CORRESPONDENCE

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

June 5, 2018

50 Shades of Green LLC
DBA: 50 Shades of Green LLC
Via email: qnogrn@50shadesogreen.com

Re: Standard Marijuana Cultivation Facility #14956

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 be sure to read the entire letter.

- **MJ-00 Application Certifications**
  - On all three forms, please correct the Licensee portion under Section 1 to say, 50 Shades of Green LLC, since that is what your online application says.
  - Page 3 of all three forms: the last two initialed statements contradict each other. Please re-read the last two statements and correct accordingly. As long as the statement does not apply to you, you would want to remove your initials from the second to last statement.

- **MJ-01 Operating Plan**
  - Page 5, first box: other than having cameras in the facility, please include in your answer your policies and procedures for preventing diversion of marijuana or marijuana product by employees.
  - Page 7, first box: the cameras will need to be removed from the diagrams for form MJ-02. Please adjust your answer accordingly.
  - Page 7, second box: saying that something is "attached" in this context means that it is attached to form MJ-01. Please reword the word "attached" to say something along the lines of, shown on the diagram for Form MJ-02…
  - Page 9: saying that something is "attached" in this context means that it is attached to form MJ-01. Please reword the word "attached" to say something along the lines of, shown on the diagram for Form MJ-02…
  - Page 12: please re-review 3 AAC 306.740 and adjust your answers accordingly. For example, you are not describing how you will store and manage the waste during the three-day waiting period. The marijuana waste must be ground to render it unusable. You do not mention the ratio of marijuana waste to compostable/non-compostable material. Additionally, METRC and AMCO Enforcement must be given notice not later than three days before rendering the waste unusable, not just prior to disposal, etc.

        - Furthermore, you mention sale to Manufacturing Facilities for the purpose of processing all stalks and stems into heating pellets for the heating of residential homes and or commercial structures. What does this mean exactly? Is this after the waste has been rendered unusable? Please clarify.
    - Page 13: this page was not included with your application. Please include page 13.
    - Page 15, first box: you refer to dispensaries in your answer. Dispensaries refer to medical marijuana, and AMCO does not license medical marijuana dispensaries. Are you meaning to say retail marijuana stores? Please correct your answer accordingly.

- **MJ-02 Premises Diagram**
    - Are you planning on the described expansion to be a part of the current proposed licensed premises since November is right around the corner? If not, and you are planning on adding it later, please note that the two buildings (if there are going to be two buildings) that you intend to have as the cultivation facility must be contiguous. In other words, the licensed premises and restricted access area must be connected somehow, such as fencing surrounding the walkway to and from the buildings, or a fence/control barrier surrounding the licensed premises. Additionally, if you are planning on adding the expansion later, the diagrams will most likely not be included with this application, since this application is solely for the proposed licensed premises, and there are cameras included on the additional building diagrams.
    - I see that you provided an aerial view diagram/map which can be included with your application; however, please provide a clearer google-like, zoomed in, aerial view diagram/map of the building in which this cultivation premises will be. In that aerial view, you need to clearly show the building and what surrounds that building (what business, other buildings, streets, etc.), and please label it.
        - Additionally, depending on if you are including the expansion as part of the current proposed licensed premises, you may want to consider showing where the expansion will be on the aerial view, as well.
    - The diagrams you submitted of the proposed cultivation facility needs some work, please show the following (more questions may come up once we receive a new diagram from you):
        - Much of the information provided on the diagrams is difficult to distinguish while comparing with the MJ-04. Please make sure the diagrams are congruent with page 2 of the MJ-04; be very specific.
        - The diagrams provided are blurry. Please submit diagrams that are clear and legible.
        - Remove the cameras from any/all of the diagrams.
        - What type of structure is the building? (include it on the diagrams)
        - Clearly label the entrances, exits, windows, and the interior layout of the proposed licensed premises and areas under cultivation.
            - Additionally, please label the carport and provide dimensions of the carport.
        - Outline the entire perimeter of the proposed licensed premises and restricted access area (use separate colors and labels).
            - Note- the bathroom can be a part of the licensed premises, but it should not be a part of the restricted access area because restricted access areas need cameras, and bathrooms should not have cameras.

        - Page 7 of your MJ-01 states that the surveillance room or area is clearly defined on the premises diagram. If this statement is accurate, please clearly define it on your premises diagram.

- **MJ-04 Cultivation Supplemental**
    - Page 2: Please provide a detailed answer that is congruent with the diagrams from MJ-02; be very specific. This box on the MJ-04 is to describe what is outlined on the MJ-02 and it must be easily decipherable. For example, please describe the areas/spaces/rooms under cultivation including their dimensions. It is difficult to match the dimensions from the MJ-04 to the dimensions on the MJ-02. For example, the diagram shows the 3rd floor dimensions to be 22X44, however the MJ-04 says the top floor is 40 feet by 44 feet. Additionally, the other floors/rooms have conflicting dimensions, as well, which effects the overall square footage. Please clarify and correct accordingly; be very specific.
    - Page 3, second box: please describe the marijuana cultivation facility's fertilizers, gases, and delivery systems, including carbon dioxide management, to be used.
    - Page 4, first box: please make sure that this box is congruent with pages 12-13 of MJ-01.
        - Additionally, METRC and AMCO Enforcement must be given notice not later than three days before rendering the waste unusable, not just prior to disposal.
    - Page 6: please provide a sample of the label(s) (including logo(s) if you will have one) of how you will comply with the labeling and packaging under 3 AAC 306.470 & 3 AAC 306.475.

- **MJ-08 Local Government Notice Affidavit**
    - Please notify the Matanuska-Susitna Borough and submit another MJ-08 certifying that you have notified them.

- **MJ-09 Statement of Financial Interest**
    - On all three forms, please correct the Licensee portion under Section 1 to say, 50 Shades of Green LLC, since that is what your online application says.
    - Additionally, page 1 of Gabrielle's form is illegible. Please redo page 1 so that it is legible.

- **Proof of Possession for Proposed Premises**
    - I will need proof of right to possession for the LLC. I know you submitted a warranty deed, but we need proof that the LLC has the right to the proposed premises.
    - If you are going to provide a commercial lease, the lease must be a legally binding lease and it should include the following:
        - An acknowledgment from the landlord/lessor that the premises will be used as a marijuana establishment, and
        - A disclaimer that the landlord/lessor may not take possession or remove marijuana from the premises, and AMCO will be contacted.

- **Entity Documents**
    - Please file the Initial Report for the LLC with the Division of Corporations, Business, & Professional Licensing (CBPL).
    - Pages 13-14 (the signature pages) of the Operating Agreement are too blurry to see most of the signatures. Please submit new signature pages for the Operating Agreement.

It is very important that you submit the above corrections and/or documents as soon as possible. AMCO staff needs adequate time to review the documents and determine if additional corrections and/or documents are necessary to complete your application. If you fail to complete this application within 90 days of the date of this notice, you must file a new application and pay a new fee, per 3 AAC 306.025(f).

Respectfully,

Jacqlene Drulis, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov

From:	Marijuana Licensing (CED sponsored)
To:	"Gabrielle Petersen"; Marijuana Licensing (CED sponsored)
Subject:	RE: Incomplete Application-50 Shades of Green LLC license #14956
Date:	Wednesday, August 01, 2018 8:39:00 AM
Attachments:	suppliment 2 to board .pdf image001.png

Gabrielle,

The attached diagram is still inadequate, because it is still not clear what the outline of the proposed licensed premises is.

Diagrams must clearly outline in color, and label, the licensed premises and the restricted access area(s) within the licensed premises (among other things). In a cultivation facility, for the most part, the entire proposed licensed premises is also the restricted access area EXCEPT the bathroom, utility room, and other areas such as your entry/decontamination room (possibly), these areas would be licensed but not restricted.

In short your diagram needs more work, please call me. The diagram must be complete by the end of today for the application to make it on the agenda for the August meeting.

Thank you

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

From: Gabrielle Petersen <qnogrn@50shadesogreen.com>
Sent: Friday, July 13, 2018 4:06 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: RE: Incomplete Application-50 Shades of Green LLC license #14956

This email transmission is for the addressed recipient only and may be of a confidential nature. If you have received this in error or you are not the intended recipient, please contact the sender and delete this email immediately.

Gabrielle Petersen-Christensen
411 Paralegal Inc.
500 E Swanson Suite 9
Wasilla, AK 99654
907-745-0411 or 907-357-0411
fax 907-373-0422

From: Marijuana Licensing (CED sponsored)
Sent: Thursday, July 12, 2018 1:56 PM
To: qnogrn@50shadesogreen.com
Cc: Marijuana Licensing (CED sponsored)
Subject: Incomplete Application-50 Shades of Green LLC license #14956

Good afternoon,

I have reviewed the corrections that were submitted. There are further corrections needed:

-MJ-01:

- Pages 12-13: saying that the marijuana waste will be mulched is insufficient. The marijuana waste must be ground to render it unusable. Please correct accordingly. Also, the board must be given notice not later than three days before rendering the waste unusable, not before the waste is disposed of; please address this.

-MJ-02:

- I see that you provided an As-Built diagram/map which can be included with your application; however, please provide a clearer google-like, zoomed in, aerial view diagram/map of the building in which this cultivation premises will be. In that aerial view, you need to clearly show the building and what surrounds that building (what business, other buildings, streets, etc.), and please label it.
- Outline the entire perimeter of the proposed licensed premises and restricted access area (use separate colors and labels).
    - Note- the bathroom can be a part of the licensed premises, but it should not be a part of the restricted access area because restricted access areas need cameras, and bathrooms should not have cameras.
- Clearly provide the interior layout of the proposed licensed premises and the areas under cultivation.
- As is, the stairs appear to be non-contiguous from the rest of the facility. Please either draw an arrow to where the stairs are within the premises, or include the stairs within the premises itself.
- How do you get from the decontamination room to the rest of the facility? I may be missing it, but I do not see a door leading from the decontamination room to the facility.

-MJ-04:

- You submitted corrections on the new forms. We cannot combine the new forms with the old forms because they are too different; and, if you are going to submit an entire MJ-04 on the new forms, an entire corresponding MJ-01 would also have to be submitted on the new forms. Please make the corrections on the old forms and submit them for review (more questions my come up once we receive a corrected MJ-04 from you).
- Page 6: Thank you for submitting your sample label; however, the warning statements must be word-for-word as written in the regulations. Be very specific and make sure that they are verbatim. A couple of your statements are correct, but the others are incorrect. Please correct

accordingly. Here is an example of the wording in the regulations:

(1) Marijuana has intoxicating effects and may be habit forming and addictive.
(2) Marijuana impairs concentration, coordination, and judgment. Do not operate a vehicle or machinery under its influence.
(3) There are health risks associated with consumption of marijuana.
(4) For use only by adults twenty-one and older. Keep out of the reach of children.
(5) Marijuana should not be used by women who are pregnant or breast feeding.

-MJ-08:

- On the new MJ-08, you are certifying that the Community Council is the City of Houston, which it is not. If you did actually re-notify the City of Houston again on 6/15/18, then please list both local governments (Matanuska-Susitna Borough and City of Houston) on the line that says "Local Government(s)". Then, list the Name/Title of the LG Official 1 and the Name/Title of the LG Official 2 on the corresponding lines. And, leave the Community Council blank. **OR**, if applicable (if you did not actually re-notify the City of Houston on 6/15/18), I can combine the previously submitted MJ-08 (City of Houston) with another MJ-08 (Matanuska-Susitna Borough). On the new MJ-08, you would only need to list the Matanuska-Susitna Borough. Please correct accordingly.

-Proof of Possession for Proposed Premises:

- Whose signature is the sergeant-at-arms, and what is this person's role in 50 Shades of Green LLC and the business? Please clarify.

*Note- I will be out of the office from July 19th-27th.

Please send any documents/correspondence to marijuana.licensing@alaska.gov.

Respectfully,

Jacqlene Drulis
Occupational Licensing Examiner
Alcohol & Marijuana Control Office
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501

From:	Marijuana Licensing (CED sponsored)
To:	qnogrn@50shadesogreen.com
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application-50 Shades of Green LLC license #14956
Date:	Tuesday, June 05, 2018 4:33:32 PM
Attachments:	14956 Incomplete Application Letter .pdf image001.png

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Hello,

Your application has been reviewed, attached is correspondence regarding corrections, additional documents, and/or resubmittals that need to be addressed. Please send any documents/correspondence to marijuana.licensing@alaska.gov.

Please let me know if you need any of the documents I have for this application. I want to make sure you receive this email and incomplete letter attached first.

Thank you,

Jacqlene Drulis
Occupational Licensing Examiner
Alcohol & Marijuana Control Office
Direct: (907) 754-3588
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501

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To:	"qnogrn@50shadesogreen.com"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application-50 Shades of Green LLC license #14956
Date:	Thursday, July 12, 2018 1:56:00 PM
Attachments:	image001.png

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