

Douglas, Craig J (CED)

From: McConnell, Erika B (CED)
Sent: Thursday, August 31, 2017 3:34 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: report of phone call

On August 22, 2017, Mr. Keith Klemme called and requested that the following be communicated to the board:

- The board should have a phone line for messages and not expect everyone to use email.
- He grows his own marijuana.
- He will not pay \$20/gram when he can get an ounce for \$80 [on the black market].
- Stores are ripping people off.
- The board needs to deal with this.
- People who bring crack and meth into this country should be executed.

Erika McConnell

Director
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501
Phone: (907) 269-0351
<https://www.commerce.alaska.gov/web/amco/>

Douglas, Craig J (CED)

From: Tom Ferry <tomferry@gci.net>
Sent: Thursday, August 24, 2017 5:21 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: RE: online handebers test not functioning.

Ill get ahold of George that knows what hes doing

From: Marijuana, CED ABC (CED sponsored) [mailto:marijuana@alaska.gov]
Sent: Thursday, August 24, 2017 3:42 PM
To: Tom Ferry
Cc: Marijuana, CED ABC (CED sponsored)
Subject: RE: online handebers test not functioning.

Good Afternoon,

AMCO does not provide the online training for handler permit, the training is approved by our board, but the training itself is provided by private businesses. Below is a list of our approved training site. You will need to contact them directly to resolve the online test.

MARIJUANA HANDLER PERMIT TRAINING

A marijuana establishment and each licensee, employee, or agent of the marijuana establishment who sells, cultivates, manufactures, tests, or transports marijuana or a marijuana product, or who checks the identification of a consumer or visitor, must obtain a marijuana handler permit from the board before being licensed or beginning employment at a marijuana establishment, per 3 AAC 306.700.

To obtain a marijuana handler permit, a person must first complete one of the following approved courses:

- **Alaska Marijuana Handler Certification Course**
Alaska Green Resources
Phone: (907) 252-8026
- **Alaska Marijuana Handler Online Certification Training**
Marijuana Handlers
Phone: (907) 301-1365
- **Alaska Marijuana Institute Online Certification Course**
Good Enterprises
Phone: (907) 202-6328
- **Cannabis Handler and Marijuana Professional Certification Course**
Serious Circus, LLC
Phone: (907) 888-8436
- **Marijuana Handler Permit Instruction**
R. L. Marcy
Phone: (907) 631-9518
- **Marijuana Handler's Card**
Kimberly Kole
Phone: (907) 727-6584



Craig J. Douglas

Administrative Officer
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501
<https://www.commerce.alaska.gov/web/amco/>

From: Tom Ferry [<mailto:tomferry@gci.net>]
Sent: Thursday, August 24, 2017 3:37 PM
To: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>
Subject: online handelerers test not functioning.

I Thomas Dean Ferry just passed the online marijuana handlers test. The site is stuck in the processing phase for over an hour. And I cannot download my certificate or anything else. I hope you get my test results and I do not have to take this test over again. So I took photos of my computer screen and a video of my computer screen that shows my results and scrolling up and down and the date of today on the screen. 907-617-1527 is my number. Can anyone help me as also nobody answers your phones as theyre on the fritz too. Thank you Tom Ferry Ketchikan Alaska.

Douglas, Craig J (CED)

From: Marijuana, CED ABC (CED sponsored)
Sent: Thursday, August 24, 2017 3:42 PM
To: Tom Ferry
Cc: Marijuana, CED ABC (CED sponsored)
Subject: RE: online handebers test not functioning.

Good Afternoon,

AMCO does not provide the online training for handler permit, the training is approved by our board, but the training itself is provided by private businesses. Below is a list of our approved training site. You will need to contact them directly to resolve the online test.

MARIJUANA HANDLER PERMIT TRAINING

A marijuana establishment and each licensee, employee, or agent of the marijuana establishment who sells, cultivates, manufactures, tests, or transports marijuana or a marijuana product, or who checks the identification of a consumer or visitor, must obtain a marijuana handler permit from the board before being licensed or beginning employment at a marijuana establishment, per 3 AAC 306.700.

To obtain a marijuana handler permit, a person must first complete one of the following approved courses:

- **Alaska Marijuana Handler Certification Course**
Alaska Green Resources
Phone: (907) 252-8026
- **Alaska Marijuana Handler Online Certification Training**
Marijuana Handlers
Phone: (907) 301-1365
- **Alaska Marijuana Institute Online Certification Course**
Good Enterprises
Phone: (907) 202-6328
- **Cannabis Handler and Marijuana Professional Certification Course**
Serious Circus, LLC
Phone: (907) 888-8436
- **Marijuana Handler Permit Instruction**
R. L. Marcy
Phone: (907) 631-9518
- **Marijuana Handler's Card**
Kimberly Kole
Phone: (907) 727-6584



Craig J. Douglas

Administrative Officer
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501
<https://www.commerce.alaska.gov/web/amco/>

From: Tom Ferry [mailto:tomferry@gci.net]
Sent: Thursday, August 24, 2017 3:37 PM
To: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>
Subject: online handlers test not functioning.

I Thomas Dean Ferry just passed the online marijuana handlers test. The site is stuck in the processing phase for over an hour. And I cannot download my certificate or anything else. I hope you get my test results and I do not have to take this test over again. So I took photos of my computer screen and a video of my computer screen that shows my results and scrolling up and down and the date of today on the screen. 907-617-1527 is my number. Can anyone help me as also nobody answers your phones as theyre on the fritz too. Thank you Tom Ferry Ketchikan Alaska.

Douglas, Craig J (CED)

From: Tom Ferry <tomferry@gci.net>
Sent: Thursday, August 24, 2017 3:37 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: online handlers test not functioning.

Categories: Craig

I Thomas Dean Ferry just passed the online marijuana handlers test. The site is stuck in the processing phase for over an hour. And I cannot download my certificate or anything else. I hope you get my test results and I do not have to take this test over again. So I took photos of my computer screen and a video of my computer screen that shows my results and scrolling up and down and the date of today on the screen. 907-617-1527 is my number. Can anyone help me as also nobody answers your phones as theyre on the fritz too. Thank you Tom Ferry Ketchikan Alaska.

Douglas, Craig J (CED)

From: Mike Stoltz <mtmike@live.com>
Sent: Thursday, August 24, 2017 12:23 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Sept Meeting

Please register me as a person to be heard for the State of AK Marijuana board meeting [on September 14](#) & 15 as a teleconference participant. Thank you for signing me up and confirming by email that I may speak..

Mike Stoltz
PO Box 202
Talkeetna, AK 99676
907-354-8442 cell

Sent from my iPhone

Douglas, Craig J (CED)

From: Holly Sheldon Lee <hollysheldonlee5g@gmail.com>
Sent: Thursday, August 24, 2017 11:18 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: TELECONFERENCE registration request for September 14 & 15 meeting Persons To Be Heard

Please register me as a person to be heard for the State of AK Marijuana board meeting on September 14 & 15 as a teleconference participant. Thank you for signing me up and confirming by email that I may speak..

Holly Sheldon Lee
P.O. Box 1
Talkeetna, AK 99676
(907) 232-4063

Douglas, Craig J (CED)

From: Good LLC <akgoodcannabis@gmail.com>
Sent: Thursday, August 17, 2017 2:02 PM
To: Marijuana Licensing (CED sponsored)
Cc: Marijuana, CED ABC (CED sponsored)
Subject: MJ 14, GOOD LLC, 10165
Attachments: Coverletter.pdf; MJ14 Retail Premises Diagram Change.pdf

Dear AMCO Office,

Please accept our premises diagram change form. Note, as buildout has not yet commenced, these are changes to the proposed plan, not an existing layout.

We have mailed a check for \$250 to AMCO for payment for this fee. Please let us know if there's anything else we can provide.

Thank you,
Christian Hood,
Owner, GOOD
[907-888-3367](tel:907-888-3367)

Follow GOOD on [Instagram](#), [Twitter](#), and [Facebook](#)

Douglas, Craig J (CED)

From: tayter86 <alaska24hcr@gmail.com>
Sent: Thursday, August 17, 2017 12:08 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Cultivation license

Categories: Forwarded to MJ Licensing, Enforcement

We are in the process of initiating and application for a cultivation license in Houston Alaska. The property we purchased has an existing liquor license grandfathered in to the establishment. Our hopes are to have an outdoor grow on the property. The lodge sits at the very front of the 6.78 acre parcel. Is the liquor license allowed to stay with the lodge or will we have to get rid of it in order to have the green houses on the property? I have read over the regulations and have found where it states a marijuana establishment may not be allowed on the same premisses as a liquor license. I wasn't sure that since they would both be separated if that would still affect the liquor license. Any info would be greatly appreciated. Thanks for your time and hoping to be in touch soon!

Taylor Zavacky

Sent from my iPhone

Douglas, Craig J (CED)

From: Elaine <ezimmerman@gci.net>
Sent: Wednesday, August 16, 2017 4:35 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Limited Cultivation

Categories: Forwarded to MJ Licensing

ALCON:

Where can I find specific regulations on the AMCO website which identify the exact type of insurance a Limited Cultivation Facility (500 sf) is required to carry?

Thank you,

Elaine

Douglas, Craig J (CED)

From: Seth Molen <molen.seth@gmail.com>
Sent: Wednesday, August 16, 2017 11:43 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: Product Manufacturing Facility License Questions

Categories: Forwarded to MJ Licensing

Good morning; I hope this email finds you well.

As the subject line states, I have a few questions in regards to a product manufacturing license. When looking at Form MJ-05, page 4, it reads that the page is required for EACH product that we desire to have approved and be able to manufacture. Would this page be required for each different flavor of an edible if the rest of the product manufacturing process and ingredient list is the same? For example, would a separate page be required for the same candy that is offered in lemon, strawberry and grape-- making it three pages for the same product or would each flavor be viewed as a separate product thus necessitating it's own page?

Additionally, and related to the question above, would a separate page 5 (Form MJ-05) be required for a different pack size of the same product. Again, and to use the example above, if the candy is packaged as a 5-pack or a 10-pack, could we combine the information for each pack size on the same page?

What if the item was not packaged for resale, instead it was packaged for wholesale to another facility, as would be the case with say marijuana wax or shatter (where it would be packaged in 0.5g and 1g containers in our facility as well as in wholesale quantities for another facility to package for sale to the public? Could we include these details on the same page 5 (MJ-05) or would it be expected to use one page for each pack size?

Thank you for your attention and your time.

Kindest regards,

Seth Molen

Douglas, Craig J (CED)

From: Mike Stoltz <mtmike@live.com>
Sent: Monday, August 14, 2017 9:10 PM
To: Marijuana Licensing (CED sponsored); Marijuana, CED ABC (CED sponsored)
Subject: Community Perspective

The MCB needs to take a serious look at themselves!

3-2 votes

Public Safety and Health are being overlooked to expedite marijuana grows and sales!

Community Perspective

FAIRBANKS - In 2014, the statewide voters narrowly passed the ballot proposition that they thought would legalize marijuana. That proposition did almost nothing for legalization since we already had Ravin, the 1975 Alaska Supreme Court decision allowing personal use and possession of marijuana. What it did do was bring in big-money commercial marijuana. By doing this, as we've seen in Colorado, this only increased usage and didn't even make enough money for the state to pay for the cost of regulation and increased hospital costs.

There were a lot of people in Alaska who voted for that proposition because they thought it would get rid of penalties for marijuana use, which were exaggerated by the proponents, but they thought that government would regulate that illicit industry appropriately and protect their neighborhoods. This didn't happen.

So far the city councils, Planning Commission and Borough Assembly have approved every single establishment, even when it's in a residential neighborhood, even when the residents plead for it not to be put there, even when the establishment breaks state law. We have incredibly weak zoning regulations that have already been modified once to allow more marijuana businesses near sensitive uses (schools, churches, youth centers). The State Marijuana Control Board, due to Gov. Bill Walker's appointments, is industry-controlled to the point where they have not only approved sites that violate the regulations they put in place but also are soon to approve regulations no other state has allowing on-site consumption. With on-site consumption, the users can drive to a pot shop, get stoned, and then somehow get home. How exactly do you have a designated driver in a smoking facility?

Currently, two more of these establishments are being put in residential neighborhoods out off of Badger Road. They go in front of the Planning Commission on Tuesday. There's one that was approved last year in a residential neighborhood off of Chena Hot Springs Road that the residents had testified against. Now, one year later, they are bringing up the fact that the whole neighborhood smells like pot, something that's been brought up time and again in Colorado.

How do you think this will affect property values in these neighborhoods? In Colorado, where housing prices have been increasing due to population growth, it's been found that neighborhoods with grow houses have prices 8.4 percent lower than the average. Do you want to live in a neighborhood that always smells like pot? I've had two real estate agents talk to me this week about migration from these types of neighborhoods and the hit on property values.

Another issue is security, in Denver the first year there was a 50 percent burglary rate. In Las Vegas, marijuana became legal on July 1, and in the first month there have already been nearly a dozen break-ins. Why would you want that type of thing happening in your neighborhood?

The 2014 proposition allowed every local community to decide for themselves if they wanted to allow these businesses. This is exactly like every other statewide marijuana law in the U.S. In fact, 70 percent of Colorado local governments have prohibited these establishments. In Fairbanks, we have two initiatives on the ballot, Proposition 1 in the borough outside of the cities and Proposition A in the city of Fairbanks. (The city of North Pole passed one last year).

These do not stop use, growth, possession or transport; they do not roll back legalization. While the big industry opposition is putting out a deceptive message that it will take us back to making pot illegal, this just isn't true. The only thing this initiative will do is prohibit the businesses.

These initiatives are your one chance to protect your neighborhoods, your property values and your families from the hours (they can be open very late into the night), noise, lighting, smell, security, normalization and drugged driving that follow these establishments.

Please get out and vote yes on Proposition 1 or Proposition A on Tuesday, Oct. 3. It's probably the most important election for your neighborhood that has happened locally.

Lance Roberts is an engineer, born and raised in Fairbanks. He is a member of the Fairbanks North Star Borough Assembly. The views expressed here are his own and do not represent the assembly or borough administration.

Sent from my iPhone

Douglas, Craig J (CED)

From: Travis Fraser <travisfraser00@yahoo.com>
Sent: Friday, August 11, 2017 1:36 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Fw: northlink license#11051 cover sheet and certificate of occupancy

Categories: Forwarded to MJ Licensing

On Friday, August 11, 2017 2:19 PM, Travis Fraser <travisfraser00@yahoo.com> wrote:



Alaska Marijuana Control Board

Cover Sheet for Marijuana Establishment Applications

Alcohol & Marijuana Control Office
550 W 7th Avenue, Suite 1800
Anchorage, AK 99501
marijuana.licensing@alaska.gov
https://www.commerce.alaska.gov/web/amco
Phone: 907.269.0350

What is this form?

This cover sheet **must** be completed and submitted any time a document, payment, or other marijuana establishment application item is emailed, mailed, or hand-delivered to AMCO's main office.

Items that are submitted without this page will be returned in the manner in which they were received.

Section 1 – Establishment Information

Enter information for the business seeking to be licensed, as identified on the license application.

Licensee:	Northlink, LLC	License Number:	11051
License Type:	Standard Marijuana Cultivation Facility		
Doing Business As:	NORTHLINK, LLC		
Physical Address:	1550 Cushman, Suite B		
City:	Fairbanks	State:	AK
		Zip Code:	99701
Designated Licensee:	Travis Fraser		
Email Address:	travisfraser00@yahoo.com		

Section 2 – Attached Items

List all documents, payments, and other items that are being submitted along with this page.

Attached Items:	<i>Copy of certificate of occupancy for Suite B Northlink Cultivation</i>
-----------------	---------------------------------------------------------------------------

OFFICE USE ONLY

Received Date:	Payment Submitted Y/N:	Transaction #:
----------------	------------------------	----------------



Certificate of Occupancy

City of Fairbanks
Building Department

This certificate issued pursuant to the requirements of Section 110 of the 001817CB-AB76-4876-6BF6-1D336EBBCC9C International Building Code certifying that at the time of issuance this structure was in compliance with the various ordinances of the City regulating building construction or use. For the following:

Project: 3095 TLZ Meritana

Permit Type: Commercial Building Permit Bldg. Permit No: CB-06-17-012088

Use Classification: Alteration Legal Description: LOT 8 BLOCK 5 RICKERT

Occupancy Group: F-1 Construction Type: TYPE V-B

Use Zone: On File Date Finished:

Owner: TLZ Property Address: P.O. Box 10874
Fairbanks, AK 99710

Remarks: Suite B - two cultivation rooms located on the first floor west side of building and second floor office space only.
Expiration date 9/29/17

1550 Cushnean Street

Location Address

[Signature]
Building Official
Carmen Chodden

Not Transferable
POST IN A CONSPICUOUS PLACE
ISSUED ON 08/10/2017

Douglas, Craig J (CED)

From:
Sent: Friday, August 11, 2017 8:18 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: FW: Marijuana devastated Colorado, don't legalize it nationally

-----Original Message-----

From: Gloria Sweeney [mailto:gsweeney@kpbsd.k12.ak.us]
Sent: Thursday, August 10, 2017 8:00 PM
To: Peter Mlynarik
Subject: FW: Marijuana devastated Colorado, don't legalize it nationally

Chief Mlynarik, this was forwarded to me by Michelle Blackwell and I felt you needed to see it also. We are not the only ones feeling that this marijuana issue is out of control. I know you are on the board and considering opening "parlors" for public consumption. I see no need for this as people can partake in their own homes (that is bad enough). Also, we have 54 cultivation sites on the Peninsula now. Shouldn't that be controlled also? How many are going to be allowed? I don't know what to do to try to get this whole "mess" halted. The proponents are very well organized and vocal. The rest of us are working and involved in the many facets of life and don't seem to have time too "protest" issues. We need the support of people like you to express our concerns. Please do all that you can be curb the spread of this marijuana.

Thank you.
Gloria Sweeney
249 River Watch Dr.
Soldotna, Ak. 99669
907-262-1054

Subject: Fwd: Marijuana devastated Colorado, don't legalize it nationally

Michelle Blackwell
Office of Senator Lisa Murkowski

----- Original message -----

From: Jeff Hunt <centennial@ccu.edu<mailto:centennial@ccu.edu>>
Date: 8/7/17 1:46 PM (GMT-09:00)
To: "Blackwell, Michelle (Murkowski)"
<Michelle_Blackwell@murkowski.senate.gov<mailto:Michelle_Blackwell@murkowski.senate.gov>>
Subject: Marijuana devastated Colorado, don't legalize it nationally

Advancing Faith, Family, and Freedom.

View this email in your browser<<http://mailchi.mp/ccu/marijuana-devastated-colorado-dont-legalize-it-nationally?e=593b6ed651>>

[Centennial Institute] <<http://ccu.us9.list-manage2.com/track/click?u=20a1f0442d8de59e73722cdc0&id=7476031c9f&e=593b6ed651>>

Friends,

Please read and share my latest op-ed in USA TODAY.<<http://ccu.us9.list-manage.com/track/click?u=20a1f0442d8de59e73722cdc0&id=de76b9702f&e=593b6ed651>>

Thank you for your support,

Jeff Hunt
Director, Centennial Institute
Vice President of Public Policy, Colorado Christian University

Marijuana devastated Colorado, don't legalize it nationally

Arrests are up. We still have a black market. And people are in danger.

Last week, Senator Cory Booker introduced the Marijuana Justice Act in an effort to legalize marijuana across the nation and penalize local communities that want nothing to do with this dangerous drug. This is the furthest reaching marijuana legalization effort to date and marks another sad moment in our nation's embrace of a drug that will have generational consequences.

Our country is facing a drug epidemic. Legalizing recreational marijuana will do nothing that Senator Booker expects. We heard many of these same promises in 2012 when Colorado legalized recreational marijuana.

In the years since, Colorado has seen an increase in marijuana related traffic deaths, poison control calls, and emergency room visits. The marijuana black market has increased in Colorado, not decreased. And, numerous Colorado marijuana regulators have been indicted for corruption.

In 2012, we were promised funds from marijuana taxes would benefit our communities, particularly schools. Dr. Harry Bull, the Superintendent of Cherry Creek Schools, one of the largest school districts in the state, said, "So far, the only thing that the legalization of marijuana has brought to our schools has been marijuana."

In fiscal year 2016, marijuana tax revenue resulted in \$156,701,018. The total tax revenue for Colorado was \$13,327,123,798, making marijuana only 1.18% of the state's total tax revenue. The cost of marijuana legalization in public awareness campaigns, law enforcement, healthcare treatment, addiction recovery, and preventative work is an unknown cost to date.

Senator Booker stated his reasons for legalizing marijuana is to reduce "marijuana arrests happening so much in our country, targeting certain communities - poor communities, minority communities." It's a noble cause to seek to reduce incarceration rates among these communities but legalizing marijuana has had the opposite effect.

According to the Colorado Department of Public Safety, arrests in Colorado of black and Latino youth for marijuana possession have increased 58% and 29% respectively after legalization. This means that Black and Latino youth are being arrested more for marijuana possession after it became legal.

Furthermore, a vast majority of Colorado's marijuana businesses are concentrated in neighborhoods of color. Leaders from these communities, many of whom initially voted to legalize recreational marijuana, often speak out about the negative impacts of these businesses.

Senator Booker released his bill just a few days after the Washington Post reported on a study by the Review of Economic Studies that found "college students with access to recreational cannabis on average earn worse grades and fail classes at a higher rate." Getting off marijuana especially helped lower performing students who were at risk of dropping out. Since legalizing marijuana, Colorado's youth marijuana use rate is the highest in the nation, 74% higher than the national average, according to the Rocky Mountain High Intensity Drug Trafficking Area Report. This is having terribly negative effects on the education of our youth.

If Senator Booker is interested in serving poor and minority communities, legalizing marijuana is one of the worst decisions. There is much work to be done to reduce incarceration and recidivism, but flooding communities with drugs will do nothing but exacerbate the problems.

The true impact of marijuana on our communities is just starting to be learned. The negative consequences of legalizing recreational marijuana will be felt for generations. I encourage Senator Booker to spend time with parents, educators, law enforcement, counselors, community leaders, pastors, and legislators before rushing to legalize marijuana nationally. We've seen the effects in our neighborhoods in Colorado, and this is nothing we wish upon the nation.

Support Centennial Institute<<http://ccu.us9.list-manage.com/track/click?u=20a1f0442d8de59e73722cdc0&id=c726c937ea&e=593b6ed651>>

[Facebook]<<http://ccu.us9.list-manage.com/track/click?u=20a1f0442d8de59e73722cdc0&id=64ce9b1fb1&e=593b6ed651>>
[Twitter]<<http://ccu.us9.list-manage2.com/track/click?u=20a1f0442d8de59e73722cdc0&id=704bcf0d29&e=593b6ed651>>
[YouTube]<<http://ccu.us9.list-manage.com/track/click?u=20a1f0442d8de59e73722cdc0&id=65818abe90&e=593b6ed651>>
[Website]<<http://ccu.us9.list-manage.com/track/click?u=20a1f0442d8de59e73722cdc0&id=7de52e3973&e=593b6ed651>>

Copyright © 2017 Centennial Institute, All rights reserved.

You are receiving this email because we believe you are a God-loving, freedom-fighting, patriot of the greatest country in the history of the world.

Our mailing address is:
Centennial Institute
8787 W. Alameda Ave.
Lakewood, CO 80226

Add us to your address book<<http://ccu.us9.list-manage.com/vcard?u=20a1f0442d8de59e73722cdc0&id=8a26a369ff>>

Want to change how you receive these emails?

You can update your preferences<<http://ccu.us9.list-manage.com/profile?u=20a1f0442d8de59e73722cdc0&id=8a26a369ff&e=593b6ed651>> or unsubscribe from this list<<http://ccu.us9.list-manage.com/unsubscribe?u=20a1f0442d8de59e73722cdc0&id=8a26a369ff&e=593b6ed651&c=e4dc0c7c85>>

Douglas, Craig J (CED)

From: paula_joanne@juno.com
Sent: Thursday, August 10, 2017 9:35 PM
To: Marijuana, CED ABC (CED sponsored); CED AMCO Enforcement (CED sponsored)
Subject: very strong odor in neighborhood

Categories: Enforcement

I am writing again to alert to an issue in the Nancy Creek Estate Neighborhood in Willow, where "The Farm" is located, on Twitty Avenue.

For days now, we have been smelling the plants flushing from the operation at The Farm, starting at the highway, around mile 64.5 and right thru our neighborhood.

At the highway it has at times been strong enough to make our eyes and noses burn.

Farm chores and general outdoor time are permeated with the smell at various times thru the day.

We noticed in research that this business declared that they had no need of filtration devices, stating that because of the fact that they sit a little bit above the houses, with some trees surrounding, that scent would never be an issue.

However, it is an issue, and it greatly devalues our properties, and reduces our quality time out of doors.

A response would be most appreciated, as well as requiring this business to take measures to ensure the problem is fixed.

Thank you,
Paula

Douglas, Craig J (CED)

From: Hoelscher, James C (CED)
Sent: Thursday, August 10, 2017 10:12 AM
To: nathangreydanus@gmail.com
Cc: McConnell, Erika B (CED); Douglas, Craig J (CED); CED AMCO Enforcement (CED sponsored)
Subject: RE: question

No license is required for personal use limits grown in a dwelling.

The answer to your second question is no. This would be a violation of AS 11.71 and AS 17.38

Thank you,

James



James Hoelscher
Special Investigator II
Enforcement Supervisor
Alcohol & Marijuana Control Office
550 W. 7th Ave, Suite 1600
Anchorage, AK 99501
Office (907) 269-0353
Cell (907) 891-9660
james.hoelscher@alaska.gov

From: Nathan Greydanus [<mailto:nathangreydanus@gmail.com>]
Sent: Thursday, July 06, 2017 1:10 PM
To: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>
Subject: question

if someone grows marijuana as a person use limit of 6 ... no license required right... could they use a carnival booth game to hand out marijuana as a prize and collect money from the game charging customers the price of pot to play the game and make everyone a winner?

Douglas, Craig J (CED)

From: Marijuana Licensing (CED sponsored)
Sent: Thursday, August 10, 2017 7:36 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: FW: Van Geer LLC

From: Sherry Dianne Cornelison [mailto:diannecornelison@yahoo.com]
Sent: Wednesday, August 09, 2017 6:41 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Van Geer LLC

The people in our neighborhood and the property owners on West Dean Dr. Wasilla Ak. have told you we do not want a pot grow on our road. Names and signatures were turned in. The government suppose to protect citizens. How is this going to effect our property values and our taxes?? Or home insurance? There are two many unanswered questions. This is not protecting the tax payers in this area by allowing this. We and my neighbors have all lived out here a long time, new comers from Anchorage coming out to build a pot grow is not welcome. If people want to have a pot grow business it needs to be out of subdivision. How can you allow pot grows right in subdivisions where people live? Very disappointed in the State of AK and the MSB. I did not vote to legalize pot. This whole process should have been planned better. How do you tell your kids to stay away from pot and your neighbor has a grow?

Sherry Dianne Cornelison
W. Dean Dr

Douglas, Craig J (CED)

From: paula_joanne@juno.com
Sent: Wednesday, August 09, 2017 10:23 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: neighborhood strong odor

Categories: Enforcement

We are have a concern in our neighborhood, regarding a massive grow operation on the corner of Parks Highway and Twitty Avenue.

I think they are called The Farm.

We are starting to have some very strong odors drifting thru our neighborhood from their operation.

It can be very bad when driving by.

I thought I had heard that proper odor control prevented this.

Can you please look into this for us?

I and all our neighbors would appreciate not being d riven indoors from our farm chores and general outdoor time.

Paula

Douglas, Craig J (CED)

From: Troy Foley <troyjfoley@gmail.com>
Sent: Wednesday, August 09, 2017 9:30 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: Question re: forgoing obstructive equipment
Attachments: 1st Floor Completed Layout.docx

Categories: Enforcement, Forwarded to MJ Licensing

Investigator Bankowski,

Upon erecting some of the flower-cycle tents in our recently approved Limited Cultivation Facility, we have determined that our floor space does not accommodate the tent placement we have devised on our premises diagram (see attached). At this time I am considering forgoing the center row of four tents in favor of a table or two to vegetate plants prior to flowering.

Would this modification require a \$250 premises diagram update prior to our final inspection from AMCO?

-Troy J. Foley
Foley's Irish Green
Lic: 12825

Douglas, Craig J (CED)

From: Mr. Michel White <mike@mikesboats.com>
Sent: Tuesday, August 08, 2017 6:31 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: cannabis seeds

Hi, I am wondering where an alaska resident can purchase marijuana seeds legally. Any info would be appreciated.
Thanks, Michel White

Douglas, Craig J (CED)

From: Walter Carlson <wrcarlson43@gmail.com>
Sent: Monday, August 07, 2017 5:55 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Testing Facility questions

Categories: Forwarded to MJ Licensing

Hello my name is Walter Carlson and I am interested in opening a testing facility in Fairbanks. I have a scientific director lined up for the position but I myself have no chemistry or biology experience. Is it okay to be an applicant for a licence without having a PhD, master's degree or bachelor's degree? My director has a master's with 6 years lab experience.

Douglas, Craig J (CED)

From: Marijuana Licensing (CED sponsored)
Sent: Thursday, August 03, 2017 8:29 AM
To: Anne Winckler
Cc: Marijuana Licensing (CED sponsored); Marijuana, CED ABC (CED sponsored)
Subject: RE: Request for copy of application MCF license #13572 dba CANNAKUSH

Good morning,

As of this very moment we have not received any paperwork for this application. The only thing the applicant has done is initiate the application on line which produces the Public Notice that gets posted at the proposed location and another conspicuous location which you can find here
<https://www.commerce.alaska.gov/web/portals/9/pub/MCB/OtherResources/MJinitiatedapplist.pdf> .

Thank you
Jane Sawyer
Occupational Licensing Examiner
Alcohol and Marijuana Control Office
907-269-0350

-----Original Message-----

From: Anne Winckler [mailto:alw@mtaonline.net]
Sent: Wednesday, August 02, 2017 3:47 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Request for copy of application MCF license #1572 dba CANNAKUSH

Alcohol & Marijuana Control Office
Ladies and Gentlemen,

Settlers Bay Owners Association has lodged a protest with your office regarding this license. The applicants, Cameron and Sarah Galvin, have asked to meet with the Settlers Bay Board of Directors to discuss the application as it relates to violation of the subdivision's CCRs. We need to see their application in order to understand their argument that the business would not violate our Covenants. The meeting is scheduled for Wednesday, August 9, 2017.

Can you send me a copy of Galvin's application, please, so that we can review it vis a vis 3AAC306.005-.990.

I realize and appreciate that your office is swamped with all sorts of requests, and I would be grateful for your providing a copy, if you can do so. E-mail will be fine:
alw@mtaonline.net

Thank you.

Sincerely,
Anne Winckler, President
Settlers Bay Owners Association, Inc.
PO Box 877378
Wasilla AK 99687
E-mail: alw@mtaonline.net
Phone: 90-376-8594

Douglas, Craig J (CED)

From: CED AMCO Enforcement (CED sponsored)
Sent: Wednesday, August 02, 2017 1:16 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: FW: Tracking of Sales - MJ Licensees

Jed,

You?



Steven M. Johnson
Special Investigator
Enforcement Unit
Alcohol & Marijuana Control Office
State Office Building, 9th Floor
333 Willoughby Avenue
Juneau, AK 99801
Office (907) 465-2330
Cell (907) 500-2053
steven.johnson@alaska.gov

From: Michael Scarcelli [mailto:michael.scarcelli@cityofsitka.org]
Sent: Wednesday, August 02, 2017 12:45 PM
To: CED AMCO Enforcement (CED sponsored) <amco.enforcement@alaska.gov>
Subject: Tracking of Sales - MJ Licensees

Hello,

I am writing to see what level of record and detail our municipality can get regarding the tracking and sales information that the (Marijuana Inventory Tracking System) METRC provides.

My understanding is that each unit sold is tracked from cultivator to point of sale (both wholesale and retail sale). In reviewing state license renewals, our municipality would like to know if they are complying with our local conditional use permits, which require sales tax for sales (wholesale or retail) outside of the municipality. We can't determine this absent audit and known sales information. Knowing the details of METRC information would be helpful.

Please advise us on the availability of such record/detail/info; and if possible, provide us with the METRC information for all Sitka Marijuana licensees to date.

Thank you

Michael Scarcelli, J.D.
Planning and Community Development Director
100 Lincoln Street, Room 109
Sitka, AK 99835
(907) 747-1815
michael.scarcelli@cityofsitka.org

Douglas, Craig J (CED)

From: Walter Carlson <wrcarlson43@gmail.com>
Sent: Thursday, July 27, 2017 4:46 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Testing Facility questions

Hello my name is Walter Carlson and I am interested in opening a testing facility in Fairbanks. I have a scientific director lined up for the position but I myself have no chemistry or biology experience. Is it okay to be an applicant for a licence without having a PhD, master's degree or bachelor's degree? My director has a master's with 6 years lab experience.

Douglas, Craig J (CED)

From: Denali Smoke <denalismoke@gmail.com>
Sent: Thursday, July 27, 2017 2:36 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Re: AK MJ License List is broken

This is the page I'm using to access the file:

<https://www.commerce.alaska.gov/web/amco/OtherMarijuanaResources.aspx>

This is the link for the pdf. [Licenses and Applications by Status as of: 7/25/2017](#)

<https://www.commerce.alaska.gov/web/portals/9/pub/MCB/OtherResources/MJinitiatedapplist.pdf>

I've been maintaining a spreadsheet with the info contained in the public notices and this is the first time I've had any real problem. There have been occasional broken links, but nothing like this.

Keith

On Thu, Jul 27, 2017 at 7:51 AM, Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov> wrote:

Good Morning-

Could you please give me a call when you have a moment. I'm not showing our links as broken, but I want to confirm we are accessing them from the same area.



Craig J. Douglas

Administrative Officer

Alcohol & Marijuana Control Office

550 West 7th Avenue, Suite 1600

Anchorage, Alaska 99501

<https://www.commerce.alaska.gov/web/amco/>

From: Denali Smoke [mailto:denalismoke@gmail.com]
Sent: Thursday, July 27, 2017 7:49 AM

To: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>

Subject: AK MJ License List is broken

Just a heads up. All the links to the public notices in the 7-25-2017 list of license applications are broken. Actually, they aren't really links.

One other thing. For those of us that don't have Adobe Acrobat, could you sort the records by license number as well as status before you publish it online?

That's all.

Keith Searles

denalismoke@gmail.com

www.DenaliSmokeNews.com



Virus-free. www.avg.com

Douglas, Craig J (CED)

From: Denali Smoke <denalismoke@gmail.com>
Sent: Thursday, July 27, 2017 7:49 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: AK MJ License List is broken

Just a heads up. All the links to the public notices in the 7-25-2017 list of license applications are broken. Actually, they aren't really links.

One other thing. For those of us that don't have Adobe Acrobat, could you sort the records by license number as well as status before you publish it online?

That's all.

Keith Searles
denalismoke@gmail.com
www.DenaliSmokeNews.com



Virus-free. www.avg.com

Douglas, Craig J (CED)

From: Florence Moore <fdmoore38@gmail.com>
Sent: Tuesday, July 25, 2017 6:30 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Re: MCB meeting

Thank you so much for your quick response!

Gratefully

Florence

--



Douglas, Craig J (CED)

From: Marijuana, CED ABC (CED sponsored)
Sent: Tuesday, July 25, 2017 2:54 PM
To: Florence Moore
Cc: Marijuana, CED ABC (CED sponsored)
Subject: RE: MCB meeting

Hello-

The next board meeting will be September 13-14 in Nome. We cannot confirm you will be on the agenda at this time as it is still being developed.



Craig J. Douglas

Administrative Officer
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501
<https://www.commerce.alaska.gov/web/amco/>

From: Florence Moore [mailto:fdmoore38@gmail.com]
Sent: Tuesday, July 25, 2017 2:19 PM
To: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>
Subject: MCB meeting

I have not been able to find online when the MCB will meet next. I would greatly appreciate the dates, as we are hoping our License #12783 will be approved by then. We would like to have a consultant come with us & need to notify him.

Thank you.

Florence & Robert Moore

--



Douglas, Craig J (CED)

From: Florence Moore <fdmoore38@gmail.com>
Sent: Tuesday, July 25, 2017 2:19 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: MCB meeting

I have not been able to find online when the MCB will meet next. I would greatly appreciate the dates, as we are hoping our License #12783 will be approved by then. We would like to have a consultant come with us & need to notify him.

Thank you.

Florence & Robert Moore

--



Douglas, Craig J (CED)

From: AMCO Local Government Only (CED sponsored)
Sent: Thursday, July 20, 2017 7:54 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: FW: marijuana retail store

Categories: Enforcement

From: . TALKEETNA RV LLC [mailto:alaskarv@mtaonline.net]
Sent: Wednesday, July 19, 2017 7:48 PM
To: AMCO Local Government Only (CED sponsored) <amco.localgovernmentonly@alaska.gov>
Subject: marijuana retail store

To whom this may concern,
I have lived in Talkeetna for 40 years and I object to the issuance of this retail marijuana store license in downtown Talkeetna. People have been smoking pot here for a long time and have been considerate to those who don't smoke it by keeping it to themselves. Last week there was a tourist who was completely intoxicated from 4 brownies he bought and consumed from this local dispensary. He was so wasted he could not walk and laid in the street for half an hour until some locals helped him get out of sight. This kind of behavior I don't want to see in a public place. There are a lot of children in the community that do not need to be around this kind of drug use in the downtown area.

Sincerely,
Aaron Benjamin

Douglas, Craig J (CED)

From: Lopez, Dallas <Dallas.Lopez@cfins.com>
Sent: Tuesday, July 18, 2017 10:39 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: General Bonding Inquiry

Categories: Forwarded to MJ Licensing

Good Afternoon,

I am writing to inquire about the current bonding requirements within your municipality. My understanding is that the state of Alaska does not currently have in place any bonding requirements for the cultivation or sale of marijuana. To my knowledge the city of Anchorage does however require a \$5,000 sales tax bond.

Can you please confirm that my information is correct, or advise me if I am not correct?

Thank you so much for your time.

Dallas Lopez | Associate Underwriter, Commercial Surety
Crum & Forster
PO Box 2807 | Houston, TX 77252 | United States
t +1.713.954.8712 | F: +1.877.622.6628
Dallas.Lopez@cfins.com | www.cfins.com



Please forward new losses to: CrumAndForsterNOL@CFIns.com



C&F and Crum & Forster are registered trademarks of United States Fire Insurance Company.

Crum & Forster, which is part of Fairfax Financial Holdings Limited, is comprised of leading and well-established property and casualty business units. The insurance companies within Crum & Forster, rated A (Excellent) by A.M. Best Company, are: United States Fire Insurance Company, The North River Insurance Company, Crum and Forster Insurance Company, Crum & Forster Indemnity Company, Crum & Forster Specialty Insurance Company, Seneca Insurance Company, Inc., Seneca Specialty Insurance Company, First Mercury Insurance Company, and American Underwriters Insurance Company. This electronic mail message and any attached files contain information intended for the exclusive use of the intended addressee and may contain personal, medical, or other legally protected or confidential information. If you received this email in error, please notify the sender and delete the original message without making copies. No waiver of any privileges is intended. Thank you.

Douglas, Craig J (CED)

From: Marijuana Licensing (CED sponsored)
Sent: Monday, July 17, 2017 7:56 AM
To: Shalona Roseborough
Cc: Marijuana Licensing (CED sponsored); Marijuana, CED ABC (CED sponsored)
Subject: RE:

Good morning,

If you are objecting to a specific application please follow the instructions here <https://www.commerce.alaska.gov/web/amco/OtherMarijuanaResources.aspx> .

Thank you
Jane Sawyer
Occupational Licensing Examiner
Alcohol and Marijuana Control Office

From: Shalona Roseborough [mailto:shalona.kidzone@yahoo.com]
Sent: Friday, July 14, 2017 6:46 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject:

I am emailing regarding an application for a Marijuana license by Ronald D. Simkiss. This person is not from Alaska and does not always reside in Alaska. He resides in Arizona. He has hunted in Alaska illegally without the correct hunting licenses, this has been reported to the proper authorities and I am not sure if any action has been taken.

Thank you
concerned Alaskan citizen

Douglas, Craig J (CED)

From: Mike Stoltz <mtmike@live.com>
Sent: Friday, July 14, 2017 3:02 PM
To: Marijuana, CED ABC (CED sponsored); Marijuana Licensing (CED sponsored)
Cc: charles.e.flockhart@usdoj.gov; General, Attorney (LAW sponsored); anchoragefbi; Bankowski, Joe (CED); joe@thehighexpedition.com; TCCI - contact; vern.halter@matsugov.us; randall.kowalke@matsugov.us; Jim Sykes; Barbara Doty; George McKee; Dan Mayfield; Matthew Beck; Steve Colligan; John Moosey; Beth Valentine; Holly Sheldon Lee; mthiessen@ap.org; Phillip Manning; Zaz Hollander; Ellen Lockyer - Alaska Public Media
Subject: Onsite Marijuana Consumption

How can the Alaska MCB continue to "backtrack" and "glue" marijuana regulations in Alaska from meeting to meeting?

Where is the MCB's "master plan" for marijuana in Alaska?

How can the MCB compare one areas/city on site marijuana consumption in a huge city like Anchorage to another rural area like Talkeetna?

Talkeetna has no police, is a designated census place and is dependent on tourism for economic survival.

If you were in Talkeetna which is largely dependent on tourism for economic survival, would you want a stinky, smelly, marijuana customer who just consumed, in your tourist shop, restaurant, on a ranger tour, on your zip line, dog tour, jet boat, river raft, or flight tour?

We have no law in Talkeetna!

Who is to regulate and how?

The MCB is ignoring the basic economy of Talkeetna, tourism, for the benefit of one retail marijuana shops gain! (High Expedition in Talkeetna) Something is severely amiss with the MCB Licensing procedures to jeopardize most all business's in Talkeetna for the benefit of one Federally Illegal Schedule One Marijuana Retail Business. (High Expeditions)

One more suggestion for the MCB to consider, when a complaint is made to the MCB, a complaint number should be given, and the disposition of how the complaint was disposed of by the MCB should be available to the public!

Mike Stoltz, Owner
Meandering Moose Lodging
Talkeetna, AK 99676
907-354-8442 cell

Sent from my iPhone

Douglas, Craig J (CED)

From: carriganalaska <carriganalaska@gmail.com>
Sent: Thursday, July 13, 2017 5:27 PM
To: McConnell, Erika B (CED); Marijuana, CED ABC (CED sponsored)
Subject: From the Anchorage assembly
Attachments: AR 2017-251(S) OCR.PDF

This was passed Tuesday night

Cary

Sent from my Samsung Galaxy smartphone.

Submitted by: Assembly Members
Constant and Rivera

Prepared by: Assembly Counsel

For reading: July 11, 2017

Municipal Clerk's Office

Approved

Date: 7/11/2017

**ANCHORAGE, ALASKA
AR No. 2017-251(S)**

**A RESOLUTION OF THE ANCHORAGE MUNICIPAL ASSEMBLY REQUESTING THE
STATE OF ALASKA MARIJUANA CONTROL BOARD TO ADOPT REGULATIONS
ALLOWING ON-SITE CONSUMPTION OF MARIJUANA OR APPROVE DESIGNATED
AREAS FOR ON-SITE CONSUMPTION IN LICENSED RETAIL MARIJUANA
ESTABLISHMENTS.**

WHEREAS, the Alaska Marijuana Control Board (AMCB) is meeting July 12-14, 2017, in Fairbanks to consider, among other things, updates on implementation of marijuana establishment licensing, ongoing and proposed regulations projects, and other matters that may come before it; and

WHEREAS, media outlets report at this meeting the AMCB will potentially consider up to three different proposals from different board members for standards and conditions to authorize on-site marijuana or marijuana product consumption; and

WHEREAS, currently consumption of marijuana on, in or upon any public place is prohibited by Alaska Statute 17.38.040 and Anchorage Municipal Code section 8.35.300; and

WHEREAS, under state law, consumption of marijuana or a marijuana product on the premises of a licensed retail marijuana store may not be allowed, except in a designated area on the licensed premises as authorized with prior approval of the AMCB and when purchased on the licensed premises (3 AAC 306.305(a)(4) and 3 AAC 306.310(b)(2))-yet the AMCB has not authorized on-site consumption anywhere in the state to date; and

WHEREAS, Anchorage Municipal Code subsection 10.80.310B.2. does not allow consumption of marijuana on the premises of a licensed retail marijuana store, but the Anchorage Assembly reserved AMC subsection 10.80.305A.4. in the Code for potential future amendment to allow on-site consumption consistent with any action by the AMCO authorizing it; and

WHEREAS, on-site marijuana consumption has been an issue and concern among stakeholders, particularly in the downtown area where visiting tourists interested in Anchorage's new marijuana industry may purchase marijuana, but currently have no place designated for lawful consumption, other than private property closed to the public which is unlikely to be available to most visitors; and

WHEREAS, the Anchorage Assembly recently approved a second municipal retail marijuana establishment license located in the downtown core area, and has more applications currently proposed and anticipated to come before the body in the near future; and

WHEREAS, businesses, community leaders and stakeholders in the downtown area have expressed concern with the imminent proliferation of multiple retail marijuana stores

1 downtown and the adverse effects they could potentially create, including worries about
2 illegal public consumption, given the high concentration of tourists in the vicinity who may
3 seek to purchase legal marijuana in Alaska without the inclusion of designated areas for
4 lawful marijuana consumption; and

5
6 WHEREAS, some citizens and business owners of the downtown Anchorage
7 area are seeking additional regulation related to the number of licensees allowed to
8 operate in the area, separation distances from protected uses or other licensees,
9 and a resolution to the on-site consumption issue; and this Assembly Resolution is
10 in response to those downtown businesses who are asking for time to develop a
11 plan specifically for downtown Anchorage addressing those issues; and

12
13 WHEREAS, the sponsors of Proposition 2, which the voters approved at the
14 November 4, 2014 statewide general election, intended to set up a system where
15 marijuana would be regulated and taxed like alcohol, yet while on-site consumption
16 of alcohol is common under a beverage dispensary or restaurant or eating place
17 liquor license, there are no comparable marijuana retail establishment licenses
18 allowing consumption on-site only of products purchased on the premises; and

19
20 WHEREAS, if authorization for on-site consumption at designated areas on licensed
21 premises is provided, particularly in areas focused on tourism, it would mitigate the
22 foreseeable risk and potential for illegal consumption of marijuana in public or on licensed
23 retail premises where it is not authorized; now, therefore,

24
25 **THE ANCHORAGE ASSEMBLY RESOLVES:**

26
27 **Section 1.** The Assembly strongly supports adoption of regulations or approval of
28 designated areas for on-site consumption on the licensed premises of retail marijuana
29 stores located in Anchorage to legitimize such use for tourists, visitors and patrons to the
30 area as soon as possible.

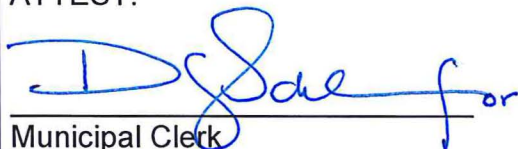
31
32 **Section 2.** Upon passage and approval, the Municipal Clerk is directed to send signed
33 copies of this resolution as soon as practicable to the Alaska Marijuana Control Board.

34
35 **Section 3.** This resolution shall be effective immediately upon passage and approval by
36 the Assembly.

37
38 PASSED AND APPROVED by the Anchorage Assembly this 11th day of July, 2017.

39
40
41
42 
43 _____
44 Chair

44 ATTEST:

45
46 
47 _____
48 Municipal Clerk

Douglas, Craig J (CED)

From: Doll, Donna M. <ddoll@nd.gov>
Sent: Wednesday, July 12, 2017 10:32 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: System questions

Categories: Enforcement, Director

Hello,

North Dakota recently passed a medical marijuana legalization law. We are in the process of looking for a system and would like to know what you are currently using. It may be easier to discuss on the phone, but I did place my questions/information request below as well.

Do you utilize a seed to sale tracking system? If yes, which one?

Do you have Point of Sale and Patient Sale tracking?

What do you use for Security Monitoring?

How to do you track patient, caregiver and agent registration?

Do you have a system that takes care of everything?

What is the interconnect ability with the system, such as law enforcement, manufacturing facilities, dispensaries as well as state oversight monitoring?

Thank you so much for any information!!

Sincerely,

Donna Doll
Administrative Assistant
Division of Medical Marijuana
North Dakota Department of Health
600 East Boulevard Ave Dept 301
Bismarck, ND 58505
(P) 701.328.1311
ddoll@nd.gov



Douglas, Craig J (CED)

From: David Nees <davidneesak@gmail.com>
Sent: Wednesday, July 12, 2017 6:19 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: On site consumption resolution by Anchorage Assembly

Please consider allowing local communities to opt out of on site consumption if you bring this topic up. The American lung Association worked long and hard to make Anchorage smoke free, so allowing on site smoking defeats that work.

Onsite consumption of edibles and other ingested products should either be regulated by, taxing to cover insurance and medical personal injury lawsuits on establishments and cities allowing onsite use.

David Nees
2542 curlew

Douglas, Craig J (CED)

From: Marijuana Licensing (CED sponsored)
Sent: Tuesday, July 11, 2017 8:54 AM
To: Jane McCourt
Cc: Marijuana Licensing (CED sponsored); Marijuana, CED ABC (CED sponsored)
Subject: RE: objection to licensing

If you are objection to a specific marijuana establishment application, please follow the instructions on our website to submit an objection <https://www.commerce.alaska.gov/web/amco/OtherMarijuanaResources.aspx>

Thank you
Jane

-----Original Message-----

From: Jane McCourt [mailto:jmccourt@mtaonline.net]
Sent: Tuesday, July 11, 2017 8:25 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: objection to licensing

To Whom it may concern:

We are very concerned about this new license application. Our subdivision has a very restrictive convents on this and we object to having this in our area. Our CCR's do not permit this as below: CCRs by the Document # 2004-002308-0 in Recording District 311, Palmer etc . Article VIII, Sections 1 Compliance A, B, F, K; Section 3 Enforcement; , and Section 4 Fines A through G.

Please also consider the fact that there are over 600 homes here and many many children. We don't need the excess traffic that this business would generate.

Thank you for your consideration.

Jane and Brad McCourt

Douglas, Craig J (CED)

From: Kerby Coman <greendegree420@yahoo.com>
Sent: Monday, July 10, 2017 3:11 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Public Comment Request

I would love to participate in public comment on July 12th

Respectfully,

Kerby Coman, CEO



2301 South Knik-Goose Bay Rd. #1
Wasilla, AK 99654
(907) 884-3153

www.facebook.com/greendegree
www.greendegree.net
greendegree420@yahoo.com



Virus-free. www.avast.com

Douglas, Craig J (CED)

From: lena lafferty <lena7272@yahoo.com>
Sent: Monday, July 10, 2017 1:25 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Speak to board

Hello. My name is Lena Lafferty. I would like to be heard during the board on 12Jul. Thank you.
[Sent from Yahoo Mail on Android](#)

Douglas, Craig J (CED)

From: Joey Caterinichio <jcaterinichio@alaska.net>
Sent: Saturday, July 08, 2017 8:44 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Regulation of amount of shops and question.
Attachments: MCB-MeetingAgenda-20170712.pdf; ATT00001.txt

Dear Board,

Why do we have so many Marijuana shops opening?

The ramification of this drug is so bad on society.

Our community and kids do not need a pot shop on every corner of anchorage.

I understand a vote passed by only 1-2%. What about the rights of all the other people that did not vote for this?

I understand people say pot is safer than alcohol. But it is not. I am not an advocate for any mis-use of substances. Most importantly, the smoking of pot is not socially, accepted, when you are stoned your stoned, unlike alcohol where you can stop at one drink. The smell of pot and smoking it on public streets, or people walking through is nauseating.

The issues are:

- 1) You can drink one glass of alcohol and not be drunk.
- 2) You can not just control how much you smoke like you can drink and the effects it has on your system.
- 3) Studies show how bad the long term effects are on the brain.
- 4) The edibles are extremely scary. No edibles should be approved ever. Kids can get a hold of them and do easily. They are less likely to know what to do or ingest a tobacco or leaf form.
- 5) Pot has always been legal in people homes in Alaska and that is where it should stay.
- 6) The smell of pot is all around town now. The smell is strong, awful and does not disperse quickly. We were so down on smoking cigarettes and now we have pot?
- 7) Just to make money off this is not ethical or right.
- 8) The trade off of what we are teaching our children is not worth the taxes collected. The law enforcement needed to control this far supersedes what we are making.
- 9) Can we not stop adding stores? How many does one city need?
- 10) Crimes are being committed and murders are happening over pot.
- 11) Our city is becoming less desirable for hard working people to live here.
- 12) How many more stores can be added in this town?

Thank you for your response.

Sincerely,

Joey Caterinichio
Business Owner and concerned taxpayer
907 229-6427

Douglas, Craig J (CED)

From: chad johnson <chadjman1@hotmail.com>
Sent: Saturday, July 08, 2017 4:17 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Prince of Wales Island cultivation

Categories: Forwarded to MJ Licensing

To Whom it may concern,

Hello my name is Chad Johnson. Im in pursuit to start both a Cultivation and Retail License location. Currently I have found a location for retail in the city of Craig. However, Im having trouble locating a site for cultivation. No city is allowing cultivation in or near 10 miles radius from Craig. I am curious if there is locations beyond these restrictions that is a possibility. There is property out by Hollis that might be okay to cultivate. My question is should I be concerned if land was once bought by land owners other than the State of Alaska, who may still hold mineral and timber rights, and may still have the say rather cultivation is acceptable on that land or not.

Thank you for your time,
Chad Johnson
206-724-1195

Douglas, Craig J (CED)

From: leonard lamb <lamblj@yahoo.com>
Sent: Saturday, July 08, 2017 12:02 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Promote not Control

Please read this article. It is about how the Board promotes the industry instead of hamstringing it in hopes it will fail.

[Nevada dispensaries running out of marijuana](#)



Nevada dispensaries licensed to sell recreational marijuana are running out of pot less than a week after the le...

Douglas, Craig J (CED)

From: Evan Tanner <etanner@anchoragedowntown.org>
Sent: Thursday, July 06, 2017 4:40 PM
To: Marijuana, CED ABC (CED sponsored)
Cc: Constant, Christopher; Jamie Boring
Subject: Public Testimony MCB Meeting // Anchorage Downtown Partnership, Ltd.

To whom it may concern;

The Anchorage Downtown Partnership would like to present public testimony regarding Tab 57 Regulations Project – Onsite Consumption at the MCB meeting next week.

Evan Tanner will read a letter on behalf of the Downtown Partnership.

Regards,

Evan Tanner

--

Evan Tanner
MEMBERSHIP & POLICY DIRECTOR
Anchorage Downtown Partnership, Ltd.
C. (501) 951-1151
Tel. (907) 279-5650

Douglas, Craig J (CED)

From: Nathan Greydanus <nathangreydanus@gmail.com>
Sent: Thursday, July 06, 2017 1:10 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: question

Categories: Enforcement

if someone grows marijuana as a person use limit of 6 ... no license required right... could they use a carnival booth game to hand out marijuana as a prize and collect money from the game charging customers the price of pot to play the game and make everyone a winner?

Douglas, Craig J (CED)

From: Marijuana, CED ABC (CED sponsored)
Sent: Wednesday, July 05, 2017 3:22 PM
To: Christopher Wilhelm
Cc: Marijuana, CED ABC (CED sponsored)
Subject: RE: Craig Douglas

We received your payment and cover letter. I will mail your handler permit this week.



Craig J. Douglas

Administrative Officer
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501
<https://www.commerce.alaska.gov/web/amco/>

From: Christopher Wilhelm [mailto:ketchikanwilhelm@yahoo.com]
Sent: Thursday, June 29, 2017 2:58 PM
To: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>
Subject: Craig Douglas

Hello Craig,

we just spoke about my wife's certificate. Please find attached a copy for completing her MJ Handlers Card application. I will return the rest in the mail to you directly.

Sincerely yours,

Christopher Wilhelm
MJ Handler #12893
MJ License #10922
Ketchikan, AK 99901

----- Forwarded Message -----

From: Kim Kole <handlealaska@gmail.com>
To: ketchikanwilhelm@yahoo.com; wilhelmtia@gmail.com
Sent: Wednesday, April 26, 2017 10:18 AM
Subject: Juneau Handler Card Wilhelm

Hello,

Attached are the certificates for Tia and Christopher Wilhelm. They will be mailing the rest of the required paperwork and money for their card. I will mail the originals out today.

Thank you,
Kim Kole

Douglas, Craig J (CED)

From: Mark Woodward <akmark21@gmail.com>
Sent: Sunday, July 02, 2017 2:26 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Onsite consumption proposal for the board - Lic. 10873

Categories: Director

Hello Director McConnell,

I know the idea of onsite consumption has been difficult for the board. Our place, The Stoney Moose, is a retail shop in Ketchikan, the first stop for the cruise ships - and please know that tourists are indeed making purchases. BUT, also know that many do not make those purchases because they don't feel comfortable with our current consumption laws. They, along with many locals, are clamoring for our lounge idea to open simply because they want to follow the law.

So with that, I would like to invite both you and the entire AMCO board to visit our retail shop and proposed onsite lounge ideas. We have many ideas incorporated from all three current ideas that the Alaska papers printed the other day:

1. A lounge with a "partake and leave" idea: we have no TVs, and actually have included a table tracking software package that will be set to 30 minute increments for customers. Again, I would love to explain our ideas with this.
2. An exhaust system designed and installed by [mechanical engineering firm](#) in Ketchikan which scrubs the air twice before having it exit the building. We are in fact having them install this system as we speak, even knowing the board's obvious reluctance towards this issue.
3. Working with edible manufacturers to limit some edibles to single servings (5mg) for customers to purchase instead of the large 5x5 packaging we've been seeing.
4. Lastly, I'd like to mention our employee shift plan that limits employees to working only 4 hour shifts in the onsite areas, with mandatory 5 minute breaks outside the onsite area every half-hour.

Again, we've thought about this more than any other shop here in Alaska mainly because we see the HUGE potential with access to the cruise ships. But again, it would be a lot easier for the board to see this potential (and safety) firsthand.

Please contact me with ANY comments or questions at any time.

-Mark Woodward, Owner
The Stoney Moose
Ketchikan, AK
Lic. # 10873
907-617-8246

Douglas, Craig J (CED)

From: Ryan Morgan <rm@funksac.com>
Sent: Friday, June 30, 2017 10:47 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: Re: Dispensary Exit Bags

Thanks so much for your quick response, Craig. I'll make sure I let my contacts up there know it is still status quo.



Ryan Morgan
National Sales Manager

FunkSac.com
rm@FunkSac.com
[216.404.2586](tel:216.404.2586) office
[440.823.6983](tel:440.823.6983) cell

CONFIDENTIALITY NOTICE: This transmission and any attachments contain confidential information from FunkSac, LLC which is legally privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient you are hereby notified that any dissemination, distribution, forwarding, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by email or by telephone at [844.468.3865](tel:844.468.3865), and delete the original message immediately. Thank you.

Please consider the environment before printing this email.

From: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>
Sent: Friday, June 30, 2017 2:45 PM
To: Ryan Morgan
Cc: Marijuana, CED ABC (CED sponsored)
Subject: RE: Dispensary Exit Bags

Good Morning-

Packaging and Labeling requirements are covered under 3AAC 306.345, the requirements are listed below, however the simple answer is licensees are still required to use opaque, resealable, child-resistant packaging.

3 AAC 306.345. Packaging and labeling

(a) A retail marijuana store shall assure that

- (1) marijuana sold on its licensed premises is packaged and labeled in compliance with 3 AAC 306.470 and 3 AAC 306.475;
- (2) any marijuana product sold on its licensed premises is packaged and labeled in compliance with 3 AAC 306.565 and 3 AAC 306.570; and
- (3) marijuana or a marijuana product sold is packaged in opaque, resealable, child-resistant packaging when the purchaser leaves the retail section of the licensed premises; the packaging 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.

(b) In addition to labeling requirements provided in (a) of this section, a retail marijuana store shall affix a label to each package of marijuana or marijuana product that

- (1) identifies the retail marijuana store selling the marijuana product by name or distinctive logo and marijuana establishment license number;
- (2) states the total estimated amount of THC in the labeled product; and
- (3) contains each of the following statements:
 - (A) "Marijuana has intoxicating effects and may be habit forming and addictive.";
 - (B) "Marijuana impairs concentration, coordination, and judgment. Do not operate a vehicle or machinery under its influence.";
 - (C) "There are health risks associated with consumption of marijuana.";
 - (D) "For use only by adults twenty-one and older. Keep out of the reach of children.";
 - (E) "Marijuana should not be used by women who are pregnant or breast feeding."



Craig J. Douglas

Administrative Officer
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501
<https://www.commerce.alaska.gov/web/amco/>

From: Ryan Morgan [mailto:rm@funksac.com]
Sent: Friday, June 30, 2017 10:24 AM
To: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>
Subject: Dispensary Exit Bags

Hello -

FunkSac is a packaging company that manufactures the child resistant "exit bags" that dispensaries are required to put products in prior to patrons leaving the store. Recently, a number of people in Alaska have told me that these bags are no longer required by the state though I cannot find language in the Alaska state rules to confirm this claim.

Can you please verify whether dispensaries are still required to use the child resistant exit bags? Thank you.


Ryan Morgan
National Sales Manager

FunkSac.com
rm@FunkSac.com
[216.404.2586](tel:216.404.2586) office
[440.823.6983](tel:440.823.6983) cell

CONFIDENTIALITY NOTICE: This transmission and any attachments contain confidential information from FunkSac, LLC which is legally privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient you are hereby notified that any dissemination, distribution, forwarding, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by email or by telephone at [844.468.3865](tel:844.468.3865), and delete the original message immediately. Thank you.

Please consider the environment before printing this email.

Douglas, Craig J (CED)

From: Marijuana, CED ABC (CED sponsored)
Sent: Friday, June 30, 2017 10:45 AM
To: Ryan Morgan
Cc: Marijuana, CED ABC (CED sponsored)
Subject: RE: Dispensary Exit Bags

Good Morning-

Packaging and Labeling requirements are covered under 3AAC 306.345, the requirements are listed below, however the simple answer is licensees are still required to use opaque, resealable, child-resistant packaging.

3 AAC 306.345. Packaging and labeling

(a) A retail marijuana store shall assure that

(1) marijuana sold on its licensed premises is packaged and labeled in compliance with 3 AAC 306.470 and 3 AAC 306.475;

(2) any marijuana product sold on its licensed premises is packaged and labeled in compliance with 3 AAC

306.565 and 3 AAC 306.570; and

(3) marijuana or a marijuana product sold is packaged in opaque, resealable, child-resistant packaging when the purchaser leaves the retail section of the licensed premises; the packaging 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.

(b) In addition to labeling requirements provided in (a) of this section, a retail marijuana store shall affix a label to each package of marijuana or marijuana product that

- (1) identifies the retail marijuana store selling the marijuana product by name or distinctive logo and marijuana establishment license number;
- (2) states the total estimated amount of THC in the labeled product; and
- (3) contains each of the following statements:
 - (A) "Marijuana has intoxicating effects and may be habit forming and addictive.";
 - (B) "Marijuana impairs concentration, coordination, and judgment. Do not operate a vehicle or machinery under its influence.";
 - (C) "There are health risks associated with consumption of marijuana.";
 - (D) "For use only by adults twenty-one and older. Keep out of the reach of children.";
 - (E) "Marijuana should not be used by women who are pregnant or breast feeding."



Craig J. Douglas

Administrative Officer
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501
<https://www.commerce.alaska.gov/web/amco/>

From: Ryan Morgan [mailto:rm@funksac.com]
Sent: Friday, June 30, 2017 10:24 AM
To: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>
Subject: Dispensary Exit Bags

Hello -

FunkSac is a packaging company that manufactures the child resistant "exit bags" that dispensaries are required to put products in prior to patrons leaving the store. Recently, a number of people in Alaska have told me that these bags are no longer required by the state though I cannot find language in the Alaska state rules to confirm this claim.

Can you please verify whether dispensaries are still required to use the child resistant exit bags? Thank you.


Ryan Morgan
National Sales Manager

FunkSac.com
rm@FunkSac.com
[216.404.2586](tel:216.404.2586) office
[440.823.6983](tel:440.823.6983) cell

CONFIDENTIALITY NOTICE: This transmission and any attachments contain confidential information from FunkSac, LLC which is legally privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient you are hereby notified that any dissemination, distribution, forwarding, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by email or by telephone at [844.468.3865](tel:844.468.3865), and delete the original message immediately. Thank you.

Please consider the environment before printing this email.

Douglas, Craig J (CED)

From: Ryan Morgan <rm@funksac.com>
Sent: Friday, June 30, 2017 10:24 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: Dispensary Exit Bags

Categories: Craig

Hello -

FunkSac is a packaging company that manufactures the child resistant "exit bags" that dispensaries are required to put products in prior to patrons leaving the store. Recently, a number of people in Alaska have told me that these bags are no longer required by the state though I cannot find language in the Alaska state rules to confirm this claim.

Can you please verify whether dispensaries are still required to use the child resistant exit bags? Thank you.



Ryan Morgan
National Sales Manager

FunkSac.com
rm@FunkSac.com
[216.404.2586](tel:216.404.2586) office
[440.823.6983](tel:440.823.6983) cell

CONFIDENTIALITY NOTICE: This transmission and any attachments contain confidential information from FunkSac, LLC which is legally privileged, confidential and exempt from disclosure under applicable law. If you are not the intended recipient you are hereby notified that any dissemination, distribution, forwarding, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by email or by telephone at [844.468.3865](tel:844.468.3865), and delete the original message immediately. Thank you.

Please consider the environment before printing this email.

Douglas, Craig J (CED)

From: Jim Dyer <jim@jkdbands.com>
Sent: Thursday, June 29, 2017 7:34 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Regulations Project - Packaging & Labeling
Attachments: PackagingLabeling_2017-06-29_001.pdf; PackagingLabeling_2017-06-29_001.docx

Dear MCB Members & Staff:

My name is Jim Dyer, and my company, JKD Brands provides packaging and labeling to numerous licensees in the Alaska marijuana industry on a regular basis. I'm submitting the attached document which addresses issues and questions that have arisen regarding the Packaging & Labeling aspects of the State of Alaska Marijuana Regulations. This submittal is intended to provide input and support to the folks in your organization who will be working on the Packaging & Labeling Regulations Project. I hope it proves to be useful, and I do believe it will save industry participants time, money, and frustration.

Thank you for taking the time to read what I have written.

Sincerely, Jim

Jim Dyer
Vice President – Operations
JKD Brands, LLC
Tel. 907-929-5838
Toll-Free: 866-568-0938
Cell: 907-885-5135
Fax: 907-929-5895
E-Mail: jim@jkdbands.com
Website: www.jkdbands.com
Skype: jim.dyer88

Regulations Project

- Packaging & Labeling -

Date: 06/29/17

File Name: PackagingLabeling_2017-06-29_001.docx

Folder: JKD Brands, LLC > JKD Cannabis > Cannabis Industry > SOA Regulations

Table of Contents

Introduction	4
Section 3 AAC 306.310 (6).....	4
Text from Regulations:.....	4
Issue(s) and Question(s):.....	4
Suggested Solution(s):	4
Section 3 AAC 306.345 (a) (3)	4
Text from Regulations:.....	4
Issue(s) and Question(s):.....	4
Suggested Solution:	4
Section 3 AAC 306.345 (b) (2)	5
Text from Regulations:.....	5
Issue(s) and Question(s):.....	5
Suggested Solution(s):	5
Section 3 AAC 306.470 (c).....	5
Text from Regulations:.....	5
Issue(s) and Question(s):.....	5
Suggested Solution(s):	6
Section 3 AAC 306.470 (d) (1)	6
Text from Regulations:.....	6
Issue(s) and Question(s):.....	6
Suggested Solution(s):	6
Section 3 AAC 306.470 (d) (3)	6
Text from Regulations:.....	6
Issue(s) and Question(s):.....	6
Suggested Solution(s):	6
Section 3 AAC 306.475 (b)	7
Text from Regulations:.....	7
Issue(s) and Question(s):.....	7
Suggested Solution(s):	7
Section 3 AAC 306.475 (e).....	7
Text from Regulations:.....	7
Issue(s) and Question(s):.....	8

Suggested Solution(s):	8
Section 3 AAC 306.645(b)(1)(B)(i)	8
Text from Regulations:.....	8
Issue(s) and Question(s):.....	8
Suggested Solution(s):	8
Missing Information.....	9
Consumer Packaging & Labeling Requirements.....	9
Declaration of Quantity.....	9
Declaration of Identity	9
Declaration of Responsibility	9
Food Packaging & Labeling Requirements	10
Certification of Packaging and Labeling	10
Conclusion	10

Introduction

This document provides key issues, questions, and proposed solutions regarding the “packaging and labeling” portions of the State of Alaska marijuana regulations. Clarifications regarding these points will save industry participants considerable time, money, and frustration. This applies to cultivators, manufacturers, testers, retailers, ancillary product vendors, the marijuana control board, and the state’s enforcement personnel. Thank you for taking the time to read and consider these points.

Section 3 AAC 306.310 (6)

Text from Regulations:

“ . . . after the expiration date shown on the label of the marijuana or marijuana product . . . ”

Issue(s) and Question(s):

“Expiration date” is not mentioned anywhere else in the regulations.

- Is it required to be on the label on commercial packaging?
- Is it optional for either marijuana or marijuana products?
- Is it only for edible products?

Suggested Solution(s):

Clarify whether or not an “expiration date” is required on marijuana or marijuana product labeling. This clarification could be done in sections 345, 475 and 570. Otherwise, remove the “expiration date” language from section 310 (6).

Section 3 AAC 306.345 (a) (3)

Text from Regulations:

“ . . . marijuana or a marijuana product sold is packaged in opaque, resealable, child-resistant packaging when the purchaser leaves the retail section of the licensed premises; the packaging 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 . . . ”

Issue(s) and Question(s):

The language quoted above is not clear, and therefore it opens-up the following questions.

- Is it intended that the package be resealable to child-resistant condition?
- Should the package still be child-resistant when it is resealed?
- What is the standard or definition of “child-resistant”?
- Is the package required to be certified as child-resistant?

Also, the MCB board had a discussion in the April 2017 meeting wherein they seemingly approved a multi-part packaging technique in which a Mylar bag with a transparent side could be placed in an opaque paper sack and then carried out of a retail store by a customer. If this is to be allowed, it should be clarified in the regulations.

Suggested Solution:

Clarify the language in this section, to address the above listed issues questions in a more explicit manner.

Consider incorporating the following generally accepted standards for child resistance as a reference within the marijuana regulations.

- U.S. Poison Prevention Packaging Act, Title 16 CFR 1700.
- ASTM D3475, Standard classification of child-resistant packaging.
- ISO-8317, Child-resistant packaging - Requirements and testing procedures for re-closable packages.

Section 3 AAC 306.345 (b) (2)

Text from Regulations:

“ . . . states the total estimated amount of THC in the labeled product; and . . . “

Issue(s) and Question(s):

Is the “total estimated amount of THC” to be provided in “milligrams” or as a “percentage”, or are both acceptable?

If the total THC is to be in milligrams, a consistent procedure is needed for precisely “how” to derive the total milligrams of THC in each commercially packaged product.

If the total THC is to be stated as a percentage, a consistent procedure is needed for precisely “how” to calculate the percentage of total THC in each commercially packaged product.

Suggested Solution(s):

Clarify the language in this section 345, and also 645(b)(B)(i), to answer the address the above listed issues and questions in a more explicit manner.

Milligram Calculation: $(\text{Total THC \% from Lab Test Report}) \times (\text{Net Weight in Milligrams}) = \text{Total mg of THC}$

Percentage: Take the Total THC Percentage directly from the Lab Test Report

NOTE: Total THC percentages for concentrates and edibles are a separate subject and are addressed in Article 5 of the regulations.

Section 3 AAC 306.470 (c)

Text from Regulations:

“ . . . Each package prepared in compliance with this section must be identified by a tracking label generated for tracking by the marijuana cultivation facility’s marijuana inventory tracking system . . . “

Issue(s) and Question(s):

Does the METRC tracking number and/or bar code need to appear on each commercial package?

(Or, just on the larger “bulk” package containing the individual commercial packages?)

In actual practice, we are seeing that the METRC number is only being displayed on the transport manifest and transport container, and is not generally being printed on each package for commercial sale. The one exception to this rule is when marijuana from multiple harvest batches of the same strain is combined and mixed together. In this case a special METRC number is being generated to identify

that specific combination of harvest batches. In cases where each harvest batch is kept separate and not mixed with others, the harvest batch numbers themselves are used to identify the product, and no METRC number is being displayed on each commercial package. A different scenario which arises from time-to-time is one in which a Retail Store has several marijuana display jars, each containing just scraps of a particular strain, and the scraps of the different strains are combined together and sold. It is unclear “how” to identify and label the combined strains, which are sometimes ground and rolled into joints. Probably, it would make sense to generate and assign a special METRC number to define that specific combination of strains.

Suggested Solution(s):

Clarify the language in this section to specify exactly “where” the METRC tracking number is to be used and displayed, and “which” METRC number to use, in accordance with actual practice using the METRC system. Add language to address the scenarios mentioned above.

Section 3 AAC 306.470 (d) (1)

Text from Regulations:

“ . . . placing marijuana packaged in compliance with (a) - (c) of this section within a sealed, tamper-evident shipping container . . . ”.

Issue(s) and Question(s):

The “tamper-evident shipping container” procedure is not explicitly defined and needs clarification.

Suggested Solution(s):

Clarify the language in this section, to describe the transport procedure and usage of tamper-evident equipment in a more explicit manner. Include the usage of serially numbered tamper-evident seals; compatible containers designed to be used with tamper-evident seals. Procedure should include entry of serialized “seal numbers” on transport manifest, and verification of seal numbers and non-opened condition of container at destination by recipient.

Section 3 AAC 306.470 (d) (3)

Text from Regulations:

“ . . . generating a transport manifest from the marijuana cultivation facility’s marijuana inventory tracking system; the transport manifest must remain with the marijuana at all times while being transported, and a copy must be given to the licensed marijuana establishment that receives the shipment . . . ”

Issue(s) and Question(s):

A description of the actual manifest “form” and “procedure details” are needed, including the usage of tamper-evident seals and containers.

Suggested Solution(s):

Clarify the language in this section, to describe the manifest procedure and usage of tamper-evident equipment in a more explicit manner.

Section 3 AAC 306.475 (b)

Text from Regulations:

“ . . . With each harvest batch of marijuana sold, a marijuana cultivation facility shall disclose in writing

- (1) each soil amendment, fertilizer, and other crop production aid applied to the growing medium or marijuana plant included in the batch, including any pesticide, herbicide, or fungicide that was used; and
- (2) the name of the licensed marijuana testing facility that performed any required laboratory test and the results of each required laboratory test. . . . ”

Issue(s) and Question(s):

To “whom” and “how” is this written disclosure to be made?

Suggested Solution(s):

Clarify the language in this section, to describe “how” and “to whom” the disclosures shall be made. Following are two possible procedures to consider.

1. The Cultivator could prepare a written statement disclosing the required information, and include this document in each transport along with the transport manifest, and give a copy to the transport recipient at the destination. A copy of the disclosure statement should also be kept of file at the cultivator’s cultivation facility. *However; if this is not acceptable, due to exposing the Cultivator’s “secret sauce”, then consider procedure # 2, as follows.*
2. The Cultivator could disclose the written statement to the AMCO office, and also keep a copy on file at the cultivation facility which would be available for review by AMCO enforcement personnel as needed. In the event of any questions arising, the disclosure could be examined by relevant persons / experts on a need-to-know basis.

Section 3 AAC 306.475 (e)

Text from Regulations:

“ . . . If a marijuana cultivation facility transports wholesale marijuana to another marijuana establishment for sale at retail or for use in manufacturing a marijuana product, a label must be affixed to the shipping container showing that a licensed marijuana testing facility has tested each harvest batch in the shipment as provided in 3 AAC 306.645. The label must report the test results, including

- (1) a cannabinoid potency profile expressed as a range of percentages that extends from the lowest percentage to highest percentage of concentration for each cannabinoid listed from every test conducted on that strain of marijuana from the same marijuana cultivation facility within the last three months;
- (2) a statement listing the results of microbial testing required under 3 AAC 306.645(b)(2);
- (3) a statement listing the results of residual solvent testing required under 3 AAC 306.645(b)(3), if applicable; and
- (4) a statement listing any contaminants for which the product was tested in addition to contaminants for which 3 AAC 306.645(b) requires testing; any additional tested contaminants include

- (A) molds, mildew, and filth;
- (B) herbicides, pesticides, and fungicides; and
- (C) harmful chemicals.

(f) If a marijuana cultivation facility ships wholesale marijuana from a harvest batch that has not been tested for each contaminant listed in (e)(4) of this section, the label for that batch must include a statement identifying each contaminant listed in (e)(4) of this section for which that harvest batch has not been tested. (Eff. 2/21/2016, Register 217) . . . “

Issue(s) and Question(s):

It does not seem feasible to list all the herbicides, pesticides, and fungicides for which a harvest batch has not been tested, since the test labs in Alaska do not currently test for any of these contaminants. This would require cultivators to list hundreds of herbicides, pesticides, and fungicides. It would seem more feasible for the cultivator to simply list the herbicides, pesticides, and fungicides which were employed in the cultivation process, and specify which phase of cultivation they were used in.

Suggested Solution(s):

Clarify and revise the language in this section as suggested above, requiring the cultivator to simply list the herbicides, pesticides, and fungicides which were employed in the cultivation process, and specify which phase of cultivation they were used in. *Looking toward the future, when testing for herbicides, pesticides, and fungicides does start to happen, the label could simply list the contaminants for which there were positive test results, some of which may actually be considered acceptable.*

Section 3 AAC 306.645(b)(1)(B)(i)

Text from Regulations:

“ . . . for a potency test on marijuana and marijuana concentrate, marijuana testing facility shall list for each required cannabinoid a single percentage concentration that represents an average of all samples within the test batch; alternatively, the sum of THC and THCA may be reported as total THC; the sum of CBD and CBDA may be reported as total CBD . . . “

Issue(s) and Question(s):

The formula stated above, Total THC = THC + THCA is not consistent with the formula being used by marijuana testing laboratories. The two marijuana testing laboratories both use the following formula.

$$\text{Total THC} = 0.877 \times \text{THCA} + \text{THC}$$

This formula takes into account the loss which occurs during decarboxylation in the conversion of THCA to THC, and is generally accepted by the scientific community.

Suggested Solution(s):

Replace the incorrect formula in 645(b)(1)(B)(i) with the corrected formula shown above. Also, insert the corrected formula in Section 345 to clarify how to calculate Total estimated THC for labeling purposes.

Missing Information

Consumer Packaging & Labeling Requirements

Marijuana is a consumer product; therefore, it stands to reason that regulations for consumer packaging should apply to commercial marijuana packaging in the State of Alaska, just as these regulations apply to other consumer goods. The Weights and Measures organization in the state government has adopted relevant portions of NIST (National Institute of Science and Technology), U.S. Department of Commerce Handbook 130. This handbook provides uniform packaging and labeling regulations for consumer packaging. NIST Handbook 130 can be obtained at the following internet location:

<https://www.nist.gov/pml/weights-and-measures/publications/nist-handbooks/handbook-130>

Key points from this handbook which should also be addressed for commercial marijuana packaging include the following.

Declaration of Quantity

The Declaration of Quantity statement provides the net weight of the packaged contents in both metric and U.S. customary units, and shall appear in the bottom 30% of the principal display panel of the consumer package.

Declaration of Identity

The Declaration of Identity on a consumer package shall appear on the principle display panel and shall not be misleading or deceptive. The identity shall be in terms of:

- (a) the name specified in or required by any applicable federal or state law or regulation or, in the absence of this;
- (b) the common or usual name* or, in the absence of this;
- (c) the generic name or other appropriate description, including a statement of function (such as "cleaning powder").

** NOTE: Common or usual name for our purposes could include words like "marijuana", "cannabis", etc.*

Declaration of Responsibility

Any package kept, offered, or exposed for sale, or sold at any place other than on the premises where packed shall specify conspicuously on the label of the package the name and address of the manufacturer, packer, or distributor. The name shall be the actual corporate name, or, when not incorporated, the name under which the business is conducted. The address shall include street address, city, state (or country if outside the United States), and ZIP Code (or the mailing code, if any, used in countries other than the United States); however, the street address may be omitted if this is shown in a current city directory or telephone directory.*

** NOTE: In actual practice, "city, state, and zip code" should be adequate, rather the detailed street address, since the detailed addresses of licensees are available through the state's website and/or licensees' websites. This is especially true in cases where security is a concern, such as cultivators and manufacturers. Another alternative for Cultivators and Manufacturers which also protects their security is to use a P.O. Box mailing address on the label.*

Food Packaging & Labeling Requirements

Marijuana Edibles are food product; therefore, it stands to reason that regulations for packaging and labeling of food products should apply to commercial marijuana edibles packaging and labeling in the State of Alaska, just as these regulations apply to other food products. The U.S. FDA (Food and Drug Administration) under the Department of Health and Human Services is responsible for assuring that foods sold in the United States are safe, wholesome and properly labeled. As such, the FDA has provided a Food Labeling Guide which is located at the following internet location:

<https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm2006828.htm>

A few of the key points from this FDA guideline which should be applied to Marijuana Edibles packaging include the following.

- Location of Labeling on Package
- Definition of PDP (Principle Display Panel)
- Label Statements Required on PDP
- Definition of Information Panel
- Definition of Information Panel Labeling
- Required Size, Prominence, and Conspicuousness
- Prohibition Against Intervening Material
- Name and Address Required on Labeling

NOTE: Some of the FDA and NIST are duplicates of one another, and happily appear to be compatible / in agreement.

Certification of Packaging and Labeling

It is hereby recommended that State of Alaska Marijuana Control Board begin a practice of certifying packaging and labeling product and practices for marijuana and marijuana products upon request. Certification requests to be entertained by the board should include requests from licensees as well as ancillary providers of packaging and labeling products and services. This practice will save enforcement personnel and licensees time, money, and frustration, and promote harmonious operations within the industry. The process should be kept simple to avoid exorbitant costs, and would not necessarily require testing by an independent third party unless deemed necessary by the board on a case-by-case basis. The state of Oregon is already doing this type of certification, and information on their packaging pre-approval program and how it works is available online at the following location:

<http://www.oregon.gov/olcc/marijuana/Pages/PackagingLabelingPreApproval.aspx>

Conclusion

The State of Alaska legal marijuana industry is in a very early stage and there has been significant progress, while there is also much room for improvement. Clarity and quality of the regulations will contribute to the overall improvement of the industry and makes things easier for all concerned.

Douglas, Craig J (CED)

From: Christopher Wilhelm <ketchikanwilhelm@yahoo.com>
Sent: Thursday, June 29, 2017 2:58 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: Craig Douglas
Attachments: Christopherwilhelm.pdf; tiawilhelm.pdf

Hello Craig,

we just spoke about my wife's certificate. Please find attached a copy for completing her MJ Handlers Card application. I will return the rest in the mail to you directly.

Sincerely yours,

Christopher Wilhelm
MJ Handler #12893
MJ License #10922
Ketchikan, AK 99901

----- Forwarded Message -----

From: Kim Kole <handlealaska@gmail.com>
To: ketchikanwilhelm@yahoo.com; wilhelmtia@gmail.com
Sent: Wednesday, April 26, 2017 10:18 AM
Subject: Juneau Handler Card Wilhelm

Hello,

Attached are the certificates for Tia and Christopher Wilhelm. They will be mailing the rest of the required paperwork and money for their card. I will mail the originals out today.

Thank you,
Kim Kole

Douglas, Craig J (CED)

From: Jana Weltzin <jana@jdwcounsel.com>
Sent: Thursday, June 29, 2017 9:23 AM
To: Marijuana, CED ABC (CED sponsored); CED AMCO REGS (CED sponsored)
Cc: Jana Weltzin
Subject: Request to Testify at MCB meeting July 12-14

Please mark me down to testify at the upcoming MCB meeting – thanks!

Jana D. Weltzin, Esq.

JDW, LLC

Principal Owner

Of Counsel to Hoban Law Group

[3003 Minnesota Drive Suite 201](#)

[Anchorage, Alaska 99503](#)

janaweltzin@gmail.com

jana@jdwcounsel.com

[630-913-1113](tel:630-913-1113) (cell & text)

[907-231-3750](tel:907-231-3750) (main office)

*Licensed in Alaska and Arizona

The information contained in this message is privileged and confidential. It is intended only to be read by the individual or entity named above or their designee. If the reader of this message is not the intended recipient, you are on notice that any distribution of this message, in any form is strictly prohibited. If you have received this message in error, please immediately notify the sender and delete or destroy any copy of this message.

IRS Circular 230 Disclaimer: To ensure compliance with IRS Circular 230, we are required to inform you that unless we have specifically stated to the contrary in writing, any advice we provide in this email or any attachment concerning federal tax issues or submissions is not intended or written to be used, and cannot be used, to avoid federal tax penalties.

Thank you.

 Think green, please don't print unnecessarily

Douglas, Craig J (CED)

From: Jana Weltzin <jana@jdwcounsel.com>
Sent: Thursday, June 29, 2017 9:21 AM
To: Marijuana, CED ABC (CED sponsored); CED AMCO REGS (CED sponsored)
Cc: McConnell, Erika B (CED); Valerie Mastolier; Jana Weltzin; Smith, Jedediah R (CED)
Subject: Public Comment for MCB Meeting July 12-14 2017
Attachments: July 2017 MCB meeting public comment.pdf

Please find attached public comment for the upcoming July MCB meeting, thank you!

Jana D. Weltzin, Esq.

JDW, LLC

Principal Owner

Of Counsel to Hoban Law Group

[3003 Minnesota Drive Suite 201](#)

[Anchorage, Alaska 99503](#)

janaweltzin@gmail.com

jana@jdwcounsel.com

[630-913-1113](tel:630-913-1113) (cell & text)

[907-231-3750](tel:907-231-3750) (main office)

*Licensed in Alaska and Arizona

The information contained in this message is privileged and confidential. It is intended only to be read by the individual or entity named above or their designee. If the reader of this message is not the intended recipient, you are on notice that any distribution of this message, in any form is strictly prohibited. If you have received this message in error, please immediately notify the sender and delete or destroy any copy of this message.

IRS Circular 230 Disclaimer: To ensure compliance with IRS Circular 230, we are required to inform you that unless we have specifically stated to the contrary in writing, any advice we provide in this email or any attachment concerning federal tax issues or submissions is not intended or written to be used, and cannot be used, to avoid federal tax penalties.

Thank you.

 Think green, please don't print unnecessarily



Jana D. Weltzin
Licensed in Alaska &
Arizona

3003 Minnesota
Blvd., Suite 201
Anchorage, Alaska 99501
Phone 630-913-1113
Main Office 907-231-3750
jana@jdwcounsel.com

June 29, 2017

Marijuana Control Board
Director McConnell
Sent via Email

Re: Public Testimony for July 12-14, 2017 MCB Meeting

Dear Esteemed MCB Members & Director McConnell:

Please consider the following issues and concerns during your MCB July 12-14 meeting. Thank you for your service to the state and Industry.

Issue #1 - Change to a Licensed Premise:

Many licensees have a space that they would like to “grow into,” meaning that these start-up businesses simply have a hard time funding the entire buildout of their space at the beginning of operations due to a myriad of reasons (lack of allowance for outside of the state investment; refusal by banks to provide ordinary business loans, etc.). This issue usually only applies to cultivation licenses as the cost of lights, necessary upgrades to power supply, buildout of separate grow rooms, office area, curing and drying rooms, etc., cost large sums of funds. Licensees would often prefer, a business sense often dictates, the need to start smaller, building out just a portion of their licensed space and then “grow into” the space as the business starts to generate money.

Up until now the process for this phasing approach has been relatively simple – the licensee files an MJ14 showing the reduced area to be licensed, Enforcement receives the new MJ14 and inspects the reduced licensed area and then as the business gets more funds from the operation of the reduced cultivation area, it builds out the premises and then submits another MJ14 showing the new buildout, and then Enforcement comes back and inspects the new area to ensure cameras are not obstructed by hoods/lights and verifies other regulatory requirements. Up until this month of June 2017, the licensees could request “Temporary Approval” where Director McConnell and Chief Hoelscher would have the final sign off on approving on a temporary basis the change in premises or denying it until the MCB has had a chance to review the change. The Temporary Approval is then brought to this Board at the next regularly scheduled meeting for final approval or denial.

However, it is the recent position of AMCO administration that there are conflicting regulations that delegate approval to the Director in one regulator provision and then in a different regulation section, the same authority to approve is vested in the MCB.

Our request is that this Board delegate the authority to the Director and Chief of Enforcement for temporary approval and then final approval and denial rests with this Board at the next MCB meeting. The two conflicting regulatory provisions at issue are as follows:

- 3AAC 306.015(c) states, in relevant part, “[i]f a marijuana establishment wishes to reduce or expand the area of the licensed premises used for a marijuana establishment, the marijuana establishment must submit a new line drawing showing the proposed changes to the premises, and **must obtain the board’s written approval.**” Emphasis added.
- 3AAC 306.705(c) – states, “a holder of a marijuana establishment license may not alter the functional floor plan or reduce or expand the area of the licensed premises **without first obtaining the director’s written approval.** A marijuana establishment license holder seeking to change or modify the licensed premises must submit a request for approval of change on a form prescribed by the board along with (1) the fee prescribed in 3AAC 306.100; (2) a drawing showing the proposed change; (3) evidence that the proposed change conforms to any local restrictions; and (4) evidence that the licensee has obtained any applicable building permits.” Emphasis added.

Again, our request is that you clarify the intent to allow for the Director to approve MJ14s on a temporary basis and then to have final approval be done by the MCB at the following MCB meeting after submission of a MJ14 Premises Change.

Issue # 2 Residency verification issue for current licensees:

- The deadline to submit a PFD application is March 30th and it takes the PFD office time to get through all of those and make an eligibility determination and unfortunately the timing of when AMCO checks PFD residency for renewals and when the PFD Department completes their review process does not often align.
 - Licensees who have applied for their PFD for the current year are being asked to complete MJ-18 even though they have received PFD’s every year and/or completed the form and/or went through the residency investigation with enforcement on the last application submitted – the requirement of a lengthy MJ18 due to the review process of the PFD office and AMCO renewals not lining up creates more work and is inefficient for the licensee, Enforcement, PFD office, and AMCO staff. Simply put – the current processing of this issue is not efficiently using state resources – unfortunately, I am not educated in the government processing system of PFD’s to articulate a educated suggestion, therefore our request is limited to requesting the Board direct AMCO staff and Enforcement to

start a dialog with PFD office on their timeline for processing and come up with a solution where the redundant need for a lengthy time consuming MJ18 for renewals is not necessary. Even if the response is for licensees to apply earlier for their PFD (*again, not knowing the internal PFD review process I am unsure if this would help resolve the issue*) that would help licensees understand what they can do to minimize processing time and need for additional documentation requested by AMCO.

Issue #3 – Renewals and request for licensees to submit fingerprints 7 days prior to deadline
AS 17.38.200(a) requires the following for applications & renewal applications:

(a) Each **application or renewal application** for a registration to operate a marijuana establishment shall be submitted to the board. A renewal application may be submitted up to 90 days before the expiration of the marijuana establishment's registration. **When filing an application under this subsection, the applicant shall submit the applicant's fingerprints and the fees required by the Department of Public Safety under AS 12.62.160 for criminal justice information and a national criminal history record check.** The board shall forward the fingerprints and fees to the Department of Public Safety to obtain a report of criminal justice information under AS 12.62 and a national criminal history record check under AS 12.62.400.

Alaska Stat. Ann. § 17.38.200 (Emphasis added). The renewal fingerprint requirement was not included in any of the renewal instructions because this requirement was not included in the MCB's regulation provision that addresses renewal applications. It is our understanding that the liquor statute for renewals and criminal justice information and records AS 04.11.295(a) states that the board may require finger prints for renewal liquor licenses, but that it has been general practice for the board only to require finger prints for renewals if it has been five years or so since the last submission of licensee fingerprints.

It is reasonable for this Board to interpret AS 17.38.200(a) as requiring finger prints for only new applicants (note how the statute in the first sentence refers to the term "applications" to indicate reference to new applications and uses the specific term of "renewal applications" to refer to applications to renew the licenses) the reference to the requirement for fingerprints is only indicated when there is a filing of an "application" – the statute does not specify a requirement for a renewal application . It is requested that the Board draft regulation for public comment to give the Board discretion of when renewal applications require new fingerprint sets and to not require new finger prints be submitted every single year as this is not the same standard used for liquor licenses nor was this requirement included in the MCB renewal application regulations.

Issue #4 – Change of Ownership

There is still no actual transfer of ownership application, just the MJ-17a: Temporary Report of Change in Ownership. All the transfer requests this Board has seen have not actually been dealt

with – AMCO staff is, to the best of our understanding, compiling a list of persons who have requested a transfer, but the actual transfer hasn't been handled because the transfer form has yet to be finalized. Many persons who were licensees that transferred their interest are concerned about the possibility of the continuing liability that stems from the operation of the license to the licensee. Additionally, there is concern for new investors who have purchased a piece of an entity that owns a license, and technically are not considered legal licensees.

Our request is for the Board to direct AMCO staff to finalize the transfer of ownership mechanism and complete the transfer requests in final form for the Board's review and approval.

Issue #5 – Meeting Minutes of MCB Meetings

Meeting minutes for MCB meetings have not been made public, or approved by the MCB, or made available on the AMCO website since the meeting minutes from the February 2017 MCB meeting, which was reviewed and approved by this Board at the March 2017 meeting. No meeting minutes from any MCB meeting since March 2017 has been approved by the Board and made public to the industry. Without meeting minutes and no access to recordings of the meetings, the record of what occurs at these licensing and regulation creation meetings is available. This is a new industry – it is critical that these meetings and their contents be properly document, and make available to the public.

Issue #6 – Lack of Clarity in Advertising Regulations

Lack of clarity as to whom the advertising regulations apply to, what the terms mean as there are limited definitions provided in the regulations and clarity as to what types of mediums are allowed for advertisement has had a chilling effect on the industry's commercial speech. I propose creating a set of regulations in Article 7 – Operating Requirements for All Marijuana Establishments – and address advisement holistically for all license types as follows:

Proposed Advertisement Regulations

Advertising - Purpose and Application of Rules

- (1) Marijuana Control Board serves the interests of the citizens of Alaska by regulating and prohibiting advertising marijuana items in a manner:
 - (a) That is attractive to minors;
 - (b) That promotes excessive use;
 - (c) That promotes activity that is illegal under Alaska law; or
 - (d) That otherwise presents a significant risk to public health and safety.
- (2) The Control Board also serves the interests of Alaskans by allowing advertising for the purpose of informing the public of the availability and characteristics of marijuana.
- (3) All marijuana advertising by a licensee must conform to these rules.

Advertising Restrictions

- (1) Marijuana advertising may not:
 - (a) Contain statements that are deceptive, false, or misleading;
 - (b) Contain any content that can reasonably be considered to target individuals under the age of 21, including but not limited to images of minors, cartoon characters, toys, or similar images and

items typically marketed towards minors, or references to products that are commonly associated with minors or marketed by minors;

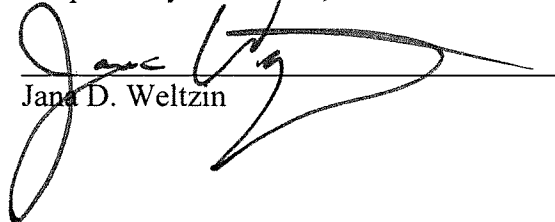
- (c) Specifically encourages the transportation of marijuana items across state lines;
 - (d) Assert that marijuana items are safe because they are regulated by the Control Board or otherwise make claims that any government agency endorses or supports marijuana;
 - (e) Make claims that recreational marijuana has curative or therapeutic effects;
 - (f) Display consumption of marijuana items;
 - (g) Contain material that encourages the use of marijuana *because of its intoxicating effect*; or
 - (h) Contain material that encourages excessive or rapid consumption.
- (2) A licensee may not make any deceptive, false, or misleading assertions or statements on any informational material, any sign, or any document provided to a consumer.
- (3) A licensee must include the following statement on all print, billboard, television, radio and internet advertising in font size legible to the viewer:
- (a) "Do not operate a vehicle or machinery under the influence of this drug".
 - (b) "For use only by adults twenty-one years of age and older."
 - (c) "Keep out of the reach of children."
- (4) A licensee may not engage in advertising via marketing directed towards location-based devices, including but not limited to cellular phones, unless the marketing is a mobile device application installed on the device by the owner of the device who is 21 years of age or older and includes a permanent and easy opt-out feature.

Advertising - Definitions

- (1) "Advertising" is publicizing the trade name of a licensee **together** with words or symbols referring to marijuana or publicizing the brand name of marijuana or a marijuana product.
- (2) "Billboard" means a large outdoor advertising structure.
- (3) "Handbill" is a flyer, leaflet, or sheet that advertises marijuana.
- (4) "Radio" means a system for transmitting sound without visual images, and includes broadcast, cable, on-demand, satellite, or internet programming. Radio includes any audio programming downloaded or streamed via the internet.
- (5) "Television" means a system for transmitting visual images and sound that are reproduced on screens, and includes broadcast, cable, on-demand, satellite, or internet programming. Television includes any video programming downloaded or streamed via the internet.
- (6) "Internet" means an electronic communications network that connects computer networks and organizational computer facilities around the world.

Thank you for your service and consideration,

Respectfully Submitted,


Jana D. Weltzin

Douglas, Craig J (CED)

From: Marijuana Licensing (CED sponsored)
Sent: Thursday, June 29, 2017 8:04 AM
To: Good LLC
Cc: McConnell, Erika B (CED); Marijuana, CED ABC (CED sponsored); christian hood
Subject: RE: Renewal of licenses 10165 and 10166

Thank you. The renewals documents have not been reviewed, but we will let you know if any corrections need to be made.

Please know we will be closed Monday and Tuesday of next week, re-opening Wednesday.

Thanks
Jane

From: Good LLC [mailto:akgoodcannabis@gmail.com]
Sent: Wednesday, June 28, 2017 4:42 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>; Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>; christian hood <christianhood15@gmail.com>
Subject: Re: Renewal of licenses 10165 and 10166

We've also sent along the fingerprints and fees today (should arrive tomorrow). Our renewal materials should be complete once fingerprints arrive.

Thanks!
Trevor

On Mon, Jun 26, 2017 at 1:28 PM, Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov> wrote:

Thanks

From: Good LLC [mailto:akgoodcannabis@gmail.com]
Sent: Wednesday, June 21, 2017 3:38 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>
Subject: Renewal of licenses 10165 and 10166

To Whom It May Concern,

Please find the documentation attached for the renewal of our applications 10165 and 10166 including the respective cover letters for each license type. Our application fees were mailed to your office today.

Sincerely,

Trevor Haynes

General Manager, GOOD
[907-888-3367](tel:907-888-3367)

--

Follow GOOD on [Twitter](#) and [Facebook](#)

--

Follow GOOD on [Twitter](#) and [Facebook](#)

Douglas, Craig J (CED)

From: Good LLC <akgoodcannabis@gmail.com>
Sent: Wednesday, June 28, 2017 4:42 PM
To: Marijuana Licensing (CED sponsored)
Cc: McConnell, Erika B (CED); Marijuana, CED ABC (CED sponsored); christian hood
Subject: Re: Renewal of licenses 10165 and 10166

We've also sent along the fingerprints and fees today (should arrive tomorrow). Our renewal materials should be complete once fingerprints arrive.

Thanks!
Trevor

On Mon, Jun 26, 2017 at 1:28 PM, Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov> wrote:

Thanks

From: Good LLC [mailto:akgoodcannabis@gmail.com]
Sent: Wednesday, June 21, 2017 3:38 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>
Subject: Renewal of licenses 10165 and 10166

To Whom It May Concern,

Please find the documentation attached for the renewal of our applications 10165 and 10166 including the respective cover letters for each license type. Our application fees were mailed to your office today.

Sincerely,

Trevor Haynes

General Manager, GOOD
[907-888-3367](tel:907-888-3367)

--

Follow GOOD on [Twitter](#) and [Facebook](#)

Douglas, Craig J (CED)

From: Mike Stoltz <mtmike@live.com>
Sent: Tuesday, June 27, 2017 3:19 PM
To: Marijuana, CED ABC (CED sponsored)
Cc: christine.c.truong@usdoj.gov; Holly Sheldon Lee
Subject: High Expeditions in Talkeetna

Joe:
Just verifying our phone conversation today, June 27, 2017

Is there a reason this Alaska Code is not enforced by the State of Alaska?
It seems the money to purchase what is now is High Expeditions Retail Marijuana Store in Talkeetna came from New York.
A down payment was made on this property from New York with a bubble due in a few years!
Has Joe McAneney told the State of Alaska of all his partners in High Expeditions Retail Marijuana Store in Talkeetna?
Including McAneney's relationship with the Genet Family?
Where does Joe McAneney get his money to support High Expeditions and other potential Marijuana Manufacturing Stores in Alaska?
3AAC 306.015 License Conditions
b) The board will not issue a marijuana establishment license to

- (1) an individual or a sole proprietorship unless the individual or proprietor is a resident of the state;
- (2) a partnership unless each partner is a resident of the state:

Mike Stoltz

Sent from my iPhone

Douglas, Craig J (CED)

From: Leif Abel <leifabel@yahoo.com>
Sent: Tuesday, June 27, 2017 3:11 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: July MCB Meeting

Hello Staff and Board,

I would like to sign up for public testimony at the July 12-14 MCB Meeting in Fairbanks. I believe Alaska is missing a good opportunity to be an innovative, responsible, leader of regulated cannabis. Prohibition by regulation is only a continuation of the war on drugs. A war that clearly did not work to stop drug use, crime, or to create a functional society. Many of this Boards decisions are sound and backed up by data and science. I appreciate this is a tough topic for this time in human development. I applaud your hard work and dedication to this matter.

Some of the boards decisions look a lot like prohibition through regulation; this only hurts our own Alaska owned small businesses and encourages the unregulated operators. If it is truly the Boards goal to foster public safety and welfare while regulating this new industry, than a reasonable balance needs to be struck. It is damaging to the reputation of our regulated Marijuana system and to the businesses involved, each time the board makes a decision which supports the delay of new regulation projects designed to streamline and make better the process. Some of these new and innovative ideas that have been delayed (such as onsite consumption venues in retails and the ability for farms to sample their own product) could help make Alaska's system, the safest, most reasonable cannabis industry in the country. Additional examples of what I would consider to be overbearing regulations would be the repeated suggestion by some that Marijuana Handlers be subjected to a background check and be ineligible to hold a card due to certain criminal records. This only continues a negative social cycle that allows for fewer options for those who may have made mistakes and want to turn their life around.

Again I thank you for all of your hard work and the opportunity to speak to you directly in July.

Highest Regards,

Leif B. Abel
(907) 252-5172
leifabel@yahoo.com

CONFIDENTIALITY NOTICE

The content of this e-mail is confidential and intended for the recipient only. If you have received this e-mail in error please delete it immediately.

Douglas, Craig J (CED)

From: Marijuana Licensing (CED sponsored)
Sent: Tuesday, June 27, 2017 1:57 PM
To: Marijuana, CED ABC (CED sponsored)
Subject: FW: Alaska State Law

From: Mike Stoltz [mailto:mtmike@live.com]

Sent: Tuesday, June 27, 2017 12:58 PM

To: charles.e.flockhart@usdoj.gov; Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>; General, Attorney (LAW sponsored) <attorney.general@alaska.gov>

Subject: Alaska State Law

Is there a reason this Alaska Code is not enforced by the State of Alaska?

It seems the money to purchase what is now is High Expeditions Retail Marijuana Store in Talkeetna came from New York.

A down payment was made on this property from New York with a bubble due in a few years!

Has Joe McAneney told the State of Alaska of all his partners in High Expeditions Retail Marijuana Store in Talkeetna?

Where does Joe McAneney get his money to support High Expeditions and other potential Marijuana Stores in Alaska?

3AAC 306.015 License Conditions

b) The board will not issue a marijuana establishment license to

(1) an individual or a sole proprietorship unless the individual or proprietor is a resident of the state;

(2) a partnership unless each partner is a resident of the state:

Mike Stoltz

Sent from my iPhone

Douglas, Craig J (CED)

From: Marijuana Licensing (CED sponsored)
Sent: Tuesday, June 27, 2017 10:13 AM
To: Marijuana, CED ABC (CED sponsored)
Subject: FW: Objection to Specific Application

-----Original Message-----

From: Gabe Long [mailto:rlguideride@gmail.com]
Sent: Monday, June 26, 2017 7:37 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Re: Objection to Specific Application

Thank you. I am concerned with the response in regard to the spelling and grammar, The second sentence should read objecting instead of objection. I would hope the newly formed marijuana board had a better grasp of the english language.

On 6/26/17, Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov> wrote:

> Received. Thank you.
>
> Objections are considered by the board when and if the application is
> considered by the board. Please know that we do not let the
> objector(s) know when the application(s) he/she is objection to goes in front of the board.
>
> It is your responsibility to check back with us or check our agenda
> that is published on our website seven days before the meeting if you
> want to speak to the marijuana control board about your objection.
>
> Thank you
> AMCO Staff
> State of Alaska-DCCED
> Alcohol and Marijuana Control Office (AMCO)
> 550 W 7th Avenue Ste. 1600
> Anchorage, AK 99501
> 907-269-0350

> -----Original Message-----

> From: Gabe Long [mailto:rlguideride@gmail.com]
> Sent: Sunday, June 25, 2017 8:49 PM
> To: Marijuana Licensing (CED sponsored)
> <marijuana.licensing@alaska.gov>
> Cc: shawn@alaskamountaingrowers.com
> Subject: Objection to Specific Application
>
> Alcohol & Marijuana Control Office
> 550 W 7th Ave., Suite 1600
> Anchorage, AK 99501

> June 25, 2017

>

>

> To whom it may concern,

> I am writing to object to the application #13419 submitted By Shawn

> Macamara on behalf of Alaska Mountain Growers LLC.

>

> The reasons for my objections are as follows:

>

> The address on the application is listed as 1 Letnikoff Drive which is

> incorrect.

>

> The actual physical location is located at the entrance of Letnikof

> Estates which is a residential subdivision that has Codes, Covenants

> and Restrictions. These CCR's are very specific in regard to the uses

> of the properties and the structures that can be built. Every

> property owner must sign the CCR's when they purchase the property

> therefore we are all responsible to a legally binding document,

> including Shawn Macnamara. Our CCR's do not allow for any commercial

> use beyond a cottage industry that cannot be larger than the primary

> residence. The construction of the building pad on the lot in

> question is substantially larger than the primary residence in

> violation of our code. There is also a provision of a 25 foot setback

> from the road where you must leave the trees intact and cannot build

> with the exception of the driveway. The lot has been clear cut to the

> lot line and the building pad is already being built to the line as

> well. There is no part of this development that complies with the codes of our subdivision.

>

> Letnikoff is a subdivision designed to protect the homeowners from the

> negative impacts of commercial enterprise and irresponsible

> development. We purchased our land because of the nature of the

> subdivision. Alaska mountain growers has already destroyed the

> natural beauty at the entrance to our subdivision and that will be the

> first thing prospective buyers will see. Our property values and the

> ability to sell our properties will undoubtedly be adversely affected.

>

> I have spent my winters in the last few years in Colorado and have

> seen first hand the development of the Cannabis industry. The common

> complaint with grow operations that are near residential neighborhood

> is smell. Even Silverpeak Apothecary in Aspen which built a state of

> the art facility including the latest in air filtration has had

> numerous complaints from the Holland Hills subdivision which on the other side of a four lane highway.

> Security is another issue. We are currently without State Troopers in

> Haines and Letnikof is beyond the normal patrols of the Haines police.

> I fear that the scale of the cultivation will attract a criminal

> element that will pose a threat to the security and safety of the entire subdivision.

>

> This application and the development currently under construction has

> already caused extreme emotional distress among my neighbors. The

> disregard for our CCR's and the quality of life in our subdivision is

> irresponsible if not hostile.

>

> Thank You.
>
> Sincerely,
> Richard Long
> Lot 23 Inlet drive
> Letnikof Estates
> Haines, Alaska 99827
> 907-314-0998
> rlguidride@gmail.com
>
>
>
>
>
>
> Objection to Alaska Mountain Growers application # 13419 by Shawn
> McNamara, Box 1633 Haines, AK 99827-1633 UNITED STATES,
> shawn@alaskamountaingrowers.com
>