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

Joseph Eickholt, Amber Eickholt, Lee Drotzur
DBA: Alaska Beasty Buds
Via email: alaskabeastybuds@gmail.com

Re: Limited Marijuana Cultivation Facility #16028

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.

- **Online Application**
  - FYI-You may need to remove your names from Entity Officials by rolling the application back to "New", but I do not have a concrete answer for that yet. I will have to meet with the Director next week for further clarification. Basically, because you applied as a general partnership you were not supposed to enter your names under Entity Officials. Please call me if you need clarification.

- **MJ-00 Application Certifications**
  - On all three forms, please correct the Licensee portion under Section 1 to show the individuals, Joseph Eickholt, Amber Eickholt, Lee Drotzur, since that is what your online application shows as the Licensee.
  - 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 1: please correct the Licensee portion to show the individuals, Joseph Eickholt, Amber Eickholt, Lee Drotzur, since that is what your online application shows as the Licensee.
  - Page 5, first box: please include in your answer your policies and procedures for preventing diversion of marijuana or marijuana product by employees.
  - Page 7, first box: Because the applications are posted on our website, diagrams showing the location of cameras cannot be included with the application. The attached diagram showing placement of all cameras within the facility will not be included with the application. Please correct your answer accordingly.
  - Page 9: your answer concerning maintaining/storing business records onsite for at least six months is sufficient; however, the second part of your answer concerning the business records being stored offsite for three years is partly inaccurate. All business records must

be maintained onsite or offsite for the current year and three preceding years, so essentially, four years. Please adjust accordingly.

- Page 11: other than making sure employees possess a marijuana handler permit, are you going to provide in-house training? Please add to your answer and explain in the box.
- Pages 12-13: AMCO and METRC must be notified not later than three days <u>before rendering the waste unusable</u>, not just prior to disposal. Please adjust your answer accordingly.
  - Additionally, please address how you will store and manage the waste during the three day waiting period.
- Page 15, first box: if you are going to include the warning statements on the labeling of marijuana, it must be quoted word for word. You are not required to include the 5 quotes in this box or a sample label for form MJ-01, but if you are going to, it must be verbatim. Please correct page 15 and the sample label accordingly. A couple of your statements are correct, but the others are incorrect. 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-02 Premises Diagram**
  - Please provide a 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.), please label it.
  - The diagram 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):
    - A limited marijuana cultivation facility must have fewer than 500 square feet under cultivation, not 500 square feet. Please correct your diagram and page 2 of the MJ-04 (outlined below) accordingly.
    - Remove the cameras from the diagram.
    - What type of structure is the building? (include it on the diagram)
    - Please clearly label the interior layout of the proposed licensed premises and areas under cultivation.
    - 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.

- **MJ-04 Cultivation Supplemental**
  - Page 1: please correct the Licensee portion to show the individuals, Joseph Eickholt, Amber Eickholt, Lee Drotzur, since that is what your online application shows as the Licensee.

- Page 2: a limited marijuana cultivation facility must have fewer than 500 square feet under cultivation, not 500 square feet. Please correct your answer and your diagram for form MJ-02 accordingly.
    - Additionally, please provide a more detailed answer that is congruent with the diagram from MJ-02. 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.
- Page 3, second box: please describe the marijuana cultivation facility's chemicals, gases, including carbon dioxide management, and delivery systems to be used.
- Page 4, first box: please make sure that this box is congruent with pages 12-13 of MJ-01.
- For the sample label provided, 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. I have provided an example of the warning statements in the requested corrections for MJ-01 above for your reference.

- **MJ-07 Public Notice Posting Affidavit**
    - In Section 1, please correct the Licensee portion to show the individuals, Joseph Eickholt, Amber Eickholt, Lee Drotzur, since that is what your online application shows as the Licensee.
    - Additionally, depending on the answer to the issue mentioned above, under Online Application, you may need to re-do the public notice.

- **MJ-08 Local Government Notice Affidavit**
    - In Section 1, please correct the Licensee portion to show the individuals, Joseph Eickholt, Amber Eickholt, Lee Drotzur, since that is what your online application shows as the Licensee.
    - In Section 2, please correct the Local Government field to say, Fairbanks North Star Borough, as long as that is the local government that you notified on 12/21/17.
    - Additionally, depending on the answer to the issue mentioned above, under Online Application, you may need to re-notify the local government.

- **MJ-09 Statement of Financial Interest**
    - On all three forms, please correct the Licensee portion under Section 1 to show the individuals, Joseph Eickholt, Amber Eickholt, Lee Drotzur, since that is what your online application shows as the Licensee.

- **Publisher's Affidavit**
    - The dates of publication do not match the publisher's affidavit dates; they are all 2 days off (12/9/17 and 12/7/17 etc.). Please submit a publisher's affidavit in which the dates match.

- **Proof of Possession for Proposed Premises**
    - Please correct the tenant to be the individual licensees (Joseph Eickholt, Amber Eickholt, Lee Drotzur), not the DBA-Doing Business As (Alaska Beasty Buds). You may include the DBA (Alaska Beasty Buds) after the licensees, if you prefer.

- At the end of the lease where the signatures are, in the "Tenant Full Name" field, please correct it to be the individual licensees (Joseph Eickholt, Amber Eickholt, Lee Drotzur), not the DBA (Alaska Beasty Buds).
- Please accordingly incorporate in the lease the following: Landlord/lessor may not remove from the premises or take possession of marijuana or marijuana products, and AMCO enforcement will be contacted.

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

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

From:	Marijuana Licensing (CED sponsored)
To:	"alaskabeastybuds@gmail.com"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application-Alaska Beasty Buds license #16028
Date:	Tuesday, June 05, 2018 8:38:00 AM
Attachments:	16028 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

From:	Marijuana Licensing (CED sponsored)
To:	"alaskabeastybuds@gmail.com"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Status moved to New- Alaska Beasty Buds License #16028
Date:	Friday, June 08, 2018 2:17:00 PM
Attachments:	image001.png

Good afternoon,

I have rolled back your application to New status. Please remove the Entity Officials from your Online Application through myAlaska, and then notify me that you have done so by responding to this email. Once you notify me, I will move the status back to Incomplete.

Thank you,

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

From:	Marijuana Licensing (CED sponsored)
To:	Alaska Beasty Buds
Cc:	Marijuana Licensing (CED sponsored)
Subject:	RE: Email 2 of 2 Completed Supplemental Forms; License # 16028
Date:	Thursday, August 02, 2018 1:55:15 PM
Attachments:	image001.png

Good afternoon,

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

-**MJ-01:**

- Page 7, first box: Please remove the wording, "Attached diagram shows placement of all cameras within the facility", since the diagram should not have cameras and should not be attached to this form.
- Page 15, first box and the sample label: I cannot deem your application complete until the requested corrections are received. I see that you made some corrections to the warning statements; however, they are still inaccurate. The warning statements must be word for word as written in the regulations. Be very specific and make sure that they are verbatim. Most of your statements are now correct, but the others are incorrect. I have bolded, underlined, and highlighted in red the errors below. Please correct accordingly.
  -For use **only** by adults twenty-one and older. Keep out of **the** reach of children.
  -Marijuana should not be used by women who are pregnant **or** breast feeding.

-MJ-02:

- Outline the entire perimeter of the proposed licensed premises and restricted access area (use separate colors and labels). It appears that the office area and restroom are going to be a part of your licensed premises, but not the restricted access area; is this correct? If so, then please use a third color to outline the entire facility, and label it Licensed Premises.
- Please show the 40'x50' dimensions of the facility, similar to your first diagram.

-MJ-04:

- Page 2: It seems to me that 128x3=384, not 394. Please correct Room Two's sq ft Under Cultivation to be 384 sq ft, and the corresponding calculation of Three 8'x16'=394… to be 384 sq ft.
  - Additionally, please provide the total sq ft under cultivation, which seems to me to be 496 sq ft.
- For the sample label provided: I cannot deem your application complete until the requested corrections are received. I see that you made some corrections to the warning statements; however, they are still inaccurate. The warning statements must be word for word as written in the regulations. Be very specific and make sure that they are verbatim. Most of your statements are now correct, but the others are incorrect. I have bolded, underlined, and highlighted in red the errors below. Please correct accordingly.
  -For use **only** by adults twenty-one and older. Keep out of **the** reach of children.
  -Marijuana should not be used by women who are pregnant **or** breast feeding.

-MJ-08:

- The unit number was removed from the premises address with the submitted correction. Please include unit B in the premises address.

*Note- Please get your corrections in by 8am tomorrow, August 3rd to be considered for the August 15-17 Board Meeting. Additionally, if you are unable to get your corrections in by 8am tomorrow, the 90 day deadline for your application to be deemed complete is September 3, 2018.

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: Alaska Beasty Buds <alaskabeastybuds@gmail.com>
Sent: Saturday, July 14, 2018 9:14 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Email 2 of 2 Completed Supplemental Forms; License # 16028

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Amber Eickholt
Alaska Beasty Buds
alaskabeastybuds@gmail.com
(907)687-3584