

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 08/29/2017

License #/Type: 10657 / Standard Cultivation

Licensee: JWS Enterprises

Address: 2997 S. Gravina Is., Ketchikan, 99901

DBA: JWS Enterprises

AMCO Case #: AB17000379

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.

3 AAC 306.435. Marijuana inventory tracking system

(a) A marijuana cultivation facility shall use a marijuana inventory tracking system in compliance with 3 AAC 306.730 to ensure all marijuana propagated, grown, or cultivated on the marijuana cultivation facility's premises is identified and tracked from the time the marijuana is propagated through transfer to another licensed marijuana establishment or destruction. The marijuana cultivation facility shall assign a tracking number to each plant over eight inches tall. When harvested, bud and flowers, clones or cuttings, or leaves and trim may be combined in harvest batches of distinct strains, not exceeding five pounds. Each harvest batch must be given an inventory tracking number. Clones or cuttings must be limited to 50 or fewer plants and identified by a batch tracking number.

After review of JWS Enterprises' METRC entries it was found 13 package entries, #'s 66-70 and 37-44 have no attributable harvest.

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 may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office

ATTN: Enforcement

550 W. 7th Ave, Suite 1600

Anchorage, Alaska 99501

amco.enforcement@alaska.gov

Issuing Investigator: S. Johnson

Received by:

SIGNATURE:

SIGNATURE:

Delivered VIA: Mail

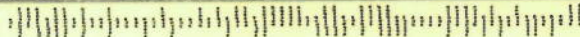
Date:

• Sender: Please print your name, address, and ZIP+4® in this box*

Alcohol & Marijuana Control Office
Attn: Joe Hamilton
550 West 7th Avenue, Suite 1601
Anchorage, AK 99501

RECEIVED

SEP 18 2017

ALCOHOL MARIJUANA CONTROL OFFICE
STATE OF ALASKA

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

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

A. Signature

x *SWagner*☒ Agent☐ Addressee

B. Received by (Printed Name)

SWagner

C. Date of Delivery

9/14/17

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☒ No

Article Addressed to:

JWS Enterprises
2417 tongass #111-214
Ketchikan, AK 99901

3. Service Type

☒ Certified Mail®☐ Priority Mail Express™☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

Article Number

(Transfer from service label)

7012 3460 0000 2166 5151

Hamilton, Joe (CED)

From: jim strassburg <jimstrassburg@aol.com>
Sent: Tuesday, December 26, 2017 11:21 AM
To: CED AMCO Enforcement (CED sponsored)
Subject: Response to NOV AB17-0379 license # 10657

Thank you for the opportunity to respond to the NOV AB17-0379. Put in the simplest terms, the error was caused by inexperience and confusion with the METRC system, an honest mistake, nothing nefarious was intended. The confusion occurred as I was entering the wet weight of those harvests into the tracking system. When you enter the wet weight of the plants they are entered with the tag #, on this page the frame that is intended for the harvest batch is also marked "optional" in italics. I mistakenly "opted" out of entering the Harvest Batch in that frame. This mistake was compounded when the system never put up any alerts while I successfully created packages for testing. The marijuana was tested, I received E mail results from the test lab, registered transfers to the test lab and to my licensed buyers, my buyers registered transfers I paid all state taxes based on the information held in METRC. I was completely unaware that a problem existed until I was contacted by METRC support and told I had been making "thin air" packages. I worked with METRC support at the direction of the MCB to correct the mistake. In my own defense I can only say that I am 69 years old and not at all "Cyber Savy," and I'm easily confused about the way this all works, I do my best to learn from my mistake and won't be making any more "thin air" packages, I call customer support when I need help, I hope this explains things to your satisfaction. Best regards Jim Strassburg

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 08/18/2017

License #/Type: 10141 / Limited Cultivation

Licensee: Coyote & Toad's Gardens, LLC

Address: 100 Rio Faux Lobo, Skagway 99840

DBA: Coyote & Toad's Garden

AMCO Case #: AB17000371

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.

3 AAC 306.435. Marijuana inventory tracking system

(a) A marijuana cultivation facility shall use a marijuana inventory tracking system in compliance with 3 AAC 306.730 to ensure all marijuana propagated, grown, or cultivated on the marijuana cultivation facility's premises is identified and tracked from the time the marijuana is propagated through transfer to another licensed marijuana establishment or destruction. The marijuana cultivation facility shall assign a tracking number to each plant over eight inches tall. When harvested, bud and flowers, clones or cuttings, or leaves and trim may be combined in harvest batches of distinct strains, not exceeding five pounds. Each harvest batch must be given an inventory tracking number. Clones or cuttings must be limited to 50 or fewer plants and identified by a batch tracking number.

After review of Coyote & Toad's METRC entries it was found there has been numerous errors regarding packages not relating back to a harvest batch. Package # 1A4020300000DAD000000015 showed a package of 2.59 lbs being created from no attributable harvest and then being discontinued two hours later.

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 may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: S. Johnson

Received by:

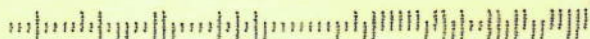
SIGNATURE:

SIGNATURE:

Delivered VIA: Mail

Date:

• Sender: Please print your name, address, and ZIP+4® in this box•

Alcohol & Marijuana Control Office
Attn: Joe Hamilton
550 West 7th Avenue, Suite 1601
Anchorage, AK 99501

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.

Article Addressed to:

Coyote and Toad's Garden, LLC
100 Rio Faux Lobo
Skagway, AK 99840

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☐ Agent
☐ Addressee

B. Received by (Printed Name)

Tiffany Metz

C. Date of Delivery

8/30/17

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

Article Number

(Transfer from service label)

7012 3460 0000 2166 5113



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 21, 2017

Coyote and Toad's Garden, LLC
DBA Coyote and Toad's Garden, LLC
Via: whaleycooper@gmail.com

Re: Coyote and Toad's Garden, LLC, License #11140

Dear Coyote and Toad's Garden, LLC:

At the November 15, 2017, meeting of the Marijuana Control Board in Anchorage, Alaska, the board requested that consideration of NOV #AB17-0371 be added to its January meeting agenda. This NOV was issued to you for "numerous errors regarding packages not relating back to a harvest batch." The board asks you to respond to this NOV. Please provide any documents or information for the board to our office by close of business on January 5, 2018, to be included in the board packets. The meeting will be held in Juneau on January 24 through 26.

Please contact our office at amco.enforcement@alaska.gov with any questions or updates on this issue.

Sincerely,

A handwritten signature in cursive script that reads "Erika McConnell".

Erika McConnell
Director

cc: License File
AMCO Enforcement

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 9/28/17

License #/Type: 11140/Retail

Licensee: Fat Tops, LLC

Address: 36380 Murray Lane Soldotna, AK 99669

DBA: Fat Tops

AMCO Case #: AB17000436

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 9/28/17 AMCO observed that Fat Tops retail inventory did not match the inventory in METRC. METRC showed 22.3g of White Widow in Fat Top's inventory while there was no White Widow present. Further METRC showed that there was 116g of Blue Kush in the store's inventory while there was only 103g.

It was also observed that a large portion of the Fat Tops retail store's inventory was being kept in License # 11138, Fat Tops standard Cultivation's safe.

This is in violations of:

3AAC 306.330 Marijuana Inventory Tracking System

3AAC 306.305(a)(3) Retail Marijuana Store Privileges

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IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

***Please send your response to the address below and include your Marijuana Establishment License Number in your response.**

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: J. Rukes

Received by:

SIGNATURE:

SIGNATURE:

Delivered VIA: Mail

Date:

2017-05-29-Clone Room-H	Blue Kush-Bud	Bud/Blower	D g	No	Test/Passed	No	09/17/2017	09/17/2017	Yes	No	Trace Test Samples
1A4020300001190000000017											
<div> <div> </div> <div> </div> </div>											
Description	Employee	Date	Reported	Sources	External App						
Sold 3.5 Grams from Package on Receipt 0000144149 on 9/25/2017	Michelle Williams (14275)	09/25/2017	09/26/2017 12:09 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000144161 on 9/25/2017	Michelle Williams (14275)	09/25/2017	09/26/2017 12:09 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000144169 on 9/25/2017	Michelle Williams (14275)	09/25/2017	09/26/2017 12:09 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000144180 on 9/25/2017	Michelle Williams (14275)	09/25/2017	09/26/2017 12:09 pm	API	Flowhub Grow/POS						
Sold 3.5 Grams from Package on Receipt 0000152802 on 9/26/2017	Michelle Williams (14275)	09/26/2017	09/26/2017 02:21 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000152810 on 9/26/2017	Michelle Williams (14275)	09/26/2017	09/26/2017 02:21 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000152826 on 9/26/2017	Michelle Williams (14275)	09/26/2017	09/26/2017 02:21 pm	API	Flowhub Grow/POS						
Sold 3.5 Grams from Package on Receipt 0000152827 on 9/26/2017	Michelle Williams (14275)	09/26/2017	09/26/2017 02:21 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000152828 on 9/26/2017	Michelle Williams (14275)	09/26/2017	09/26/2017 02:21 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000152830 on 9/26/2017	Michelle Williams (14275)	09/26/2017	09/26/2017 02:21 pm	API	Flowhub Grow/POS						
Sold 0.5 Grams from Package on Receipt 0000152835 on 9/26/2017	Michelle Williams (14275)	09/26/2017	09/26/2017 02:21 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000152841 on 9/26/2017	Michelle Williams (14275)	09/26/2017	09/26/2017 02:21 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000152856 on 9/27/2017	Michelle Williams (14275)	09/27/2017	09/26/2017 02:22 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000152857 on 9/27/2017	Michelle Williams (14275)	09/27/2017	09/26/2017 02:22 pm	API	Flowhub Grow/POS						
Sold 0.5 Grams from Package on Receipt 0000152860 on 9/27/2017	Michelle Williams (14275)	09/27/2017	09/26/2017 02:22 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000152861 on 9/27/2017	Michelle Williams (14275)	09/27/2017	09/26/2017 02:22 pm	API	Flowhub Grow/POS						
Sold 1 Grams from Package on Receipt 0000152866 on 9/27/2017	Michelle Williams (14275)	09/27/2017	09/26/2017 02:22 pm	API	Flowhub Grow/POS						
Removed Sales of 2 Grams from Receipt 0000117569 on 9/18/2017	Trenton Buning (15217)	09/18/2017	09/26/2017 03:26 pm	User	Flowhub Grow/POS						
Package adjusted by -2 Grams	Trenton Buning (15217)	11/22/2017	11/22/2017 11:09 am	User	Flowhub Grow/POS						
- Reason: Waste	Trenton Buning (15217)	11/22/2017	11/22/2017 11:09 am	User	Flowhub Grow/POS						

LANCE CHRISTIAN WELLS
LAW OFFICES OF LANCE CHRISTIAN WELLS, LLC
A Professional Corporation
733 W. Fourth Avenue, Suite 308
Anchorage, Alaska 99501
(907) 274-9696

e-mail: lwells@lci.net

Fax No. (907) 277-9859

November 30, 2017

Investigator J. Rukes
Alcohol & Marijuana Control Office
Attn: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501

Re: AMCO Case # AB17-000436; Date of Violation: 9/28/17
Licensee: Fat Tops, LLC.
Retail Marijuana Store License # 11140

Dear Investigator Rukes:

I have been retained by Fat Tops, LLC. to respond to the above two notices of violation recently received. I will address them in the order of their occurrence as follows.

On September 28, 2017, it is alleged that AMCO investigator observed that Fat Tops retail inventory did not match the inventory in METRC. METRC showed 22.3 grams of White Widow in Fat Tops inventory while there was no White Widow present.

In response, the White Widow was among other bags of product on top of it within the safe, and the inspector discontinued searching for it as he wanted to move on and disallowed staff of Fat Tops to continue same. It was subsequently located upon his departure from the premises. The inspector was in a hurry, and did not want to take the time to allow a thorough search for the White Widow to occur. No product was missing it was accounted for.

As to the allegation that METRC showed that there was 116 grams of Blue Kush in the store's inventory while there was only 103 grams, is also incorrect.

In response, the remaining 13 grams were in the store's safe, as these remaining 13 grams were considered to be non-useable/non-retainable waste material, and was being held until such time as a decision could be made with what to do with it, AMCO notified, and its ultimate destruction.

Lastly, it is also alleged that a large portion of the Fat Tops retail store's inventory was being kept in license # 11138, Fat Tops Standard Cultivation's safe.

In response, at the time of the initial inspection and licensing of Fat Tops retail and cultivation, there was only one safe located inside the cultivation area that they used to hold their products for retail as the cultivation side had not yet produced any product. At the time of the initial inspection, the inspector had no problem with products for retail being stored there until the last inspection by Officer Rukes, who stated that retail-owned products must be kept in the retail area. The situation was remedied shortly following the inspection and all products that are owned by the retail store are now kept in the retail vault/safe. Furthermore, this alleged violation of 3AAC 306.305(a)(3) Retail Marijuana Store Privileges, "store marijuana and marijuana products on the licensed premises in a manner consistent with 3AAC 306.710-3AAC 306.720". Upon review of these headings and sub-sections, there appears to be no violation.

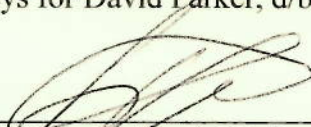
It is respectfully requested, that the alleged violations against Fat Tops, LLC Retail be dismissed. There is no basis in form, fact, or statutory authority to find a violation. Mr. Parker has not, nor would he do anything willful or intentional, to violate any rules set forth within this marijuana industry, by the State of Alaska, as codified in 3AAC 306 or other Alaska statutes.

Lastly, Mr. Parker requests to appear before the marijuana control board and be heard regarding the above violations.

Thank you for your time and attention to this matter. We look forward to working with you in building this marijuana industry.

Sincerely Yours,

LAW OFFICES OF LANCE C. WELLS, LLC
Attorneys for David Parker, d/b/a Fat Tops, LLC.



Lance C. Wells

LCW/ejr

cc: David Parker, Fat Tops, LLC.

*Why should we believe it was "Found" After the inspection.
We were never notified they "found" it. FLH*

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: Thursday, September 28, 2017

License #/Type: 10161, Standard cultivation

Licensee: Beth Brewington

Address: 8535 Dimond D Cir, Unit C, Anchorage, AK

DBA: The Frost Frontier

AMCO Case #: AB17-0461

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 Thursday, September 28th, 2017. The State of Alaska Marijuana & Alcohol Control Enforcement, received an email from Beth Brewington of The Frost Frontier - License # 10161 advising that the waste from approximately 67 harvest batches had not been recorded in the State approved METRC system. This caused a record keeping error in The Frost Frontier and METRC system total amounts of marijuana. The waste from any marijuana must be recorded and tracked in the METRC system.

On August 17, 2017 in an email correspondence between Enforcement supervisor James Hoelscher and Beth Brewington, the issue of notifying METRC was discussed. A solution of a one time, first option to work with METRC on getting the entry errors corrected was recommended.

This option was not completed causing additional record keeping errors.

This is a violation of:

3 AAC 306.435 (a) Marijuana inventory tracking system

3 AAC 306.730 (a) Marijuana inventory tracking system

3 AAC 306.740 (c)(1)(2) Waste disposal

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Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: K. Whiteman

Received by:

SIGNATURE:

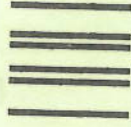
SIGNATURE:

Delivered VIA: Mail

Date:

Article # 7013 2250 0000 9617 5873

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10



UNITED STATES POSTAL SERVICE

• Sender: Please print your name, address, and ZIP+4 in this box •

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

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. Article Addressed to:

The Frost Frontier LLC
3333 Lakeshore Dr, Unit 1
Anchorage, AK 99517

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?

If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type

- ☒ Certified Mail
- ☐ Registered
- ☐ Insured Mail
- ☐ Express Mail
- ☐ Return Receipt for Merchandise
- ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number
(Transfer from service label)



Date: October 24, 2017

FROM: License Number: 10161



The Frost Frontier
Standard Cannabis Cultivation Facility
8535 Dimond D Circle, Unit C
Anchorage, Alaska 99515

907-229-6007

TheFrostFrontier@gmail.com

TO: Alcohol & Marijuana Control Office
ATTEN: Enforcement
550 West Seventh Avenue, Suite 1600
Anchorage, Alaska 99501

RE: Article # 7013 2250 0000 9617 5873 / Issuing Investigator:
K Whiteman



To Whom it May Concern:

After the August 17th email reply from Mr. Hoelscher, his advice was taken very seriously and we continued our outreach to Metrc for course corrections, instruction and guidance as well as a request for on-site instruction (this was denied by Metrc). After the week of the 17th I personally registered for and attended the next available advanced training, August 24. Ticket call dates denoting The Frost Frontier communications with Metrc have been included in this letter.

In summary the majority of errors stemmed from early entry mistakes regarding:

1. inventorying harvest(s)
2. what constitutes a harvest batch
3. when to package
4. reporting waste and
5. finishing harvest batches.

After our on site training with Kelly Jenkins of Metrc (Oct. 17), we have full understanding of recording waste and have made arrangements with Mr. Jenkins to organize on going webinar trainings direct with him for The Frost Frontier staff. Currently we are working backward from the most current harvest to ensure entries and waste are reported correctly and are working hard to make good progress to ultimately organize past harvest(s); those which are correctable and are able to be finished within the system. We are committed to compliance, track-ability, being well organized and to operate transparently. With that, we are looking to hire a Metrc administrator who will be responsible for operating our Metrc inventory system only.

Included in this letter as well, please find a copy of Mr. Jenkins Meeting Summary to us and Ms McConnell at AMCO after the Oct. 17th on site training. Mr. Jenkins discovered outside of the poor start, positive strides have been made moving forward with clear, concise entry applications.

We hope this letter answers any concerns of the AMCO Board and AMCO Enforcement.

Respectfully,

A handwritten signature in blue ink, appearing to read "Beth Brewington". The signature is fluid and cursive, with a large initial "B" and a long, sweeping underline.

Beth Brewington, Co-Owner
The Frost Frontier Standard Cannabis Cultivation Facility
8535 Dimond D Circle, Unit C
Anchorage, Alaska. 99515

907-229-6007
TheFrostFrontier@gmail.com

From: **Alaska Metrc** support-ak@metrc.com
Subject: Fwd: Ticket Numbers
Date: October 23, 2017 at 12:57 PM
To: Beth Brewington thtrotstfrontier@gmail.com



Beth,

Here are the ticket numbers from August 12th, 2017 through September 28th, 2017, excluding Training Registrations.

121677 - August 12
122565 - August 16
122830 - August 17
122831 - August 17
122982 - August 18
123080 - August 19
123092 - August 19
123288 - August 21
123685 - August /22
123995 - August 23
124488 - August 25
124551 - August 26
126638 - September 6
127691 - September 11
129201 - September 18
129902 - September 21
129904 - September 21
130195 - September 22
131036 - September 27
131056 - September 27
131062 - September 27
131283 - September 28

Jessica Chinn
METRC Support Desk
877-566-6506
support@metrc.com



From: Beth Brewington <beth.brewington@gmail.com>
Subject: Fwd: The Frost Frontier - On Site Visit 10/16/17
Date: October 22, 2017 at 3:12 PM
To: Frost Farms & Frost Frontier <thefrostfrontier@gmail.com>

Beth Ann
907-229-6007

Begin forwarded message:

From: Kelly Jenkins <kelly.jenkins@franwell.com>
Date: October 19, 2017 at 4:16:19 AM AKDT
To: Beth Brewington <beth.brewington@gmail.com>
Cc: "erika.mcconnell@alaska.gov" <erika.mcconnell@alaska.gov>
Subject: The Frost Frontier - On Site Visit 10/16/17

Hello Beth,

Thank you very much for meeting me on Tuesday. I will follow up with you at the end of the week to discuss setting up a webinar session to discuss the rest of the reconciliation process. My contact information is listed at the bottom of this email for you as well if you have any questions in the meantime.

Detailed below is a recap of the visit and what we discussed.

Overview

- Frost Frontier
- Producer

Analysis

- **Cultivation**

- **Waste**

- Waste was being tracked by individual plants at multiple stages instead before being reported in Metrc
 - *Discussed and demonstrated the process of reporting waste and informed them that the extra tracking was unnecessary and that they only need to report waste for the entire harvest batch*
 - *Discussed the ability to report waste multiple times (Prime Trim and Fine Trim)*
 - Recording Rock Wool waste - The cubed plots in which the plants are grown as a substitute for standard soil are left with roots after the harvest
 - *I informed them to weigh the rock wool cubes and*

From: metrc.com support email support@metrc.com
Subject: Re: [#127599] Atten Lisa-Fwd: Testing Results
Date: September 12, 2017 at 2:35 PM
To: thefrostfrontier@gmail.com

Hi Beth,

Yes, we did speak yesterday about your harvests from August 5th and August 8th and we discussed that the testing was not attached to the harvest batches due to packaging errors. This has been documented in Metrc ticket # 126638.

If you have additional questions, please contact the Support Desk.

Thank you,
Leisa
Metrc Testing Team
877-566-6506



Ticket: <https://support.metrc.com/helpdesk/tickets/126638>

On Mon, Sep 11 at 4:22 PM , Beth Brewington <thefrostfrontier@gmail.com> wrote:
Hi Lisa,

I would like a reference for my record keeping that you and I spoke at length this morning about the below test analysis on our August Harvest batches dated: AUGUST 5TH AND 8TH, 2017. And why the test results were not attached to the batch strains due to my mistake in prepackaging our flower/bud before sending it off to the lab for it's profile information.

If you agree we spoke and covered these topics, please reply to this email so I may include it along with my other paperwork to document my files that I did speak with METRC regarding this mistake, and that I did receive instructions from you on how to correct this in the future.

Thank you,
Beth Brewington
The Frost Frontier MJ Cultivation Facility
8535 Dimond D Circle, Unit C
Anchorage, Alaska 99515
907-229-6007

On Sep 8, 2017, at 2:32 PM, Beth Brewington
<thefrostfrontier@gmail.com> wrote:

Hi This is for Lisa in testing

Benin forwarded message

From: Evan S <eschlos@gmail.com>
Subject: Fwd: Testing Results
Date: August 22, 2017 at 4:16:31 PM AKDT
To: Beth Brewington <thefrostfrontier@gmail.com>

----- Forwarded message -----
From: Mark Malagodi <mark@canntest.com>
Date: Tue, Aug 22, 2017 at 3:52 PM
Subject: Testing Results
To: Evan S <eschlos@gmail.com>

Evan,

I have attached results for the nine samples delivered on 8/18/17 along with an explanation sheet. The results have been entered into METRC and all say TestPassed. The terpene test is still running on the Grapefruit Juice, and I will send an updated result sheet for that by the end of the day. Please let me know if you have any questions. Thank you for your business.

--
Mark Malagodi, Ph.D.
CEO, CannTest, LLC
907-258-6878

<Sample 3221 The Frost Frontier.pdf>
<Sample 3222 The Frost Frontier.pdf>
<Sample 3223 The Frost Frontier.pdf>
<Sample 3224 The Frost Frontier.pdf>
<Sample 3225 The Frost Frontier.pdf>
<Sample 3226 The Frost Frontier.pdf>
<Sample 3227 The Frost Frontier.pdf>
<Sample 3228 The Frost Frontier.pdf>
<Sample 3229 The Frost Frontier.pdf>
<Cover Letter for Flower Sample Report.docx>

document them on the green waste log when the waste is destroyed and disposed of, as it is not created from trimming during the harvest

- o **Harvests**

- Baked Alaska 10-16-17-B
 - *Originally, this harvest was accidentally split into two separate harvests when reporting in Metrc. I instructed Beth to waste and then finish these harvests, after which i instructed her to recreate the harvest by creating new plantings and phasing them through the system*
- *Discussed the process of finishing harvests and ensuring that they are finished with the remaining wet weight (moisture loss)*
- Several Harvest batches were recently trimmed and are awaiting the testing process
 - *I informed Beth that this product may remain as part of their harvest batch until they are ready to test the product, after which they may package it.*

Summary

Overall, the inventory and processes seem to be efficient and accurate. Several harvests were looked into and had to be corrected (listed above) however the rest of the information entered appears accurate and has a well defined model for tracking harvests and plants.

They have also demonstrated clear improvement from entries made 3 months ago in comparison to the most recent entries. Many of the potential errors made in the past seem to have been corrected and i do not see the same issues recurring often if at all

Kelly Jenkins
303-667-3124
kelly.jenkins@franwell.com

From: Beth Brewington <beth.brewington@gmail.com>
Subject: Fwd: The Frost Frontier - On Site Visit 10/16/17
Date: October 22, 2017 at 3:12 PM
To: Frost Farms & Frost Frontier: thefrostfrontier@gmail.com

Beth Ann
907-229-6007

Begin forwarded message:

From: Kelly Jenkins <kelly.jenkins@franwell.com>
Date: October 19, 2017 at 4:16:19 AM AKDT
To: Beth Brewington <beth.brewington@gmail.com>
Cc: "erika.mcconnell@alaska.gov" <erika.mcconnell@alaska.gov>
Subject: The Frost Frontier - On Site Visit 10/16/17

Hello Beth,

Thank you very much for meeting me on Tuesday. I will follow up with you at the end of the week to discuss setting up a webinar session to discuss the rest of the reconciliation process. My contact information is listed at the bottom of this email for you as well if you have any questions in the meantime.

Detailed below is a recap of the visit and what we discussed.

Overview

- Frost Frontier
- Producer

Analysis

• Cultivation

◦ Waste

- Waste was being tracked by individual plants at multiple stages instead before being reported in Metrc
 - *Discussed and demonstrated the process of reporting waste and informed them that the extra tracking was unnecessary and that they only need to report waste for the entire harvest batch*
 - *Discussed the ability to report waste multiple times (Prime Trim and Fine Trim)*
- Recording Rock Wool waste - The cubed plots in which the plants are grown as a substitute for standard soil are left with roots after the harvest
 - *I informed them to weigh the rock wool cubes and*

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: Saturday, November 11th, 2017.

Licensee: Troy Millhouse

DBA: Green Go, LLC

License #/Type: 10959 Standard Cultivation

Address: 101 Post Rd. Anchorage, AK 99501

AMCO Case #: AB17-0487

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 Saturday, November 11th, 2017. The State of Alaska Alcohol & Marijuana Control Enforcement Investigators were in the neighborhood of Green Go, LLC on Post road in Anchorage, AK and did detect a strong odor of marijuana coming from the ventilation system attached to Green Go's licensed premises.

The strong odor of marijuana was easily detected outside of the facility and on the public right of way

Please regard this Notice of Violation as Enforcements directive that Green Go, LLC will ensure that any marijuana at the facility does not emit an odor that is detectable by the public outside of the marijuana cultivation facility.

Your attention is directed to:

3 AAC 306.430 Restricted access area. (c)(2)

(c) A marijuana cultivation facility shall ensure that any marijuana at the marijuana cultivation facility (2) does not emit an odor that is detectable by the public from outside the cultivation facility except as allowed by a local government conditional use permit process.

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 may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: K. Whiteman

SIGNATURE: 

Delivered VIA: Mail

Received by:

SIGNATURE:

Date:

Article # 7013 2250 0000 9617 6269

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: Monday, January 8th, 2018

License #/Type: 10959 Standard Cultivation

Licensee: Troy Millhouse

Address: 101 Post Rd Anchorage, AK 99501

DBA: Green Go, LLC

AMCO Case #: AB18-0030

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 Monday, January 8th, 2018. The State of Alaska Alcohol & Marijuana Control Enforcement Investigators did receive a complaint of a strong odor of marijuana coming from Green Go, LLC on Post Road in Anchorage, AK. Investigators were in the area of Post Road and did detect a strong odor of marijuana coming from the cultivation facility Green Go, LLC licensed premises.

The strong odor of marijuana was easily detected outside of the facility and on the public right of way.

Please regard this Notice of Violation as Enforcements directive that Green Go, LLC will ensure that any marijuana at the facility does not emit an odor that is detectable by the public outside of the marijuana cultivation facility.

Your attention is directed to:
3 AAC 306.430 Restricted access area. (c)(2)

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Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: K. Whiteman

Received by:

SIGNATURE: 

SIGNATURE:

Delivered VIA: Mail

Date:

Article # 7013 2250 0000 9617 6283

USPS Tracking®

[FAQs > \(http://faq.usps.com/?articleId=220900\)](http://faq.usps.com/?articleId=220900)**Track Another Package +****Tracking Number:** 70132250000096176269

Remove X

Expected Delivery on**TUESDAY****14** NOVEMBER
2017 ⓘ **by**
8:00pm ⓘ **Delivered**

November 14, 2017 at 1:37 pm
DELIVERED, LEFT WITH INDIVIDUAL
ANCHORAGE, AK 99501

Tracking History**November 14, 2017, 1:37 pm**

Delivered, Left with Individual
ANCHORAGE, AK 99501

Your item was delivered to an individual at the address at 1:37 pm on November 14, 2017 in ANCHORAGE, AK 99501.

November 14, 2017, 7:28 am

Out for Delivery
ANCHORAGE, AK 99501

November 14, 2017, 7:18 am

Sorting Complete

ANCHORAGE, AK 99501

November 14, 2017, 6:22 am

Arrived at Unit

ANCHORAGE, AK 99501

November 14, 2017, 1:19 am

Departed USPS Regional Facility

ANCHORAGE AK DISTRIBUTION CENTER

November 13, 2017, 9:29 pm

Arrived at USPS Regional Facility

ANCHORAGE AK DISTRIBUTION CENTER

Product Information

See Less

Can't find what you're looking for?

Go to our **FAQs** (<http://faq.usps.com/?articleId=220900>) section to find answers to your tracking questions.

From: Rich Beezley
To: [CED AMCO Enforcement \(CED sponsored\); Whiteman, Kendrick J \(CED\)](#)
Cc: [Fuzzy Millhouse; Rich Beezley](#)
Subject: Green Go LLC NOV Responses for 11/11/17 & 1/8/18
Date: Friday, January 12, 2018 11:19:52 AM
Attachments: [NOV response - Green Go 111317 & 1818.pdf](#)
[image001.png](#)
[Green Go LLC NOV 1.8.18.pdf](#)

Greetings Mr. Whiteman,

Attached is Green Go LLC's response to the two NOV's mentioned below. We apologize for the delay in response. We are doing everything necessary to put this issue at rest.

Thank you,

Rich Beezley
Chief Operating Officer
AKGLD LLC
907-205-7202

Begin forwarded message:

From: My Info <bigdaddyfuzzy@yahoo.com>
Subject: Fwd: November 13, 2017 & January 8, 2018 NOV responses needed.
Date: January 10, 2018 at 11:15:25 AM AKST
To: richbeezley@gmail.com

----- Forwarded message -----

From: "Whiteman, Kendrick J (CED)" <kendrick.whiteman@alaska.gov>
Date: Jan 9, 2018 2:27 PM
Subject: November 13, 2017 & January 8, 2018 NOV responses needed.
To: bigdaddyfuzzy@yahoo.com
Cc: "Hoelscher, James C (CED)" <james.hoelscher@alaska.gov>

Troy Millhouse,

On Monday November 13th, 2017 a revised Notice of Violation was sent to 101 N Post Rd. for a violation of an odor of marijuana coming from your facility on Saturday November 11, 2017.

As of this date no written response has been received. It is recommended that you respond in writing to document your response for the Marijuana Control Board.

I am attaching a email copy of the NOV for your information. Please send a written response to my email address and amco.enforcement@alaska.gov.

You will be receiving another NOV for an odor violation via certified mail, please respond in writing to this violation as well. So, in summary you will need

to respond to both attached NOV's immediately.

Thank you,



Kendrick Whiteman
Special Investigator I

Enforcement Unit
Alcohol & Marijuana Control Office

550 West 7th Ave. Suite 1600

Anchorage, AK 99501
Office (907) 334-2529

Cell (907) 310-9535
[*kendrick.whiteman@alaska.gov*](mailto:kendrick.whiteman@alaska.gov)

Green Go LLC (4a-10959)

We are writing in response to an NOV that was issued to our facility on 11/13/2017 and again on 1/8/2018 in regards to Odor Control.

First off, we want to apologize for not replying to the notice in November until now. Since we received that NOV in November we have added additional air scrubbers and ionizers to the facility. We have also foamed the building to help alleviate the odor from exiting the facility.

We believed we had the smell situation solved until we received the latest NOV on 1/8/18. We were harvesting that day so the odor being released is the strongest it will be during those harvest times and apparently the smell is still being leaked outside the building. We are adding an additional air filter and ionizer to our front room and have identified smell coming from the smoke stack so we will be rerouting the air to eliminate the issue. Again, we apologize for the delayed response and most importantly for the smell.

-Troy Millhouse

A handwritten signature in cursive script that reads "Troy Millhouse".

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: Friday, October 20, 2017

Licensee: Dane Wyrick

DBA: Danish Gardens, LLC

License #/Type: #10310, Marijuana Cultivation

Address: 2430 Cinnabar Loop, Anchorage, AK

AMCO Case #: AB17-0483

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 October 20th, 2017 numerous complaints of marijuana odor emitting from Danish Gardens, LLC were reported to the State of Alaska Alcohol & Marijuana Control Enforcement Office. The odor was detected in the early evening hours on several occasions prior to October 20th, 2017.

On Friday, October 20th 2017 at approximately 10:00 AM, Enforcement Supervisor James Hoelscher and I went to the Cinnabar loop area where Danish Gardens, LLC is located. The wind was gusting to the west of Danish Gardens, LLC. Supervisor Hoelscher and I parked approximately one block away to the west of the cultivation facility. The wind was gusting in our direction and there we could detect a strong odor of marijuana coming from the marijuana cultivation Danish Gardens, LLC. The odor increased as we did approach the cultivation facility to speak with the manager Christopher Owens. After speaking with Mr. Owens, he did state that Danish Gardens, LLC did have issues with the ventilation system and the filters that were used to cover the outside vents.

This is a violation of:

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Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: K. Whiteman


SIGNATURE: 

Delivered VIA: Mail

Received by:

SIGNATURE:

Date:

- NOV Returned undelivered
- Hand Delivered
NOV Delivered on 11/13/2017
To CHRIS OWENS -
- Certified mail Returned -
Signed By CHRIS OWENS. 

Article # 7013 2250 0000 9617 5897

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.

Article Addressed to:

DAVID GARDENS, LLC
2430 Cinnabar Loop
Anchorage, AK 99517-3138

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent ☐
B. Received by (Printed Name) ☐ Addressee
C. Date of Delivery
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

Article Numbr 7013 2250 0000 9617 5897
(Transfer from)
S Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540



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

November 20, 2017

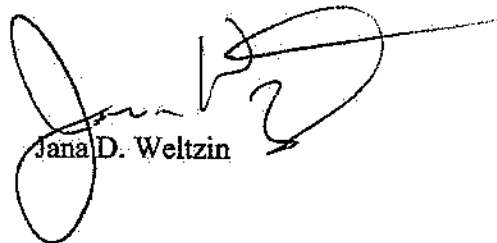
Sent Via Electronic Mail

Re: Response to Notice of Violation Dated October 20, 2017 Re: Danish Gardens Marijuana
Cultivation Facility License No. 10310

Dear AMCO Enforcement:

Please see the attached response to NOV case number AB17-0483 on behalf of my client Danish
Gardens, a Marijuana Cultivation Facility, license number 10310.

Sincerely,



Jana D. Weltzin

Notice of Violation

(3AAC 306.805)

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Licensee: Dane Wyrick

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DBA: Danish Gardens, LLC

AMCO Case #: AB17-0483

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This is a violation of:

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*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office

ATTN: Enforcement

550 W. 7th Ave, Suite 1600

Anchorage, Alaska 99501

amco.enforcement@alaska.gov

Issuing Investigator: K. Whiteman

SIGNATURE: 

Delivered VIA: Mail

Received by: Christopher Owens

SIGNATURE: 

Date: November 13, 2017

Article # 7013 2250 0000 9617 5897



CULTIVATED WITH LOVE AND SCIENCE IN ALASKA, BY ALASKANS
DANISH GARDENS, LLC – 2430 CINNABAR LOOP – ANCHORAGE, AK 99507

To whom it may concern:

Through multiple interactions with Alaska Marijuana Control officers and representatives from the Municipality of Anchorage and subsequent written notices from these entities, Danish Gardens, LLC has become aware of complaints regarding marijuana odor emanating from our premises. As a result, Danish Gardens has committed to a progression of marijuana odor elimination efforts in order to be compliant with regulatory requirements and to be good neighbors. Please find below details of our efforts to remediate marijuana odor.

Please note that our original plans for this facility called for a closed loop air system which would have expelled no odor rich air to the outside of the building. The Municipality of Anchorage required us to change those plans and install fans that purge air to the outside of the building which have been the primary source of the problem.

In order to address the problem, we looked at the building from the perspective of what areas generate the most odor and areas that still move air, but generate less odor. Those areas are as follow:

- Flower Rooms A, B, and C
 - Flower Rooms A & B are currently active and are the primary generators of odor in the building.
 - Flower Room C is not currently active but receives humidity dumps from A & B during dark cycles so is still an area of concern.
- Vegetation Room, Mother Room, Clone Room, Reservoir Room
 - These areas contain plants, but they are not in flower cycle. While these plants do generate some odor, it is negligible compared to the flower rooms.
 - The reservoir room does not contain plants but has connecting doors (usually closed) to both flower rooms.
- General building hallways, offices, bathrooms, break rooms and future retail area.
 - These areas are all run through the original air handling system of the building consisting of 28 intake vents in offices, hallways, bathrooms, etc. and four rooftop units that intake fresh air and expel inside air. This system only operates when there is a call for cooling. The system brings in fresh air and only expels air when the building is over pressurized. We have inspected the rooftop vents on 12 different occasions and every inspection has revealed outgoing vents sucked shut due to negative pressure in the building.

REMEDATION EFFORTS

Flower Rooms A, B & C

Initial efforts to remediate odor led us to seek advice from experts in the marijuana cultivation industry and experts in the air flow and HVAC industry. After research we determined that Active Air 6" x 16", 400 CFM activated carbon canister filters on each outgoing fan that was required by the Municipality of Anchorage should take care of the problem. We committed to a 90 day replacement schedule although the filters are rated for a year. Over an evaluation period, we discovered that while on most days smell from the building was negligible, on certain days where we had cold, heavy air in the mornings, odor was present. We found that this odor usually dissipated within an hour or two as the day warmed and outdoor air circulation increased.

In an effort to improve on the situation, we then upgraded our filters in Flower Rooms A, B & C as follows:

- Flower A – Active Air 8" x 39", 950 CFM activated carbon filter (300% increase over previous active filter area)
- Flower B – Active Air 8" x 39", 950 CFM activated carbon filter plus an Active Air 6" x 16", 400 CFM activated carbon canister (400% increase over previous active filter area)
- Flower C – Active Air 8" x 39", 950 CFM activated carbon filter (300% increase over previous active filter area)

As of November 8, 2017 we have re-routed the airflow ducting from Flower A & B to the roof with a seven foot stack to a level of 32 feet from ground level in an effort to increase dispersion of remaining odors at a height less detectable to our neighbors. This is an increase in height of 24 feet over the previous installation. Flower C was already vented to the roof.

Reservoir Room

This room does not have active outside ventilation other than an old welding fume vent fan that we do not use. As a precautionary measure we have attached an Active Air 6" x 16", 400 CFM activated carbon canister in case we decide to ever turn the vent fan on.

Vegetation Room

We started this room with a single Active Air 6" x 16", 400 CFM activated carbon canister. We later doubled the capacity with a second Active Air 6" x 16", 400 CFM activated carbon canister.

Mother Room, Clone Room

These rooms do not actively vent to the outside. They do however have the general building ventilation system. Please see remediation efforts below.

General building hallways, offices, bathrooms, break rooms and future retail area

Due to the complexity of this system, we contracted G & S Services to evaluate the intakes and outputs of the system and pressure test it to determine if there are ventilation leaks. None were identified. As mentioned above, this system only vents to the outside if the building experiences over-pressurization due to inflow of fresh air when cooling is called for. Because we have other cooling systems for our grow areas, this is rarely called for. After a dozen or more physical observations of the rooftop units, we have yet to see any of the four units out-venting. As a precaution, we have placed Air Handler brand 24" x 24" x 2" activated carbon filters on all 28 intake vents in the general building, hallways, future retail area, bathrooms, Mother Room and Clone Room.

Please see photographs and diagrams of filtration placement in the attached appendix.

Please feel free to contact me at any time for questions or clarification.

Thanks and best regards,

Dane Wyrick

Dane Wyrick



Dane Wyrick

Owner

Danish Gardens, LLC

907-250-9790

mrdane_ak@yahoo.com

APPENDIX



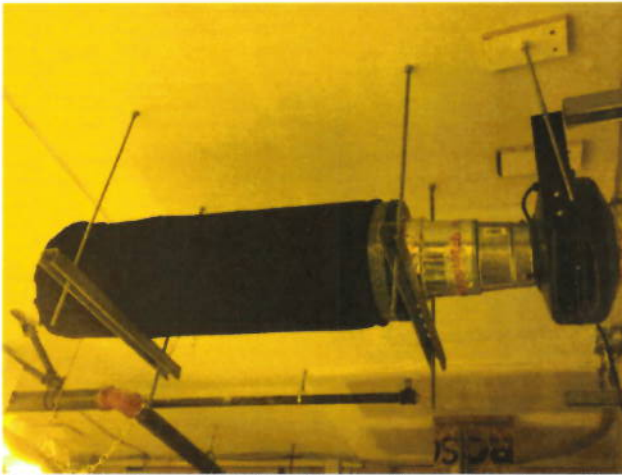
6" x 16", 400 CFM activated carbon canister – Reservoir Room



Double 6" x 16", 400 CFM activated carbon canisters – Vegetation Room



Active Air 8" x 39", 950 CFM activated carbon filter – Flower Room C



Active Air 8" x 39", 950 CFM activated carbon filter - Flower Room A



Active Air 8" x 39", 950 CFM activated carbon filter and 6" x 16", 400 CFM activated carbon canister – Flower Room B



Air Handler brand 24" x 24" x 2" activated carbon filters – All general building intakes.

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 12/13/2017

License #/Type: 10050 / Retail Marijuana Store

Licensee: Rainforest Farms, LLC

Address: 216 2nd Street, Juneau, AK 99801

DBA: Rainforest Farms

AMCO Case #: AB17000715

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.

3 AAC 306.330. Marijuana inventory tracking system:

(c) A retail marijuana store shall reconcile each transaction from the retail marijuana store's point-of-sale system and current inventory to its marijuana inventory tracking system at the close of business each day.

On July 28, 2017 AMCO sent notice to all METRC Administrators describing the change in reporting from daily package sales reporting to sales receipt reporting (see attached).

It has been found Rainforest Farms, LLC has not changed over to such reporting and therefore has violated this regulation for 111 days.

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 may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

***Please send your response to the address below and include your Marijuana Establishment License Number in your response.**

Alcohol & Marijuana Control Office

ATTN: Enforcement

550 W. 7th Ave, Suite 1600

Anchorage, Alaska 99501

amco.enforcement@alaska.gov

Issuing Investigator: S. Johnson

Received by:

SIGNATURE:

SIGNATURE:

Delivered VIA: Mail

Date:

Hamilton, Joe (CED)

From: James Barrett <rainforestjames@gmail.com>
Sent: Tuesday, December 26, 2017 3:45 PM
To: CED AMCO Enforcement (CED sponsored)
Subject: Rainforest Farms, LLC 10050 Violation Response
Attachments: LETTER TO DIRECTOR Change in METRC reporting.pdf

AMCO,

It has come to our attention that in the view of AMCO enforcement, we have not been accounting for our daily sales properly.

This issue first started in July and was thought to have been resolved months ago. After AMCO sent out "Metrc Support Bulletin" dated 7/28/2017, from METRC Support, clarifying how to report sales, we had contacted the Director about this and didn't receive much of a response (see attached letter). We knew the Director was very busy these days so we then decided to take it upon ourselves to purchase Greenbits POS system. This costs us around \$5000 per year and an additional \$500 per month for METRC reporting. Because Greenbits claims to be the "only METRC compliant POS in Alaska", we went ahead and spent thousands only to find that the system did not work with our store. Despite our best efforts, we took a huge loss. We then decided to revert back to our original POS -Square POS - and it has worked perfectly. It provides us with accurate - and required - reporting.

WHAT HAPPENED: Because METRC was accepting our daily sales as they were being recorded, it was assumed that it was being done properly. Unbeknownst to us and with best intentions to report correctly, it turns out that reporting was not done properly. We had tried to communicate to the Director about this issue and were told that we were fine reporting the way we were and so we just kept doing business as usual thinking we were reporting correctly. (please see attached correspondence).

RESOLUTION: We found that the reporting error was due to inconsistencies in METRC reporting and our POS software. Our point of sale software was unable to provide proper .csv files in the correct format for METRC daily uploads and so we had created an excel template that creates the proper .csv in the format requested per the Metrc Support Bulletin dated 7/28/2017 from METRC Support.

At the time of receiving the letter of violation (December 13, 2017), we were unaware that we were not compliant with state regulations and have since made changes to our daily sales reporting to correct any possible errors. Furthermore, after reading the violation letter, we had immediately taken steps to resolve the error and have been compliant since.

This problem has been resolved and all reporting is now accurate, compliant, and complete. our reporting is now compliant with 3 AAC 306.330.

Please let us know if this is a satisfactory resolution to the notice of violation. It is our goal to remain compliant and work with AMCO however we can to resolve any issues.

Sincerely,
James Barrett
Rainforest Farms, LLC
907-957-4751

Change in METRC reporting

5 messages

Rainforest James <rainforestjames@gmail.com>
To: Erika B McConnell <erika.mcconnell@alaska.gov>

Mon, Aug 7, 2017 at 4:57 PM

Director,

The changes mentioned in the attached document raise concern for me.

This change presents a potential conflict of interest. The company GreenBits has been pushing its products on retailers in Alaska and claims to be the only company that can provide daily reporting services. This puts us in a position where we MUST buy from Greenbits in order to be compliant.

We keep daily records of sales and all transactions, however, METRC does not allow for any way to easily import daily sales other than buying Green bits POS.

Upon our initial inspection with AMCO officials, our POS was satisfactory and met all regulatory requirements. This change puts an incredibly financial burden on our business.

I feel we should be able to at least upload pdfs or other formats that our current POS already uses. There must be a way to use our current POS software and avoid Greenbits monopoly on the POS business.

I feel that Greenbits pushed for this regulation change and puts economic hardship on our business. Greenbits even advertises on its website as "the only POS fully integrated with METRC in Alaska" (see attached.).

The lowest price for Greenbits is \$3500 plus \$500 per month for "daily record entry". That's \$9500 per year for Greenbits POS station. We have already spent thousands into our current Square POS.

Basically, we now have to try to afford this software in order to be compliant. We can't afford this type of expense.

I feel like METRC and GreenBits work together. In fact, they have to work together in order for the two softwares to mesh.

Is there anything that can be done about this? Our system of reporting is already compliant and very accurate. We have on record every transaction made to date including date, time, METRC product and so forth.

Anything you can do to clarify this will help. I will be in Anchorage on Wednesday if you like to meet in person.


Thanks,

James Barrett
Rainforest Farms

2 attachments



image1.PNG
309K

 AK-IB_001_072817_V1.pdf
287K

Rainforest James <rainforestjames@gmail.com>
To: Erika B McConnell <erika.mcconnell@alaska.gov>

Thu, Aug 17, 2017 at 8:38 AM

Still awaiting a response. Thanks,

James

[Quoted text hidden]

> <AK-IB_001_072817_V1.pdf>

>

>

> <image1.PNG>

>

>
>

Rainforest James <rainforestjames@gmail.com>
To: Erika B McConnell <erika.mcconnell@alaska.gov>

Thu, Aug 17, 2017 at 9:11 AM

Director,

After more thought, I have decided to retract my last two emails requesting clarification on this matter.

We will be using this system to comply with METRC as required by regulation.

I apologize for any inconvenience.

Thanks again,

James Barrett
[Quoted text hidden]

McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>
To: Rainforest James <rainforestjames@gmail.com>

Thu, Aug 17, 2017 at 9:39 AM

Thanks!

Erika McConnell
Director
Alcohol & Marijuana Control Office
State of Alaska
[Quoted text hidden]

McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>
To: Rainforest James <rainforestjames@gmail.com>
Cc: "Hoelscher, James C (CED)" <james.hoelscher@alaska.gov>

Thu, Aug 17, 2017 at 9:41 AM

Hi Mr. Barrett,

My apologies for not responding more promptly. I want to assure you that the actions taken by AMCO and Franwell have not been taken with any particular other company or system in mind. It is my understanding that there are multiple POS systems that can produce the required reporting.

Thank you,
Erika McConnell

Erika McConnell
Director
Alcohol & Marijuana Control Office
State of Alaska

—Original Message—
From: Rainforest James [mailto:rainforestjames@gmail.com]
Sent: Thursday, August 17, 2017 9:12 AM
To: McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>
Subject: Re: Change in METRC reporting

[Quoted text hidden]

CONFIDENTIALITY NOTICE: This email message including any attachments is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, or disclosure is prohibited.

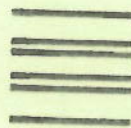
5162-2162



Alcohol & Marijuana Control Office
Attn: Joe Hamilton
550 West 7th Avenue, Suite 1601
Anchorage, AK 99501

• Sender: Please print your name, address, and ZIP+4® in this box•

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10



UNITED STATES POSTAL SERVICE

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent ☐ Addressee
 B. Received by (Printed Name) ☐ Addressee
 C. Date of Delivery 12/15/17
 D. Is delivery address different from item 1? ☐ Yes ☒ No
 If YES, enter delivery address below:

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.

Article Addressed to:

Rainforest Farms, LLC
216 2nd Street
Juneau, AK 99801

3. Service Type
☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery
 4. Restricted Delivery? (Extra Fee) ☐ Yes

Article Number
(Transfer from service label)

7012 3460 0000 2162 5162

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Date: 1-2-18

License #/Type: Retail Marijuana Store

Licensee: SEU LLC

Address: 715 W. 4th Ave, Anchorage, AK

DBA: Alaska Fireweed

AMCO Case #: AB18-0006

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.

AMCO Investigators received information that Jean Pellet was selling marijuana without a marijuana handlers permit and that under 21 persons had been on the licensed premises. Photos were also provided anonymously. Licensee Susan Nowland was contacted and shown the photos. Nowland denies Pellet was selling marijuana but admits he was in a restricted area. When asked about the visitors log, Nowland admits Pellet is not being signed into the visitor log 100% of the time. Pellet works for NM Enterprise, Inc. and is responsible for selling t-shirts. Pellet has periodically checked ID's at the entrance to the establishment but does not have a handlers permit. Regarding the children on the premises, Nowland stated they were her children and grandchildren. She took them through the restricted access area to gain access to the roof to watch Fur Rondy 2017 fireworks.

Your attention is directed to 3AAC306.710: Restricted access areas, 3AAC306.700: Marijuana handler permit required and 3AAC306.755: Business records

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 may respond, either orally or in writing, to the Notice. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: J. Hamilton

Received by:

SIGNATURE: *J. Hamilton*

SIGNATURE:

Delivered VIA: Mail

Date:

7013 2250 0000 9617 6580



Tony Ak Fireweed

PICTURES

Wednesday, December 27, 20...



Save



Share



Tony Ak Fireweed

PICTURES

Wednesday, December 27, 20...



Save



Share



Tony Ak Fireweed

PICTURES

Wednesday, December 27, 20...



Save



Share



Camera 03



10

1P

1R



Model FE8181

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Edit



Delete

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. **SEU LLC**
dba Alaska Fireweed
715 W. 4th Avenue
Anchorage, AK 99501

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?

If YES, enter delivery address below:

3. Service Type

- ☐ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes2. Article Number
(Transfer from service label)

7013 2250 0000 9617 6580

PS Form 3811, July 2013

Domestic Return Receipt

• Sender: Please print your name, address, and ZIP+4® in this box®

AMCO
550 W. 7th Avenue, Suite 1600
Anchorage, AK 99501

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

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