



MEMORANDUM

TO: Marijuana Control Board

DATE: Friday, April 01, 2022

FROM:  James Hoelscher, Enforcement Supervisor

RE: Enforcement Report, Marijuana

The Alaska Police Standards Council has accredited our course for "Alcohol & Marijuana Laws for Patrol Officers". We will be teaching our first class on April 4, 2022 to Village Public Safety Officers.

Investigator Chiesa is currently working on the material for the on-line module for training, and I anticipate that this will be completed and approved prior to the fall. This is a huge step towards having the availability of education for all Alaska law enforcement on current Alcohol & Marijuana laws.

We remain fully staffed and Investigator Chiesa has settled into his post in the Mat-Su Valley. Investigator Chiesa has recently been accepted as a member of the Professional Development Committee by the National Liquor Law Enforcement Association. This panel has 10 members appointed throughout the Country, making this an exceptional achievement.

Investigator Moses has also been adjusting to his new position with AMCO in Fairbanks. There have been no major changes for the Anchorage or Juneau based Enforcement.

AMCO Enforcement has continued to provide enforcement to both Alcohol & Marijuana industries. Sometimes this causes one industry to appear to get more "attention" than the other. Investigative assignments are however solely by scope and need.

Enforcement has continued to have staff meetings on varying topics with the goal of improvement and streamlining.

Lastly, regarding our activity that reflects our principles, we have created separate and combined graphs for each board in hopes that they are easier to understand and interpret. If there is not number associated with a specific principle, it is because we have not received a report regarding that principle. I anticipate that the more we are able to educate and build a solid line of communication with other law enforcement, these reported number will increase.

Backup power for surveillance – I previously recommended that a licensee has some type of uninterruptible power supply (UPS) requirement to insure video recording continues for a certain amount of time should the power be lost at a licensed facility. The importance of this has been affirmed to me when we had a few burglaries where the suspects cut the power to the buildings prior to overcoming the locks and illegally entering the premises. The only instance of enforcement having any substantial and

usable video of the suspects was at a facility that had UPS for their security equipment. I am asking the board to consider adding this requirement in regulation, it is a fairly inexpensive investment that benefits the licensee and their employees, law enforcement, board and AMCO.

Tax Violations - AMCO Enforcement Unit will soon begin to review licensee tax issue complaints on a case-by-case basis by looking at the totality of the situation and bringing various enforcement measures forward to encourage compliance before tax receipts become enormous and, in some cases, insurmountable by licensees.

Packaging of Marijuana and Marijuana Products/Concentrates –

- “Variety Packs” – On 2-4-22, we issued an advisory concerning unapproved “variety packs”. This was done after we received complaints of Cultivators, Product Manufacturers and Concentrate manufacturers creating and selling variety packs.
 - The licensee(s) were placing products and concentrates in one multi pack “package” within METRC.
 - In some cases, the packages exceeded the allowable serving size (3 AAC 306.560(2)) and the packages have not been approved by the MCB.
 - AMCO Enforcement was told that in some of these incidents, the packages were “exit bags” and not unapproved variety packs. We found that in these cases the following applied to the packaging:
 - sealed prior to a customer purchasing the items
 - has METRC tags already applied
 - Is labeled “**Variety Pack**”
 - each METRC Tag on the package is labeled Variety Pack
 - has the required warnings for a package already applied
 - nothing can be added to the bag or changed by the customer
 - it is only filled with the originating licensee’s product

Licensees were advised to stop this practice. AMCO Enforcement has concluded that these small, but relevant details point more towards company packaging using an unapproved package, rather than an exit bag. I am asking for the board to review this and support Enforcement’s decision.

- Trade show or event packaging – Enforcement was approached after the aforementioned advisory was distributed. It was asked if a licensee could sell backpacks filled with marijuana and marijuana products as a “judge kit”. The judges would purchase certain/specific marijuana and marijuana products that were placed in a backpack labeled for the event. Enforcement advised the individual making the request that we would seek board guidance as we can see the slight difference between the unapproved packaging and the need for this to occur at an approved trade show.

I also advised both parties that this can be made a moot point if retailers sold the marijuana and marijuana products and utilized the bags/backpacks as exit bags. The caveat was that it had to be used as an exit bag and not used for any other purpose and the customer could choose what items they placed in the bags, if the marijuana retail store promoted certain items and said this purchase includes...

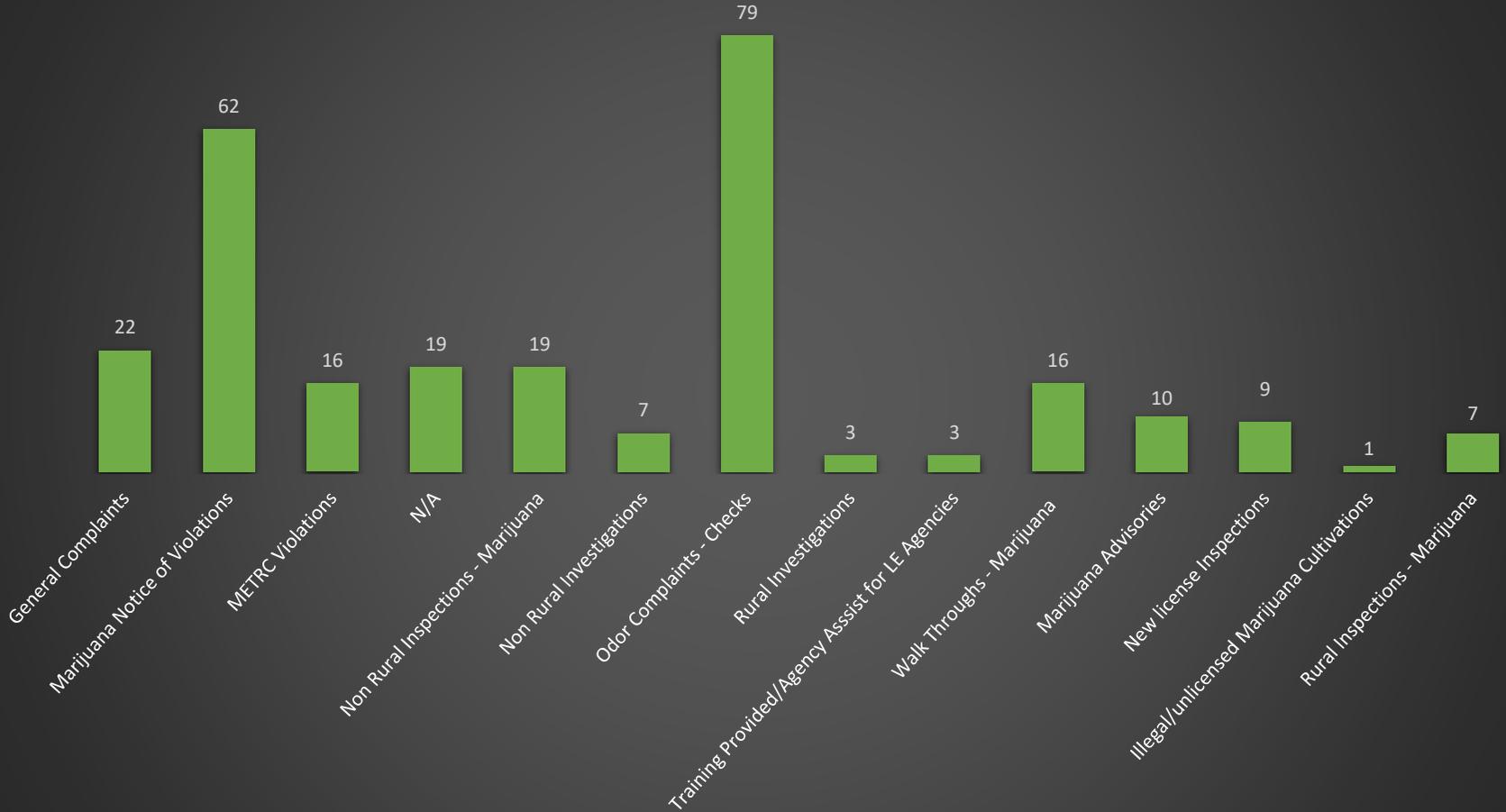
Packaging supply chain issue – AMCO Enforcement is requesting delegated approval of different types of packaging to be used by our licensees as we see the complications caused by supply chain issues. If a

licensee was to provide an adequate compliant replacement, we do not see the need to complicate a process for the board, licensee and AMCO.

Signage - A survey of various sign laws and procedures by the regulations desk, Program Coordinator and enforcement continues.

January 1st, 2022 - March 24, 2022

MCB Enforcement Principles

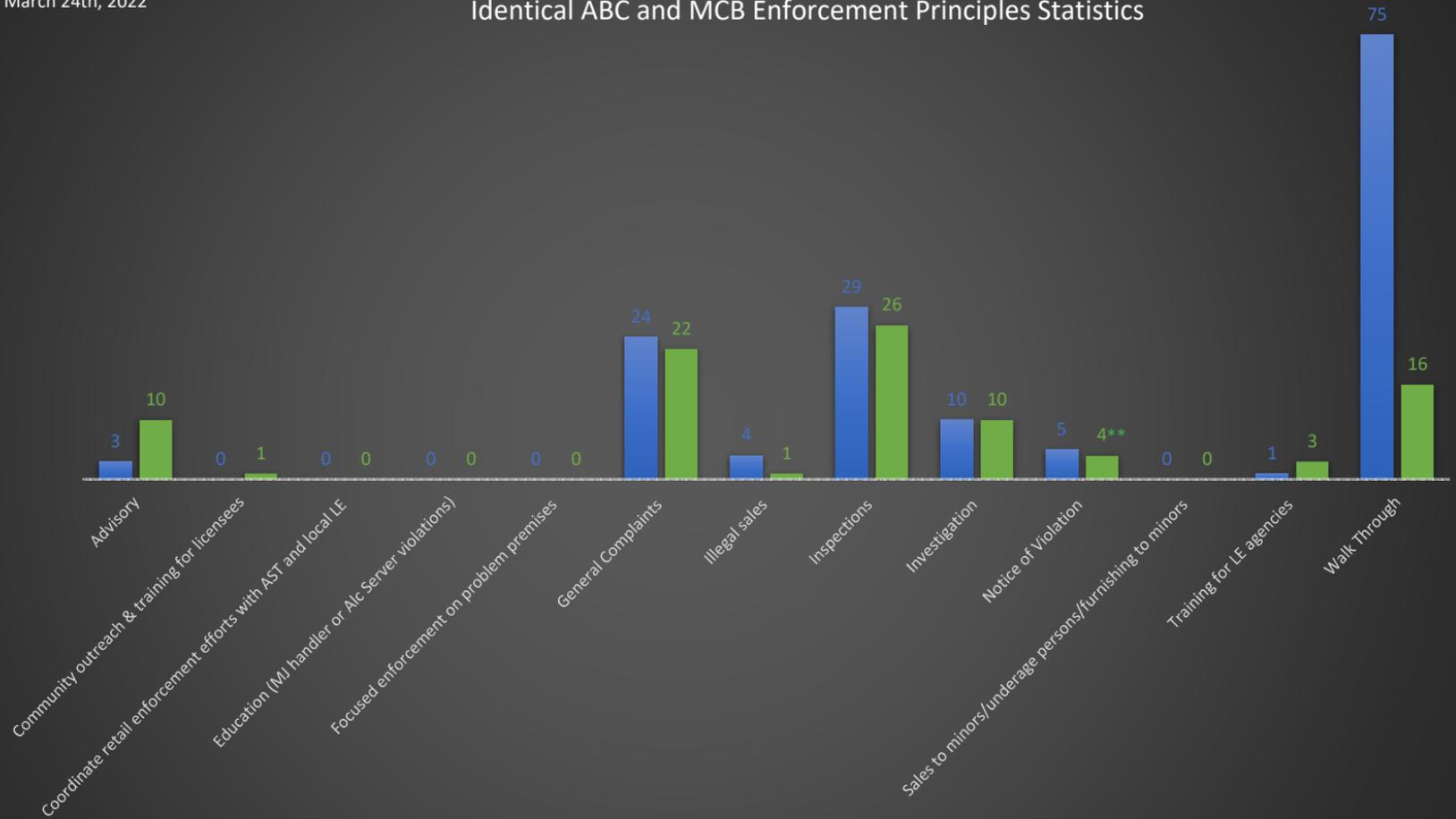


"Disclaimer: Reported numbers are not final outcomes."

Marijuana

Identical ABC and MCB Enforcement Principles Statistics

Alcohol
Marijuana



**Tax delinquency violations is not included.

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**** CORRECTED ****

AMCO Cultivator Name - DBA	License No.	Balances for Taxpayers on the Delinquency List in the Past 12 Months												Times on Delinquency List in Past 12 Months
		Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	
50 SHADES OF GREEN LLC	14956	16,615	16,757	18,397	22,226	25,071	29,825	33,587	36,134	36,841	38,145	38,574		11
ABSOLEM'S GARDEN	12612					4,744	6,691	6,070						3
ACP, LLC	20716	48,944	62,278	64,288	76,465	79,801	82,119	109,422	109,149	113,838	115,483	117,285	117,737	12
AK BEST BUDS LLC	14581										11,970			1
ALASKA CANNABIS COMPANY	12618	147,635	147,939	149,557	149,850									4
ALASKA CANNABIS CULTIVATORS	10592												32,465	1
ALASKA CANNABIS PROPAGATION	11651				6,722	6,722	6,722	6,722	6,722	6,722	6,722	6,722	6,722	9
ALASKA FRONTIER CANNABIS, LLC	14396				9,231	9,263	9,294	9,335	9,367	9,405	9,433			7
ALASKA JANE	11617								1,232	1,293	2,479	2,660	2,784	5
ALASKA MARIJUANA GARDENS (AMG)	12125					2,435				6,299	41,989	51,658	62,415	5
ALASKA LOVEN IT, LLC	12833							9,886			21,369			2
ALASKA PRECISION	10040	4,970	4,980	6,550	6,799	12,659	12,339	17,663				14,877		8
ALASKA BLOOMS, LLC	10073	692,880	691,391	687,202	689,586	691,897	694,209	697,194	716,952	770,498	775,947	782,449	788,667	12
ALASKAN DEVIL'S LETTUCE	11556				4,563	4,578	4,592	4,611	4,626	4,644	4,657	4,676	4,693	9
ALASKAN DREAM LLC	16276					2,413								1
ALASKAN PHARMS, LLC	13785			1,635	2,511									2
ALTHEA'S MORNING BEAR CULTIVATION	14352			25,521										1
ARCTIC GREENERY, LLC	10286			3,719									5,870	2
BODHI TREE WELLNESS	14178											421		1
BLUE BEAR CANNAFARM	11424			5,296							9,538			2
BLUFFSIDE GARDENS	16015						842							1
BOREAL INC.	10514		13,225	19,438										2
BRO BRO BUDZ, LLC.	18516	5,702	5,989	5,686		5,544	5,562			7,721	7,441	7,170	7,476	9
BUBBA GREENS LLC	22369					11,013								1
CANNAFROST	14245										2,002			1
COTTON MOUTH CANNABIS CO.	15015								14,441					1
COTTONMOUTH ROAD	17079		4,158	1,577										2
DANISH GARDENS, LLC	10310				238,415	239,260	240,221	241,100	241,986	242,902	243,763	244,691	245,529	9
DREAM GREEN FARMS	10080	13,021	6,573		19,388				8,569	11,106	18,822	30,540	45,649	8
FAIRBANKS FIREWEED, LLC	11092						1,763	4,984	6,139		6,568		4,230	5
FARMER JACK'S LLC	10142				18,863	18,929	19,005	19,074	19,144	19,216	19,284	19,357	19,423	9
FIBERFLITE	13577					5,448								1
FRISON FARMS, LLC.	12616			616			321							2
FRONTIER GROW LABS, LLC	11319			2,284								6,006		2
FROZEN NORTH FARMS	10500			1,250		1,980	1,201					1,318		4
GOLDHILL GARDENS	10481				2,117	1,148	794	1,961						4
GRATEFUL BUD LLC	16474			18,659							8,629	14,312	23,701	4
GREAT ALASKAN BUD COMPANY	10112			17,486										1
GREEN ACRES 907, LLC	19466			200		7,378	4,168							3
GREEN LEAF	10066				79,352	79,639	79,966	80,265	80,567	80,878	81,171	81,487	81,773	9
GREEN LIFE SUPPLY LLC	10958			6,104										1
GREEN RUSH GARDENS LLC	10011			2,366										1
GREEN VALLEY ENTERPRISES	13221							28,291	29,058	35,761	39,872	45,774		5
GREENSTAR, INC.	12872		6,013	14,603	24,464	35,702	41,719			53,397	59,341	74,223	81,565	9
GUEST SERVICES, LLC.	12461					1,053								1
HAPPY CANNABIS	10201			510						882	1,892			3
HAPPY TREES, LLC.	13416												7,411	1
HARDWORKING HIPPIES	11350								619		1,061			2
HERBAL INSTINCTS	10156			116,953	150,763	164,163	170,486	175,207	178,017	179,276	179,770	180,493	181,155	10
HERB'N LEGENDS LLC.	15209		5,152	250		250								3
HIGH VIBES LLC	19485					11,421								1
JWS ENTERPRISES	10657	8,993		11,430					6,907					3
KINE CO	17409				2,886						5,776		2,133	3
KUSHTOPIA	11611			18,635										1
LAST FRONTIER JOINT OPERATIONS LLC.	11957	55,564	32,695	37,738	4,842		7,999	28,902	10,438	6,746	25,360	21,135	62,566	11
MAD MOTA	15025			2,058			4,911	3,388	5,778					4
MATANUSKA THUNDER FARMS LLC	16261											2,451		1
MOOSE GARDEN, LLC.	10025			13,451										1
NORTH STAR FIRE	13479			36,483			1,156	1,156	2,982			16,802		5
NORTHERN LIGHTS CULTIVATION 2	12173	422												1
PEAK SEASON, LLC.	13803				2,786									1
PERMAFROST DISTRIBUTORS	11519	38,473	38,569	38,724										3
PINNACLE PROJECTS	12989			331										1
RAINFOREST FARMS, LLC	10026				119,042	119,446	119,851	120,376	120,786	121,284	121,639	122,159	122,635	9
RASTA FARMS, LLC.	14919							14,198						1
R.C. TINDERBOX, LLC	10299										3,980			1
RED FOX FARMS LLC	17778		6,416	2,538	3,337		1,957		1,862			2,620	5,385	7
ROCK HARD NUGZ AK	15223					776								1
SEA*WEED FARMS	14511									2,583				1
SNOW LOTUS GARDENS, LLC	20642				7,828	5,982					16,715	15,163	11,925	5
STONED SALMON FARMS	11605			39,558		46,150	75,600	67,649	82,695					5
SUILNUA	11664					25,979	1,998							2
TAKU HORTICULTURE COMPANY, LLC	12176			1,220										1
TALKEETNA HERB COMPANY	10004			6,863		6,910	6,952	13,060	10,592					5
THE FROST FRONTIER	10161								35,019					1
THE GIVING TREE	13211				850	853	856	859	862	866	868	872	876	9
THE RED LIGHT DISTRICT	21725												13,983	1
TLG GARDEN LLC	13344					9,656								1
TWO BIRDS ONE STONED	17445			6,957							11,325	13,964	14,317	4
VALLEY HAPPINESS, LLC	17612								11,199					1
WILDFLOWER FARMS	12833											22,384		1
Total Taxpayers on Delinquency List by Month		11	14	37	23	33	29	24	26	21	31	29	26	

Delinquencies under \$200 are omitted even if they were on the delinquency letter to AMCO

Red font indicates out-of-business