

**From:** Ron Gray  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Retail Business Owners List ...  
**Date:** Wednesday, March 28, 2018 12:12:09 PM

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To Whom It May Concern:

Good day. I'm looking for a list of all the "Retail Marijuana Business Owners" in the State of Alaska. Is there a particular site I can go to to find such a list.

Thank you, Ron Gray

Sent from [Mail](#) for Windows 10

**From:** Buffie Jones  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Meeting sooner than June....  
**Date:** Thursday, March 29, 2018 11:56:01 PM

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This is concerning to Old School & Buffie LLC that there are 30+ licenses in the process of being under review &/or deemed complete. By the time of this meeting we hope to be included in that group to get our manufacturing license. We've been in this process a long time & set backs delayed & postponed & muni regulations etc, etc, etc. I hope to hear some good news on this issue during the Nome meeting. Thank you  
Oldskl ( owner ) Old School & Buffie LLC, license #11778 Limited Cultivation  
Initiated Manufacturing license # 16794

Sent from my iPad

**From:** Christina Thibodeaux  
**To:** [McConnell, Erika B \(CED\)](#); [Hoelscher, James C \(CED\)](#); [Marijuana, CED ABC \(CED sponsored\)](#)  
**Cc:** [Jana Weltzin](#); [Valerie Mastolier](#)  
**Subject:** Sponsorship of Events by Licensed Marijuana Establishments  
**Date:** Friday, March 30, 2018 12:10:51 PM  
**Attachments:** [Sponsorship of Events by Licensed Marijuana Establishments - Public Comment.pdf](#)

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Good Afternoon All,

Please find the attached Letter regarding sponsorship of events by licensed marijuana establishments.

Thank you very much and Happy Friday,

***Tina Thibodeaux***

JDW, LLC

Paralegal

3003 Minnesota Drive Suite 201

Anchorage, Alaska 99503

907-231-3750

[info@jdwcounsel.com](mailto:info@jdwcounsel.com)

[christina@jdwcounsel.com](mailto:christina@jdwcounsel.com)

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

March 30, 2018

Director McConnell  
Chief James Hoelscher  
MCB Board

*Sent Via Electronic Mail*

Re: Sponsorship of Events by Licensed Marijuana Establishments

Dear Director McConnell and Chief Hoelscher:

I am writing this letter to request blanket approval from AMCO for marijuana licensees regarding sponsorship of events and general advertising. The majority of industry participants are striving to remain compliant with the regulations and avoid the issuance of NOV's. At the same time, these business owners are also striving and struggling to make their existence known to their would-be customers.

In order to ensure licensees remain in compliance with evolving interpretation of regulations, many of my clients attempt to gain approval of their involvement in events, such as sponsorship of concerts, sporting events, and community fairs. However, often AMCO officials either do not respond to the request for approval or respond weeks, sometimes a month later, when the opportunity has already passed, and the licensee was precluded from participating due to waiting on AMCO approval.

The industry as a whole needs set guidelines with clear parameters for involvement in events including sponsoring community and statewide events. This would allow industry participants to have a clear path forward and steer clear of NOV's and reduce the burden on the already overworked AMCO staff. A general framework would save AMCO Enforcement and staff time, by having a set of standards to refer to when answering licensee questions regarding advertising privileges and prohibitions and specific events. Uncertainty and the looming threat of NOV's causes these small business owners to miss out on vital sponsorship and advertising opportunities, which places an unfair burden on these new business owners.

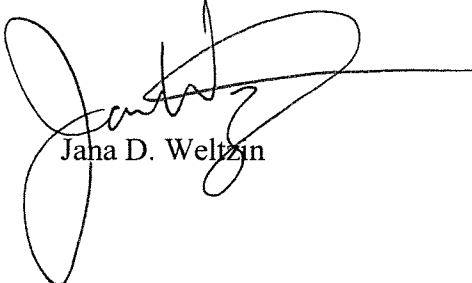
Below I have set out a basic framework and structure for licensees to evaluate whether their participation in a particular event is appropriate/allowable under our existing regulatory framework:

- ✓ Any events specifically held for and geared towards only children shall not be sponsored by marijuana licensees. Family events and venues can be sponsored if the event holders also accept alcohol businesses as sponsors, i.e., Arctic Man and other similar unique Alaskan traditions, sporting events, all ages concerts/community events, etc.;
- ✓ All sponsorship media advertisements, banners, posters, or social media postings, which mentions or displays only the business name and/or logo are allowed and shall not be required to contain the five advertisement warnings. Any form of event advertisement that mentions regulated marijuana products shall include the five warnings.
- ✓ No sponsorship material shall insinuate or offer any marijuana or marijuana products will be given as promotional material for free or available at the event.
- ✓ No sponsorship material shall be drafted in a manner that would appeal specifically to persons under the age of 21 to engage in the consumption of marijuana/marijuana products.
- ✓ No sponsorship material shall contain cartoons when referring to or about a marijuana licensee sponsorship.
- ✓ A marijuana licensee may hold or be their own sponsor of an event, such as a concert, provided that the event does not violate any provision of the State of Alaska commercial marijuana regulations (i.e., no onsite consumption, no giving marijuana away or selling it off premises, no restricted access violations, etc.).

Unless or until your office provides me with a framework/structure that is different from above, my clients will not be requesting approval to participate in sponsorship of events moving forward. However, they will ensure strict adherence to the five points above and the advertising regulations. Given the lack of timely responses to event approvals, resulting in missed opportunities, and lack of event sponsorship approval being required by the regulations, I feel that the above framework and concept is a reasonable approach to participating in sponsorship events.

Please do not hesitate to respond with an alternative structure or any concerns you may have with my approach – as always, I see my office and your office as teammates and this is merely an attempt to make this industry work more seamlessly and take some of the work load off of AMCO.

Sincerely,



Jana D. Welton

**From:** [Wiebold, Karinne E \(DOL\)](#)  
**To:** [Marijuana Licensing \(CED sponsored\)](#); [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** FW: approved license request  
**Date:** Monday, April 02, 2018 1:57:04 PM

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Hi,

I am following up with this request to see if you might have the additional marijuana permit holder information. Please get back with me as soon as possible.

Thanks,

Karinne Wiebold, Economist  
DOLWD, Research and Analysis  
PO Box 25501  
Juneau, AK 99802  
*Phone*|907.465.6039  
*Fax*|907.465.4506

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**From:** Wiebold, Karinne E (DOL)  
**Sent:** Tuesday, March 20, 2018 6:06 PM  
**To:** Oates, Sarah D (CED) <[sarah.oates@alaska.gov](mailto:sarah.oates@alaska.gov)>  
**Subject:** approved license request

Hi Sarah,

A couple weeks ago you sent me a couple spreadsheets to assist with my marijuana industry research, and I am reaching out with a hail mary to see if you can help me again.

The attached spreadsheet lists all the approved licenses and has business names, but I am having a really hard time matching it to employment records. Is there any chance that you all have the unemployment insurance numbers (UI numbers) or a tax id number, or what we sometimes call an employer identification number (ein)?

It would help me so much!

Thanks,

Karinne Wiebold, Economist  
DOLWD, Research and Analysis  
PO Box 25501  
Juneau, AK 99802  
*Phone*|907.465.6039  
*Fax*|907.465.4506

**From:** [Wiese, James B \(DFG\)](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Cordova, Ak -- James Wiese  
**Date:** Wednesday, April 04, 2018 8:52:13 AM

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My name is James Wiese and I have a question about dispensaries. How many citations have been given to all dispensaries in Alaska for selling to someone under 21? Are those dispensaries still open?

I can be reached at 907-253-6667 or [james\\_barry500@yahoo.com](mailto:james_barry500@yahoo.com) thank you for your time.

**From:** dollynda Phelps  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Comment re: enforcement  
**Date:** Wednesday, April 04, 2018 10:43:09 AM  
**Attachments:** [APRIL 4 MCB comment seeds.docx](#)

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Please accept this public comment on record.  
Thank you,

Dollynda Phelps

907-252-8026



As the marijuana industry has grown over the last year, it has become increasingly tricky for licensees to follow regulations due to the well used term “interpretation of regulation.” From what I have personally seen over the last year, for the most part, licensees are putting in a great deal of effort to know the regulations and follow them. The problem is that AMCO has taken the liberty on many occasions to choose not to follow or enforce written regulations and make up their own.

One recent example of this was the February bulletin from METRC, requiring that all seeds be packaged, tagged, and entered into METRC. Most licensees licensed in the last 8 months were told by AMCO at the time of licensing that this was required and appeased the request. As a licensed cultivator, I refer to regulations as a bible. This requirement from AMCO was and still is blatantly contrary to written regulations. Case in point, regulations require seeds to be entered into METRC from the time they are **propagated** and become active. State regulations definition of propagate means to cause a marijuana plant to grow by planting clones (seeds) or cuttings, not sitting dormant on a shelf in storage.

### **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.

### **3 AAC 306.730. Marijuana inventory tracking system**

(a) A marijuana establishment shall use a marijuana inventory tracking system capable of sharing information with the system the board implements to ensure all marijuana cultivated and sold in the state, and each marijuana product processed and sold in the state, **is identified and tracked from the time the marijuana is propagated from seed or cutting**, through transfer to another licensed marijuana establishment.

### **The definition of “propagate” as found in 3AAC 306.900:**

(34) “propagate” means to **cause a marijuana plant to grow by planting clones or cuttings**, and nurturing them into viable plants up to eight inches in height;

### **3 AAC 306.755. Business records**

(a) A marijuana establishment shall maintain in a format that is readily understood by a reasonably prudent business person :

(8) accurate and comprehensive inventory tracking records that account for all marijuana inventory **activity from seed or immature plant stage** until the retail marijuana or retail marijuana product is sold to a consumer, to another marijuana establishment, or destroyed;

Seeds sitting in a box, on a shelf are dormant. There is no activity. When a seed is propagated as per 306.900(34) and becomes active, it is then entered into METRC and all “activity” for that seed is recorded as per 306.755. This requirement is extremely clear in the regulations, so why was every cultivator in the industry threatened with losing their genetics on premises if we did not act on the bulletin? It makes it extremely difficult to remain compliant when AMCO is not following written regulations and expects something completely different than what is required, or we may risk a facing

violation. This is merely one example of this, so the question is, who holds AMCO accountable for following written regulations and in some cases state law? As a licensee I now feel like I am walking on eggshells trying to stay compliant, with a book of regulations for guidance, that doesn't mean anything. We as licensees are expected to follow regulations or we will lose our right to do business and possibly risk paying a fine. But it's a 2 way street, AMCO must follow the same regulations. If AMCO feels regulations should be changed they must go through the proper process to do that, not just make up what they want whenever they want. We as an industry must demand that AMCO stop interpreting things the way they want and follow what is written. We as an industry must hold AMCO accountable.

**From:** Tasha Grossl  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Meeting agenda  
**Date:** Thursday, April 05, 2018 2:00:56 PM

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Hello!

There are usually links associated with the tabs listed under the agenda as I'm following along with the meeting, but I can't get any of them to work... is this a change or a technical issue?

Thank you,

J. Tasha Grossl  
Managing Member



**From:** David Shimek  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** TO AMCO BOARD: OWNERSHIP "CHANGES OF CONTROL"  
**Date:** Saturday, April 07, 2018 1:26:07 PM

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At the Nome meeting your time (and a lot of licensee money and time) was wasted on “changes of control” where there really was no change of control —the same people who had been in control were still in control.

Clearly nothing of value was obtained for either you or the licensees.

The Director should be given guidance from the Board as to what situations merit a full “change of control” application.

David Shimek  
907-277-5330  
[ddshimek@hotmail.com](mailto:ddshimek@hotmail.com)

**From:** Britny Sifuentes  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Question - Additives in METRC  
**Date:** Monday, April 09, 2018 2:20:55 PM

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Is it **required** to input additive information into METRC?

I've already asked METRC and they said it's they're understanding it's required at this time and to check with you guys for further clarification.

*Britny Sifuentes*

**Fiberflite**

**Sitka, AK**

[britny.fiberflite@gmail.com](mailto:britny.fiberflite@gmail.com)

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**From:** Mike Stoltz  
**To:** [Marijuana, CED ABC \(CED sponsored\); McConnell, Erika B \(CED\)](#)  
**Subject:** Illegal Meeting  
**Date:** Wednesday, April 11, 2018 10:09:33 AM

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You conducted a ILLEGAL MCB meeting in Nome.

4 members. 2 of which apparently had not been approved by legislature.

Big Problems!

Alaska Legislature approves all Walker nominees but  
1<<https://www.apnews.com/ecedce0f53054ca786ae7cf5c7dfd671/Alaska-Legislature-approves-all-Walker-nominees-but-1>>

The Alaska Legislature on Tuesday rejected Gov. Bill Walker's nomination of a former Planned Parenthood field organizer to serve on a board...

Sent from my iPhone

**From:** [McConnell, Erika B \(CED\)](#)  
**To:** [Mike Stoltz](#); [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** RE: Illegal Meeting  
**Date:** Wednesday, April 11, 2018 12:03:16 PM

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Mr. Stoltz:

AS 17.38.11.(b): "b) Three members of the board constitute a quorum for the conduct of business."

AS 39.05.080(4): "(4) Pending confirmation or rejection of appointment by the legislature, persons appointed shall exercise the functions, have the powers, and be charged with the duties prescribed by law for the appointive positions or membership."

Thank you,  
Erika

*Erika McConnell*

Director  
Alcohol & Marijuana Control Office  
State of Alaska

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**From:** Mike Stoltz <mtmike@live.com>  
**Sent:** Wednesday, April 11, 2018 10:09 AM  
**To:** Marijuana, CED ABC (CED sponsored) <marijuana@alaska.gov>; McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>  
**Subject:** Illegal Meeting

You conducted a ILLEGAL MCB meeting in Nome.

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The Alaska Legislature on Tuesday rejected Gov. Bill Walker's nomination of a former Planned Parenthood field organizer to serve on a board...

Sent from my iPhone

Brandon Emmett,

I am sending this to you because I consider you the "Rock" of reason and fairness on the Board.

I am concerned that if we wish to encourage a "cottage" marijuana industry in AK we need to make it possible for "limited" growers to market their products directly to consumers as with a "Farmer's Market" or a "farm stand" venue. With no restrictions on the number and size of "standard" growers we are rapidly heading towards an overproduction of massive proportions. Our potential consumption is finite. Our whole state is roughly the population of one medium size city in other states. I fear that the "mega-growers" will push wholesale prices down so low that the "limited" growers will not be profitable.

When the FNSB was drafting regulations they were offering a "limited retail" license that would allow growers to sell their own products from their facility like a "farm stand". Perhaps the State could consider something like that so that the small growers could sell directly to consumers rather than only being able to sell wholesale.

If we don't encourage and facilitate the small growers, the industry will soon be dominated by a small hand full of mega-growers and the "cottage Industry" we envisioned will be forced back underground.

Can you think of a way that a retail license could be used for a "Farmer's Market" venue where growers could sell directly to the public (age exclusive of course) and perhaps run all sales through one retail license?

I am interested in your thoughts on these matters.

Respectfully,  
Karl Hough  
PO box 10918  
Fairbanks AK 99710  
457-4325



**From:** Sarah Henkel  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Cc:** [Elstun Lauesen](#)  
**Subject:** METRC data public disclosure  
**Date:** Tuesday, April 17, 2018 2:54:07 PM

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Hello-

I am the owner of an economic trade publication in Alaska. I am currently attempting to provide information on the supply chain of Alaska's growing cannabis industry, but have had no luck obtaining any useful data from METRC. Specifically, I am attempting to attain monthly reports showing quantities and locations of the product at each point in its supply chain- cultivation, testing, and retail distribution. As METRC has a monopoly in Alaska, I believe this data should be considered public information and be made accessible to the media. Is there anything the MCB can do to assist me in providing this service to the public?

Thank you,  
Sarah Henkel  
[sarah.henkel@me.com](mailto:sarah.henkel@me.com)  
907-982-8474

**From:** Wingate, Donald G.  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Foods served in a marijuana retail facility  
**Date:** Wednesday, April 18, 2018 11:59:53 AM

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Looking for specific citation that would restrict food service in a retail marijuana facility.

Donald Wingate  
Municipality of Anchorage  
Department of Health and Human Services  
Food Safety and Sanitation Program  
Environmental Health Specialist  
825 L St 3<sup>rd</sup> Floor  
Mail: P.O. Box 196650 Anchorage, Alaska 99519-6650  
Telephone: (907) 343-6995  
Fax: (907) 249-7312



**From:** outlook\_EAC61EA90C1EA8C3@outlook.com  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Preparing to Harvest  
**Date:** Thursday, April 19, 2018 11:36:57 AM

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Good Morning,

We are preparing to harvest our first batch and cannot find information in the regulations pertaining to whether or not we need to give AMCO notice prior to harvest.

Thank you

Lorrie  
Absolem's Garden

Sent from [Mail](#) for Windows 10

**From:** Mike Stoltz  
**To:** [McConnell, Erika B \(CED\)](#); [Marijuana, CED ABC \(CED sponsored\)](#); [Hoelscher, James C \(CED\)](#)  
**Subject:** Protect Public Safety  
**Date:** Friday, April 27, 2018 11:44:39 AM

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Erika:

How can the MCB function legally and NOT protect public safety?

### **Mission Statement**

Enforce alcohol and marijuana commerce laws and provide clear, consistent standards for licensure to protect the public from harm.

Marijuana testing in Alaska gets a failing grade<<http://www.adn.com/opinions/2018/04/26/marijuana-testing-in-alaska-gets-a-failing-grade/>>

Some consequences arise from inherent limitations in the testing process.

How would you like to order a beer and get served a double shot of whiskey?

Mike Stoltz

Sent from my iPhone

**From:** AKO FARMS LLC.  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Question  
**Date:** Friday, April 27, 2018 4:01:12 PM

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Hello, this is Morgan from AKO FARMS LLC down here in Sitka Alaska. We are trimming some leaves off our flowering plants and I was wondering if the state want us to record that amount? We are not disposing of the waste quite yet. Would we wait to record waste when we are actually dispose of it? Thank you

Let me know. Call if this doesn't make sense 907-623-0417 or email me back, thanks!

**From:** [CED AMCO REGS \(CED sponsored\)](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** FW: Corrupt industry  
**Date:** Tuesday, May 01, 2018 2:35:27 PM

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**From:** t <tneade@gmail.com>

**Sent:** Friday, April 27, 2018 2:31 PM

**To:** CED AMCO REGS (CED sponsored) <amco.regs@alaska.gov>

**Subject:** Corrupt industry

To whom it may concern, I have some questions and fear about the lack of regulation in the marijuana industry of Alaska. There are clearly many loop holes in the whole industry such as the fact there is NO TAX on anything a Manufacturing Facility produces, like edibles and concentrates. There has been horrible testing practices, and a very uneducated Marijuana Board which has a Business Owner as the Vice Chair clearly to make business easier for himself. Which he produces a Completely edible "BHO Honey Syringe" under distillates that has no MG Serving size or limit!!! They even advertise it as fully decarboxilated which means its fully digestible, and guarantee way over 50mg. Testing labs got caught doing faulty practices and so much has been let a slap on the hand. I worked in a shop for 8 months and not but 1 time seen an inspection officer come in. Let alone all the mistakes and glitches that happen on the incomplete tracking systems that no one is truly watching. I am really concerned and will continue to take this higher up the federal system if nothing is ever done. Trevar.

**From:** Annie Zak  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Reporter on deadline looking for info about a few marijuana licenses  
**Date:** Thursday, May 10, 2018 3:14:17 PM

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Hello,

I'm a reporter at the Anchorage Daily News and I'm writing because I wanted to check on the status of a few marijuana licenses from awhile ago. I don't think these shops have opened so wanted to check their statuses. None of these are active/open at this time, is that right?

True North Cannabis (735 W 4th Ave)  
Alaska Green Cross (211 E. Dimond Blvd, Unit A)  
Frost Farms (8535 Dimond D Circle, Unit B)

Let me know if you can help me out, thank you so much.

Best,  
Annie

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**Annie Zak**

[azak@adn.com](mailto:azak@adn.com) | 907-257-4349

**Anchorage Daily News** | [adn.com](http://adn.com)  
300 W. 31st Ave.  
Anchorage, AK 99503



**From:** William Wolf  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Limited cultivation license question  
**Date:** Friday, May 11, 2018 11:43:27 AM

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It is my understanding that i can forego the fire marshal paperwork if i am applying for a limited cultivation under 500 sqft unattached to the house and i do not use co2. Is this correct?

Thanks.  
W.Wolf



**From:** Robin Thomas  
**To:** [Marijuana, CED ABC \(CED sponsored\): Jana Weltzin](#)  
**Subject:** rethinking excise tax  
**Date:** Sunday, May 13, 2018 10:42:04 PM

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Hi, I recently heard discussion by the MCB board on changing marijuana tax from the cultivation excise tax to a percentage based tax as opposed to taxing at retail level. The argument was that the current excise tax rates were prohibitive to the success of small business licenses in Alaska . For example the current excise tax is \$800/lb which may soon be 50% of the wholesale value of a lb of marijuana (1600\$).

There was some board discussion on how difficult and costly a retail tax would be to enforce. Excise tax is used for tobacco and alcohol for this very reason. A percentage based tax was an option that could be explored. I have been a fish processor and a direct marketer as a fish harvester. I paid 3% and 5 % fish taxes. Normally the fish processor pays the tax but a direct market harvester would pay the tax as his product does not go through a processor.

5% tax on a lb. of marijuana sold for 1600\$ would only be 80\$ which is much more economical than the current excise tax of 800\$.

The Dept of Revenue DOR is very familiar percentage based taxes and could easily implement this type of tax on the marijuana industry.

Another concern as to the economic success of the marijuana industry is the over capitalization of the industry, very similar to the over capitalization of fisheries in the state of Alaska. Alaska rationalized the state ground fish fisheries when they became over capitalized. There were a lot of unhappy folks when the public resource was allocated as individual fishing quotas IFQ's however the industry is still alive and thriving. Here again is a model that the marijuana industry may want to look at for the survival of the industry. Alcohol licenses are limited as well as fishing licenses. Limiting the marijuana industry may be the answer to over capitalization for marijuana as well. My recommendation would be to limit the licenses per capita where a logarithm of 15% of the population use 1 gram per day, using a market prediction (1600\$?) lb and cost of goods COGS per geographical area based on utility and cost of living, a break even pro forma budget analysis, to determine how many marijuana businesses per population are sustainable.

For my region in Norton Sound with a population of 10,000 with a high level of consumption at 25% using 1 gram per day, the region could theoretically consume 5 lbs per day or 35lb per week. This may sustain 20 limited grows that produce 1.25 lb per week and possibly 4 retail stores considering that the conservative COG of 1 gram @ 5.00\$ per gram for cultivation and the net profits of 4 retail stores in the region ( 15 communities) hub of Nome, subject to 280E tax codes, to be 20% of gross ( 1 million net), very similar to commercial fisheries margins @ 30% of gross.

Thank you so much for the opportunity to share.

Robin C Thomas  
Gudlief Organization LLC  
Nome , Alaska

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Robin C Thomas  
907 304 5054

**From:** Abby Kaye  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Introductory Call with NACB  
**Date:** Tuesday, May 15, 2018 11:30:20 AM

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Good afternoon,

My name is Abigail Kaye, I am the Head of Operations at the National Association of Cannabis Businesses. I am reaching out to see if you would be interested in setting up an introductory call. To tell you more about the NACB, we are the first and only self regulatory organization for the U.S. cannabis industry. We aim to support the compliance, transparency and growth of legal cannabis industries nationwide. Let me know what times could work for you and I will have a call set up. Thank you and I look forward to speaking soon.

All the best,

**Abigail Kaye**  
abby.kaye@nacb.com  
www.nacb.com

**From:** [Marijuana Licensing \(CED sponsored\)](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** FW: 500"  
**Date:** Wednesday, May 16, 2018 9:57:07 AM  
**Attachments:** [image001.png](#)

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**From:** Marijuana Licensing (CED sponsored)  
**Sent:** Wednesday, May 16, 2018 9:42 AM  
**To:** 'Susan Burrell' <[ssusiesfire@msn.com](mailto:ssusiesfire@msn.com)>; Marijuana Licensing (CED sponsored) <[marijuana.licensing@alaska.gov](mailto:marijuana.licensing@alaska.gov)>  
**Subject:** RE: 500'

Good morning,

The authority to determine whether a jail or a courthouse fall under 3 AAC 306.010 rests with the Marijuana Control Board. I have forwarded your question to the MCB's general email box which gets compiled for the board to see at every meeting.

Thank you  
Jane Sawyer  
Occupational Licensing Examiner  
Alcohol and Marijuana Control Office  
907-269-0350

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**From:** Susan Burrell <[ssusiesfire@msn.com](mailto:ssusiesfire@msn.com)>  
**Sent:** Tuesday, May 15, 2018 10:18 AM  
**To:** Marijuana Licensing (CED sponsored) <[marijuana.licensing@alaska.gov](mailto:marijuana.licensing@alaska.gov)>  
**Subject:** 500'

In regards to the 500'

3 AAC 306.010. License restrictions (a) 'The board will not issue a marijuana establishment license if the licensed premises will be located within 500 feet of a school ground, a recreation or youth center, a building in which religious services are regularly conducted, or a correctional facility. The 2 UPDATED: 3/7/2018 distance specified in this subsection must be measured by the shortest pedestrian route from the public entrance of the building in which the licensed premises would be located to the outer boundaries of the school ground, the outer boundaries of the recreation or youth center, the main public entrance of the building in which religious services are regularly conducted, or the main public entrance of the correctional facility. This section does not prohibit the renewal of an existing marijuana establishment license or the transfer of an existing marijuana establishment license to another person if the licensed premises were in use before

the school ground, recreation or youth center, the building in which religious services are regularly conducted, or a correctional facility began use of a site within 500 feet. If an existing marijuana establishment license for premises located within 500 feet of a school ground, a recreation or youth center, a building in which religious services are regularly conducted, or a correctional facility is revoked or expires, the board will not issue another marijuana establishment license for the same premises unless the school ground, the recreation or youth center, the building in which religious services are regularly conducted, or the correctional facility no longer occupies the site within 500 feet.

Is a jail considered a correctional facility? And do you consider a courthouse in that description?

thank you

*Susie Burrell*



*Petersburg, AK 99833*

907-518-4425

907-772-3673

**From:** [CED AMCO REGS \(CED sponsored\)](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Cc:** [Marijuana Licensing \(CED sponsored\); Oates, Sarah D \(CED\)](#)  
**Subject:** FW: Public comment  
**Date:** Thursday, May 24, 2018 12:21:52 PM  
**Attachments:** [ResoreRestructuringTax-March72017.pdf](#)

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This looks like a general comment for the board, rather than a regulation comment.

Jedediah R. Smith  
Local Government Specialist  
Alcohol and Marijuana Control Office  
(907) 334-2195  
<https://www.commerce.alaska.gov/web/amco/>

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**From:** dollynda Phelps <jeffndol@yahoo.com>  
**Sent:** Thursday, May 24, 2018 10:53 AM  
**To:** CED AMCO REGS (CED sponsored) <amco.regs@alaska.gov>  
**Subject:** Public comment

Hello, there are several concerns regarding the inability to sell otherwise unusable bud or flower as trim to a manufacturing facility. This is a very urgent issue, as most licensed cultivators believe (rightly so) that this is an acceptable way to still make a little revenue from an otherwise worthless harvest due to poor test results, poor bud structure, and poor appearance. Currently the DOR is not allowing this due to written law defining trim and bud. It is a very urgent matter as not only the cultivator is at a financial loss, but the state revenue department as well.

Cultivators are in no way trying to circumvent paying the tax, they just can't afford to go into debt to pay a bud tax on a product they cannot sell at a bud price. I hope you understand that there are only 2 options for an un-sellable crop of bud:

Option A: Pay a bud tax of \$800/lb but sell at a trim price to a manufacturer (\$1-\$2/g)...

- Cost of bud tax exceeds the value and production cost of the product
- Instead of incurring debt for selling bud at a trim price but paying a bud tax, bud will be destroyed and taken to landfill.
- The state sees \$0 in revenue, the cultivator struggles to pay production costs

Option B: Pay a trim tax of \$240/lb after grinding un-sellable bud into trim, sell to a manufacturer at a trim price...

- Un-sellable bud is ground into trim and sold to a manufacturer at a trim price of \$1-\$2/g
- The state sees \$240/lb in revenue and the cultivator can pay their production costs.

If cultivators are unable to create trim out of unusable bud, then they will be forced to sell the trim from the crop and throw the bud away. This clearly makes no sense, either for the cultivator who is struggling to pay bills incurred growing the crop, or the

state to refuse tax dollars. This is not unique to the marijuana industry, all agricultural crops experience a poor crop occasionally. Take pumpkins for instance. The quality harvest is brought to the store for pumpkin carving, the beat up ugly pumpkins end up at a cannery for use as pie filling

It would benefit not only the industry but the state revenue department to address this immediately by amending 3AAC 306 to include the definition of trim as "any part of the plant other than bud or flower, except that bud or flower which is intended for sale to a Manufacturing facility for processing". This is an urgent matter and needs immediate attention.

In fact, this matter was discussed by the MCB in 2017 and a Resolution Requesting Restructuring of Tax on Flower Sold to Manufacturers was passed on March 7, 2017. (see attachment) It is clear the legislature has neither the time or interest to address this issue, but it simply must be addressed. Please find a way to amend current regulations that support this change. Godspeed!

Thank you,

Dollynda Phelps

907-252-8026



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

**Department of Commerce, Community,  
and Economic Development**

ALCOHOL & MARIJUANA CONTROL OFFICE

550 West Seventh Avenue, Suite 1600  
Anchorage, AK 99501  
Main: 907.269.0350

**Marijuana Control Board**

**Resolution Requesting Restructuring of Tax on Flower Sold to Manufacturers**

*Adopted (passed 3-2) on March 7, 2017*

WHEREAS, it is to the State of Alaska's economic benefit to receive tax revenue from all marijuana cultivated by licensed facilities; and

WHEREAS, in a mature industry, it is economical for cultivators to sell lower quality flower to product or concentrate manufacturers at a price lower than supports the \$50 per ounce tax rather than destroy the flower; and

WHEREAS, per 15 AAC 61.100(a)(2), the remainder of the plant is taxed at \$15 per ounce.

RESOLVED, the Marijuana Control Board requests that the State of Alaska Department of Revenue restructure the marijuana tax to reduce the tax on flower sold to product or concentrate manufacturers from \$50 per ounce to \$15 per ounce, either by regulation or by seeking a statutory change from the Alaska Legislature.

A handwritten signature in black ink, appearing to read "Peter Mlynarik".

Peter Mlynarik  
Chair  
Marijuana Control Board

A handwritten signature in blue ink, appearing to read "Erika McConnell".

Erika McConnell  
Director  
Alcohol & Marijuana Control Office



**From:** Alaskan Blooms  
**To:** [Marijuana, CED ABC \(CED sponsored\): Jana Weltzin](#)  
**Subject:** Unreasonable Review Que Wait Time  
**Date:** Thursday, May 24, 2018 3:36:23 PM

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Dear Director McConnell,

We are writing to bring to the forefront our frustration of the license review/completion que. Our retail application was submitted and accepted February 4, 2018. We have yet to receive anything regarding the status of this application from AMCO. This length of time to wait is creating an undue burden on our business as we pay rent and utilities on a building that is not in use. It seems that the review process for completion should not take 4-5 months, and I have heard that new applicants are actually being aided/walked through this process, putting the AMCO staff in the role of a consultant. Not only is this delaying applicants that have done the work, but it is a waste of resources on what we see as an already strapped AMCO staff. Can you move these licenses/applications to completion on their own merit and let the MCB determine what is approved or denied? We understand that there is a lot of work with licensing and renewal, but the pace at which the reviews are happening is entirely burdensome to business owners and likely will result in many people going out of business before they even open. Please do something that speeds this process of review up so that the MCB can make their decisions based on merit in the most expedient way possible.

Thank you,  
Karen Lowry-Bloom

*~Alaskan Blooms~*



**From:** Marcey Luther  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Cc:** [jana@jdwccounsel.com](mailto:jana@jdwccounsel.com)  
**Subject:** Public Comment - Testimony  
**Date:** Thursday, May 24, 2018 4:07:15 PM

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Attn Director Ericka McConnell,

It has come to our attention that the MCB has been assisting applicants in the capacity of consulting. This is concerning considering that we have had a completed application awaiting approval since February 4, 2018. As of today we have not received confirmation that our application will be heard at the upcoming session. This is additionally concerning since we spent our time and money ensuring that our application was flawless, and it appears that there is no benefit for being prepared and ready to do business, in contrast to how the meetings have been going, where ill prepared applicants are being catered to.

As the price and supply of cannabis has plunged and peaked, this wait has caused an undue burden on our business. We are maintaining rent and utilities for a space that we cannot do business in as of yet.

Another issue causing problems for many is the way the tax structure is set up. With the profit margin for retailers substantially higher than that of the cultivators, it makes much more sense for that burden to be shared equally, if not for more of the burden to be placed onto the profiting party. Please grant us some relief.

Another issue that causes an unfair burden is the increase in surveillance requirements. First, there has not been adequate explanation to justify this increase. and another, when growers are already struggling increasing requirements by 300% is a death sentence.

Thank you very much for your attention,

Marcey Luther  
Fairbanks, AK

**From:** Michael Holland  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Licensing  
**Date:** Friday, May 25, 2018 11:27:56 AM

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Attn: Public Comments & Testimony

Dear Marijuana Control Board, May 25, 2018

Can you please set appropriate time to review applications in upcoming sessions into your calendars? Ourselves, along with many other businesses have been patiently awaiting approval since early February. During this time the price of wholesale cannabis has fallen, this combination of circumstances is risking the longevity of our company and the job of myself and my co-workers. (Over 20 families in the community of Fairbanks)

We know you guys are working hard to make this industry a success, and we can not assume what challenges you are facing, but please grant us some relief. Cultivators are hit the hardest tax with overhead costs and taxes. Not to mention an unjustifiable tax increase in local property taxes. I would ask you to consider that many applicants have put their life savings on the line for these jobs and that the difference that could be made for these families by pushing up the time line for review is astronomical.

Thank you for your dedication to us and to this industry

Signed,  
Michael Holland

**From:** Robert Mikol  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Wish to testify on 6/13 meeting on non-agenda items  
**Date:** Friday, May 25, 2018 1:14:54 PM

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To whom it may concern,  
I would like to be place on the list to testify on non-agenda items for the June 13, 2018 meeting.

Thank you

Robert Mikol  
Goldhill Gardens  
PO Box 80106  
Fairbanks, Alaska 99708

--

Robert Mikol  
907-750-0197

"We're all just walking each other home." Ram Das

**From:** Jana Weltzin  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Cc:** [Smith, Jedediah R \(CED\)](#)  
**Subject:** Public comment for marijuana mailbox FW: Transfer applications and problems arising due to lumping them in same review que as new applications  
**Date:** Friday, May 25, 2018 4:25:40 PM

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Please include this email and the email below in the marijuana mail box tab for the MCB meeting in June 2018. Thank you, Jana

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**From:** Jana Weltzin  
**Sent:** Friday, May 25, 2018 4:24 PM  
**To:** McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>; Dinegar, Harriet C (LAW) <harriet.dinegar@alaska.gov>; Oates, Sarah D (CED) <sarah.oates@alaska.gov>  
**Cc:** Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>; Smith, Jedediah R (CED) <jedediah.smith@alaska.gov>; Douglas, Craig J (CED) <craig.douglas@alaska.gov>; Jana Weltzin <jana@jdw counsel.com>; Valerie Mastolier <valerie@jdw counsel.com>; Christina Thibodeaux <christina@jdw counsel.com>  
**Subject:** Transfer applications and problems arising due to lumping them in same review que as new applications

Hi AMCO team – I wanted to provide you all with some input on why you may want to consider changing the method in which you review transfer applications. Currently, as I understand it, transfer applications are put into the same review que has new applications. For sake of clarity, I am not referring to ownership reports, I am discussing regular transfer applications and controlling interest applications within the entity transfers. This system causes some concerning consequences and raises issues that have negative implications for licensees, new owners, old owners, IRS, AMCO, and AMCO Enforcement. I will address the concerns, topic by topic, below:

#### Negative Implications for Licensees (old and new owners)

- Contractual obligations – for most business transfer there is a purchase and sale agreement that occurs to memorialize the terms of the deal and make the deal binding on the parties. The agreement states closing date for when the new owner takes ownership of the business, what the new owner receives with the purchase of the business, and what the seller gets in return. In some cases, the sale is for a piece of the entity, in other cases it's the whole company transferring from one person to another. In both cases, there is a problem caused by the way AMCO is reviewing the transfer applications.
  - For example, Owner A owns an entity that owns a license, Owner A wants to sell 50% of the business to Owner B, Owner B wants to buy 50% of the business from Owner A. The parties write up the deal, sign the paperwork, file the notice of change of officials (which is required to be submitted with the transfer paper work). Owner A & B have agreed that on July 1 2018, owner B will be 50% owner of the company, will participate in 50% of the profits and will participate in running the company. The two owners, A&B, submit their transfer application to AMCO. Owner A gets an email from AMCO that states, your transfer application is 72 in the review que. Which means 6-8 months of waiting to even get the transfer application reviewed by a reviewer and scheduled

for the next MCB meeting (which could add on months to the approval wait time). The deal between owner A & B said the participation of Owner B starts on July 1 – therefore Owner B reasonably anticipated he would begin participating in the profits shortly after that date. But now, Owner A has to tell Owner B the bad news – that the transfer won't be reviewed or approved for 6-8 months, which means, Owner B will not be able to participate in the business and its profits for that period of time because he won't be a licensee, and therefore cannot accept funds without violating the indirect/direct financial interest. Owner A now is in default of the contractual agreement. One potential solution would be to hold the profits of the company in a bank account that both owners would need to sign for to release the funds, however, these companies do not have access to banking. So this is not a possibility. Another would be to engage an escrow company to set up an escrow account – unfortunately, due to the banking hurdles, no escrow company will do this either. SO – Owner A is really left between a rock and a hard place – owner A has to choose to break the agreement OR stash the cash that represents Owner B's portion either at their facility (of which break in attempts occur) or take it home (which is also unfavorable given the fact that so much of these licensee's personal information is readily available to the public).

- Another example – owner A's wife becomes sick and needs to go to the Mayo clinic indefinitely for treatment, Owner A is a good husband and will go with his wife to support her through this trying time. Owner A understands that his license will be rendered void by doing this (since we don't have any mechanism to allow for folks who need to leave the state) and the couple also needs money for medical expenses, so he enters into a purchase and sale agreement for 100% ownership of the marijuana entity that owns the license. AMCO reviewers tell Owner A that his transfer application is "in the queue and number 73" .. Owner A is also informed that no action on the ownership change may take place, and that Owner A has to act as the licensee and owner until approved by control board – however, reviewer estimates that review time will be 6-8 months. What should owner A do? Send his wife alone for treatment of the life threatening sickness she is facing? Go with her, let the license be operated by new owner and get a violation for giving a non-licensee a direct or indirect financial interest?
- Ongoing regulatory compliance – for the new and old owners, who is on the hook for regulatory compliance? The New owner owns the company that owns the license – the old owner is the one that still must act as an owner/designated licensee – this is another grey area created by policies and processes that could be fixed by taking a step back and reorganizing processes and policies of AMCO review process.
- Report correct income and complications with tax obligations
  - Here is a hypothetical situation: New owner took ownership of entity Jan. 1 2017– but AMCO didn't review the transfer until June 2017 and the transfer was not approved until August 2017 – more than half the year has passed, and when it comes to filing taxes, who has the income tax responsibility for the time period between Jan 2017 to August 2017?
- Forcing folks to be responsible for another person's assets
  - In a company purchase agreement – the new owner also purchases (for the most part)

the equipment of the company – if the new owner is prohibited from acting as the new owner and the old owner (assuming the old owner even agrees to do so) has to act as interim owner – then the old owner is on the hook for taking care of and preserving the company's equipment. What happens if the equipment gets broken, is that on the old owner or the new? What happens if an employee gets injured? Old owner or new? All of these risks that could lead to costly litigation can be substantially minimize if AMCO set up a separate review que for Transfer Apps – it would ensure that a transfer app wouldn't take 8months to review, it would provide some assurance as to a timeframe the transfer app would get reviewed, and given the stage of the industry, it makes sense to prioritize these types of applications bc you cannot expect people to operate (responsibly and as their ultimate priority) a company in which they legally no longer own.

#### Negative Implications for AMCO reviewers and staff

- Public perception that AMCO is inserting itself in contractual business agreements – there is an increasing amount of discussion amongst licensees and other business owners and potential investors/owners that AMCO is getting in the way of business relationships – when a third party interferes with another person's contractual or business relationship and causes damages, that third party can be held responsible for such consequences. There is no need for prioritizing new applications over transfers – there are likely 10-20 transfer applications in the que with AMCO and likely 70 new applications – prioritizing transfers will not significantly slow down new application review time – and regardless, new applications are not faced with the myriad of issues and consequences as are incurred in lengthy review ques for transfer applications.
- AMCO requires renewals to be filed with old owners because transfer not reviewed in time – businesses and partnerships are a lot like relationships – sometimes they go bad and the partners end up not being able to stand each other, have animosity towards one another and simply cannot work/or get along with one another – hence the decision to transfer one ownership portion to the other. It is unreasonable to request from a licensee to file their renewal under the old ownership regime because it may be impossible to get the old owner, who has already signed the purchase agreement, and walked away from the company, to sign a renewal form listing them as a licensee for another year. It is just unnecessary conflict that does not benefit anyone. This is another reason why the transfer applications should be made a priority.

#### Taxes – Federal and Alaska

- If the license transfer takes 8 months, but the purchase of the entity has been completed, who is responsible for the tax obligations for the course of those 8 months?

-

#### Workers compensation

- If the old owner has to maintain running the business, and the new owner cannot step in and take that role, who is responsible for workers compensation insurance? And who is responsible for complying with Alaska labor and wages laws? If one person is legally the entity's owner, and another is required by AMCO to actually run the business, where does or,

and more importantly, how can the responsibility be placed on either of the individuals as one alone does not have the full authority to run the business.

-  
The examples and concerns above are only a snapshot of the damaging possibilities that a 8 month review time wait for transfer applications could create – and for what purpose? There doesn't seem to be a whole lot of upside to putting new applications and transfer applications in the same review queue. One could argue, well it's fairer this way that new applications and transfers be reviewed first come first serve – but that logic doesn't hold water. If it were true that it is unfair to new applications to be reviewed in the same queue as transfers, then wouldn't that same logic apply to MJ14 reviews? MJ16 new products? MJ15 change in operating plans? MJ14, 15, and 16s all are reviewed via a different queue line – these requests and changes in business operations/premises go into their own independent review queue, they are not placed in the same queue as the new applications. Why is that? Because it makes sense that they should not go into a review queue for 8 months because the license has already waited in that line once before – during its initial submission, changes for approved licensees should not have to go into a queue where the wait is so long. It's inefficient for AMCO, the licensee, and the business operations.

Therefore, on behalf of my clients, and for the sake of reducing conflict and issues in our industry, please consider my request to create a separate review queue for transfers only.

Thank you,

-  
*Jana D. Weltzin, Esq.*

JDW, LLC

Principal Owner

Of Counsel to Hoban Law Group

[3003 Minnesota Drive Suite 201](#)

[Anchorage, Alaska 99503](#)

[janaweltzin@gmail.com](mailto:janaweltzin@gmail.com)

[jana@jdwcounsel.com](mailto:jana@jdwcounsel.com)

[630-913-1113](tel:630-913-1113) (cell & text)

[907-231-3750](tel:907-231-3750) (main office)

\*Licensed in Alaska and Arizona

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Thank you.



Think green, please don't print unnecessarily

**From:** [CED AMCO REGS \(CED sponsored\)](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Cc:** [McConnell, Erika B \(CED\)](#)  
**Subject:** FW: MCB meeting public comment May 25,2018  
**Date:** Tuesday, May 29, 2018 8:49:38 AM

---

Public comment on taxation.

Jedediah R. Smith  
Local Government Specialist  
Alcohol and Marijuana Control Office  
(907) 334-2195

<https://www.commerce.alaska.gov/web/amco/>

**From:** Kate Staskon <katestaskon@gmail.com>  
**Sent:** Thursday, May 24, 2018 5:30 PM  
**To:** CED AMCO REGS (CED sponsored) <amco.regs@alaska.gov>  
**Subject:** MCB meeting public comment May 25,2018

Hello, there are several concerns regarding the inability to sell otherwise unusable bud or flower as trim to a manufacturing facility. This is a very urgent issue, as most licensed cultivators believe (rightly so) that this is an acceptable way to still make a little revenue from an otherwise worthless harvest due to poor test results, poor bud structure, and poor appearance. Currently the DOR is not allowing this due to written law defining trim and bud. It is a very urgent matter as not only the cultivator is at a financial loss, but the state revenue department as well.

Cultivators are in no way trying to circumvent paying the tax, they just can't afford to go into debt to pay a bud tax on a product they cannot sell at a bud price. I hope you understand that there are only 2 options for an un-sellable crop of bud:

Option A: Pay a bud tax of \$800/lb but sell at a trim price to a manufacturer (\$1-\$2/g)...

- Cost of bud tax exceeds the value and production cost of the product
- Instead of incurring debt for selling bud at a trim price but paying a bud tax, bud will be destroyed and taken to landfill.
- The state sees \$0 in revenue, the cultivator struggles to pay production costs

Option B: Pay a trim tax of \$240/lb after grinding un-sellable bud into trim, sell to a manufacturer at a trim price...

- Un-sellable bud is ground into trim and sold to a manufacturer at a trim price of \$1-\$2/g
- The state sees \$240/lb in revenue and the cultivator can pay their production costs.

If cultivators are unable to create trim out of unusable bud, then they will be forced to sell the trim from the crop and throw the bud away. This clearly makes no sense, either for the cultivator who is struggling to pay bills incurred growing the crop, or the



state to refuse tax dollars. This is not unique to the marijuana industry, all agricultural crops experience a poor crop occasionally. Take pumpkins for instance. The quality harvest is brought to the store for pumpkin carving, the beat up ugly pumpkins end up at a cannery for use as pie filling

It would benefit not only the industry but the state revenue department to address this immediately by amending 3AAC 306 to include the definition of trim as "any part of the plant other than bud or flower, except that bud or flower which is intended for sale to a Manufacturing facility for processing". This is an urgent matter and needs immediate attention.

In fact, this matter was discussed by the MCB in 2017 and a Resolution Requesting Restructuring of Tax on Flower Sold to Manufacturers was passed on March 7, 2017. (see attachment) It is clear the legislature has neither the time or interest to address this issue, but it simply must be addressed. Please find a way to amend current regulations that support this change.

Thank you,

Kathryn Staskon



Virus-free. [www.avast.com](http://www.avast.com)

**From:** [CED AMCO REGS \(CED sponsored\)](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Cc:** [McConnell, Erika B \(CED\)](#)  
**Subject:** FW: Public Commemnt  
**Date:** Tuesday, May 29, 2018 8:54:56 AM

---

Another public comment on tax structure.

Jedediah R. Smith  
Local Government Specialist  
Alcohol and Marijuana Control Office  
(907) 334-2195  
<https://www.commerce.alaska.gov/web/amco/>

-----Original Message-----

From: buckeye@alaska.net <buckeye@alaska.net>  
Sent: Friday, May 25, 2018 9:52 AM  
To: CED AMCO REGS (CED sponsored) <amco.reg@alaska.gov>  
Subject: Public Commemnt

Hello, there are several concerns regarding the inability to sell otherwise unusable bud or flower as trim to a manufacturing facility. This is a very urgent issue, as most licensed cultivators believe (rightly so) that this is an acceptable way to still make a little revenue from an otherwise worthless harvest due to poor test results, poor bud structure, and poor appearance. Currently the DOR is not allowing this due to written law defining trim and bud. It is a very urgent matter as not only the cultivator is at a financial loss, but the state revenue department as well.

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Thank you,

Doug Anderson 907-394-2274