CORRESPONDENCE

THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Commerce, Community, and Economic Development

ALCOHOL & MARIJUANA CONTROL OFFICE
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February 4, 2022

Herbal Dreams, LLC
DBA: Herbal Dreams, LLC
Via email: dan@danrogers.net

Re: Marijuana Product Manufacturing Facility license #28777

Dear applicant,

AMCO has reviewed the documents submitted for the proposed marijuana establishment license referenced above. This letter is notice under 3 AAC 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.**

- **Proof of Possession**
  - I started to look at the two leases you submitted with this application (master and sublease), then I went to look at what you had submitted for your renewal of your cultivation 16170 since it is at the same location and same ownership. My question is: is the lease from 16170 still current, and is it okay for me to copy over the lease from 16170 to this application?

- **MJ-05 Manufacturing Supplemental**
  - on page 2 of the MJ-05 you state that you "Those base concentrates may be resold…" but your base/in-house products do not mention this. See more below under "in-house products".

- **Products** (I am listing all products received whether they need corrections or not):

  - **In-house products:**
    - **Cannabis Cream –**
      - look at each of the two pages of this product, you have inconsistent product names on them.
      - you indicate that the intent of this product is 'wholesale' but you are not describing how you will wholesale it on the packaging description section.

Further, on the packaging description, you state this product will not be for sale.

- **Cannacocnonut Oil, and Cannabutter –** complete unless you are going to be selling this product to another manufacturer.

- **Edibles:**
  - **Cannabis Brownies –**
    - Intended use: unless I do not understand what you mean by "wholesale" this product may not be wholesaled or bulked to any other marijuana establishment.
    - Packaging description: the text in this box talks about infused gummies not cannabis brownies. Again, this product may not be wholesaled or bulked. Further, if you intend to have servings of 10mg per cookie, you need to specifically describe it.
    - The label: your 'serving' size description is confusing. You state 14g is the serving size. What constitutes 14g? half of brownie, one brownie? That needs to be clear.

  - **Cannabis Coffee Creamer –**
    - Intended use: unless I do not understand what you mean by "wholesale", this product may not be wholesaled or bulked to any other marijuana establishment.
    - Packaging description: your bottle needs depict the serving demarcations.
    - The label: your 'serving' size description is confusing. You first state 5mg/oz (to me this means 5mg per ounce, then you state serving size is 0.6fl oz (is .6fl oz the same as ounce?), then you state 24ml servings. It's all confusing. Please re-do this. I get this is a sample label, what I am trying to convey here is that it is confusing, it is not clear what one serving is.

  - **Cannabis Peanut Butter Cookies; Cannabis Chocolate Chip Cookies; (two products) -**
    - Intended use: unless I do not understand what you mean by "wholesale", this product may not be wholesaled or bulked to any other marijuana establishment.
    - Packaging description: this product may not be wholesaled or bulked. Also, if you intend to make 10mg servings, you need specifically describe it.
    - The label: your 'serving' size description is confusing. You state 14g is the serving size. What constitutes 14g? half of cookie, one cookie? That needs to be clear. I get this is a sample label, what I am trying to convey here is that it's confusing, it is not clear what one serving is.

  - **Gummies –**
    - Intended use: unless I do not understand what you mean by "wholesale", this product may not be wholesaled or bulked to any other marijuana establishment.
    - Packaging description: this product may not be wholesaled or bulked. Also, if you intend to make 10mg servings, you need specifically describe it.

- The label: your 'serving' size description is confusing. You state 14g is the serving size. What constitutes 14g? half of gummi, one gummies, two gummies. That needs to be clear. I get this is a sample label, what I am trying to convey here is that it is confusing, it is not clear what one serving is.

- **Cannabis Crunch Gourmet Ice Cream Pops; Cookies, Cream, and Cannabis Gourmet Ice Cream Pops; Sprinkle Topped Gourmet Ice Cream Pops; (three products) –**
  - Intended use: unless I do not understand what you mean by "wholesale", this product may not be wholesaled or bulked to any other marijuana establishment.
  - Packaging description: this product may not be wholesaled or bulked. Also, if you intend to make 10mg servings, you need specifically describe it.
  - The label: your 'serving' size description is confusing. You state 14g is the serving size. What constitutes 14g? half of ice cream pop, one ice cream pop. That needs to be clear. I get this is a sample label, what I am trying to convey here is that it is confusing, it is not clear what one serving is.

- **Concentrates: all the products listed in this section have the same issue in common. Please address it for each product.**

  - **Crumble; Diamonds; Distillate Extraction; Distillate Vape Cartridge; Full Spectrum Cannabis Oil (FECO); Live Resin Vape Cartridge; Live Rosin; Rosin; Sauce; Sauce Vape Cartridge; Shatter; Wax; (12 products).**
    - on each product, you state that the intended use is smokable and wholesale but you are not describing how you will package it for wholesale in the packaging description section. You only describe packaging when selling it already packaged to the retail store.

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. That date is May 5, 2022.

Respectfully,

Jane P. Sawyer, Regulations Specialist
For,
Glen Klinkhart, Director
marijuana.licensing@alaska.gov