CORRESPONDENCE

THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Commerce, Community, and Economic Development

ALCOHOL & MARIJUANA CONTROL OFFICE
550 West 7th Avenue, Suite 1600
Anchorage, AK 99501
Main: 907.269.0350

November 1, 2018

Alaska Wild Coyote, Inc.
DBA: AMG Concentrates
Via email: silvia@gci.net

Re: Marijuana Concentrate Manufacturing Facility Facility #12471

Dear applicant,

The AMCO Office has reviewed the documents submitted for the proposed marijuana establishment license referenced above. This letter is notice under 3 ACC 306.025(e)(2) that your application is incomplete and additional items are needed to complete the application. The additional items that need correction or resubmittal are listed below—please be sure to read the entire letter. **Please note that if the corrections and/or additional documents submitted in response to this letter are not found to be complete, your application will be returned to you in accordance with 3 AAC 306.025(e)(1), and you will need to file a new application and pay a new fee should you wish to continue pursuing licensure.**

- **MJ-00 Application Certifications**
  - Page 1, Section 3 – Other Licenses for Armando Gonzalez:
    - There are other licenses owned or in the process of being applied for that have not been disclosed.
- **MJ-01 Operating Plan**
  - Page 4, Section 3.5:
    - Please review 3 AAC 306.715(e) and expand upon your response to indicate when AMCO is contacted after an unauthorized breach has occurred.
  - Page 4, Section 3.7:
    - It appears that some of your response may have been cut off in the space provided. The last sentence reads "There will also be signs posted on the exterior of the building that state "No Loitering" If any".
  - Page 6, Section 4.2:
    - You indicate in your response that records for the last six months will be stored in a secured office, but the only offices depicted in the diagrams provided are located within the standard cultivation facility at this address. As a reminder, 3 AAC 306.755 requires that business records for the last six months be kept on the licensed premises (in this case, the licensed premises of the marijuana concentrate manufacturing facility).
- **MJ-02 Premises Diagram**
  - Diagram 1 + 5, Page 2:
    - In color, please outline and label the boundary of the licensed premises for the manufacturing facility. Also highlight and label the restricted access areas.

        - Areas used for storage have not been depicted.
        - Any tables or counters within the licensed premises must be depicted.
    - Diagram 3 and 4 (Page 2 and 3):
        - In color, please outline and label which area will be part of the licensed premises.
- **MJ-05 Manufacturing Supplemental**
    - Shatter – Packaging Description:
        - Your response states that for retail marijuana stores, up to one pound bags will be used for wholesale transactions. Under 3 AAC 306.565(c), non-edible marijuana products can be transferred in wholesale packages only to other licensed marijuana product manufacturing facilities.
    - Shatter – Sample Label Warning Statements:
        - The warning statements must be verbatim. You have added the word "the" to "There are health risks associated with consumption of marijuana".
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Bubble Hash – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Budder – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Cavier Nugs:
        - This product is not a marijuana concentrate.
    - Crumble - Packaging Description:
        - Your response states that for retail marijuana stores, up to one pound bags will be used for wholesale transactions. Under 3 AAC 306.565(c), non-edible marijuana products can be transferred in wholesale packages only to other licensed marijuana product manufacturing facilities.
    - Dry Sift Hash – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Hash – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Kief – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Oil – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Pre-rolled Joints:
        - This product is not a marijuana concentrate.
    - Rosin – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Sap – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Sugar Sap – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Vape Pen Oil – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
    - Wax – Sample Label Warning Statements:
        - You have omitted the word "the" from "Keep out of the reach of children".
- **Applicant's Alaska Residency**
    - Carmen Villamides' Alaska residency could not be verified. Did she apply for the PFD in 2018?

It is very important that you submit the above corrections and/or documents in a timely manner so that AMCO staff has adequate time to review the corrections and/or additional documents which must be found to be complete within 90 days of the date of this letter.

Respectfully,

TJ Zielinski, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov

From:	Marijuana Licensing (CED sponsored)
To:	"silvia@gci.net"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application - AMG Concentrates License #12471
Date:	Thursday, November 01, 2018 2:47:00 PM
Attachments:	12471 Incomplete Notice.pdf image001.png

Good afternoon,

Your application for your marijuana establishment license has been reviewed, and at this time is considered incomplete. See the attached notice regarding corrections, additional documents, and/or resubmittals that need to be addressed in your application.

Please make sure to read the entire letter. If the submitted corrections are not found to be complete, your application will be returned to you in accordance with 3 AAC 306.025(e)(1), and you will need to file a new application and pay a new fee should you wish to continue pursuing licensure. Essentially, we will accept corrections one time within your 90-day deadline period. Feel free to call or email if you need clarification on any items from the Incomplete Notice.

Let us know if you require copies of any documents that were submitted.

If you have any questions or concerns, please address them to marijuana.licensing@alaska.gov.

Sincerely,

TJ Zielinski
Occupational Licensing Examiner
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501

From:	Marijuana Licensing (CED sponsored)
To:	gonzalezmondo80@yahoo.com; silvia@gci.net
Cc:	Marijuana Licensing (CED sponsored)
Subject:	RE: Alaska Wild Coyote, Inc. dba: AMG Concentrates, License 12471
Date:	Wednesday, December 12, 2018 2:22:37 PM
Attachments:	Form MJ-18 Applicant Residency Verification.pdf image001.png

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Good afternoon Armando,

Thank you for your email. I see that it has been more than a year since Form MJ-18 was submitted for Carmen, so it will be necessary to fill out a new MJ-18 for this license application. Please see attached for a fillable copy of this form.

Sincerely,

TJ Zielinski
Occupational Licensing Examiner
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501

From: gonzalezmondo80@yahoo.com <gonzalezmondo80@yahoo.com>
Sent: Wednesday, December 12, 2018 2:00 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Alaska Wild Coyote, Inc. dba: AMG Concentrates, License 12471

Hi T.J.,

I just spoke with you on the phone, and you requested information regarding a question I had from the letter you sent on November 1, 20018. Under "Applicant's Alaska Residency" you stated that Carmen Villamides Alaska residency could not be verified. Carmen doesn't file for her PFD, and never has. When we applied for our Standard Marijuana Cultivation License, #12125, Alaska Marijuana Gardens, we submitted a MJ-18 for Carmen. Can we submit a copy of that form and all of the information with our AMG Concentrate Application, or does she have to submit an entirely new form. None of the information has changed. As soon as I get an answer on this, I will submit all the corrections you asked for in the letter. Due to Thanksgiving, the earthquake, and the coming Holidays, it has taken more time than I had planned on to get this submitted. I appreciate your help and patience on this matter.

Thank you,
Armando Gonzalez

From:	Marijuana Licensing (CED sponsored)
To:	silvia@gci.net
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application - AMG Concentrates License #12471
Date:	Thursday, December 20, 2018 9:05:13 AM
Attachments:	12471 MJ-01 - Pages 4 and 6.pdf image001.png

Good morning,

I have finished reviewing the corrections that you submitted yesterday. Most of the needed corrections have been addressed, but there are a few additional revisions needed in order for your application to be deemed complete.

On **Form MJ-01: Operating Plan**, there are statements that must be signed with the initials of a licensee that have been left blank on pages 4 and 6. Please see attached for copies of these pages.

On **Form MJ-05: Manufacturing Supplemental**, corrections for the warning statements listed for **Budder** were not received.

Under 3 AAC 306.990(11), "concentrate" or "marijuana concentrate" is defined as resin, oil, wax, or any other substance produced by extracting or isolating cannabinoids, THC, or other components from a marijuana plant or from materials harvested from a marijuana plant. **Caviar Nugs** (marijuana buds rolled in two types of concentrates) and **Pre-rolled joints** (flower and trim packaged in paper cones) do not meet this definition, so I have omitted them from your application.

The remaining corrections can be scanned and emailed. Let me know if you need any copies of any other pages.

Sincerely,

TJ Zielinski
Occupational Licensing Examiner
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501