Notice(s) of Violation

Alcohol & Marijuana Control Office
550 W. 7th Ave, Suite 1600
Anchorage, AK 99501

Date: 2-13-17
Case Number: AB17-0079
Page 1 of 1 Page

Notice of Violation

(3AAC 306.805)

Licensee	License Number	Type of License
Jane B. Stinson	10021	Retail
D.B.A.	How Delivered	Law Enforcement Agency
Enlighten Alaska, LLC	Electronic/Certified Mail 7013 2250 0000 9617 5118	AMCO
Street or P.O. Box	City, State	Zip
2600 Spenard Road	Anchorage, AK	99503

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS.44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing **Note: This is not an accusation or a criminal complaint.**

On 2/10/17, it learned by AMCO investigators that your location had been selling marijuana oil (CBD Oil) manufactured from a source outside the State of Alaska for sale. This action is in violation of the following:

3AAC306.305-Retail Marijuana Store Privileges
3AAC306.310-Acts Prohibited at Retail Marijuana Store
3AAC306.330-Marijuana Inventory Tracking System
3AAC306.340-Testing Required for Marijuana and Marijuana Products
3AAC306.345-Packaging and Labelling

Reference:
AS17.38.010(b)(2),(3)
AS17.38.131-Enforcement Powers
AS17.38.900(10),(15)-Definitions
3AAC306.830-Seizure of Marijuana Product
3AAC306.830(b)-Seizure of Marijuana Product (Hearing within 10 Days)

You are directed to respond to the Director of the Marijuana Control Board in writing to this Notice of Violation within 10 days of receipt to explain what action you have taken to prevent a reoccurrence of this violation. FAILURE TO RESPOND TO THIS NOTICE OF VIOLATION WITHIN 10 DAYS WILL RESULT IN YOUR APPEARANCE, EITHER IN PERSON OR TELEPHONICALLY, BEFORE THE MARIJUANA CONTROL BOARD AT THEIR NEXT REGULARLY SCHEDULED BOARD MEETING.

***Please include your Marijuana Establishment License Number in your response.**

Alcohol & Marijuana Control Office
ATTN: Enforcement Unit
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501

A Response is Required

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A Licensee shall respond, either orally or in writing, to the Notice.

Receipt:	Violation Observed By: Licensee admitted
Filed By: F.R. Hamilton	Title: Investigator III

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Arti

Jane Stinson
dba Enlighten Alaska
2600 Spenard Road
Anchorage, AK 99503-8934

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Leah Levinton
☐ Agent
☐ Addressee

B. Received by (Printed Name) Leah Levinton
C. Date of Delivery 2/17/17

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number
(Transfer from service label) 7013 2250 0000 9617 5118

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Commerce, Community, and Economic Development

ALCOHOL AND MARIJUANA CONTROL OFFICE

550 West 7th Ave, Suite 1600
Anchorage, AK 99501
Main: 907.269.0350
Fax: 907.272.9412

February 10, 2017

Enlighten Alaska, LLC
2600 Spenard Road
Anchorage, AK 99503-8934
Via Certified and Electronic Mail

NOTICE OF HEARING

Re: Alaska Retail Marijuana Store License #10021

You are hereby notified that, on February 9, 2017, the following marijuana product was seized from your licensed place of business in accordance with 3 AAC 306.830. Seizure of marijuana or marijuana product :

Description of Item	Estimated Weight/Volume/Amount
*Please see attached Written Inventory Receipt	

The marijuana product listed above was found to be in violation of regulations pertaining to licensure as a Marijuana Retail Establishment:

3 AAC 306.305. Retail marijuana store privileges

3 AAC 306.310. Acts prohibited at retail marijuana store

3 AAC 306.330. Marijuana inventory tracking system

3 AAC 306.340. Testing required for marijuana and marijuana products

A hearing before the board has been scheduled to discuss the disposition of the items listed above.

Time: 3:00 pm
Date: 2-17-17
Location: 550 West 7th Avenue Suite 1600 Conference room, Anchorage, AK 99501

To participate telephonically, you must provide the following investigator the telephone number at which a registered representative of the licensed business may be reached. Your representative will be contacted at this number at the appointed time of hearing.

Investigator: Joe Bankowski
Email address: joe.bankowski@alaska.gov
Phone number: 907-269-0355

If a registered representative of the licensed business does not appear in person or participate telephonically at this hearing, or if after a hearing the board finds that seizure of the marijuana product was justified, the marijuana product may be destroyed.

A registered representative of the licensed business may request a reasonable delay by notifying the investigator listed above no later than 48 hours prior to the hearing. The seized items will remain in the possession of the state until the board has rendered a decision.

Please contact the investigator listed above with any additional questions you may have.

Jana D. Weltzin
Licensed in Alaska & Arizona
3003 Minnesota Blvd., Suite 201
Anchorage, Alaska 99501
Phone 630-913-1113
Main Office 907-231-3750
JDW, LLC
jana@jdwcounsel.com

February 16, 2017

Marijuana Control Board
Director Chambers
AMCO Enforcement
Sent Via Email

Re: Enlighten Alaska License No 10021 – Notice of Violation and Hearing on Feb. 17, 2017
RE: Products containing Hemp/CBDs

Dear MCB Members, Director Chambers & AMCO Enforcement Division:

Thank you for your continued efforts with regulating the new commercial marijuana market in Alaska. This correspondence is submitted on behalf of License No. 10021 in response to Notice of Violation ("NOV") Case Number AB17-0079.

Attached is an email from licensee Leah Levinton to Enforcement outlining the events that transpired on February 9, 2017 which lead to the NOV at issue. *See Email from Levinton attached as Exhibit A.*

Enlighten Alaska had the following list of products on display, in plain view, on the day they had their "Full Shelf Inspection" by AMCO enforcement agents, and kept them on their shelves until Leah removed the products on February 9, 2017:

Therabis Hemp-Based Pet Care

- Calm and Quiet – Large dog, qty 4, retail value: $48
- Calm and Quiet – Medium dog, qty 6, retail value: $60
- Calm and Quiet – Small dog, qty 5, retail value: $40
- Stop the Itch – Large dog, qty 5, retail value: $60
- Stop the Itch – Medium dog, qty 6, retail value: $60
- Stop the itch – Small dog, qty 5, retail value: $40
- Up and Moving – Large dog, qty 6, retail value: $72
- Up and Moving – Medium dog, qty 6, retail value: $60
- Up and Moving – Small dog, qty 5, retail value: $40
- TOTAL RETAIL VALUE: $480

CBD for Life

- Pure CBD Extract Pain Relief Spray – qty 7, retail value: $210

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- Pure CBD Lip Balm - qty 1, retail value: $10
- Pure CBD For Life Rub - qty 10, retail value: $200
- Pure CBD Foot Cream - qty 2, retail value: $40
- Pure CBD Face Cream - qty 7, retail value: $245
- Pure CBD Face & Body Cleanser - qty 9, retail value: $180
- TOTAL RETAIL VALUE: $885

Alaska Cannabis Exchange

- 100% Whole Plant CBD Hemp Oil 30 ml – qty 10, retail value: $900
- 100% Whole Plant CBD Hemp Oil 60 ml – qty 9, retail value: $1,485
- Pet: 100% Whole Plant CBD Pet Hemp Oil 15 ml – qty 6, retail value: $210
- Pet: 100% Whole Plant CBD Pet Hemp Oil 30 ml – qty 8, retail value: $520
- Vape: 100% Whole Plant CBD Hemp Oil 15 ml – qty 8, retail value: $280
- Vape: 100% Whole Plant CBD Hemp Oil 30 ml – qty 12, retail value: $780
- TOTAL RETAIL VALUE: $4,175

Total retail value of products taken off the shelf: $5,540

Product Line CBD for Life Analysis:

The product line named *CBD for Life* does not meet the definition of a marijuana product under the federal law or the state commercial marijuana statute and regulations. The definition section of the regulations, 3 AAC 306.990(25), defines marijuana to have the same meaning given in AS 17.38.900, which states:

> (9) "marijuana" means all parts of the plant of the genus cannabis whether growing or not, the seeds thereof, the resin extracted from any part of the plant, and every compound, manufacture, salt, derivative, mixture, or preparation of the plant, its seeds, or its resin, including marijuana concentrate; "marijuana" **does not include** fiber produced from the stalks, **oil**, or cake **made from the seeds of the plant**, sterilized seed of the plant which is incapable of germination, or the weight of any other ingredient combined with marijuana to prepare topical or oral administrations, food, drink, or other products;

Alaska Stat. Ann. § 17.38.900 (West)(emphasis added). The definition adopted by the regulations specifically excludes certain parts of the marijuana plant from being considered marijuana, relevant to this particular brand of products, CBD for Life, is oil made from the seeds of the plants.

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Attached as *Exhibit B,* you will find pictures of the actual CBD for Life's ingredient list – the only cannabis related ingredient is **"cannabis sativa seed oil."** AS 17.38.900(9)'s definition of marijuana and applicable exemptions from the definition largely stem from the Federal Statutory definition which reads:

> Under 21 U.S.C. § 802(16):
>
> The term "marihuana" means all parts of the plant Cannabis sativa L., whether growing or not; the seeds thereof; the resin extracted from any part of such plant; and every compound, manufacture, salt, derivative, mixture, or preparation of such plant, its seeds or resin. **Such term does not include the mature stalks of such plant, fiber produced from such stalks, oil or cake made from the seeds of such plant**, any other compound, manufacture, salt, derivative, mixture, or preparation of such mature stalks (except the resin extracted therefrom), fiber, oil, or cake, or the sterilized seed of such plant which is incapable of germination.

Hemp Indus. Ass'n. v. Drug Enf't Admin., 357 F.3d 1012, 1017 (9th Cir. 2004)(emphasis added). In the Hemp Indus. Ass'n case, the Ninth Circuit held that the DEA may ban products that "contain any quantity" of THC only in so far as it does not apply that ban to *non-psychoactive hemp products* – as "such products do not contain a "schedule I controlled substance" as defined by Congress. *Id.* The Ninth Circuit concluded that, "[t]he non-psychoactive hemp in Appellants' **products is derived from the "mature stalks" or is "oil and cake made from the seeds" of the *Cannabis* plant, and therefore fits within the plainly stated exception to the CSA definition of marijuana."** *Id.,* at 1017. Finding that the Congressional definition of marijuana excludes non-psychoactive hemp, the appellate court ruled against the DEA, stating:

> **The amendments to 21 C.F.R. § 1308.11(d)(27) that make THC applicable to all parts of the *Cannabis* plant are therefore void.**

Id. 1019.

Notably, our regulatory definition includes the same "seed oil" exclusion as the Federal scheme and therefore, the product line of CBD for Life is not a marijuana product. While we appreciate enforcement's protectionary stance illuminated in the press release No. 17.005, noting concerns with potential federal enforcement, this product is not a scheduled federal drug or a state controlled substance by definition.

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Enlighten Alaska Respectfully requests the MCB to allow this line to be continued and to be carried in its retail store and any accused violations relating to this product by enforcement be dismissed.

Product Analysis for Therabis Hemp-Based Pet Care

Attached as *Exhibit C* are pictures of Therabis Hemp-Based Pet Care products that were removed from the Enlighten Alaska shelves. The product is meant only for animal consumption and contain whole plant extract and hemp powder. 3 AAC 306.990(27) defines marijuana infused product as "a product that contains marijuana or marijuana concentrate **and is intended for human use.** AS 17.38.900(15) defines marijuana products to mean concentrated marijuana products and marijuana products that are comprised of marijuana and other ingredients and are intended for use or consumption…" The same chapter, at AS 17.38.900(3) defines consumption to mean the act of ingesting, inhaling, or otherwise introducing marijuana into the **human body."**

This product is not intended for human use – therefore it is not a marijuana product by definition of the state statute or by regulation. Enlighten respectfully requests the MCB allows Enlighten to continue to sell this product on its retail shelves.

Product Analysis for Alaska Cannabis Exchange ("ACE"):

Alaska Cannabis Exchange's product analysis is a bit different than the two above – unlike CBD for Life, which is only a seed oil extract in the product, these products use the whole hemp plant to create the oil.

However, two of the six products are whole plant CBD Pet Hemp products meant solely for animal consumption and not human consumption and therefore, as detailed above, are not marijuana products. See attached *Exhibit D*, pictures of ACE products.

The remaining four products are whole plant hemp CBD oil – the oil of which purports to be produced in Colorado under the pilot program of the Farm Bill 2014. Public Law 113-79 113th Congress Section 7606 Legitimacy of Industrial Hemp Research subsection (a) outlines the general requirements for an industrial hemp pilot program. Alaska currently does not have a industrial hemp program – but there currently is a bill in the Alaska Legislature (SB 6) which would develop an industrial hemp program.

The four ACE products that are intended for human consumption admittedly should have been tracked and regulated in the commercial marijuana regulatory structure. That said, enforcement's decision to "raid" these fledging marijuana retail stores, making national news, and giving the overall appearance to the nation that these stores were funneling illegal products seems a bit contrary to the stated intent of the raids., i.e., to protect the state's commercial industry from Federal intervention.

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These products were on the shelf at the time Enlighten had its final full shelf inspection – why weren't the products identified at that point as illegal marijuana products? On the date of Enlighten's full shelf inspection there was only one marijuana product manufacturing producing product – Frozen Bud's. As a side note, today the same holds true – only one manufacturing product company is actively producing product. It doesn't seem like it would be too difficult to spot a marijuana product that was not produced by a state licensed marijuana company, since there is only one actively producing products.

More likely, enforcement saw the hemp derived products, which are also carried in grocery stores like Natural Pantry, Rainbow Foods, head shops, etc., and assumed, just as the majority of these marijuana retail licensees assumed, this is not a marijuana infused product because it is hemp derived.

Moreover, the Municipality of Anchorage on December 5, 2016 issued the attached (*as Exhibit E*) AMC 12.50 Retail Sales Tax on Marijuana and Marijuana Products Informational No. 2 – Industrial Hemp informed the industry and the public that Hemp *"is not considered marijuana. Therefore, the Municipality of Anchorage's position is that industrial hemp is not subject to the retail marijuana sales tax."* The memorandum went on to explain that while both hemp and marijuana come from the same cannabis species, they are **"genetically distinct."** *Exhibit E.* The Anchorage memorandum explained the difference in THC content, which for hemp is less than 0.3% -- the ACE products sold by Enlighten were tested by Steep Hill in California and tested below the 0.3% threshold (see *Exhibit F testing results attached)* – confirming these ACE products are indeed hemp derived.

Another point of confusion (or clarity depending on the view) comes from SB 6 – currently in front of the Alaska legislature - that is urging the implementation of an industrial hemp program for Alaskan farmers – that bill specifically amends the definition of marijuana to exclude hemp.

Hemp truly is defined as a separate plant under federal law[1] - but given the sentiment of the press release issued by AMCO referenced above, it appears we are doing two things in this state – (1) taking enforcement actions with the pretext of staving off federal intervention by being tough regulators – (2) but then focusing enforcement actions on a product that is explicitly excluded from the definition of marijuana under federal law… The rationale is similar plugging your ears, when it smells bad outside – doesn't make too much sense.

[1] 7 US Code 5940(b)(2) (2) Industrial hemp
The term "industrial hemp" means the plant Cannabis sativa L. and any part of such plant, whether growing or not, with a delta-9 tetrahydrocannabinol concentration of not more than 0.3 percent on a dry weight basis.

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Now assuming both parties made a mistake and were both wrong as to the classification of the hemp products at issue – and AMCO is now concerned that if it doesn't take action it would be putting the industry at risk for federal shut-down – does it really make sense to conduct a state-wide "raid" and create a national perception that these shop owners are funneling illegal marijuana through their legitimate businesses? Or, would it make more common sense, financial sense, and attract less negative federal attention to issue cease and desist letters to these businesses, clarifying that these hemp products need to be tracked and regulated and are classified as marijuana products.

These licensees have been nothing but honest in their responses, honest with their intent, and strive to be compliant in every way – but this is a new industry – and just as the enforcement agents who conducted Enlighten Alaska's full shelf inspection and granted them their paper license, Enlighten was not aware Hemp oil would be considered the same classification as THC oil.

Often in today's world we feel pressured to act in a manner that is a bit dramatic - make a big splash, create much attention and take actions that have rippling reactionary effects we often don't intend. We forget the importance of being mindful of perception and conservation of limited resources. In the event a similar issue such as this one occurs in the future, please feel free to use less forceful tactics – just reach out and let's work together to create a strong and fruitful industry – we are all on the same team here, we just have different positions to play. Let's play them together.

Sincerely,

Jana D. Weltzin

Exhibit A

Jana Weltzin

From: Leah Levinton <Leah@enlightenak.com>
Sent: Monday, February 13, 2017 3:03 PM
To: amco.enforcement@alaska.gov
Cc: Evan Levinton; Jane Stinson; Valerie Mastolier; Jana Weltzin
Subject: Enlighten Alaska CBD product explanation

Joe,

We appreciate the work that you do for AMCO. Your visit to Enlighten Alaska last Friday, February 10, 2017 was professional and courteous. During your visit with Evan Levinton and myself (co-owners), you asked that we send you detailed information about the CBD products we briefly had in our store; specifically the type (brand), quantity, when we purchased the product, and when and why we removed the products from our shelves.

We removed all CBD products from Enlighten on Feb. 10, 2017 because it came to the attention of our lawyer, Jana D. Weltzin, due to being altered by another company, that AMCO enforcement had indicated it a policy that certain CBD products should not be in a marijuana licensed facility. She wanted to make sure we didn't have any products that violated the regulations and immediately contacted us to confirm that we did not. Once she made contact with us and confirmed we did have these types products on our shelves, she alerted us that it appeared the opinion of AMCO enforcement that these products on our shelves may not be proper and to remain compliant with AMCO, until we received further clarification, we needed to remove the products.

All the products removed from the shelves of our stores are NOT derived from the marijuana plant – the CBD infused products in our store were ALL hemp based and not marijuana based – hence we were confused when we were instructed by legal counsel to remove the product – but to play it safe our attorney wanted us to remove until we had further clarification from AMCO and not to sell any more of the hemp based product until further notice. We complied with her counsel.

Another reason we were taken by surprise by your visit relating to our CBD products is because at our initial inspection, all of the products itemized below and removed from **our shelves were present and prominently displayed at the time and date of our final AMCO inspection**. Enforcement agents from AMCO inspected the retail store, saw the products, but did not have any issue with them – we assumed because they are hemp based. Our attorney, Ms. Weltzin, advised us to take all the CBD products off the shelves, till further AMCO clarification, in full view of the surveillance cameras to ensure we properly recorded removing the product.

The products we removed are itemized below:

Therabis Hemp-Based Pet Care

- Calm and Quiet – Large dog, qty 4, retail value: $48
- Calm and Quiet – Medium dog, qty 6, retail value: $60
- Calm and Quiet – Small dog, qty 5, retail value: $40
- Stop the Itch – Large dog, qty 5, retail value: $60
- Stop the Itch – Medium dog, qty 6, retail value: $60

- Stop the itch – Small dog, qty 5, retail value: $40
- Up and Moving – Large dog, qty 6, retail value: $72
- Up and Moving – Medium dog, qty 6, retail value: $60
- Up and Moving – Small dog, qty 5, retail value: $40
- TOTAL RETAIL VALUE: $480

CBD for Life

- Pure CBD Extract Pain Relief Spray – qty 7, retail value: $210
- Pure CBD Lip Balm - qty 1, retail value: $10
- Pure CBD For Life Rub - qty 10, retail value: $200
- Pure CBD Foot Cream - qty 2, retail value: $40
- Pure CBD Face Cream - qty 7, retail value: $245
- Pure CBD Face & Body Cleanser - qty 9, retail value: $180
- TOTAL RETAIL VALUE: $885

Alaska Cannabis Exchange

- 100% Whole Plant CBD Hemp Oil 30 ml – qty 10, retail value: $900
- 100% Whole Plant CBD Hemp Oil 60 ml – qty 9, retail value: $1,485
- Pet: 100% Whole Plant CBD Pet Hemp Oil 15 ml – qty 6, retail value: $210
- Pet: 100% Whole Plant CBD Pet Hemp Oil 30 ml – qty 8, retail value: $520
- Vape: 100% Whole Plant CBD Hemp Oil 15 ml – qty 8, retail value: $280
- Vape: 100% Whole Plant CBD Hemp Oil 30 ml – qty 12, retail value: $780
- TOTAL RETAIL VALUE: $4,175

Total retail value of products taken off the shelf: $5,540

As the products are all derived from the Hemp plant and not the marijuana plant, we believe the products are not containing marijuana as defined by AS 17.38.900, we are currently storing them in my personal home.

As you recall, we provided a complete walk through of the entire premises, including a view into our safe inside our vaulted product room to verify that all CBD product was off of our shelf and no longer located on the premises. We emphasized that we will be compliant and follow instructions from AMCO. We look forward to the AMCO resolving this issue with CBD so that in the future, we may provide our customers this non-psychoactive hemp product that most use for medicinal purposes. Thank you so much for your openness to learn about these hemp products. Our company would like to be on the forefront of these issues and we would like to assist as much as possible in the process to clarify this issue.

Please let me know if you have any questions or need anything else from our team at Enlighten Alaska.

Leah Levinton
Enlighten Alaska
2600 Spenard Rd.
(907) 717-9889

Exhibit B

INGREDIENTS:
WATER (AQUA), GLYCERIN,
CAPRYLIC/CAPRIC TRIGLYCERIDE,
CYCLOPENTASILOXANE, PAULLINIA
CUPANA SEED EXTRACT, CETEARYL
ALCOHOL, PENTYLENE GLYCOL,
CETYL ALCOHOL, STEARIC ACID,
CANNABIS SATIVA SEED OIL,
HYALURONIC ACID, DIMETHICONE,
OLEA EUROPAEA (OLIVE) FRUIT
OIL, PANTHENOL, ALOE BARBA-
DENSIS LEAF JUICE, EUTERPE
OLERACEA FRUIT EXTRACT, PINUS
PINASTER BARK/BUD EXTRACT,
CHAMOMILLA RECUTITA (MATRI-
CARIA) FLOWER EXTRACT,
CAMELLIA
CBD
FACE CREAM
This luxurious cream hydrates your skin and fights off dullness with natural Hemp extracts leaving your face with a radiant youthful glow.
Apply morning and night to face and neck after cleansing.

Exhibit C

HELPS PROMOTE
HEALTHY
JOINTS **AND** HIPS

Manufactured by Therabis
5080 Paris Street, Denver, CO 80239
Made in USA

CAUTION: FOR PET USE ONLY. NOT FOR HUMAN USE.
Keep out of the reach of children and pets to avoid unintended consumption. Use with care and follow instructions closely. In case of accidental overdose, contact a health professional immediately. If your pet is ill or has a condition that does not improve, seek veterinary care. Safe use in pregnant animals or animals intended for breeding has not been proven.

PROMOTES HEALTHY
SKIN **AND** EASES
SCRATCHING

Manufactured by Therabis
5080 Paris Street, Denver, CO 80239
Made in USA

CAUTION: FOR PET USE ONLY. NOT FOR HUMAN USE.
Keep out of the reach of children and pets to avoid unintended consumption. Use with care and follow instructions closely. In case of accidental overdose, contact a health professional immediately. If your pet is ill or has a condition that does not improve, seek veterinary care. Safe use in pregnant animals or animals intended for breeding has not been proven.

HELPS MAINTAIN
A CALM
AND QUIET DEMEANOR

Manufactured by Therabis
5080 Paris Street, Denver, CO 80239
Made in USA

CAUTION: FOR PET USE ONLY. NOT FOR HUMAN USE.
Keep out of the reach of children and pets to avoid unintended consumption. Use with care and follow instructions closely. In case of accidental overdose, contact a health professional immediately. If your pet is ill or has a condition that does not improve, seek veterinary care. Safe use in pregnant animals or animals intended for breeding has not been proven.

Therabis' Up And Moving leverages our powerful formula to promote healthy joints. Our core formula of whole-plant cannabinoids, hemp powder, green lipped mussel, vitamin C, and chromium come together to keep your furry family members Up And Moving.

Therabis' Stop The Itch leverages our powerful formula to soothe your dog's skin. Our unique combination of whole-plant cannabinoids paired with bromelain and quercetin protect cells from oxidative stress and helps ease the torment of itching and scratching.

Therabis' Calm And Quiet leverages our powerful formula to ease anxiety and help dogs maintain a calm demeanor. Our powerful combination of whole-plant cannabinoids and L-theanine come together to keep your dog at their social and emotional best for a happier, healthier pet.

Exhibit D

Directions
Delta Tetrahydrocannabinol (THC)
cannabisace.com
support@cannabisace.com
Serving Per Container: 80 ±
Directions: Place 2-4 drops in your
food, 3-4 times daily. Increase as needed
Ingredients: Triglycerides (MCT's) oil,
Extract
Caution: Keep lid tightly closed. Store in a
HEMP PRODUCT has not been evaluated
HAS BEEN MANUFACTURED
ACCORDANCE WITH THE FDA's
hemp product is not intended to diagnose
prevent any disease.
Delta Tetrahydrocannabinol (THC)
CSA and the Federal Farm Bill of 2014
Nutritional Facts
Serving Size 1 ml
Serving Per Container 30
Amount Per Serving
% Daily Values*
Calories 15
Calories from Fat 15
Total Fat 1g 2%
Saturated Fat 0g 4%
Trans Fat 0g
Sodium 0mg 0%
Total Carbohydrate 0g
Dietary Fiber 0g 0%
Sugars 0g 0%
Protein 0g 0%
*Percent Daily Values are based on a 2,000 calorie diet.
Delta Tetrahydrocannabinol (THC) in accordance
with the CSA and the Federal Farm Bill of 2014
**Daily value not established. Not a significant
source of Vitamin A, Vitamin C, Calcium, or Iron.
Ingredient Chain
Medium Chain Triglycerides (MCT) oil, Cannabis
Sativa Extract
Directions & Suggested
Shake well before using. Store in a
cool, dry place
Adults take approx 1 ml, two
Not to be used during pregnancy
If you have a medical condition
pharmaceutical drugs, please
Do not use if safety seal is broken
Keep out of the reach
This HEMP PRODUCT has not been
the FDA BUT HAS BEEN MANUFACTURED
WITH cGMP IN ACCORDANCE
FDA's REQUIREMENTS
intended to diagnose, treat, cure, or
Batch #1215V
7 05641 24688
7 05641 24689
7 05641 24690
6 84357 40604
6 84357 40605

Exhibit E

MUNICIPALITY OF ANCHORAGE

Finance Dep't., Treasury Div. Fax: (907) 343-6677	Mailing Address P.O. Box 196650 Anchorage, AK 99519-6650	Physical Address 632 W. 6th Avenue, 3rd Floor Anchorage, AK 99501

AMC 12.50 Retail Sales Tax on Marijuana and Marijuana Products
INFORMATIONAL #2 Issued: 12/5/2016
Industrial Hemp

Is industrial hemp exempt from the Retail Marijuana Sales Tax?

AMC 12.50.010 defines marijuana as *"all parts of the plant of the genus Cannabis..."* However, industrial hemp is not considered marijuana. Therefore the Municipality of Anchorage's position is that **industrial hemp is not subject to the retail marijuana sales tax**.

What is industrial hemp?

Industrial Hemp refers to the non-psychoactive (less than 0.3% THC) varieties of Cannabis sativa L. Both hemp and marijuana come from the same cannabis species but are genetically distinct. Industrial hemp has no value as a recreational drug due to its non-psychoactive properties. Industrial hemp is usually grown outdoors, in a variety of climates and soil types.

What are uses of industrial hemp?

Industrial hemp has a multitude of uses. Unlike marijuana, which is harvested for the buds, the entire hemp plant can be harvested. Hemp stalk can be used to make biomass energy, paper products, clothes, insulation, plastic and more. Hemp seed can be used to make health food, organic body care and fuel.

Why is the MOA excluding industrial hemp?

Industrial hemp, as defined in U.S. Code Title 7 § 5940(b)(2), distinguishes marijuana from industrial hemp. Colorado has already followed suit by enacting a state law allowing commercial hemp cultivation. Senate Bill 8, an act relating to the regulation and production of industrial hemp, was introduced into the Alaska State Legislature in 2015. Therefore, MOA is also following suit by excluding industrial hemp from the retail marijuana sales tax due to its minimal THC content.

If you have any questions about this matter, please contact the Treasury Division of the Municipality of Anchorage at the numbers listed below between 8:00 a.m. and 5:00 p.m., Monday through Friday, except on holidays.

Exhibit F

17999 County Rd. 4
Brighton, Colorado 80603
GreenhouseGrowingSystem.com
303-659-8863

LABORATORY CANNABINOID PROFILE CERTIFICATE OF ANALYSIS	Extraction Date:08-Feb-17 Analysis Date/Time:08-Feb-17, 16:41:09

CUSTOMER INFORMATION		SAMPLE DETAILS	
Company:	Alaska Cannabis Exchange	**Sample name**	ACE Hemp Oil in MCT (30mL)
Contact Person:	Darrick Fitz	**Sample number**	4429
Contact Email:	fitzdarrick@yahoo.com	**Sample Information**	600mg CBD
Contact phone:	303-330-5681		

Substance Potency Analysis

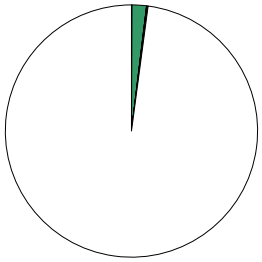
CANNABINOID	Mg. PER GRAM	TOTAL Mg. IN A	1	GRAM PACKAGE (as reported by client)
CBD MAXIMUM *	18.536	18.536		
THC MAXIMUM *	0.735	0.735		
CBDA	0.080	0.080		
CBG	0.602	0.602		
CBD	18.466	18.466		
CBN	0.052	0.052		
THC	0.735	0.735		
CBC	1.143	1.143		
THCA	0.000	0.000		

CANNABINOIDS REPORTED AS "0" WERE BELOW DETECTABLE LEVELS

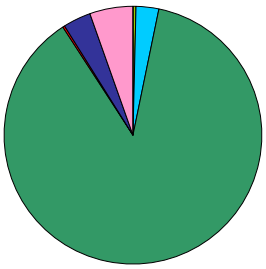
Substance Distribution Analysis

COLOR CODE	CANNABINOID	% BY WEIGHT	Distribution
	CBDA	0.008	0.38%
	CBG	0.060	2.85%
	CBD	1.847	87.61%
	CBN	0.005	0.25%
	THC	0.074	3.49%
	CBC	0.114	5.42%
	THCA	0.000	0.00%

% By Weight



Distribution



White in % by weight is inert material

* All cannabinoids in their acid forms (ending in "A") are convertible to their non-acid forms via a decarboxylation process (heating). The THC and CBD maximum values reported above are the maximum theoretical amounts of THC and CBD the tested product would have if it were fully decarboxylated.

MacKenzie Keller

MacKenzie Keller
Laboratory Director

** Maximum % THC values exceeding three-tenths of one percent (0.3%) on a dry weight basis do not qualify as industrial hemp

** Maximum % THC Value for this sample is: 0.07 %

17999 County Rd. 4
Brighton, Colorado 80603
GreenhouseGrowingSystem.com
303-659-8863

LABORATORY CANNABINOID PROFILE CERTIFICATE OF ANALYSIS	Extraction Date:08-Feb-17 Analysis Date/Time:08-Feb-17, 17:03:58

CUSTOMER INFORMATION		SAMPLE DETAILS	
Company:	Alaska Cannabis Exchange	**Sample name**	ACE CBD Pet Oil in MCT (15mL)
Contact Person:	Darrick Fitz	**Sample number**	4430
Contact Email:	fitzdarrick@yahoo.com	**Sample Information**	150mg CBD
Contact phone:	303-330-5681		

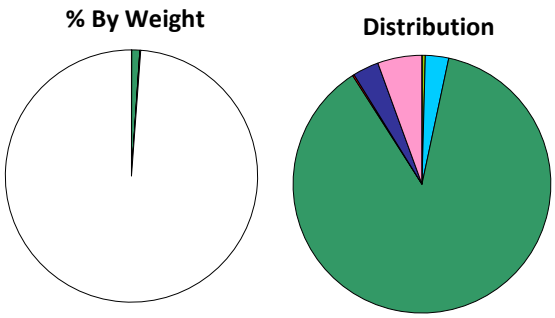
Substance Potency Analysis

CANNABINOID	Mg. PER GRAM	TOTAL Mg. IN A	1	GRAM PACKAGE (as reported by client)
CBD MAXIMUM *	10.303	10.303		
THC MAXIMUM *	0.384	0.384		
CBDA	0.049	0.049		
CBG	0.343	0.343		
CBD	10.260	10.260		
CBN	0.024	0.024		
THC	0.384	0.384		
CBC	0.651	0.651		
THCA	0.000	0.000		

CANNABINOIDS REPORTED AS "0" WERE BELOW DETECTABLE LEVELS

Substance Distribution Analysis

COLOR CODE	CANNABINOID	% BY WEIGHT	Distribution
	CBDA	0.005	0.42%
	CBG	0.034	2.92%
	CBD	1.026	87.61%
	CBN	0.002	0.20%
	THC	0.038	3.28%
	CBC	0.065	5.56%
	THCA	0.000	0.00%



White in % by weight is inert material

* All cannabinoids in their acid forms (ending in "A") are convertible to their non-acid forms via a decarboxylation process (heating). The THC and CBD maximum values reported above are the maximum theoretical amounts of THC and CBD the tested product would have if it were fully decarboxylated.

MacKenzie Keller

MacKenzie Keller
Laboratory Director

** Maximum % THC values exceeding three-tenths of one percent (0.3%) on a dry weight basis do not qualify as industrial hemp

** Maximum % THC Value for this sample is: 0.04 %

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Brighton, Colorado 80603
GreenhouseGrowingSystem.com
303-659-8863

LABORATORY CANNABINOID PROFILE CERTIFICATE OF ANALYSIS	Extraction Date:08-Feb-17 Analysis Date/Time:08-Feb-17, 16:18:20

CUSTOMER INFORMATION		SAMPLE DETAILS	
Company:	Alaska Cannabis Exchange	**Sample name**	ACE CBD Vape Oil (15mL)
Contact Person:	Darrick Fitz	**Sample number**	4428
Contact Email:	fitzdarrick@yahoo.com	**Sample Information**	150mg CBD
Contact phone:	303-330-5681		

Substance Potency Analysis

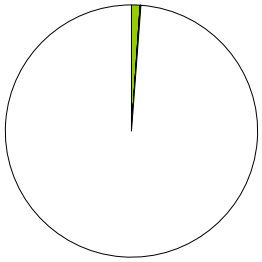
CANNABINOID	Mg. PER GRAM	TOTAL Mg. IN A	1	GRAM PACKAGE (as reported by client)
CBD MAXIMUM *	10.113	10.113		
THC MAXIMUM *	0.274	0.274		
CBDA	10.978	10.978		
CBG	0.024	0.024		
CBD	0.551	0.551		
CBN	0.042	0.042		
THC	0.050	0.050		
CBC	0.046	0.046		
THCA	0.255	0.255		

CANNABINOIDS REPORTED AS "0" WERE BELOW DETECTABLE LEVELS

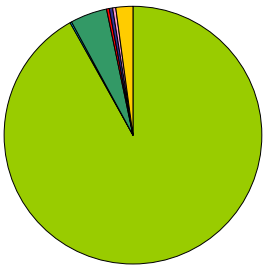
Substance Distribution Analysis

COLOR CODE	CANNABINOID	% BY WEIGHT	Distribution
	CBDA	1.098	91.89%
	CBG	0.002	0.20%
	CBD	0.055	4.61%
	CBN	0.004	0.35%
	THC	0.005	0.42%
	CBC	0.005	0.39%
	THCA	0.026	2.14%

% By Weight



Distribution



White in % by weight is inert material

* All cannabinoids in their acid forms (ending in "A") are convertible to their non-acid forms via a decarboxylation process (heating). The THC and CBD maximum values reported above are the maximum theoretical amounts of THC and CBD the tested product would have if it were fully decarboxylated.

MacKenzie Keller

MacKenzie Keller
Laboratory Director

** Maximum % THC values exceeding three-tenths of one percent (0.3%) on a dry weight basis do not qualify as industrial hemp

** Maximum % THC Value for this sample is: 0.03 %