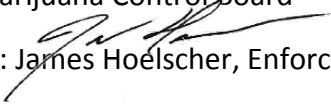




MEMORANDUM

TO: Marijuana Control Board

DATE: August 6, 2018

FROM:  James Hoelscher, Enforcement Supervisor

RE: Enforcement Report, Marijuana

AMCO Enforcement has been extremely busy with investigations, inspections and providing assistance to alcohol and marijuana licensees. We completed a large amount of scheduled travel to rural areas for the main purpose of inspections. While in these rural areas, we often provide information and answer title 4 and 17.38 questions to local law enforcement at their request.

I have included a pie chart to show the numerical proportion of AMCO Enforcement's contacts in relation to the number of enforcement actions taken. Contacts were made during inspections and walk-throughs. Calls are documented when an Investigator receives a call and emails are only emails that are sent to amco.enforcement@alaska.gov. A small percentage of our contacts end up in a NOV or Advisory and the number brought to the board as an accusation is a considerably small portion. One can look at the graph in numerous ways. I can tell you that the AMCO Enforcement staff's contacts with licensees and the public are largely education and informational. Due to our limited enforcement resources and the volume of contact, calls, and emails, Enforcement has prioritized what information should be subject to a full investigation (in accordance with the Enforcement Priorities to be discussed shortly); not all information provided to us is able to be thoroughly investigated, even though a more thorough investigation may be warranted.

I will provide a pie chart in future reports and in January 2019, hope to break down the stats even further to show the difference in Alcohol and Marijuana Investigations, calls and emails.

Alcohol & Marijuana Current Stats, as of August 3, 2018

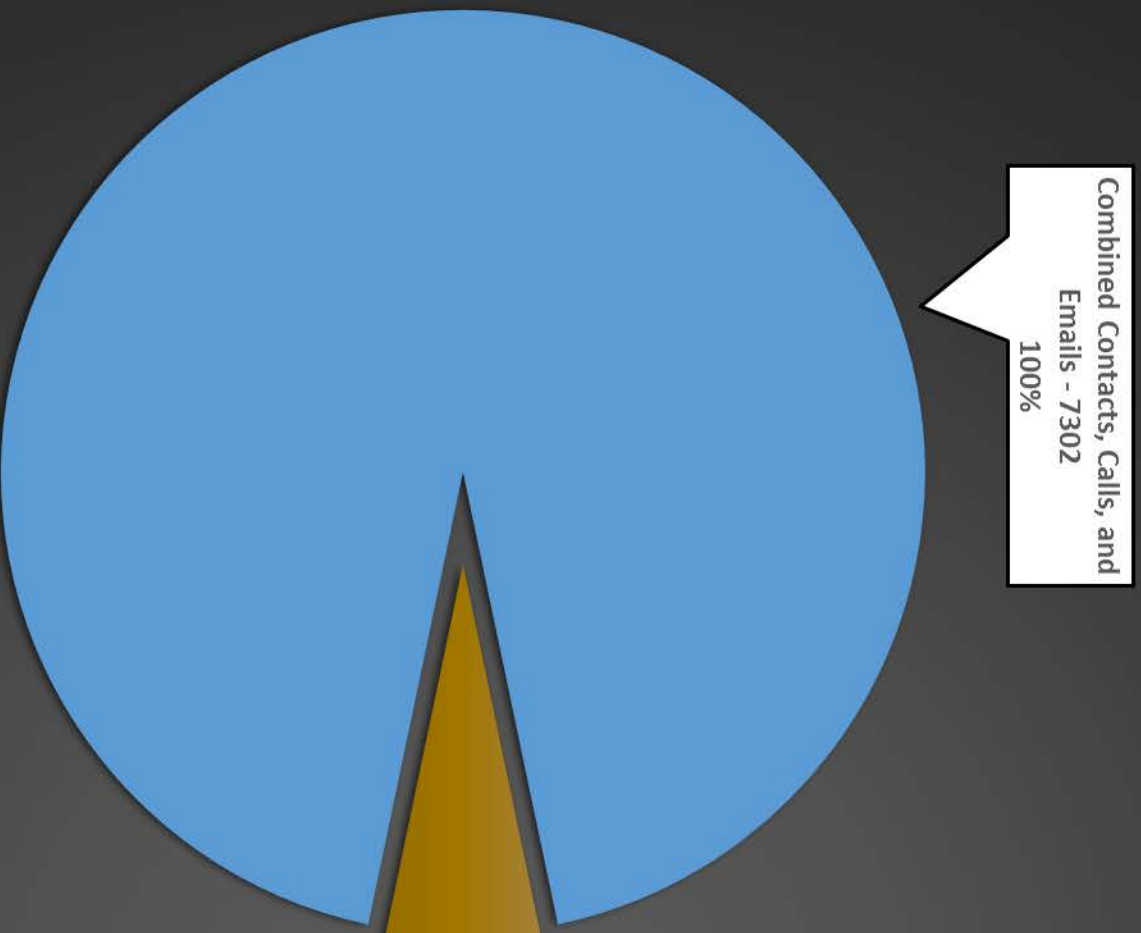
Investigations – 282 (211 Non-Rural – 71 Rural)
Alcohol Walk-throughs - 231
Alcohol Inspections – 247 (133 Non-Rural - 114 Rural)
Alcohol NOV's -115 (46 of these NOV's were change of ownership)
Alcohol Advisory Notices – 28
Alcohol Permits reviewed - 552
Marijuana Walk-throughs - 94
Marijuana Inspections – 108 (62 Non-Rural - 46 Rural)
Marijuana NOV's - 38
Marijuana Advisory Notices - 34
Marijuana Background Conducted (MJ-18) - 16
Marijuana Handler Cards Issued – 1,242
Compliance Checks/Shoulder Taps – 5
Criminal Charges - 2
Enforcement Calls/Requests/General Enforcement Email – 6,578



Permits and Events

Recently, a special events permit for alcohol was issued, in part, in front of a marijuana retail store. This created a “comingling” of the marijuana retail store and the alcohol permittee, but the area permitted was not on the marijuana licensed premises. However, the marijuana licensee did mention the alcohol event on their Facebook page. We are also seeing where “marijuana events” are being held on licensed premises for alcohol, but do not advertise consumption of marijuana at the event. We recognize that this is not a violation, but also know that this has been a concern for both boards as our understanding was that the MCB does not want alcohol on marijuana premises and ABC does not want marijuana on alcohol premises. Enforcement is seeking guidance or clarification (or direction) from each board and recommends that the boards create a joint sub-committee to address these shared concerns and provide licensees and AMCO clear and consistent guidance.

January 1, 2018 to August 3, 2018



Combined Contacts, Calls, and Emails - 7302

- Combined Contacts, Calls, and Emails - 7302
- Alc NOV's 115
- MJ NOV's 39

- Rural Investigations 72
- Alc Advisory Notices 35
- MJ Advisory Notices 35

- Non-Rural Investigations 214
- Alc Accusation 3
- MJ Accusation 1

