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

December 22, 2017

Turnagain Horticulture Company
DBA: Turnagain Horticulture Company
Via email: molen.seth@turnagainherbco.com

Re: Standard Marijuana Cultivation Facility License #12817

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. Please read the entire letter and call me if you have any questions.

- **Online Application (unit number needed, please let me know immediately what that unit number will be)**
  - Because you are applying for other types of licenses at the same location and each one is under a different company/entity, you must designate a unit number to each of the proposed licensed premises for each license. So, when you have that unit number figured out, please let me know **immediately** so that I can add the unit number in the system. The system will then generate a new Advertisement Notice template and Public Notice which you will need for part of your corrections (you will be able to print these from your MyAlaska).

- **MJ-00 Application Certifications**
  - On page 1 of each of the MJ-00's please add the unit number that will be designated as requested above, under Online Application.

- **MJ-01 Operating Plan (when you are done with the corrections to this and MJ-02, and MJ-04, please make sure that you read them and that the narrative flows nicely throughout and consistent with each other)**
  - Page 1: please add the unit number that will be designated as requested above, under Online Application.
  - Page 2, first box: instead of saying "pursuant" and cite the regulation(s), please explain how you will meet the regulations.
  - Page 2, second box: expand upon your answer to this box and explain how you will meet the licensee/employee/agent to visitor ratio.
  - Page 4, first box: not sure what to make of the answer here, first you talk about the exterior lighting of the facility, then you state that the cultivation facility is considered Phase Two. This is a cultivation application, so is there currently a building or not? Or am I confused?

- Page 7: the answer to these boxes, aside from changing the name of the business, are all the same for all three applications. That said, when you state that the building will house and store the video surveillance and recording equipment you need to be very specific in saying which area of the building (under which licensed premises) you will have the video surveillance recording equipment and the digital and paper records. That said, each of the businesses must keep a minimum of six months records on its licensed premises. Please amend the answer to this box accordingly.
- Page 12, first box: the marijuana waste must be ground (not shredded) before mixing it…to make it unusable. Please amend this section accordingly. ALSO, the answer to these boxes, aside from changing the name of the business, are all the same for all three applications. That said, can you please specify where (under which licensed premises) will the dumpster be? **Additionally, you will need to keep the waste for each business separate and within its own licensed premises.** You can dispose of it altogether, but while it is in the process of waste and destruction it must be separate and within its own licensed premises.
- Page 13: the marijuana waste must be ground (not shredded) to make it unusable. Please correct this page accordingly.

- **MJ-02 Premises Diagram**
  - Page 1: please add the unit number that will be designated as requested above, under Online Application.
  - The 43 pages of diagrams you submitted were just too much to decipher. Please provide a diagram or diagram(s) that clearly show/outline the following:
    - Type of structure the building is.
    - Proposed licensed premises (use one color).
    - Restricted access areas (use a different color). **Now,** for a cultivation facility the entire licensed premises should be considered licensed and restricted access area, the exceptions are, for example, you have a reception area where you log the visitors in which case it could just be licensed but not restricted access area if you don't have marijuana being processed there. This can get confusing, call me if you have questions.
    - Very clear and labeled interior layout of the cultivation premises including any rooms within the cultivation premises
    - Clearly label the surveillance room (will the surveillance room be under the licensed premises of the cultivation facility, another question of mine that wasn't clear when reading your operating plan).
    - Entrance(s), exit(s).
    - Storage area(s).
    - Dimensions overall and for each individual room/area within the cultivation premises.
    - Submit a very clear labeled diagram of the entire building but at the same time it must very clearly show the requested information of the cultivation diagram mentioned just above this bullet point.

- **MJ-04 Cultivation Supplemental**
  - Page 1: please add the unit number that will be designated as requested above, under Online Application.

- Page 2: please make sure that this page is consistent with what you show on your diagram.
- Page 4, first box: please make sure that this box is consistent with page 12 of MJ-01.
- Page 6: please provide a sample label showing how you will comply with 3 AAC 306.470 and 3 AAC 306.475, and please provide a sample of the logo you will use.

- **MJ-07 Public Notice Posting Affidavit**
  - Post the updated Public Notice, which should include the unit number as mentioned above, under Online Application, for 10 days at both the location of the proposed premises and another conspicuous location.
  - I will need a new MJ-07 filled out and signed in front of a notary.

- **MJ-08 Local Government Notice Affidavit**
  - Re-notify the Municipality of Anchorage and the midtown community council by providing them with the updated Public Notice that should include the unit number as mentioned above, under Online Application.
  - I will need a new MJ-08 filled out and signed in front of a notary.

- **MJ-09 Statement of Financial Interest**
  - On page 1 of the MJ-09's please add the unit number that will be designated as requested above, under Online Application.

- **Publisher's Affidavit**
  - Please let me know immediately the unit number you designate to the proposed premises for this license so that I can update the system and you can run a one-time newspaper ad that includes the unit number.
  - I will need the affidavit of publication and copy of the ad for this publishing.

- **Proof of Possession for Proposed Premises**
  - The lease that you submitted is inadequate (I did not review it). Please provide a lease where Turnagain Horticulture Company is the tenant. The lease to Turnagain Horticulture Company must be a legally binding lease and must include:
    - The unit number you assigned to the proposed premises for this license (see first paragraph above, under Online Application)
    - An acknowledgment from the landlord/lessor that the premises will be used as a marijuana establishment, and
    - A clause that the landlord/lessor may not take possession or remove marijuana from the premises and AMCO will be contacted (this is usually under the "Default" section).
    - Note: if this turns out to be a lease/sublease type of deal. The master lease must also include the acknowledgment and the clause mentioned above.

- **Entity Documents**
  - Please provide the corporation's bylaws, and file your initial report with Division of Corporations, a separate state agency, https://www.commerce.alaska.gov/cbp/main/Search/EntityDetail/10056558 .

- **Applicant's Residency (I only need the MJ-18 and supporting documentation once, not for each of the three applications)**
    - I was unable to verify Seth's Alaska residency via the Permanent Fund Dividend's database. Seth, are you going to apply for PFD once January rolls around? AND, please fill out the attached MJ-18 and send it back with any supporting documentation, I will then forward it to our enforcement section for residency check.

- **Miscellaneous**
    - On all your cover pages you state that the document is confidential. I just want to let you know that our forms and their contents are not kept confidential, nor are any other documents, such as a lease, etc., that is part of the application packet are kept confidential.

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