



## MEMORANDUM

TO: Chair Mlynarik and Members of the  
Marijuana Control Board

DATE: August 18, 2017

THRU: Brandon Emmett and Loren Jones

FROM: Erika McConnell, Director

RE: Report of Subcommittee on Licensed  
Premises

On July 12, 2017, the Marijuana Control Board discussed issues relating to licensed premises raised by me in my director's report. After some general conversation, the board agreed to appoint a subcommittee to work on the issue, and Mr. Emmett and Mr. Jones volunteered.

Mr. Emmett, Mr. Jones, Program Coordinator Sarah Oates, Chief Investigator James Hoelscher, and I met on August 17, 2017.

Mr. Emmett and Mr. Jones agreed on the following recommendations to the board:

1. Licensed premises associated with a single license must be contiguous. This interpretation is consistent with 3 AAC 306.430(a) and (c)(1), 3 AAC 306.535(a), and 3 AAC 306.710. If an applicant is not able to make their proposed licensed premises areas contiguous, they would need to apply for a separate license for each unconnected licensed premises area.
2. Anywhere on the licensed premises of a cultivation or manufacturing facility where marijuana may be present at any time must be a restricted access area. If a licensed premises contains multiple buildings and marijuana will be moved between buildings, the area between the buildings must be restricted access area.
3. The board needs to determine how to address those approved licenses that are not in compliance with this interpretation. Licensees who may be forced to expend significant amounts of money to change their layout should be given ample time to make adjustments. Permanent grandfathering is not recommended.

Attachment: List of licensees who are not in compliance with this interpretation

## Licensees with noncontiguous licensed premises:

#10022 Sunrise Gardens  
Licensee: Purple Quail LLC  
License Type: Standard Cultivation

#10026 Rainforest Farms, LLC  
Licensee: Rainforest Farms, LLC  
License Type: Standard Cultivation  
\* Noncontiguous storage shed labeled as having no marijuana in it

#10027 Black Rapids LLC  
Licensee:  
License Type: Standard Cultivation  
\* Unclear if noncontiguous "break area" is part of licensed premises

#10035 Arctic Herbery  
Licensee: Bryant Thorp  
License Type: Standard Cultivation

#10037 Arctic Herbery  
Licensee: Bryant Thorp  
License Type: Retail

#10097 Raspberry Roots  
Licensee: Raspberry Roots, LLC  
License Type: Retail

#10148 Talisman Farms  
Licensee: Omar Gucer  
License Type: Limited Cultivation

#10156 Elevated Innovations, LLC  
Licensee: Elevated Innovations, LLC  
License Type: Standard Cultivation

#10176 Alpha Kilo LLL  
Licensee: Alpha Kilo LLC  
License Type: Limited Cultivation

#10310 Danish Gardens LLC  
Licensee: Danish Gardens, LLC  
License Type: Standard Cultivation

#10837 Hillside Natural Wellness  
Licensee: Hillside Natural Wellness, LLC  
License Type: Retail  
\* Unclear if marijuana will be located in separated area labeled "surveillance equipment," "RAA," and "shared office"

#10922 Sparkle Farms Alaska  
Licensee: SFA LLC  
License Type: Limited Cultivation

#11384 Green Elephant LLC  
Licensee: Green Elephant LLC  
License Type: Standard Cultivation

#12448 Will's World  
Licensee: Will's World, LLC  
License Type: Limited Cultivation  
\* Unclear if marijuana will be located in separated area labeled "surveillance room," "storage for business records," and "office"