THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Commerce, Community, and Economic Development

ALCOHOL & MARIJUANA CONTROL OFFICE
550 West 7th Avenue, Suite 1600
Anchorage, AK 99501
Main: 907.269.0350

November 9, 2017

The Noble Dudes, LLC
DBA: The Noble Dudes, LLC
Via email: waparsley@yahoo.com

Re: Limited Marijuana Cultivation Facility License #13659

Dear applicant,

The AMCO Office is reviewing the documents submitted for the proposed marijuana establishment license referenced above. The following items need to be corrected and/or resubmitted**.**

- **Online Application**
  - Your online application has the names in the incorrect section. According to your entity documents all three persons listed on the online application are LLC members. So Brandon and Bartton need to be moved up to under entity officials. ALSO, the lease to the proposed premises is specifically to a "shop at the end of the property line". I have rolled the application back to "new" status so that you can go back into your myAlaska and re-arrange the names AND add the word "shop" sort of as unit number to the premises/physical address. You will need to update the online application and resubmit it so that a new Advertisement Notice and Public Notice generate which you will need for part of your corrections. Let me know when you have done that or call me if you have questions.

- **MJ-00 Application Certifications**
  - The DBA for each of MJ-00's is inadequate. You need to put the doing-business-as name not "same as above" even if it is the same. ALSO, please add "shop" sort of like a unit number to the premises address on page 1.

- **MJ-01 Operating Plan**
  - Page 1, section 1: you need to put the doing-business-as name not "same as above" even if it is the same. ALSO, please add "shop" sort of like a unit number to the premises address.
  - Page 2, second box: please expand upon the answer to this box and describe how your establishment will comply with the licensee/employee/agent to visitor ratio required under 3 AAC 306.710.
  - Page 3, sample badge: the identification badge to be displayed by each licensee, employee, or agent while on the premises must be produced by the licensee. Please provide a sample of the identification badge.
  - Page 4, first and second box reference an attachment which is the diagram but I'm not sure what to look for on the diagram to cross reference.

- Page 6, first box: please expand on your answer to this box and let us know who will be notified of the breach of security (a licensee, employee).
- Page 7, second box: you are saying that the surveillance recording equipment will be housed in a safe, secure location offsite. What is that offsite location and how will you ensure that that offsite location is accessible only to authorized personnel, law enforcement, or an agent of the board.
- Page 7, the check boxes: you checked "yes" to the first box which contradicts the very statement you made of having an offsite location for the surveillance equipment.
- Page 9: expand upon your answer in this box and elaborate about the required business records your establishment will maintain.
- Page 12, first box: the three-day notice to AMCO before rendering the marijuana waste unusable must be given in writing (email would be fine) as Metrc does not currently have that capability. Will you please notate that you understand that in this box.
- Page 15, first box: read 3 AAC 306.470 and 3 AAC 306.475 and explain in this box, in addition to what you already have, how your establishment will comply with those regulations. AND, please provide a sample label, and logo if you will have one, that shows how you will meet those regulations.

- **MJ-02 Premises Diagram**
  - Page 1, section 1: you need to put the doing-business-as name not "same as above" even if it is the same. ALSO, please add "shop" sort of like a unit number to the premises address.
  - Provide a better aerial view (the one you submitted is faded). The aerial view must clearly show the shop that is the proposed licensed premises, and what surrounds that shop and the property (label the diagram).
  - On the diagram of the interior layout, the green and red lines need to be right on the outline of the rectangle, you can actually just use one color since both your licensed premises and restricted access areas are one in the same. Call me if I don't make sense.

- **MJ-04 Cultivation Supplemental**
  - Page 1, section 1: you need to put the doing-business-as name not "same as above" even if it is the same. ALSO, please add "shop" sort of like a unit number to the premises address.
  - Page 5: re-review 3 AAC 306.455 and 3 AAC 306.465 and provide a thoroughly describe how your establishment will comply with both regulations.

- **MJ-07 Public Notice Posting Affidavit**
  - Once you have updated the online application as requested above under "Online Application" post the updated Public Notice at the location of the proposed premises and another conspicuous location for 10 days.
  - I will need a new MJ-07 correctly filled out and signed in front of a notary for that posting.

- **MJ-08 Local Government Notice Affidavit**
  - Once you have updated the online application as requested above under "Online Application" re-notify the local government and the community council by providing the updated Public Notice. The local government is the Mat-Su Borough, contact Mark

Whisenhunt, not Mat-Su City Hall. You do need to have the name and title of the person to whom you provided the Public Notice for the local government.
  - I will need a new MJ-08 correctly filled out and signed in front of a notary.

- **MJ-09 Statement of Financial Interest**
  - The DBA for each of MJ-09's is inadequate. You need to put the doing-business-as name not "same as above" even if it is the same. ALSO, please add "shop" sort of like a unit number to the premises address on page 1.

- **Publisher's Affidavit**
  - Please provide a copy of the newspaper ad. It should have accompanied the publisher's affidavit but it did not. We need to see what the newspaper ad said. **Send me a copy of the newspaper ad before you run the ad one more time in case there are other things you need to fix.**
  - Once you have updated the online application as requested above under "Online Application" you will need to post a new ad (just one) that shows the "shop" as part of the premises/physical address.
  - I will need the publisher's affidavit with a copy of the newspaper ad attached to it for that ad.

- **Proof of Possession for Proposed Premises**
  - The tenant on the lease is The Noble Dudes, it should say The Noble Dudes, **LLC**.
  - Also, please have the landlord/lessor incorporate a disclaimer on the lease (usually under the Default section) that the landlord/lessor will not remove or take possession of marijuana and that AMCO will be contacted. Note that any corrections to the lease must be initialed by all parties including the landlord/lessor.

- **Entity Documents**
  - The LLC's Operating Agreement shows different ownership percentage for each of the members than what you reported to Division of Corporations, a separate state agency, https://www.commerce.alaska.gov/cbp/main/Search/EntityDetail/10057372 . Is there a document that should accompany the operating agreement where those changes are being made? Or was the wrong information reported to Division of Corporations? Or what?

- **Applicant's Alaska Residency**

  - I was unable to verify Alaska residency through the Permanent Fund Dividend database for Brandon A Ross. Brandon, please fill out the attached MJ-18 and submit it with any documentation accompanying it so that I can forward it to our investigators for residency verification.

If we do not receive your completions within 90 days, per 3 AAC 306.025(f), you must file a new application and pay a new fee.

Respectfully,

Jane Sawyer, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov