking system

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: M. Chiesa

Received by:

SIGNATURE: 

SIGNATURE:

Delivered VIA: Mail

Date:



2693 Arla Street – Fairbanks, AK 99709
907-479-2079
www.aurorablaze.com

August 6, 2018

Aurora Blaze, LLC (License #12328) received a Notice of Violation (AMCO Case #AB 18-0517) on May 31, 2018 for reporting late a move of 30 plants of Rollex OG into the vegetative stage of Metrc. This happened due to a communication error between Aurora Blaze's office personnel and our growers. The plants should have moved into the vegetative stage in Metrc on January 18, 2018 instead of February 21, 2018 and we apologize for the mistake. We have since taken steps to better our communication between the two departments so that this error does not happen again.

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 05/31/2018

License #/Type: 12328 / Standard Marijuana Cultivation Facility

Licensee: Aurora Blaze, LLC

Address: 2693 Arla Street, Fairbanks, AK 99709

DBA: Aurora Blaze, LLC

AMCO Case #: AB18-0517

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 05/07/2018, AMCO Enforcement received information from METRC reporting entries of marijuana plants in your METRC inventory showing a plant life cycle of less than 14 days. In a review of the your METRC inventory I found 30 plants of the Rollex OG strain that were all listed as planted on 01/04/2018, they were all reported in vegetative stage on 02/21/2018 and then all 30 plants were placed in flowering stage on 02/22/2018. This indicates the 30 plants all shared a one day vegetative stage.

I spoke with Brittany GITSCHEL. She informed me the plants were entered into vegetative stage late because of a communication error between their growers and office personnel. GITSCHEL said the batch should have moved into vegetative state 01/18/2018 rather than 02/21/2018. GITSCHEL said the plants were tagged at the appropriate time. GITSCHEL said the reported flowering stage date of 02/22/2018 was correct.

Your attention is directed to:

3 AAC 306.435 (a) Marijuana inventory tracking system

3 AAC 306.730 (a) Marijuana inventory tracking system

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

***Please send your response to the address below and include your Marijuana Establishment License Number in your response.**

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: M. Chiesa

Received by: *Brittany Gitschel*

SIGNATURE: 

SIGNATURE: *Brittany Gitschel*

Delivered VIA: Mail

Date: *6/28/18*

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 06-1-18

Licensee: Aurora Blaze, LLC

DBA: Aurora Blaze, LLC

License #/Type: #12328 Standard Cultivation Facility

Address: 2693 Arla Street, Fairbanks, AK 99709

AMCO Case #: AB 18-000739

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On May 29, 2018 it was found 141 harvest batches had been "finished" in the METRC system with the waste weight being over-reported, causing 100 of the harvest batches to appear they had not generated any packages when in fact they had. The remaining 41 of the harvest batches had never had any packages created from them, to include a package for testing. The destruction of the entire 41 harvest batches was not reported to AMCO with the three day's notification as required by regulation (Waste reporting issue previously addressed in NOV Case AB 18-000529 issued on 5-10-18). The "finishing" of the harvest batches occurred primarily on 5-1-18 and 5-15-18 when the licensee, Brittany Gitschel was attempting to clean up and rectify her METRC account.

This is a violation of: 3 AAC 306.435 Marijuana Inventory Tracking System, 3 AAC 306.730 Marijuana Inventory Tracking System, and 3 AAC.740 (c)(1) Waste Disposal.

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: A. Stonecipher

Received by:

SIGNATURE:



SIGNATURE:

Delivered VIA: Email

Date:

Article #



2693 Arla Street – Fairbanks, AK 99709
907-479-2079
www.aurorablaze.com

August 6, 2018

Aurora Blaze, LLC (License #12328) received a Notice of Violation (AMCO Case #AB 18-000739) on June 1, 2018 for “finishing” 141 harvest batches in Metrc and over reporting waste weights. This was due to a misunderstanding that Investigator Stonecipher has since cleared up for us. In the harvest tab of Metrc the “Moisture Loss” category is actually called “Weight”. This confused our staff, because the weight numbers in that section didn’t match the actual weights we were getting off every strain per harvest. In an effort to fix what we thought was wrong we wasted out the numbers in the “weight” category. Investigator Stonecipher also let us know that harvests shouldn’t be “finished” until every package from a harvest has been sold, so we won’t finish anymore harvests until all product is sold from now on. Regarding the 41 harvest batches that were never tested (due to the small size of each batch amount), those harvests took place before we were properly keeping track of our waste weights and reporting them to AMCO. In the month of May, Aurora Blaze received an NOV for our improper reporting of marijuana plant waste and corrective actions were immediately performed. All waste is now labeled and stored in one area of the building for a minimum of three (3) days under direct camera surveillance. Waste logs are sent to AMCO on a weekly basis to remain in compliance.

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 06-1-18

License #/Type: #12328 Standard Cultivation Facility

Licensee: Aurora Blaze, LLC

Address: 2693 Arla Street, Fairbanks, AK 99709

DBA: Aurora Blaze, LLC

AMCO Case #: AB 18-000739

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On May 29, 2018 it was found 141 harvest batches had been "finished" in the METRC system with the waste weight being over-reported, causing 100 of the harvest batches to appear they had not generated any packages when in fact they had. The remaining 41 of the harvest batches had never had any packages created from them, to include a package for testing. The destruction of the entire 41 harvest batches was not reported to AMCO with the three day's notification as required by regulation (Waste reporting issue previously addressed in NOV Case AB 18-000529 issued on 5-10-18). The "finishing" of the harvest batches occurred primarily on 5-1-18 and 5-15-18 when the licensee, Brittany Gitschel was attempting to clean up and rectify her METRC account.

This is a violation of: 3 AAC 306.435 Marijuana Inventory Tracking System, 3 AAC 306.730 Marijuana Inventory Tracking System, and 3 AAC.740 (c)(1) Waste Disposal.

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: A. Stonecipher

SIGNATURE:



Delivered VIA: Email

Received by: Brittany Gitschel

SIGNATURE: 

Date: 6/21/18

Article #

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 06/07/2018

License #/Type: 10901 / Retail Marijuana Store

Licensee: The High Expedition Company

Address: 13465 E. Main St., Talkeetna, AK

DBA: The High Expedition Company

AMCO Case #: AB18-0644

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 05/10/2018 Michael EMERS from Rosie Creek Farm, standard marijuana cultivation facility license # 10005, contacted AMCO Enforcement to report two packages of marijuana (#0503 & 0504) he delivered to The High Expedition Company, retail marijuana store license #10901, on 05/08/2018 at 1230 hrs. had not yet been entered as "received" in METRC as of 0955 hrs. on 05/10/2018.

I checked METRC and determined the two packages EMERS reported were associated with manifest # 307502. I checked the METRC history of the manifest and discovered it was not entered as received by The High Expedition Company until 05/10/2018 at 0956 hrs. A check of associated business records of both licensees and information provided by designated licensee, Joseph MCANENEY, confirm this shipment was in fact received on 05/08/2018 at 1230 hrs. NOT on 05/10/2018 at 0956 hrs. as reported in METRC.

While checking transportation manifests received by The High Expedition Company, I discovered a second manifest, #327002 (packages 0685, 0686, 0687 and 0688), which was entered into METRC as received on 05/29/2018 at 1549 hrs. This shipment originated from Lady Gray Gourmet Medibles, product manufacturing license # 12254. A check of business records and information received from MCANENEY revealed the shipment was actually received by The High Expedition Company on 05/26/2018 at 1445 hrs.

Your attention is directed to:

3 AAC 306.330(b) Marijuana Inventory Tracking System

3 AAC 306.750(e) Transportation

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: M. Chiesa

Received by:

SIGNATURE: 

SIGNATURE:

Delivered VIA: Mail

Date:



Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

AMCO Case #: AB18-0644

I am responding to a Notice of Violation regarding the above mentioned AMCO case under issuing investigator M. Chiesa.

This is the text of my immediate response to investigator Chiesa via email on 6/5/18:

I did a preliminary analysis of the mishap that occurred with properly receiving the two referenced manifests and the errors had not been brought to my attention by our manager. I instantly realized the mistakes that were made and that my manager failed in notifying AMCO or METRC about the accidental failure to promptly receive these manifests when they were actually delivered to our facility. I had a long and thorough discussion with my manager about the importance of these issues and I have already implemented a new policy with redundancy to alleviate any future possibility of failing to receive the manifests properly.

This is what was done to correct the errors made by my manager and my failure to ensure the redundancy of properly reporting and fixing any errors made when receiving deliveries in METRC. Since the errors, I have been observing and monitoring our new process and it seems to be working very well and will never happen again under this protocol and management.

Thanks for the chance to correct these mistakes and improve my operations.

Best,

Joe McAneney
The High Expedition Co.
Retail License #10901

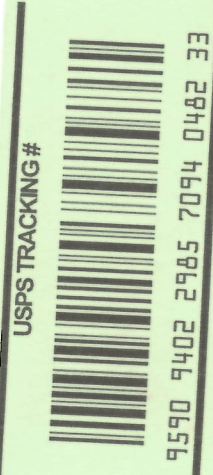
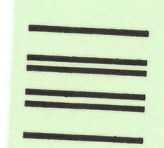
5490-8104

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Avenue, Suite 1600
Anchorage, AK 99501

• Sender: Please print your name, address, and zip in this box.

United States
Postal Service

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10



#GNKCVRLSPSN

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

The High Expedition Company
P.O. Box 1127
Talkeetna, AK 99676



9590 9402 2985 7094 0482 33

2. Article Number (Transfer from service label)

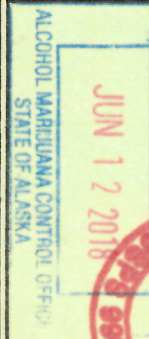
7018 0040 0000 9068 7057

COMPLETE THIS SECTION ON DELIVERY

A. Signature
☒ X

B. Received by (Printed Name) ☐ Agent ☐ Addressee

C. Date of Delivery
JUN 12 2018



3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Registered Mail
- ☐ Registered Mail Express®
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☒ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 06/07/2018

Licensee: Green Life Supply, LLC

DBA: Green Life Supply LLC

License #/Type: 11927 / Retail Marijuana Store

Address: 511 30th Avenue, Fairbanks, AK

AMCO Case #: AB18-0653

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 4/17/2018 Nathan DAVIS, designated licensee from Green Life Supply LLC, retail marijuana store license #11927, contacted AMCO Enforcement to self-report a problem with his premises' point of sale software (MJ Platform) not reporting sales into METRC since early March. DAVIS reported since opening the store on 03/02/2018 he began noticing the cash register till and the end of day sales reports were not matching up. DAVIS stated from the employee's perspective sales appeared to be recording properly and the point of sale gave no indication to the user that the sale was not actually recording. Upon further review he discovered the point of sale software was not properly reporting the sales into the state's mandatory marijuana tracking system, METRC. DAVIS said he attempted to work with the point of sale software company, MJ Freeway, to resolve the reporting discrepancy.

DAVIS attempted to resolve the issue by working with MJ Freeway. After not being able to resolve the reporting discrepancy with MJ Freeway he began working nights programming a new point of sale system. DAVIS closed the store, inventoried all marijuana and marijuana product in the store, cross referenced the inventory with METRC and found the inventory was off. At this point DAVIS contacted AMCO Enforcement to self-report the issue and worked with AMCO Enforcement to implement a plan to correct the problem. DAVIS did not reopen the store until 04/20/2018 after correcting the inventory discrepancy and implementing the new point of sale software system.

Due to the software deficiency each transaction from the marijuana retail store's original point of sale system was not reconciled at the close of each business day with the marijuana inventory tracking system from when the store opened in early March to when the store was closed to conduct an inventory audit in mid-April.

Your attention is directed to:

3 AAC 306.330(c) Marijuana Inventory Tracking System

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: M. Chiesa

Received by:

SIGNATURE: 

SIGNATURE:

Delivered VIA: Mail

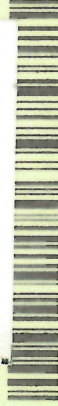
Date:

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Green Life Supply, LLC
863 6th Avenue
Fairbanks, AK 99701



9590 9402 2985 7094 0482 40

2. Article Number (Transfer from service label)

0092 6906 0000 0400 8102

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ Received by (Printed Name) *Ron A Long*

☐ Agent ☐ Addressee

C. Date of Delivery

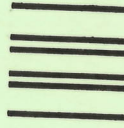
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

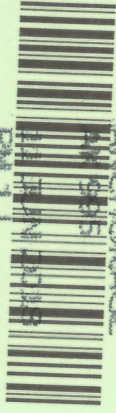
- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail (Limit \$500)
- ☐ Mail Restricted Delivery
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☒ Signature Confirmation®
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

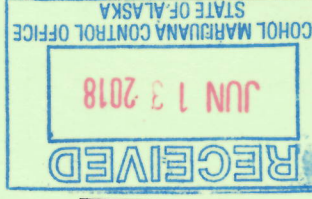


9590 9402 2985 7094 0482 40



USPS TRACKING #

United States
Postal Service



• Sender: Please print your name, address, and ZIP+4® in this box •

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Avenue, Suite 1600
Anchorage, AK 99501

AB18-0653

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 6/14/18

License #/Type: #11053 Retail Store

Licensee: True Dank, LLC

Address: 1550 Cushman Ste. A, Fairbanks AK 99701

DBA: True Dank

AMCO Case #: AB 18-000681

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 5-29-18 it came to Enforcement's attention True Dank was not reporting sales in METRC since April 5, 2018. I, Investigator Stonecipher went to the Retail Store on 5-31-18 to investigate the incident. It was determined the licensees were using Greenbits Point of Sale system to track sales. Greenbits information was not being uploaded into METRC as required. The licensees admitted they failed to check METRC; as they were relying on Greenbits for inventory tracking. The licensees immediately began to contact METRC and Greenbits support systems to rectify the issue.

This is a violation of 3 AAC 306.330 (a) & (c) Marijuana Tracking System.

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: A. Stonecipher

Received by:

SIGNATURE:



SIGNATURE:

Delivered VIA: Email

Date:

Article #

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 6/14/18

License #/Type: #11053 Retail Store

Licensee: True Dank, LLC

Address: 1550 Cushman Ste. A, Fairbanks AK 99701

DBA: True Dank

AMCO Case #: AB 18-000681

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

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3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: A. Stonecipher

SIGNATURE: 

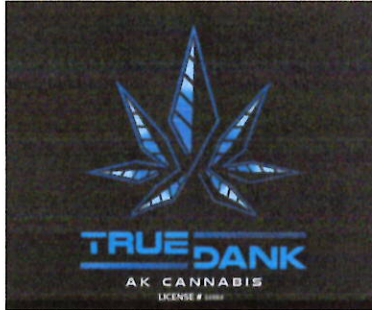
Delivered VIA: Email

Received by: 

SIGNATURE: 

Date: 6-15-18

Article #



June 15, 2018

True Dank
1550 South Cushman St.
Suite A
Fairbanks AK, 99701

Re: True Dank, LLC NOV - Metrc Sales Reporting Case AB 18-000681

Amanda Stoncipher had informed us about an issue with our METRC not reporting any sales from the dates between 4/4/2018 and (at that time the present) 5/30/2018. As soon as this was brought to our attention, we immediately contacted METRC and GreenBits (our retail POS) customer service and tried to figure out the issue.

After being bounced between both companies, the issue was resolved and GreenBits had reported all the backlog of sales to METRC and has been reporting properly since.

We realize that this could have been caught and resolved a lot earlier if we had been checking METRC sales reports for True Dank instead of relying solely on GreenBits. We will now make it a point to check our METRC sales reports every night to make sure the info is flowing properly.

Sincerely,

Travis Fraser
NorthLink / True Dank
Owner
(907) 378-7437

Notice of Violation

(3AAC 306.805)

DBA: Matanuska Medicine Woman

Date: 6-20-18

Limited Cultivation #12062

Name: Matanuska Medicine Woman, LLC

Address: 13840 W. Shangrila Avenue, Wasilla, AK 99623

AMCO Case # AB18-0731

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

AMCO Investigators received information that in January of 2018 you had a change of ownership percentages; from all three members being 33 1/3 percent to the following:

Anthony Olivieri to 49.5
Vanessa Liston-Cunningham to 1
Zallman Liston to 49.5

You did not notify the Board in the prescribed time.

Your attention is referred to 3AAC306.040(a) & (d)(2): Ownership change to be reported to the board.

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

***Please send your response to the address below and include your Marijuana Establishment License Number in your response.**

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Joe Hamilton

F.R. (Joe)
Hamilton

Digitally signed by F.R.
(Joe) Hamilton
Date: 2018.06.20
10:00:35 -08'00'

Certified Mail

Received by

Signature

Date: 6-20-18

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 06/21/2018

License #/Type: 10278 / Retail Marijuana Store

Licensee: GoodSinse LLC

Address: 2604 Davis Road, Fairbanks, AK

DBA: GOODSINSE LLC

AMCO Case #: AB18-0751

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 06/05/2018 AMCO Enforcement received information GoodSinse LLC had advertisements for marijuana or marijuana product that did not contain the warnings required pursuant to Alaska Marijuana Regulations posted on Instagram.

I visited the GoodSinse Instagram page, <https://www.instagram.com/goodsinse/>, and found 74 posts to page. On the main page there were no required warnings posted. I opened each of the 74 posts on the GoodSinse Instagram page. Of the 74 posts I discovered 44 of them advertised marijuana or marijuana product and did not contain the required warnings. The posts were date stamped between 03/07/2017 and 12/12/2017.

This is a violation of 3 AAC 306.360. Restriction on advertising of marijuana and marijuana products:

(e) All advertising for marijuana or any marijuana product must contain each of the following warnings:

- (1) "Marijuana has intoxicating effects and may be habit forming and addictive.";
- (2) "Marijuana impairs concentration, coordination, and judgment. Do not operate a vehicle or machinery under its influence.";
- (3) "There are health risks associated with consumption of marijuana.";
- (4) "For use only by adults twenty-one and older. Keep out of the reach of children.";
- (5) "Marijuana should not be used by women who are pregnant or breast feeding."

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: M. Chiesa

Received by:

SIGNATURE:

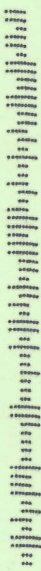


SIGNATURE:

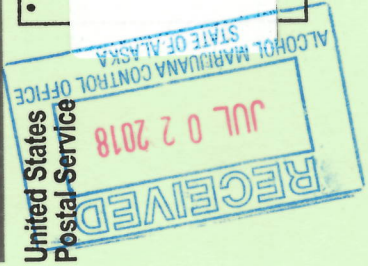
Delivered VIA: Mail

Date:

Article # 7018 0040 0000 9068 7088



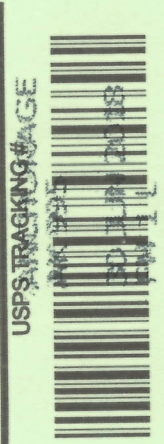
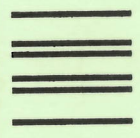
Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Avenue, Suite 1600
Anchorage, AK 99501



• Sender: Please print your name, address, and ZIP+4® in this box •

22 1840 4602 5862 2046 0656

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10



USPS TRACKING

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

GoodSine LLC
2750 Park Way
North Pole, AK 99705



9590 9402 2985 7094 0481 72

2. Article Number (Transfer from service label)

7018 0040 0000 9058 7088

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ *David J. [Signature]* ☐ Agent
B. Received by (Printed Name) ☐ Addressee

C. Date of Delivery
6/26

D. Is delivery address different from item 1? ☒ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
- ☐ Adult Signature
 - ☐ Adult Signature Restricted Delivery
 - ☒ Certified Mail®
 - ☐ Certified Mail Restricted Delivery
 - ☐ Collect on Delivery
 - ☐ Collect on Delivery Restricted Delivery
 - ☐ Restricted Delivery
 - ☐ Priority Mail Express®
 - ☐ Registered Mail™
 - ☐ Registered Mail Restricted Delivery
 - ☐ Return Receipt for Merchandise
 - ☒ Signature Confirmation™
 - ☐ Signature Confirmation Restricted Delivery

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 06/22/2018

Licensee: James Barrett

DBA: Rainforest Farms, LLC

License #/Type: 10050 / Retail Marijuana Store

Address: 216 2nd St., Juneau, AK 99801

AMCO Case #: AB18000624

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 05/30/2018 AMCO enforcement received a Error Package Adjustment report from METRC showing Rainforest Farms, LLC having reported 108 packages adjusted for the reason of "In-House Quality Control" totaling 12.12+ lbs.

Speaking with James and Giono Barret, owners of Rainforest Farms, LLC they thought that was how to report waste from a retail store. James informed me it was all wasted and disposed of. I requested the video from the office where the waste was to take place.

Upon entering in the office it was apparent the camera had been moved and I was unable to see where the waste took place.

Upon review video of May 27, 2018 0600 hours, I observed James Barrett taking cash out of the safe and what appears to be him counting the cash and placing it in a suitcase. I did not observe any waste being placed in the suitcase. James walks out of the office approximately three minutes later with two suitcases and a satchel.

On 06/07/2018 I met with James Barrett at Rainforest Farm retail. James informed me he made a mistake in an excel formula and had misreported sales amounts for the last 2 1/2 months. He was instructed to work with METRC to fix the issue.

3 AAC 306.310. Acts prohibited at retail marijuana store(b)(1)

3 AAC 306.330. Marijuana inventory tracking system (a),(c) &(d) 108 entries

3 AAC 306.720. Video surveillance (a) &(c)

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: S. Johnson

Received by:

SIGNATURE:

SIGNATURE:

Delivered VIA: Mail

Date:

From: James Barrett
To: [CED AMCO Enforcement \(CED sponsored\)](#)
Subject: Response to Notice of Violation Case #AB18000624
Date: Sunday, July 08, 2018 11:18:51 AM
Attachments: [Response to Notice of Violation Case #AB18000624.pdf](#)

AMCO,

Attached you will find our correspondence and explanation regarding the Notice of Violation (Case #AB18000624) for Rainforest Farms.

Please let me know if you have any further questions as we are eager to rectify any apparent issues.

Sincerely,

James Barrett
Rainforest Farms, LLC
907-957-4751

CONFIDENTIALITY NOTICE: This email message including any attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, or disclosure is prohibited.

Rainforest Farms, LLC
License 10050
Response to Notice of Violation
Case #AB18000624

7/05/2018

AMCO,

In response to the NOV₇ received I will do my best to clarify what has happened in this situation.

The Error Package Adjustment report received by AMCO was due to simple entry error.

As we purchase bulk flower product, it is brought to our store and packaged. After it is packaged, **the weight packaged is deducted from the bulk weight packaged which gives us the amount that should be entered into METRC as "waste, scale variance, or drying loss"**.

For example, if 450 grams are purchased, roughly 400 grams will be packaged and sold to consumers, 10 - 25 grams will be loss due to drying, 10-20 from scale variances, many stems will be also be removed (5-15 grams) and then there is unsaleable trim leftover. This amount usually accumulates to roughly 50 grams per pound of bulk product. After we package bulk products, the packaged weight then gets deducted from original amount and is therefore calculated as the waste. This calculated waste is separate from the physical waste leftover after packaging. All of the physical leftover is mixed with sand and placed in the waste area which is then saved until it is ready to leave the building for waste.

The footage on May 27th does not show the weight inside the waste accumulated in the suitcase because it has accumulated over the course of time. Video footage shows James Barrett taking the waste out of premises but does not show it accumulate over time. Waste is entered into METRC as it leaves the building but accumulates in waste area over time.

In effort to ensure waste is disposed of properly, we usually dispose of waste about once per month. This also creates a more efficient and accurate way to track waste - rather than try to track several packages wasted every day - which can get messy - we like to let them accumulate and then move them all at once for cleaner and easier tracking entries in to METRC.

Apparently **waste had accidentally entered as "in house quality control" when it should have been entered as "waste"**. This was done out of error and should have been entered simply as "waste" in METRC. In the future, this will not happen again and we will make sure these entries are more carefully entered to avoid these types of mistakes.



The obstruction of video footage was due to items being placed in front of the camera. This was an accident made by employees whom did not realise that setting items in front of the camera would obstruct view. We have since moved the items blocking the camera view. Furthermore, we are in the process of changing our security plans to have more video footage coverage so that this situation does not occur or repeat itself.

ACTIONS TO REMEDY NOV:

1. **Rainforest Farms will further train staff to enter waste correctly and more accurately. More specifically, staff will be trained to know the differences of types of waste entries and how they should be inputted properly. This will ensure the compliance of 3 AAC 306.310 and 3 AAC 306-330.**
2. **Rainforest Farms has informed staff to make sure never to place items in front of video cameras. This will ensure that the requirements of 3 AAC 306.720 has been met.**
3. **Rainforest Farms will file form MJ-14 to add extra cameras in the facility. This will prevent any video obstruction in the future even in the case of accidental obstruction. This will ensure that the requirements of 3 AAC 306.720 has been met.**

It is our hope that we can work with AMCO closely on this issue to make sure that it is not only resolved, but will never happen again. We understand the importance of reporting requirements not only for compliance reasons but also for the efficiency of our own operations.

We have been working with AMCO Investigators on this issue and are hoping to rectify any apparent wrongdoing in any way possible.

Please do not hesitate to ask for further clarification on this matter as we are eager to ensure full compliance in every way possible.

Sincerely,


James Barrett
Manager
Rainforest Farms, LLC



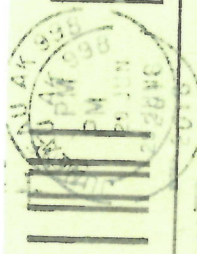
Postage and Fees Paid
Permit No. 9-10
USPS
First-Class Mail

• Sender: Please print your name, address, and ZIP+4® in this box•

Alcohol & Marijuana Control Office
Attn: Jason Davies
550 West 7th Avenue, Suite 1601
Anchorage, AK 99501

RECEIVED
JUL 02 2018
ALCOHOL MARIJUANA CONTROL OFFICE
ANCHORAGE, AK

UNITED STATES POSTAL SERVICE



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

Rainforest Farms, LLC
216 2nd Street
Juneau, AK 99801

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☐ Agent ☐ Addressee
- B. Received by (Printed Name) ☐ Yes ☐ No
- C. Date of Delivery
- D. Is delivery address different from item 1? ☐ Yes ☐ No

- 3. Service Type
☒ Certified Mail®
☐ Registered
☐ Insured Mail
☐ Return Receipt for Merchandise
☐ Collect on Delivery
- 4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No

Article Number
(Transfer from service label)

7012 3460 0000 2166 5304

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 06/27/2018

Licensee: Aaron Bean

DBA: Green Leaf

License #/Type: Standard Marijuana Cultivation Facili

Address: 4614 Halibut Pt. R.d, C-2,3,& 4, Sitka 99835

AMCO Case #: AB18000767

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 05-24-2018 AMCO Enforcement was sent an odor complaint via email regarding Green Leaf #10066 located in Sitka, AK. I, Investigator Johnson traveled to Sitka to investigate the complaint. Upon arrival, a strong odor of marijuana was smelled beginning at the entrance to the property from the Halibut Point Road and all along the front of the building which houses both the retail and cultivation of Green Leaf. I contacted the licensee, Aaron Bean who informed me they had some work done recently and the city had signed off on everything. I informed him of what I smelled and instructed him to check his carbon filters and have this issue taken care of immediately.

This is a violation of 3 AAC 306.430(c)(2)

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: S. Johnson

Received by:

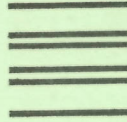
SIGNATURE:

SIGNATURE:

Delivered VIA: Mail

Date:

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10



UNITED STATES POSTAL SERVICE

RECEIVED

JUL 13 2018

ALCOHOL MARIJUANA CONTROL OFFICE
STATE OF ALASKA

• Sender: Please print your name, address, and ZIP+4® in this box

Alcohol & Marijuana Control Office
Attn: Jason Davies
550 West 7th Avenue, Suite 1601
Anchorage, AK 99501

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Green Leaf
PO Box 464
Sitka, AK 99835

COMPLETE THIS SECTION ON DELIVERY

- A. Signature *James Cervera* ☒ Agent ☐ Addressee
- B. Received by (Printed Name) *James Cervera* C. Date of Delivery *7/11/18*
- D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number
(Transfer from service label)

7012 3460 0000 2166 5311

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date:

License #/Type:

Licensee:

Address:

DBA:

AMCO Case #:

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator:

Received by:

SIGNATURE: *JR Hamilton*

SIGNATURE:

Delivered VIA:

Date:



Jana D. Weltzin
Licensed in Alaska & Arizona
3003 Minnesota Blvd., Suite 201
Anchorage, Alaska 99501
Phone 630-913-1113
Main Office 907-231-3750
JDW, LLC
jana@jdwcounsel.com

July 27, 2018

AMCO & Enforcement
Marijuana Control Board
Sent Via Email

Re: NOV Case No: AB18-0823 – AK Frost License No: 10866

Dear MCB and Enforcement Team:

On July 18th, 2018, my client Kyle Denton, designated licensee for AK Frost, received the NOV number referenced above. The NOV is essentially stating that there was an unreported change of ownership for this license, which would be a violation under 3 AAC 306.040, if this change was a non-controlling ownership change, or 3AAC 306.045 for a major controlling change in ownership.

AK Frost is undergoing ownership restructuring - a group of Alaskan business folks have negotiated to buy less than 50% of an entity named Blackstone Investments, LLC. The concept is that Blackstone Investments will be buying 100% of AK Frost, and Blackstone Investments membership majority is held and owned by the original licensees of this license, David McConnell and Kyle Denton, with Kyle remaining as the manager of the entity.

As you know, our regulations may seem a bit foreign to persons who are not entrenched in this industry and who have not been following the changes to the regulations or do not have that much experience with our regulatory scheme. Therefore, when the group of investors hired a great business attorney to help them with the negotiation and memorialization of said purchase of interest and overall game plan to restructure these entities, a couple assumptions were made about the marijuana specific requirements for transferring ownership of a marijuana license, which lead to the premature filing of the notice of change of officials.

Initially, because the natural persons who originally were the only two licensees for AK Frost (Kyle and Dave) still would hold majority interest of the entity owning the license, Kyle and Dave thought they could do the change of ownership report under 3 AAC 306.040 within ten (10) days for a non-controlling ownership change report. The attorney for the investor group went ahead and filed the notice of changes of officials for AK Frost, replacing Kyle and Dave as owners and adding

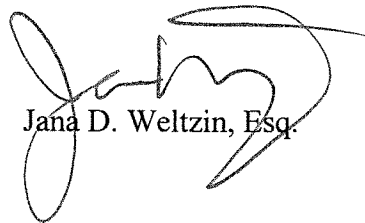
Blackstone Investments as the sole owner. See attached change of ownership report filed May 4th, 2018.

During the review of the renewal process, my office worked with Jane Sawyer (AMCO plan reviewer) to come up with a method to “undo” the change of ownership back to the original ownership structure, in order to comply with 3AAC 306.045 and we are now in the process of compiling a controlling change of ownership application, which once completed, will be submitted to AMCO for review and later for MCB hearing review. My office personally walked the Notice of Change (to revert the ownership change) to the Anchorage Corporation Commissions Office to obtain a stamped, received version, to prove to the AMCO review team that the ownership was being reverted, to correct the premature filling of the notice of change of officials. See attached stamped notice of change of officials.

The definition of controlling change in interest is not in the regulations and was defined in an MCB board action and therefore, unless a person is really paying attention to our industry and our meetings, it would be a really tough call to determine what the proper change in ownership regulation applied to the situation. It is a completely understandable misunderstanding and there was no change in the business operations from how the company has always been managed – no other persons other than Kyle and Dave have been operating control of the business, the license, or the finances.

We appreciate Jane Sawyer’s help with this matter and this license is now in good standing. The licensees now understand the proper steps that need to occur prior to a transfer in controlling ownership.

Thank you for your consideration,



Jana D. Weltzin, Esq.



THE STATE
of **ALASKA**

Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing



AK Entity #: 10037110
Date Filed: 05/04/2018
State of Alaska, DCCED

COR

FOR DIVISION USE ONLY

RECEIVED
Juneau

MAY 04 2018

CBPL

cc 25/100 ms

Corporations Section

State Office Building, 333 Willoughby Avenue, 9th Floor
PO Box 110806, Juneau, AK 99811-0806
Phone: (907) 465-2550 • Fax: (907) 465-2974
Email: corporations@alaska.gov
Website: Corporations.Alaska.Gov

Notice of Change of Officials

Domestic Limited Liability Company (AS 10.50)

- This Notice of Change of Officials form is only for Domestic Limited Liability Companies and is used to report changes between biennial reporting periods in: members, managers, and percentage of interest held.
- This Notice of Change of Officials will not be filed if the entity's biennial report is not current. To verify the entity's biennial report due date, go online to www.Corporations.Alaska.Gov and select *Search Corporations Database*
- Standard processing time for complete and correct filings submitted to this office is approximately 10-15 business days. All filings are reviewed in the date order they are received.
- The information you submit is a public record and will be posted on the State's website.

1. Important:

AS 10.50.765

Each Domestic Limited Liability Company is required to notify this office when there is a change of officials.
— AS 10.50.765

Failure to meet this requirement may result in involuntary dissolution of the entity's authority to transact business in the State of Alaska.

The Domestic Limited Liability Company is to keep and make available the records of the official(s) changes.
— AS 10.50.860-.870

2. Fee:

☒ \$25 Nonrefundable Filing Fee (CORF)

3 AAC 16.065(b)

Mail this form and the non-refundable \$25 filing fee in U.S. dollars to the letterhead address. Make the check or money order payable to the State of Alaska, or use the attached credit card payment form.

3. Entity Information:

AS 10.50.765

Entity Name: AK Frost, LLC

Alaska Entity Number: 10037110

4. REMOVE from Record:

AS 10.50.765(b)

The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: David McConnell

Name: _____

Name: _____

Name: _____

If an official is not being removed from record, then list them in Item #5 below (with their current information).

RECEIVED
Juneau

MAY 04 2018

CBPL

5. ALL Current Officials:

AS 10.50.765(b)

The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765 (b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

FULL LEGAL NAME	COMPLETE MAILING ADDRESS	% OWNED	MEMBER	Manager
Kyle Denton	PO Box 90084, Anchorage, AK 99509			x
Blackstone Investments, LLC	P.O. Box 9084, Anchorage, AK 99509	100	x	

→ If necessary, use the following supplement page and include all information required above in Item #5.

6. Required Signature:

AS 10.50.840

The Notice of Change of Officials must be signed by: a member (AS 10.50.840(a)(2)); or a manager if manager managed (AS 10.50.840(a)(1)); or an attorney-in-fact (AS 10.50.840(c)). Persons who sign documents filed with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor.

Signature: Jane SauerDate: 5-1-2018Printed Name: Jane Sauer

Title of Authorized Signer:

☐ Member☐ Manager☒ Attorney-in-fact

If signing on behalf of a member or manager which is an entity, then identify the signer's relationship and signing authority with the member entity. For example: John Smith, President of XYZ Inc. the sole member of ABC LLC.



THE STATE
of **ALASKA**
Department of Commerce
Division of Corporations



* 2 0 1 8 2 0 0 4 6 1 2 2 *

COR

FOR DIVISION USE ONLY

RECEIVED
Juneau

MAY 17 2018

CBPL

cc 25 yrs

Corporations Section
State Office Building, 333 Willoughby Avenue, 9th Floor
PO Box 110806, Juneau, AK 99811-0806
Phone: (907) 465-2550 • Fax: (907) 465-2974
Email: corporations@alaska.gov
Website: Corporations.Alaska.Gov

Notice of Change of Officials

Domestic Limited Liability Company (AS 10.50)

- This Notice of Change of Officials form is only for Domestic Limited Liability Companies and is used to report changes between biennial reporting periods in: members, managers, and percentage of interest held.
- This Notice of Change of Officials will not be filed if the entity's biennial report is not current. To verify the entity's biennial report due date, go online to www.Corporations.Alaska.Gov and select *Search Corporations Database*.
- Standard processing time for complete and correct filings submitted to this office is approximately 10-15 business days. All filings are reviewed in the date order they are received.
- The information you submit is a public record and will be posted on the State's website.

Each Domestic Limited Liability Company is required to notify this office when there is a change of officials.
— AS 10.50.765

Failure to meet this requirement may result in involuntary dissolution of the entity's authority to transact business in the State of Alaska.

The Domestic Limited Liability Company is to keep and make available the records of the official(s) changes.
— AS 10.50.860-.870

☒ \$25 Nonrefundable Filing Fee (CORF)

3 AAC 16.065(b)

Entity Name: Blackstone Investments, LLC

Alaska Entity Number: 10083469



K 2 1 2 9 5 9 6

The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: _____ Name: _____

Name: _____ Name: _____

If an official is not being removed from record, then list them in Item #5 below (with their current information).

RECEIVED
Juneau

MAY 17 2018

CBPL

The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.165(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765 (b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

Kyle Denton	P.O. Box 90084, Anchorage, AK 99509	50.0	*
Dave McConnell	P.O. Box 90084, Anchorage, AK 99509	2.5	*
Seth Anderson	P.O. Box 90084, Anchorage, AK 99509	5.0	*
Marc Eld	P.O. Box 90084, Anchorage, AK 99509	5.0	*
Carey Mills	P.O. Box 90084, Anchorage, AK 99509	5.0	X

→ If necessary, use the following supplement page and include all information required above in Item #5.

The Notice of Change of Officials must be signed by a member (AS 10.50.840(a)(2)); or a manager if manager managed (AS 10.50.840(a)(1)); or an attorney-in-fact (AS 10.50.840(c)). Persons who sign documents filed with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor.

Signature: _____

Date: 5-17-2018

Printed Name: Jane Sauer

Title of Authorized Signer: ☐ Member ☐ Manager ☒ Attorney-in-fact

If signing on behalf of a member or manager which is an entity, then identify the signer's relationship and signing authority with the member entity. For example: John Smith, President of XYZ Inc. the sole member of ABC LLC.

Notice of Change of Officials SUPPLEMENT

If used, this supplement must be returned with Form 08-491.

Entity Name: Blackstone Investments, LLC

Alaska Entity Number: 10083469

RECEIVED
Juneau

MAY 17 2018

CBPL

The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: _____ Name: _____

Name: _____ Name: _____

If an official is not being removed from record, then list them in Item #5 below (with their current information).

The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765 (b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

BUSINESS NAME		BUSINESS ADDRESS			
Harry Pritchard		P.O. Box 90084, Anchorage, AK 99509	5.0	*	
Scott Young		P.O. Box 90084, Anchorage, AK 99509	10.0	*	
Tom Zietlow		P.O. Box 90084, Anchorage, AK 99509	10.0	*	

If necessary to complete Items #4 and #5, make copies of this SUPPLEMENT page.



THE STATE
of **ALASKA**

Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing

Corporations Section

State Office Building, 333 Willoughby Avenue, 9th Floor

PO Box 110806, Juneau, AK 99811-0806

Phone: (907) 465-2550 • Fax: (907) 465-2974

Email: corporations@alaska.gov

Website: Corporations.Alaska.Gov

COR

FOR CHANGING USE ONLY

RECEIVED
Anchorage

JUL 17 2018

✓
CBPL

25
75

9/10/18

Notice of Change of Officials

Domestic Limited Liability Company (AS 10.50)

- This Notice of Change of Officials form is only for Domestic Limited Liability Companies and is used to report changes between biennial reporting periods in: members, managers, and percentage of interest held.
- This Notice of Change of Officials will not be filed if the entity's biennial report is not current. To verify the entity's biennial report due date, go online to www.Corporations.Alaska.Gov and select *Search Corporations Database*
- Standard processing time for complete and correct filings submitted to this office is approximately 10-15 business days. All filings are reviewed in the date order they are received.
- The information you submit is a public record and will be posted on the State's website.

1. Important:

AS 10.50.765

Each Domestic Limited Liability Company is required to notify this office when there is a change of officials.
— AS 10.50.765

Failure to meet this requirement may result in involuntary dissolution of the entity's authority to transact business in the State of Alaska.

The Domestic Limited Liability Company is to keep and make available the records of the official(s) changes.
— AS 10.50.860-.870

2. Fee:

☒ \$25 Nonrefundable Filing Fee (CORF)

3 AAC 16.065(b)

Mail this form and the non-refundable \$25 filing fee in U.S. dollars to the letterhead address. Make the check or money order payable to the State of Alaska, or use the attached credit card payment form.

3. Entity Information:

AS 10.50.765

Entity Name: AK Frost, LLC

Alaska Entity Number: 10037110

4. REMOVE from Record:

AS 10.50.765(b)

The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: Blackstone

Name: _____

Name: Investments, LLC

Name: _____

If an official is not being removed from record, then list them in Item #5 below (with their current information).

RECEIVED
Anchorage

JUL 17 2018

CBPL

5. ALL Current Officials:

AS 10.50.765(b)

The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765 (b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

FULL LEGAL NAME	COMPLETE MAILING ADDRESS	% OWNED	MEMBER	Manager
Kyle Denton	PO Box 90084, Anch. AK 99509	50	X	X
David McConnell	PO Box 90801 Anch. AK 99509	50	X	

→ If necessary, use the following supplement page and include all information required above in Item #5.

6. Required Signature:

AS 10.50.840

The Notice of Change of Officials must be signed by: a member (AS 10.50.840(a)(2)); or a manager if manager managed (AS 10.50.840(a)(1)); or an attorney-in-fact (AS 10.50.840(c)). Persons who sign documents filed with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor.

Signature: Kyle DentonDate: 7.14.18Printed Name: Kyle Denton

Title of Authorized Signer:

☒ Member☒ Manager☐ Attorney-in-fact

If signing on behalf of a member or manager which is an entity, then identify the signer's relationship and signing authority with the member entity. For example: John Smith, President of XYZ Inc. the sole member of ABC LLC.



THE STATE
of **ALASKA**

Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing

Corporations Section

State Office Building, 333 Willoughby Avenue, 9th Floor

PO Box 110806, Juneau, AK 99811-0806

Phone: (907) 465-2550 • Fax: (907) 465-2974

Email: corporations@alaska.gov

Website: Corporations.Alaska.Gov

COR

RECEIVED
Anchorage

JUL 17 2018

CBPL

Contact Information

- Return this form with your filing
- This information may be used by the Division to assist with processing your attached filings
- This form will not be filed for record, or appear online

Entity Information		Enter your entity information as it appears on this filing.
Entity Name:	AK Frost LLC	
AK Entity #:	10037110	

Contact Person		Whom may we contact with any questions or problems with this filing?
Company:	JDW LLC	
Contact:	Jana Wettzin	
Mailing Address:	Address: 3003 Minnesota Dr. #201	
	City: Anchorage	State: AK ZIP: 99503
Phone:	907-231-3750	
Email:	jana@jdwllc.com	

Document Return Address		Provide an address for the return of your filed documents.
<input checked="" type="checkbox"/> Return my filings to the address provided ABOVE		
<input type="checkbox"/> Return my filings to this address provided BELOW		
Company:		
Contact:		
Mailing Address:	Address:	
	City:	State: ZIP:

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 7-13-18

License #/Type: 10865 / Manufacturing Facility

Licensee: Blackstone Investments, LLC

Address: 5200 A St., Anchorage, AK

DBA: AK Rime

AMCO Case #: AB18-0822

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

You have an unapproved transfer of controlling interest. Details are as follows:

Change in ownership:

David McConnell – previously Member/Manager with 50% ownership, removed
Kyle Denton - previously Member/Manager with 50% ownership, changed to Manager with 0% ownership
Blackstone Investments, LLC - added as Member with 100% ownership

Date of unreported change of officers/ownership: 5/4/2018

Your attention is referred to 3 AAC 306.045: Application for transfer of a license to another person

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

***Please send your response to the address below and include your Marijuana Establishment License Number in your response.**

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: J. Hamilton

Received by:

SIGNATURE: *JR Hamilton*

SIGNATURE:

Delivered VIA: Mail

Date:



Jana D. Weltzin
Licensed in Alaska & Arizona
3003 Minnesota Blvd., Suite 201
Anchorage, Alaska 99501
Phone 630-913-1113
Main Office 907-231-3750
JDW, LLC
jana@jdwcounsel.com

July 27, 2018

AMCO & Enforcement
Marijuana Control Board
Sent Via Email

Re: NOV Case No: AB18-0822 – AK Rime License No.: 10865

Dear MCB and Enforcement Team:

On July 18th, 2018, my client Kyle Denton, designated licensee for AK Rime, received the NOV number referenced above. The NOV is essentially stating that there was an unreported change of ownership for this license, which would be a violation under 3 AAC 306.040, if this change was a non-controlling ownership change, or 3AAC 306.045 for a major controlling change in ownership.

AK Rime is undergoing ownership restructuring - a group of Alaskan business folks have negotiated to buy less than 50% of an entity named Blackstone Investments, LLC. The concept is that Blackstone Investments will be buying 100% of AK Rime, and Blackstone Investments membership majority is held and owned by the original licensees of this license, David McConnell and Kyle Denton, with Kyle remaining as the manager of the entity.

As you know, our regulations may seem a bit foreign to persons who are not entrenched in this industry and who have not been following the changes to the regulations or do not have that much experience with our regulatory scheme. Therefore, when the group of investors hired a great business attorney to help them with the negotiation and memorialization of said purchase of interest and overall game plan to restructure these entities, a couple assumptions were made about the marijuana specific requirements for transferring ownership of a marijuana license, which lead to the premature filing of the notice of change of officials.

Initially, because the natural persons who originally were the only two licensees for AK Rime (Kyle and Dave) still would hold majority interest of the entity owning the license, Kyle and Dave thought they could do the change of ownership report under 3 AAC 306.040 within ten (10) days for a non-controlling ownership change report. The attorney for the investor group went ahead and filed the notice of changes of officials for AK Rime, replacing Kyle and Dave as owners and

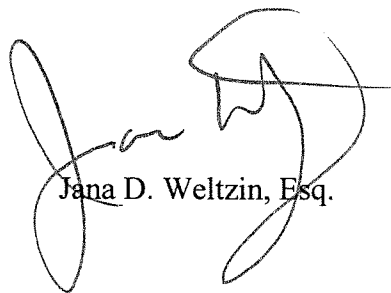
adding Blackstone Investments as the sole owner. See attached change of ownership report filed May 4th, 2018.

During the review of the renewal process, my office worked with Jane Sawyer (AMCO plan reviewer) to come up with a method to “undo” the change of ownership back to the original ownership structure, in order to comply with 3AAC 306.045 and we are now in the process of compiling a controlling change of ownership application, which once completed, will be submitted to AMCO for review and later for MCB hearing review. My office personally walked the Notice of Change (to revert the ownership change) to the Anchorage Corporation Commissions Office to obtain a stamped, received version, to prove to the AMCO review team that the ownership was being reverted, to correct the premature filling of the notice of change of officials. See attached stamped notice of change of officials.

The definition of controlling change in interest is not in the regulations and was defined in an MCB board action and therefore, unless a person is really paying attention to our industry and our meetings, it would be a really tough call to determine what the proper change in ownership regulation applied to the situation. It is a completely understandable misunderstanding and there was no change in the business operations from how the company has always been managed – no other persons other than Kyle and Dave have been operating control of the business, the license, or the finances.

We appreciate Jane Sawyer’s help with this matter and this license is now in good standing. The licensees now understand the proper steps that need to occur prior to a transfer in controlling ownership.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read 'Jana D. Weltzin', is written over the printed name. The signature is stylized with large loops and a long horizontal stroke extending to the right.

Jana D. Weltzin, Esq.

201820051965

AK Entity #: 10037112
 Date Filed: 05/04/2018
 State of Alaska, DCCED



THE STATE
 of **ALASKA**

Department of Commerce, Community and Economic Development
 Division of Corporations, Business and Professional Licensing

Corporations Section

State Office Building, 333 Willoughby Avenue, 9th Floor

PO Box 110806, Juneau, AK 99811-0806

Phone: (907) 465-2550 • Fax: (907) 465-2974

Email: corporations@alaska.gov

Website: Corporations.Alaska.Gov

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 Juneau

MAY 04 2018

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Notice of Change of Officials

Domestic Limited Liability Company (AS 10.50)

- This Notice of Change of Officials form is only for Domestic Limited Liability Companies and is used to report changes between biennial reporting periods in: members, managers, and percentage of interest held.
- This Notice of Change of Officials will not be filed if the entity's biennial report is not current. To verify the entity's biennial report due date, go online to www.Corporations.Alaska.Gov and select *Search Corporations Database*
- Standard processing time for complete and correct filings submitted to this office is approximately 10-15 business days. All filings are reviewed in the date order they are received.
- The information you submit is a public record and will be posted on the State's website.

1. Important:

AS 10.50.765

Each Domestic Limited Liability Company is required to notify this office when there is a change of officials.

— AS 10.50.765

Failure to meet this requirement may result in involuntary dissolution of the entity's authority to transact business in the State of Alaska.

The Domestic Limited Liability Company is to keep and make available the records of the official(s) changes.

— AS 10.50.860-.870

2. Fee:

☒ \$25 Nonrefundable Filing Fee (CORF)

3 AAC 16.065(b)

Mail this form and the non-refundable \$25 filing fee in U.S. dollars to the letterhead address. Make the check or money order payable to the State of Alaska, or use the attached credit card payment form.

3. Entity Information:

AS 10.50.765

Entity Name: AK Rime, LLC

Alaska Entity Number: 10037112



K 2 1 1 9 9 5 9

4. REMOVE from Record:

AS 10.50.765(b)

The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: David McConnell

Name: _____

Name: _____

Name: _____

If an official is not being removed from record, then list them in Item #5 below (with their current information).

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5. ALL Current Officials:

AS 10.50.765(b)

The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765 (b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

FULL LEGAL NAME	COMPLETE MAILING ADDRESS	% OWNED	MEMBER	
			MEMBER	Manager
Kyle Denton	PO Box 90084, Anchorage, AK 99509			x
Blackstone Investments, LLC	P.O. Box 9084, Anchorage, AK 99509	100	x	

→ If necessary, use the following supplement page and include all information required above in Item #5.

6. Required Signature:

AS 10.50.840

The Notice of Change of Officials must be signed by: a member (AS 10.50.840(a)(2)); or a manager if manager managed (AS 10.50.840(a)(1)); or an attorney-in-fact (AS 10.50.840(c)). Persons who sign documents filed with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor.

Signature: Date: 5-12-18Printed Name: Jane Sauer

Title of Authorized Signer:

☐

Member

☐

Manager

☒

Attorney-in-fact

If signing on behalf of a member or manager which is an entity, then identify the signer's relationship and signing authority with the member entity. For example: John Smith, President of XYZ Inc. the sole member of ABC LLC.



THE STATE
of **ALASKA**
Department of Commerce
Division of Corporations



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Juneau

MAY 17 2018

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cc 25 yrs

Corporations Section
State Office Building, 333 Willoughby Avenue, 9th Floor
PO Box 110806, Juneau, AK 99811-0806
Phone: (907) 465-2550 • Fax: (907) 465-2974
Email: corporations@alaska.gov
Website: Corporations.Alaska.Gov

Notice of Change of Officials

Domestic Limited Liability Company (AS 10.50)

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- Standard processing time for complete and correct filings submitted to this office is approximately 10-15 business days. All filings are reviewed in the date order they are received.
- The information you submit is a public record and will be posted on the State's website.

Each Domestic Limited Liability Company is required to notify this office when there is a change of officials.
— AS 10.50.765

Failure to meet this requirement may result in involuntary dissolution of the entity's authority to transact business in the State of Alaska.

The Domestic Limited Liability Company is to keep and make available the records of the official(s) changes.
— AS 10.50.860-.870

☒ \$25 Nonrefundable Filing Fee (CORF)

3 AAC 16.065(b)

Entity Name: Blackstone Investments, LLC

Alaska Entity Number: 10083469



The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: _____ Name: _____

Name: _____ Name: _____

If an official is not being removed from record, then list them in Item #5 below (with their current information).

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The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765 (b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

Kyle Denton	P.O. Box 90084, Anchorage, AK 99509	50.0	*	
Dave McConnell	P.O. Box 90084, Anchorage, AK 99509	2.5	*	
Seth Anderson	P.O. Box 90084, Anchorage, AK 99509	5.0	*	
Marc Eld	P.O. Box 90084, Anchorage, AK 99509	5.0	*	
Carey Mills	P.O. Box 90084, Anchorage, AK 99509	5.0	X	

→ If necessary, use the following supplement page and include all information required above in Item #5.

The Notice of Change of Officials must be signed by: a member (AS 10.50.840(a)(2)); or a manager if manager managed (AS 10.50.840(a)(1)); or an attorney-in-fact (AS 10.50.840(c)). Persons who sign documents filed with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor.

Signature: Jane Sauer

Date: 5-17-2018

Printed Name: Jane Sauer

Title of Authorized Signer: ☐ Member ☐ Manager ☒ Attorney-in-fact

If signing on behalf of a member or manager which is an entity, then identify the signer's relationship and signing authority with the member entity. For example: John Smith, President of XYZ Inc. the sole member of ABC LLC.

Notice of Change of Officials SUPPLEMENT

If used, this supplement must be returned with Form 08-491.

Entity Name: Blackstone Investments, LLC

Alaska Entity Number: 10083469

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Juneau

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The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: _____ Name: _____

Name: _____ Name: _____

If an official is not being removed from record, then list them in Item #5 below (with their current information).

The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765 (b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

OFFICIAL NAME	ADDRESS	PERCENTAGE OWNED	MANAGER	MANAGED
Harry Prichard	P.O. Box 90084, Anchorage, AK 99509	5.0	*	
Scott Young	P.O. Box 90084, Anchorage, AK 99509	10.0	*	
Tom Zietlow	P.O. Box 90084, Anchorage, AK 99509	10.0	*	

If necessary to complete items #4 and #5, make copies of this SUPPLEMENT page.

201820108809



THE STATE
of **ALASKA**

Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing

Corporations Section

State Office Building, 333 Willoughby Avenue, 9th Floor

PO Box 110806, Juneau, AK 99811-0806

Phone: (907) 465-2550 • Fax: (907) 465-2974

Email: corporations@alaska.gov

Website: Corporations.Alaska.Gov

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FOR JUDGE: V. P. ONLY

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Notice of Change of Officials

Domestic Limited Liability Company (AS 10.50)

- This Notice of Change of Officials form is only for Domestic Limited Liability Companies and is used to report changes between biennial reporting periods in: members, managers, and percentage of interest held.
- This Notice of Change of Officials will not be filed if the entity's biennial report is not current. To verify the entity's biennial report due date, go online to www.Corporations.Alaska.Gov and select *Search Corporations Database*
- Standard processing time for complete and correct filings submitted to this office is approximately 10-15 business days. All filings are reviewed in the date order they are received.
- The information you submit is a public record and will be posted on the State's website.

1. Important:

AS 10.50.765

Each Domestic Limited Liability Company is required to notify this office when there is a change of officials.
— AS 10.50.765

Failure to meet this requirement may result in involuntary dissolution of the entity's authority to transact business in the State of Alaska.

The Domestic Limited Liability Company is to keep and make available the records of the official(s) changes.
— AS 10.50.860-.870

2. Fee:

☒ \$25 Nonrefundable Filing Fee (CORF)

3 AAC 16.065(b)

Mail this form and the non-refundable \$25 filing fee in U.S. dollars to the letterhead address. Make the check or money order payable to the State of Alaska, or use the attached credit card payment form.

3. Entity Information:

AS 10.50.765

Entity Name: AK Limu, LLC

Alaska Entity Number: 10037112

4. REMOVE from Record:

AS 10.50.765(b)

The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: Blackstone

Name: _____

Name: Investments, LLC

Name: _____

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Anchorage

JUL 17 2018

If an official is not being removed from record, then list them in Item #5 below (with their current information).

CBPL

5. ALL Current Officials:

AS 10.50.765(b)

The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
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- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
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- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

FULL LEGAL NAME	COMPLETE MAILING ADDRESS	% OWNED	MEMBER	Manager
Kyle Denton	PO Box 90084, Anch. AK 99509	50	X	X
David McConnell	PO Box 90801 Anch. AK 99509	50	X	

→ If necessary, use the following supplement page and include all information required above in Item #5.

6. Required Signature:

AS 10.50.840

The Notice of Change of Officials must be signed by: a member (AS 10.50.840(a)(2)); or a manager if manager managed (AS 10.50.840(a)(1)); or an attorney-in-fact (AS 10.50.840(c)). Persons who sign documents filed with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor.

Signature: _____

Date: 7.14.18

Printed Name: _____

Title of Authorized Signer:

☒ Member☒ Manager☐ Attorney-in-fact

If signing on behalf of a member or manager which is an entity, then identify the signer's relationship and signing authority with the member entity. For example: John Smith, President of XYZ Inc. the sole member of ABC LLC.



THE STATE
of **ALASKA**

Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing

Corporations Section

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PO Box 110806, Juneau, AK 99811-0806

Phone: (907) 465-2550 • Fax: (907) 465-2974

Email: corporations@alaska.gov

Website: Corporations.Alaska.Gov

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JUL 17 2018

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Contact Information

- Return this form with your filing
- This information may be used by the Division to assist with processing your attached filings
- This form will not be filed for record, or appear online

Entity Information	
Enter your entity information as it appears on this filing.	
Entity Name:	AK RIMY LLC
AK Entity #:	10037112

Contact Person	
Whom may we contact with any questions or problems with this filing?	
Company:	IDW, LLC
Contact:	Jana Wettzin
Mailing Address:	Address: 3003 Minnesota Dr. #201 City: Anchorage State: AK ZIP: 99503
Phone:	907-231-3750
Email:	jana@idwcounsel.com

Document Return Address	
Provide an address for the return of your filed documents.	
<input checked="" type="checkbox"/> Return my filings to the address provided ABOVE	
<input type="checkbox"/> Return my filings to this address provided BELOW	
Company:	
Contact:	
Mailing Address:	Address: City: State: ZIP:

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 7-13-18

License #/Type: #10248 / Cultivation

Licensee: Blackstone Investments, LLC

Address: 5200 A St., Anchorage, AK

DBA: Isidore

AMCO Case #: AB 18-0821

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

You have an unapproved transfer of controlling interest. Details are as follows:

Change in ownership:

David McConnell – previously Member/Manager with 50% ownership, removed

Kyle Denton - previously Member/Manager with 50% ownership, changed to Manager with 0% ownership

Blackstone Investments, LLC - added as Member with 100% ownership

Date of unreported change of officers/ownership: 5/4/2018

Your attention is referred to 3 AAC 306.045: Application for transfer of a license to another person

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office

ATTN: Enforcement

550 W. 7th Ave, Suite 1600

Anchorage, Alaska 99501

amco.enforcement@alaska.gov

Issuing Investigator: J. Hamilton

Received by:

SIGNATURE:



SIGNATURE:

Delivered VIA: Mail

Date:



Jana D. Weltzin
Licensed in Alaska & Arizona
3003 Minnesota Blvd., Suite 201
Anchorage, Alaska 99501
Phone 630-913-1113
Main Office 907-231-3750
JDW, LLC
jana@jdwcounsel.com

July 27, 2018

AMCO & Enforcement
Marijuana Control Board
Sent Via Email

Re: NOV Case No: AB18-0821 – Isidore LLC License No: 10248

Dear MCB and Enforcement Team:

On July 18th, 2018, my client Kyle Denton, designated licensee for Isidore LLC, received the NOV number referenced above. The NOV is essentially stating that there was an unreported change of ownership for this license, which would be a violation under 3 AAC 306.040, if this change was a non-controlling ownership change, or 3AAC 306.045 for a major controlling change in ownership.

Isidore is undergoing ownership restructuring - a group of Alaskan business folks have negotiated to buy less than 50% of an entity named Blackstone Investments, LLC. The concept is that Blackstone Investments will be buying 100% of Isidore LLC, and Blackstone Investments membership majority is held and owned by the original licensees of this license, David McConnell and Kyle Denton, with Kyle remaining as the manager of the entity.

As you know, our regulations may seem a bit foreign to persons who are not entrenched in this industry and who have not been following the changes to the regulations or do not have that much experience with our regulatory scheme. Therefore, when the group of investors hired a great business attorney to help them with the negotiation and memorialization of said purchase of interest and overall game plan to restructure these entities, a couple assumptions were made about the marijuana specific requirements for transferring ownership of a marijuana license, which lead to the premature filing of the notice of change of officials.

Initially, because the natural persons who originally were the only two licensees for Isidore (Kyle and Dave) still would hold majority interest of the entity owning the license, Kyle and Dave thought they could do the change of ownership report under 3 AAC 306.040 within ten (10) days for a non-controlling ownership change report. The attorney for the investor group went ahead and filed the notice of changes of officials for Isidore, replacing Kyle and Dave as owners and adding

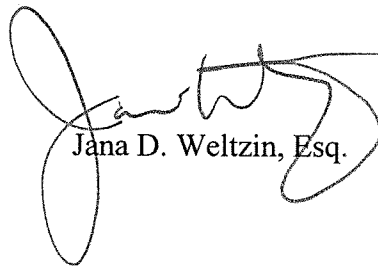
Blackstone Investments as the sole owner. See attached change of ownership report filed May 4th, 2018.

During the review of the renewal process, my office worked with Jane Sawyer (AMCO plan reviewer) to come up with a method to “undo” the change of ownership back to the original ownership structure, in order to comply with 3AAC 306.045 and we are now in the process of compiling a controlling change of ownership application, which once completed, will be submitted to AMCO for review and later for MCB hearing review. My office personally walked the Notice of Change (to revert the ownership change) to the Anchorage Corporation Commissions Office to obtain a stamped, received version, to prove to the AMCO review team that the ownership was being reverted, to correct the premature filling of the notice of change of officials. See attached stamped notice of change of officials.

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We appreciate Jane Sawyer’s help with this matter and this license is now in good standing. The licensees now understand the proper steps that need to occur prior to a transfer in controlling ownership.

Thank you for your consideration,



Jana D. Weltzin, Esq.

201820051965

AK Entity #: 10037086
Date Filed: 05/04/2018
State of Alaska, DCCEDTHE STATE
of **ALASKA**Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing**Corporations Section**State Office Building, 333 Willoughby Avenue, 9th Floor

PO Box 110806, Juneau, AK 99811-0806

Phone: (907) 465-2550 • Fax: (907) 465-2974

Email: corporations@alaska.govWebsite: Corporations.Alaska.Gov**COR**

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CC 25 / 100 MS

Notice of Change of Officials**Domestic Limited Liability Company (AS 10.50)**

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- The information you submit is a public record and will be posted on the State's website.

1. Important:

AS 10.50.765

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— AS 10.50.765

Failure to meet this requirement may result in involuntary dissolution of the entity's authority to transact business in the State of Alaska.

The Domestic Limited Liability Company is to keep and make available the records of the official(s) changes.
— AS 10.50.860-.870

2. Fee:☒ \$25 Nonrefundable Filing Fee (CORF)

3 AAC 16.065(b)

Mail this form and the non-refundable \$25 filing fee in U.S. dollars to the letterhead address. Make the check or money order payable to the State of Alaska, or use the attached credit card payment form.

3. Entity Information:

AS 10.50.765

Entity Name: Isidore, LLCAlaska Entity Number: 10037086

4. REMOVE from Record:

AS 10.50.765(b)

The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: David McConnell

Name: _____

Name: _____

Name: _____

If an official is not being removed from record, then list them in Item #5 below (with their current information).

RECEIVED
Juneau**MAY 04 2018****CBPL****5. ALL Current Officials:**

AS 10.50.765(b)

The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765 (b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

FULL LEGAL NAME	COMPLETE MAILING ADDRESS	% OWNED	MEMBER	
			MEMBER	Manager
Kyle Denton	PO Box 90084, Anchorage, AK 99509			x
Blackstone Investments, LLC	P.O. Box 9084, Anchorage, AK 99509	100	x	

→ If necessary, use the following supplement page and include all information required above in Item #5.

6. Required Signature:

AS 10.50.840

The Notice of Change of Officials must be signed by: a member (AS 10.50.840(a)(2)); or a manager if manager managed (AS 10.50.840(a)(1)); or an attorney-in-fact (AS 10.50.840(c)). Persons who sign documents filed with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor.

Signature: Jane SauerDate: 5-1-2018Printed Name: Jane Sauer

Title of Authorized Signer:

☐ Member☐ Manager☒ Attorney-in-fact

If signing on behalf of a member or manager which is an entity, then identify the signer's relationship and signing authority with the member entity. For example: John Smith, President of XYZ Inc. the sole member of ABC LLC.



THE STATE
of **ALASKA**
Department of Comm
Division of Corporatio



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FOR DIVISION USE ONLY

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Juneau

MAY 17 2018

CBPL

cc 25 17th

Corporations Section
State Office Building, 333 Willoughby Avenue, 9th Floor
PO Box 110806, Juneau, AK 99811-0806
Phone: (907) 465-2550 • Fax: (907) 465-2974
Email: corporations@alaska.gov
Website: Corporations.Alaska.Gov

Notice of Change of Officials

Domestic Limited Liability Company (AS 10.50)

- This Notice of Change of Officials form is only for Domestic Limited Liability Companies and is used to report changes between biennial reporting periods in: members, managers, and percentage of interest held.
- This Notice of Change of Officials will not be filed if the entity's biennial report is not current. To verify the entity's biennial report due date, go online to www.Corporations.Alaska.Gov and select **Search Corporations Database**
- Standard processing time for complete and correct filings submitted to this office is approximately 10-15 business days. All filings are reviewed in the date order they are received.
- The information you submit is a public record and will be posted on the State's website.

Each Domestic Limited Liability Company is required to notify this office when there is a change of officials.
— AS 10.50.765

Failure to meet this requirement may result in involuntary dissolution of the entity's authority to transact business in the State of Alaska.

The Domestic Limited Liability Company is to keep and make available the records of the official(e) changes.
— AS 10.50.860-.870

☒ \$25 Nonrefundable Filing Fee (CORF)

3 AAC 16.065(b)

Entity Name: Blackstone Investments, LLC

Alaska Entity Number: 10083469



The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: _____ Name: _____

Name: _____ Name: _____

If an official is not being removed from record, then list them in Item #5 below (with their current information).

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Juneau

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The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765 (b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

Kyle Denton	P.O. Box 90084, Anchorage, AK 99509	50.0	*	
Dave McConnell	P.O. Box 90084, Anchorage, AK 99509	2.5	*	
Seth Anderson	P.O. Box 90084, Anchorage, AK 99509	5.0	*	
Marc Eld	P.O. Box 90084, Anchorage, AK 99509	5.0	*	
Carey Mills	P.O. Box 90084, Anchorage, AK 99509	5.0	X	

→ If necessary, use the following supplement page and include all information required above in Item #5.

The Notice of Change of Officials must be signed by: a member (AS 10.50.840(a)(2)); or a manager if manager managed (AS 10.50.840(a)(1)); or an attorney-in-fact (AS 10.50.840(c)). Persons who sign documents filed with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor.

Signature: _____

Date: 5-17-2018

Printed Name: Jane Sauer

Title of Authorized Signer: ☐ Member ☐ Manager ☒ Attorney-in-fact

If signing on behalf of a member or manager which is an entity, then identify the signer's relationship and signing authority with the member entity. For example: John Smith, President of XYZ Inc. the sole member of ABC LLC.

Notice of Change of Officials SUPPLEMENT

If used, this supplement must be returned with Form 08-491

Entity Name: Blackstone Investments, LLC

Alaska Entity Number: 10083469

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MAY 17 2018

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The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: _____ Name: _____

Name: _____ Name: _____

If an official is not being removed from record, then list them in Item #5 below (with their current information).

The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765 (b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- **BOLD** fields are required.

NAME	ADDRESS	PERCENTAGE OWNED	MANAGER	OFFICIAL
Harry Prichard	P.O. Box 90084, Anchorage, AK 99509	5.0	*	
Scott Young	P.O. Box 90084, Anchorage, AK 99509	10.0	*	
Tom Zietlow	P.O. Box 90084, Anchorage, AK 99509	10.0	*	

If necessary to complete items #4 and #5, make copies of this SUPPLEMENT page.



THE STATE
of **ALASKA**

Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing



Corporations Section

State Office Building, 333 Willoughby Avenue, 9th Floor

PO Box 110806, Juneau, AK 99811-0806

Phone: (907) 465-2550 • Fax: (907) 465-2974

Email: corporations@alaska.gov

Website: Corporations.Alaska.Gov

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Anchorage

JUL 17 2018

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Notice of Change of Officials

Domestic Limited Liability Company (AS 10.50)

- This Notice of Change of Officials form is only for Domestic Limited Liability Companies and is used to report changes between biennial reporting periods in: members, managers, and percentage of interest held.
- This Notice of Change of Officials will not be filed if the entity's biennial report is not current. To verify the entity's biennial report due date, go online to www.Corporations.Alaska.Gov and select *Search Corporations Database*
- Standard processing time for complete and correct filings submitted to this office is approximately 10-15 business days. All filings are reviewed in the date order they are received.
- The information you submit is a public record and will be posted on the State's website.

1. Important:

AS 10.50.765

Each Domestic Limited Liability Company is required to notify this office when there is a change of officials.
— AS 10.50.765

Failure to meet this requirement may result in involuntary dissolution of the entity's authority to transact business in the State of Alaska.

The Domestic Limited Liability Company is to keep and make available the records of the official(s) changes.
— AS 10.50.860-.870

2. Fee:

☒ \$25 Nonrefundable Filing Fee (CORF)

3 AAC 16.065(b)

Mail this form and the non-refundable \$25 filing fee in U.S. dollars to the letterhead address. Make the check or money order payable to the State of Alaska, or use the attached credit card payment form.

3. Entity Information:

AS 10.50.765

Entity Name:

Isidor, LLC

Alaska Entity Number:

100370804

4. REMOVE from Record:

AS 10.50.765(b)

The following officials (members and, if applicable, managers) will be completely removed from the record as a result of this filing:

Name: Blackstone

Name: _____

Name: Investments, LLC

Name: _____

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Anchorage

JUL 17 2018

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If an official is not being removed from record, then list them in Item #5 below (with their current information).

5. ALL Current Officials:

AS 10.50.765(b)

The following is a complete list of ALL remaining and new officials who will be on record as a result of this filing.

- An LLC must have at least one member who owns a % of the LLC. — AS 10.50.155(b)
- Must provide all members who own 5% or more of the LLC. — AS 10.50.765(b)
- Members must own a % of the LLC. A member may be a manager if the LLC is manager managed.
- An LLC may be managed by a manager if provided in Articles of Organization. A manager may be a member if the manager also owns a % of the LLC. — AS 10.50.075(5) and AS 10.50.110(b)

- List ALL officials and their current information to be on record.
- Manager will only be accepted if the entity is manager-managed per the articles.
- BOLD fields are required.

FULL LEGAL NAME	COMPLETE MAILING ADDRESS	% OWNED	MEMBER	Manager
Kyle Denton	PO Box 90084, Anch. AK 99509	50	X	X
David McConnell	PO Box 90801 Anch. AK 99509	50	X	

→ If necessary, use the following supplement page and include all information required above in Item #5.

6. Required Signature:

AS 10.50.840

The Notice of Change of Officials must be signed by: a member (AS 10.50.840(a)(2)); or a manager if manager managed (AS 10.50.840(a)(1)); or an attorney-in-fact (AS 10.50.840(c)). Persons who sign documents filed with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor.

Signature: Kyle DentonDate: 7.14.18Printed Name: Kyle Denton

Title of Authorized Signer:

☒ Member☒ Manager☐ Attorney-in-fact

If signing on behalf of a member or manager which is an entity, then identify the signer's relationship and signing authority with the member entity. For example: John Smith, President of XYZ Inc. the sole member of ABC LLC.



THE STATE
of **ALASKA**

Department of Commerce, Community and Economic Development
Division of Corporations, Business and Professional Licensing

Corporations Section

State Office Building, 333 Willoughby Avenue, 9th Floor

PO Box 110806, Juneau, AK 99811-0806

Phone: (907) 465-2550 • Fax: (907) 465-2974

Email: corporations@alaska.gov

Website: Corporations.Alaska.Gov

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Anchorage

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Contact Information

- Return this form with your filing
- This information may be used by the Division to assist with processing your attached filings
- This form will not be filed for record, or appear online

Entity Information		Enter your entity information as it appears on this filing.	
Entity Name:	Isidore, LLC		
AK Entity #:	18037086		

Contact Person		Whom may we contact with any questions or problems with this filing?	
Company:	JDW, LLC		
Contact:	Jana Wettzin		
Mailing Address:	Address: 3003 Minnesota Dr. #201		
	City: Anchorage	State: AK	ZIP: 99503
Phone:	907-231-3750		
Email:	jana@jdwounsel.com		

Document Return Address		Provide an address for the return of your filed documents.	
<input checked="" type="checkbox"/> Return my filings to the address provided ABOVE			
<input type="checkbox"/> Return my filings to this address provided BELOW			
Company:			
Contact:			
Mailing Address:	Address:		
	City:	State:	ZIP:

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 7-16-18

License #/Type: 12037 - Standard Cultivation

Licensee: William Stevens

Address: 20525 Twitty Rd, Willow, AK

DBA: The Farm

AMCO Case #: AB18-0824

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 7-5-18, an email was sent to William Stevens, designated licensee for The Farm. The emailed asked for an update as to how much product had been stolen from a burglary that had occurred in June of 2018. As of today, there has been no response.

Your attention is directed to 3 AAC 306.755(b): Business records, a marijuana establishment shall provide any record required to be kept on the licensed premises to an employee of the board upon request. Any record kept off premises must be provided to the board's employees not later than three business days after a request for the record.

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

***Please send your response to the address below and include your Marijuana Establishment License Number in your response.**

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: J. Hamilton

Received by:

SIGNATURE: *JR Hamilton*

SIGNATURE:

Delivered VIA: Mail

Date:

Article # 7018 0360 0000 1428 4318

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 7/17/18

Licensee: Maureen Eberhardt

DBA: MoMo's Bakery

License #/Type: 10903, Product Manufacturing

Address: 2917 Spenard Rd, Suite 102

AMCO Case #: AB18000832

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 07/11/18 at approximately 1500 hours, MoMo's employee Amy Ewing (MHP# 7540923) completed a licensed transfer with manifest #0000382510 from MoMo's Bakery to Cannabaska.

AMCO Investigators observed that the product being transported was contained inside two unsealed cardboard boxes in the main cabin of the vehicle.

Ewing confirmed that the boxes were never sealed nor were they inside a locked, safe and secure storage compartment inside the vehicle.

MoMo's board approved operating plan lists the following procedure regarding transportation: "MoMo's will be transporting marijuana and marijuana product in a sealed package in a heavy duty, locked aluminum or metal storage box. The box will be in the back of the licensee's vehicles. The storage box will be locked and attached to the vehicle. In the alternative, MoMo's may use a certified transporter such as Valkyrie Security"

These are violations of 3 AAC 306.750(d) and 3 AAC 306.020 (c)(5)

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: J. Bankowski

Received by:

SIGNATURE:

SIGNATURE:

Delivered VIA: Email

Date:

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 7/25/18

License #/Type: 10799/Standard Cultivation

Licensee: Ronald Bass

Address: 13886 W Parks Hwy, Houston, AK 99694

DBA: Calm N Collective

AMCO Case #: AB18-864

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 7/19/18 a routine inspection was conducted at Calm N Collective. One employee on site did not have his handler card and had to go home to get it. There were also some dependencies found between what plants were currently in the facility versus what plants were in Metrc. Plants with tag numbers 3825, 3833, and 3839 were in Metrc but the corresponding plants were not in the facility.

These are in violation of:

3 AAC 306.320 (2) Marijuana handler permit required,

3 AAC 306.435. Marijuana inventory tracking system

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: J. Rukes

SIGNATURE:

Delivered VIA: Mail

Received by:

SIGNATURE: 

Date: 7/25/18

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 7-27-18

License #/Type: 10237/ Standard Cultivation

Licensee: Alaskasense, LLC

Address: 521 W. Tudor Rd, Anchorage, AK

DBA: Alaskasense

AMCO Case #: AB18-0898

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 7-26-18, Investigator Hoelscher was at 550 W. Tudor Road which is across from your establishment. Investigator Hoelscher could smell the odor of marijuana emanating from your establishment.

Your attention is referred to 3 AAC 306.430(c)(2): A marijuana cultivation facility shall ensure that any marijuana at the marijuana cultivation facility does not emit an odor that is detectable by the public from outside the cultivation facility except as allowed by a local government conditional use permit process

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: J. Hamilton

SIGNATURE: *J. Hamilton*

Delivered VIA: In-Person

Received by:

SIGNATURE: *Smadar Warden*

Date: *7/27/18*

Article #