From:	Marijuana Licensing (CED sponsored)
To:	Jana Weltzin; Marijuana Licensing (CED sponsored)
Cc:	Valerie Mastolier; Christina Thibodeaux
Subject:	RE: -Incomplete Application Notice-High Flower Farms license #13396
Date:	Tuesday, April 17, 2018 12:53:37 PM

As you know, any areas where marijuana or marijuana product are stored must be included as part of the licensed premises.

Under the existing floor plan the only license that could have this storage room included in its licensed premises is the cultivation facility. The reason for this is because the board voted to accept the recommendations presented by a subcommittee regarding licensed premises during its September 2017 meeting. The first recommendation was that a licensed premises must be one contiguous area, and only the cultivation facility would meet that requirement with the existing floor plan.

Additionally, the board voted at its January 2018 meeting to adopt a regulation change that requires a licensee to have sole right of possession over all areas of the licensed premises. That project has been forwarded to the Department of Law and should become effective within the coming months. Because the application for the retail marijuana store is for a different entity the sole right of possession requirement could not be met in this scenario.

Jane and Sarah.

From: Jana Weltzin <jana@jdwcounsel.com>
Sent: Tuesday, April 17, 2018 11:37 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Valerie Mastolier <valerie@jdwcounsel.com>; Christina Thibodeaux <christina@jdwcounsel.com>; Jana Weltzin <jana@jdwcounsel.com>
Subject: -Incomplete Application Notice-High Flower Farms license #13396

HI – on the incomplete letter we received for this licensee , you indicated that the product most "have its own storage room" however, I cannot find the regulatory citation that requires that each license have its own "storage room". I do see where it is required that the storage of marijuana and products must be under surveillance, but that is not what your office is requesting – its requesting a separate storage room and I just don't think that you are correct in requiring that.

Can you point to the specific citation that states each license must have its own storage room? Thanks so much in advance.

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Think green, please don't print unnecessarily