

Alcohol & Marijuana Control Office

Initiating License Application

5/22/2018 1:49:15 PM

License Number: 10009

License Status: Active-Operating

License Type: Marijuana Testing Facility

Doing Business As: CANNTTEST, LLC

Business License Number: 1007028

Designated Licensee: Mark Malagodi

Email Address: mark@canntest.com

Local Government: Anchorage (Municipality of)

Community Council: Downtown

Latitude, Longitude: 61.224000, -149.874000

Physical Address: 620 E Whitney Road
Suite B
Anchorage, AK 99501
UNITED STATES

Licensee #1

Type: Entity

Alaska Entity Number: 10021705

Alaska Entity Name: CannTest, LLC

Phone Number: 907-258-6878

Email Address: mark@canntest.com

Mailing Address: 620 E Whitney Road
Suite B
Anchorage, AK 99501-1622
UNITED STATES

Entity Official #1

Type: Individual

Name: Jonathan Rupp

Phone Number: 907-202-6484

Email Address: jonathan.rupp@gmail.com

Mailing Address: 2621 E 20th Avenue
Anchorage, AK 99508-3280
UNITED STATES

Entity Official #2

Type: Individual

Name: Mark Malagodi

Phone Number: 907-346-1333

Email Address: mark@canntest.com

Mailing Address: 2927 Wentworth Street
Anchorage, AK 99508-4341
UNITED STATES

Note: No affiliates entered for this license.



Alaska Marijuana Control Board

Form MJ-20: Renewal Application Certifications**What is this form?**

This renewal application certifications form is required for all marijuana establishment license renewal applications. Each person signing an application for a marijuana establishment license must declare that he/she has read and is familiar with AS 17.38 and 3 AAC 306. A person other than a licensee may not have direct or indirect financial interest (as defined in 3 AAC 306.015(e)(1)) in the business for which a marijuana establishment license is issued, per 3 AAC 306.015(a).

This form must be completed and submitted to AMCO's main office by each licensee (as defined in 3 AAC 306.020(b)(2)) before any license renewal application will be considered complete.

Section 1 – Establishment Information

Enter information for the licensed establishment, as identified on the license application.

Licensee:	CannTest, LLC	License Number:	10009		
License Type:	Marijuana Testing Facility				
Doing Business As:	CannTest, LLC				
Premises Address:	620 E Whitney Road Suite B				
City:	Anchorage	State:	AK	ZIP:	99508

Section 2 – Individual Information

Enter information for the individual licensee who is completing this form.

Name:	Mark Malagodi
Title:	CEO

Section 3 – Changes to Licensed Marijuana Establishment

Read each line below, and then sign your initials in the box to the right of only the applicable statement:

Initials

I certify that **no changes have been made**, except for those that have been previously reported or requested on a form prescribed by the Board, to this licensed establishment's business name, ownership, licensed premises diagram, or operating plan, and (for marijuana product manufacturers) that I do not wish to request Board approval for production of any new proposed marijuana products.



I certify that **a change has been or will be made** to one or more of the items listed above for this establishment, and I understand that an additional form(s) and fee(s) must be submitted to AMCO before any renewal application for this license can be considered complete.



If you have selected the second certification, please list any and all of the types of changes that need to be reported/requested:



Form MJ-20: Renewal Application Certifications

Section 4 – Certifications

Read each line below, and then sign your initials in the box to the right of any applicable statements:

Initials

I certify that I have **not** been convicted of any criminal charge in the previous two calendar years.I certify that I have **not** committed any civil violation of AS 04, AS 17.38, or 3 AAC 306 in the previous two calendar years.I certify that a notice of violation has **not** been issued for this license.Sign your initials to the following statement only if you are unable to certify one or more of the above statements:

Initials

I have attached a written explanation for why I cannot certify one or more of the above statements, which includes the type of violation or offense, as required under 3 AAC 306.035(b).



Read each line below, and then sign your initials in the box to the right of each statement:

Initials

I certify that no person other than a licensee listed on my marijuana establishment license renewal application has a direct or indirect financial interest, as defined in 3 AAC 306.015(e)(1), in the business for which the marijuana establishment license has been issued.



I certify that I meet the residency requirement under AS 43.23 for a permanent fund dividend in the 2018 calendar year.



I certify that this establishment complies with any applicable health, fire, safety, or tax statute, ordinance, regulation, or other law in the state.



I certify that I am operating in compliance with the Alaska Department of Labor and Workforce Development's laws and requirements pertaining to employees.



I certify that I have not violated any restrictions pertaining to this particular license type, and that this license has not been operated in violation of a condition or restriction imposed by the Marijuana Control Board.



I certify that I understand that providing a false statement on this form, the online application, or any other form provided by or to AMCO is grounds for rejection or denial of this application or revocation of any license issued.

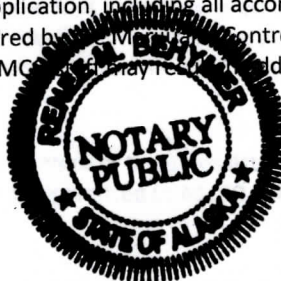


As an applicant for a marijuana establishment license renewal, I declare under penalty of unsworn falsification that I have read and am familiar with AS 17.38 and 3 AAC 306, and that this application, including all accompanying schedules and statements, is true, correct, and complete. I agree to provide all information required by the Marijuana Control Board in support of this application and understand that failure to do so by any deadline given to me by AMCO may result in additional fees or expiration of this license.

Signature of licensee

Printed name of licensee

Mark Nakagawa



Notary Public in and for the State of Alaska

My commission expires: August 5, 2021

Subscribed and sworn to before me this 5th day of June, 2018.



Alaska Marijuana Control Board

Form MJ-20: Renewal Application Certifications**What is this form?**

This renewal application certifications form is required for all marijuana establishment license renewal applications. Each person signing an application for a marijuana establishment license must declare that he/she has read and is familiar with AS 17.38 and 3 AAC 306. A person other than a licensee may not have direct or indirect financial interest (as defined in 3 AAC 306.015(e)(1)) in the business for which a marijuana establishment license is issued, per 3 AAC 306.015(a).

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Section 1 – Establishment Information

Enter information for the licensed establishment, as identified on the license application.

Licensee:	CannTest, LLC	License Number:	10009		
License Type:	Marijuana Testing Facility				
Doing Business As:	CannTest, LLC				
Premises Address:	620 E Whitney Road Suite B				
City:	Anchorage	State:	AK	ZIP:	99508

Section 2 – Individual Information

Enter information for the individual licensee who is completing this form.

Name:	Jonathan Rupp
Title:	Scientific Director

Section 3 – Changes to Licensed Marijuana Establishment

Read each line below, and then sign your initials in the box to the right of only the applicable statement:

Initials

I certify that **no changes have been made**, except for those that have been previously reported or requested on a form prescribed by the Board, to this licensed establishment's business name, ownership, licensed premises diagram, or operating plan, and (for marijuana product manufacturers) that I do not wish to request Board approval for production of any new proposed marijuana products.



I certify that **a change has been or will be made** to one or more of the items listed above for this establishment, and I understand that an additional form(s) and fee(s) must be submitted to AMCO before any renewal application for this license can be considered complete.



If you have selected the second certification, please list any and all of the types of changes that need to be reported/requested:

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**Form MJ-20: Renewal Application Certifications****Section 4 – Certifications**Read each line below, and then sign your initials in the box to the right of any applicable statements:

Initials

I certify that I have **not** been convicted of any criminal charge in the previous two calendar years.I certify that I have **not** committed any civil violation of AS 04, AS 17.38, or 3 AAC 306 in the previous two calendar years.I certify that a notice of violation has **not** been issued for this license.Sign your initials to the following statement only if you are unable to certify one or more of the above statements:

Initials

I have attached a written explanation for why I cannot certify one or more of the above statements, which includes the type of violation or offense, as required under 3 AAC 306.035(b).



Read each line below, and then sign your initials in the box to the right of each statement:

Initials

I certify that no person other than a licensee listed on my marijuana establishment license renewal application has a direct or indirect financial interest, as defined in 3 AAC 306.015(e)(1), in the business for which the marijuana establishment license has been issued.



I certify that I meet the residency requirement under AS 43.23 for a permanent fund dividend in the 2018 calendar year.



I certify that this establishment complies with any applicable health, fire, safety, or tax statute, ordinance, regulation, or other law in the state.



I certify that I am operating in compliance with the Alaska Department of Labor and Workforce Development's laws and requirements pertaining to employees.



I certify that I have not violated any restrictions pertaining to this particular license type, and that this license has not been operated in violation of a condition or restriction imposed by the Marijuana Control Board.



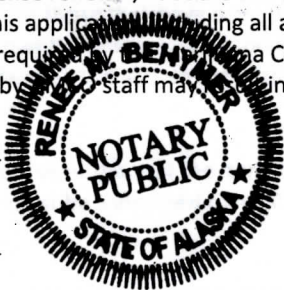
I certify that I understand that providing a false statement on this form, the online application, or any other form provided by or to AMCO is grounds for rejection or denial of this application or revocation of any license issued.



As an applicant for a marijuana establishment license renewal, I declare under penalty of unsworn falsification that I have read and am familiar with AS 17.38 and 3 AAC 306, and that this application, including all accompanying schedules and statements, is true, correct, and complete. I agree to provide all information required by the Marijuana Control Board in support of this application and understand that failure to do so by any deadline given to me by the Board or staff may result in additional fees or expiration of this license.

Signature of licensee

Printed name of licensee

Subscribed and sworn to before me this 5th day of June, 2018.

Notary Public in and for the State of Alaska

My commission expires: August 5, 2021

3 AAC 306.660. Failed materials; retests (a) If a sample tested by a marijuana testing facility does not pass the required tests based on the standards set out in **3 AAC 306.645**, the marijuana establishment that provided the sample shall (1) dispose of the entire harvest batch or production lot from which the sample was taken; and (2) document the disposal of the sample using the marijuana establishment's marijuana inventory tracking system. (b) If a sample of marijuana fails a required test, any marijuana plant trim, leaf, and other usable material from the same plants automatically fail the required test. The board may approve a request to allow a batch of marijuana that fails a required test to be used to make a carbon dioxide- or solvent-based extract. After processing, the carbon dioxide- or solvent-based extract must pass all required tests. (c) If a marijuana cultivation facility or a marijuana product manufacturing facility petitions for a retest of marijuana or a marijuana product that failed a required test, the board may authorize a retest to validate the test results. The marijuana cultivation facility or a marijuana product manufacturing facility shall pay all costs of a retest.

You are directed to respond to the Director of the Alcohol & Marijuana Control Office in writing to this Notice of Violation within 10 days of receipt to explain what action you have taken to prevent a reoccurrence of this violation. FAILURE TO RESPOND TO THIS NOTICE OF VIOLATION WITHIN 10 DAYS WILL RESULT IN YOUR APPEARANCE, EITHER IN PERSON OR TELEPHONICALLY, BEFORE THE ABC BOARD OF DIRECTORS AT THEIR NEXT REGULARLY SCHEDULED BOARD MEETING.

***Please include your Alcohol License Number in your response.**

**Sara Chambers, Acting Director
Alcohol & Marijuana Control Office
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501**

A Response is Required

3 AAC 304.525 (B) provides that upon receipt of a Notice of Violation, a licensee may request to appear before the Director and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice and the Director must grant an appearance within ten days after receipt of a request. A Licensee shall respond, either orally or in writing, to the Notice.

Receipt:	Violation Observed By: Kendrick Whiteman
Filed By: Kendrick Whiteman	Title: Investigator III

From: [Mark Malagodi](#)
To: [Whiteman, Kendrick J \(CED\)](#); [CED AMCO Enforcement \(CED sponsored\)](#)
Subject: Re: Notice of Violation for Canntest #10009
Date: Friday, January 27, 2017 9:48:11 AM

In response to Notice of Violation for Canntest #10009, I understand that there is now a pending amendment to the regulations that will allow the Director to grant a request for a sample retest. However in both the version of the regulations on the AMCO website, and the language of 3 AAC 306.660 in the Notice of Violation, there is no mention of the Director having the ability to grant a retest. My understanding at the time was that only the Board had the ability to grant a retest. Since the Board's meetings are scheduled roughly 60 days apart, and the validity of a crop would not last that long, I asked one member of the Board if I could provide a retest of a sample, and was told it would be OK to do so. I have since changed my procedure for providing retests. Assuming the amendment to the regulations passes that will allow the Director to authorize the retest, which I think is an excellent change to the regulations, CannTest's procedure for companies that request a retest of a failed sample will be to direct the company to send an email to the Director of AMCO requesting authorization of a retest. If said company does not hear a response from the Director within 72 hours I will ask the company to contact me, and I will contact James Hoelscher to assist in getting a response from the Director. At the meeting at CannTest to which the Violation Notice refers he indicated he would assist in roadblocks to getting approval of a retest. Once an approval is granted I will ask the company to forward me the email, which will be printed and kept with other important documents. Thank you for your understanding, and for changing the regulations to allow for a more expedient approval method.

On Thu, Jan 26, 2017 at 2:52 PM, Whiteman, Kendrick J (CED)
<kendrick.whiteman@alaska.gov> wrote:

Mark Malagodi,

Here is a Notice of Violation for retesting, a printed copy will be mailed to you.

You may send your written response to the general email box
(amco.enforcement@alaska.gov), Interim Director Sara Chambers, and myself.

Thank you,

Kendrick Whiteman

Alcohol & Marijuana Control Office

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Mark Malagodi, Ph.D
CEO, CannTest, LLC
907-258-6878



620 E Whitney Road, Suite B
Anchorage, AK 99501
Phone: 907-258-6878

January 27, 2017

Sara Chambers, Acting Director
Alcohol & Marijuana Control Office
550 W. 7th Ave, Suite 1600
Anchorage, AK 99501

RE: CannTest Notice of Violation License #: 10009

In response to Notice of Violation for CannTest #10009, I understand that there is now a pending amendment to the regulations that will allow the Director to grant a request for a sample retest. However in both the version of the regulations on the AMCO website, and the language of 3 AAC 306.660 in the Notice of Violation, there is no mention of the Director having the ability to grant a retest. My understanding at the time was that only the Board had the ability to grant a retest. Since the Board's meetings are scheduled roughly 60 days apart, and the validity of a crop would not last that long, I asked one member of the Board if I could provide a retest of a sample, and was told it would be OK to do so. I have since changed my procedure for providing retests. Assuming the amendment to the regulations passes that will allow the Director to authorize the retest, which I think is an excellent change to the regulations, CannTest's procedure for companies that request a retest of a failed sample will be to direct the company to send an email to the Director of AMCO requesting authorization of a retest. If said company does not hear a response from the Director within 72 hours I will ask the company to contact me, and I will contact James Hoelscher to assist in getting a response from the Director. At the meeting at CannTest to which the Violation Notice refers he indicated he would assist in roadblocks to getting approval of a retest. Once an approval is granted I will ask the company to forward me the email, which will be printed and kept with other important documents. Thank you for your understanding, and for changing the regulations to allow for a more expedient approval method.

Sincerely,

Mark Malagodi, Ph.D
CEO, CannTest, LLC

Alcoholic & Marijuana Control Office
550 W. 7th AVE, SUITE 1600
Anchorage, AK 99501

Date: 13-8-17
Number AB17-00110
Page 1 of 1

Notice of Violation

(3AAC 306.805)

Licensee CannTest, LLC	License Number 10009	Type of License Marijuana Testing Facility
D.B.A. CannTest, LLC	How Delivered <input type="checkbox"/> Certified Mail # On-File <input checked="" type="checkbox"/> Via Email	Law Enforcement Agency Alaska State Troopers
Street or P.O. Box 620 E Whitney Road Ste. B	City, State Anchorage, AK	Zip 99501

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

VIOLATION: According to METRC Manifest records, on February 13, 2017, you picked up marijuana samples from Branden Roybal at Alaska Cannabis Cultivators, License #10592, in Fairbanks, AK, in order to transport them to your facility in Anchorage, AK.

Your attention is directed to 3 AAC 306.750(a)(1)&(2) Transportation

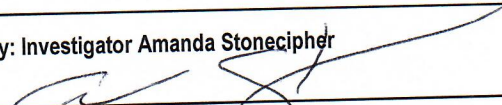
You are directed to respond to the Director of the Marijuana Control Board in writing to this Notice of Violation within 10 days of receipt to explain what action you have taken to prevent a reoccurrence of this violation. FAILURE TO RESPOND TO THIS NOTICE OF VIOLATION WITHIN 10 DAYS WILL RESULT IN YOUR APPEARANCE, EITHER IN PERSON OR TELEPHONICALLY, BEFORE THE MARIJUANA CONTROL BOARD AT THEIR NEXT REGULARLY SCHEDULED BOARD MEETING.

***Please include your Marijuana License Number in your response.**

Alcohol and Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave. Suite 1600
Anchorage, Alaska 99501

A Response is Required

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the Director and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice and the Director must grant appearance within ten days after receipt of a request. A Licensee shall respond, either orally or in writing, to the Notice.

Receipt:	Violation Observed By: Amanda Stonecipher
Filed By: Investigator Amanda Stonecipher 	Title: Investigator III



620 E Whitney Road, Suite B
Anchorage, AK 99501
Phone: 907-258-6878



March 10, 2017

Sara Chambers, Acting Director
Alcohol & Marijuana Control Office
550 W. 7th Ave, Suite 1600
Anchorage, AK 99501

RE: CannTest Notice of Violation License #: 10009

In response to Notice of Violation AB17=00110 for CannTest #10009, I am very surprised to be receiving this notice. I explained at the AMCO office on 2/21/17 why I believe I acted fully within the regulations when I transported samples from Fairbanks to the CannTest facility on 2/13/17, but I will reiterate my explanation in this response. It had been CannTest's plan from the start to transport samples from cultivators and producers back to the testing lab. This plan was discussed at early Control Board meetings, and my operational plan which included this type of transport was approved by the Board. Therefore when I travelled to Fairbanks on 2/13 I had no idea that this would be considered against regulations. I travelled to the first location, picked up the samples, then travelled to the second location. When I arrived at the second location the owner told me he had been informed by James Hoelscher that this would not be allowed. I tried to call Mr. Hoelscher but was told he was gone for the day. I talked to Joe Hamilton who conferred with Sarah Oates, and he told me that it was not against regulations for me to transport the samples. Since it is my understanding that Sarah Oates was involved in the writing of the regulations I believed her opinion to be valid. The second cultivator did not want to risk the ambiguity of the situation, so he said he would fly down to my facility at a later date. By that time it was after 5:00pm and I had to fly out at 6:00pm so I had little choice but to transport the samples from the first cultivator back to the CannTest facility. The next day I called to arrange a meeting to discuss the conflicting information I received on sample transport. At the meeting on 2/21/17 I was surprised to hear that a ruling had been made that the regulations had been interpreted to prevent a testing facility from transporting from a cultivator to the facility. I still believe this was not the intent of the Board. However given the ruling I have now contracted with a transportation company that is not affiliated with CannTest to transport samples from cultivators and producers to CannTest. If the proposed regulations pass, and I am told that they allow an owner of a testing lab to transport, then I will go back to transporting myself. I hope this clarifies my actions.

Sincerely,
Mark Malagodi, Ph.D
CEO, CannTest, LLC



620 E Whitney Road, Suite B
Anchorage, AK 99501
Phone: 907-258-6878

March 10, 2017

Sara Chambers, Acting Director
Alcohol & Marijuana Control Office
550 W. 7th Ave, Suite 1600
Anchorage, AK 99501

RE: CannTest Notice of Violation License #: 10009

In response to Notice of Violation AB17=00110 for Canntest #10009, I am very surprised to be receiving this notice. I explained at the AMCO office on 2/21/17 why I believe I acted fully within the regulations when I transported samples from Fairbanks to the CannTest facility on 2/13/17, but I will reiterate my explanation in this response. It had been CannTest's plan from the start to transport samples from cultivators and producers back to the testing lab. This plan was discussed at early Control Board meetings, and my operational plan which included this type of transport was approved by the Board. Therefore when I travelled to Fairbanks on 2/13 I had no idea that this would be considered against regulations. I travelled to the first location, picked up the samples, then travelled to the second location. When I arrived at the second location the owner told me he had been informed by James Hoelscher that this would not be allowed. I tried to call Mr. Hoelscher but was told he was gone for the day. I talked to Joe Hamilton who conferred with Sarah Oates, and he told me that it was not against regulations for me to transport the samples. Since it is my understanding that Sarah Oates was involved in the writing of the regulations I believed her opinion to be valid. The second cultivator did not want to risk the ambiguity of the situation, so he said he would fly down to my facility at a later date. By that time it was after 5:00pm and I had to fly out at 6:00pm so I had little choice but to transport the samples from the first cultivator back to the CannTest facility. The next day I called to arrange a meeting to discuss the conflicting information I received on sample transport. At the meeting on 2/21/17 I was surprised to hear that a ruling had been made that the regulations had been interpreted to prevent a testing facility from transporting from a cultivator to the facility. I still believe this was not the intent of the Board. However given the ruling I have now contracted with a transportation company that is not affiliated with CannTest to transport samples from cultivators and producers to CannTest. If the proposed regulations pass, and I am told that they allow an owner of a testing lab to transport, then I will go back to transporting myself. I hope this clarifies my actions.

Sincerely,
Mark Malagodi, Ph.D
CEO, CannTest, LLC

Notice of Violation

(3AAC 306.805)

This form, all information provided and responses are public documents per Alaska Public Records Act AS 40.25

Date: 5/9/17

License #/Type: Marijuana Testing Facility

Designated Licensee: Mark Malagodi

AMCO Case#: AB17-0221

DBA: Canntest, LLC

Premises Address: 620 E Whitney Rd Ste B. Anchorage, AK 99501

Mailing Address: 620 E Whitney Rd Ste B. Anchorage, AK 99501

This is a notice to you as licensee that an alleged violation has occurred. If the Marijuana Control Board decides to act against your license, under the provisions of AS 44.62.330 - AS 44.62.630 (Administrative Procedures Act) you will receive an Accusation and Notice of your right to an Administrative Hearing.

Note: This is not an accusation or a criminal complaint.

On 04/28/17 Canntest accepted Metrc manifest #0000056106 from Steep Hill Alaska as Steep Hill's equipment had technical difficulties and could not complete the required tests. This shipment contained package #1A4020300001A91000000255, a 0.3 gram sample of shatter (Blue Angel - HB36 - 3/18/17) produced by Einstein Labs, sourced from production batch #1A4020300001A91000000251. This sample was subsequently tested by Canntest and failed residual solvent testing for butanes. Canntest did not enter this failed test result into Metrc and Mark Malagodi instead contacted Einstein Labs licensee Justin Roland to inform him of the failure. The product was "re-baked" and a second sample (#1A4020300001A91000000257) was pulled from the same production batch and accepted by Canntest on 05/01/17 with manifest #0000057202. This test passed residual solvent testing however Canntest was unable to enter this new testing information because this package was linked to the original test sample which still showed "Testing In Progress". Metrc support became involved and Malagodi expressed to them his concern regarding the time it would take for the Board to authorize a retest which is why he suggested that Roland re-bake the product and create a new batch. Metrc support informed Malagodi he must enter the test results regardless of the result. It was not until 05/08/17 that Malagodi entered the failed test result which subsequently failed the production batch and all other packages derived from that batch, including the secondary test that passed residual solvent testing.

This is a violation of 3 AAC 306.660 and 3 AAC 306.670(a)(1) and (2).

3 AAC 306.805 provides that upon receipt of a Notice of Violation, a licensee may request to appear before the board and be heard regarding the Notice of Violation. The request must be made within ten days after receipt of the Notice. A licensee may respond, either orally or in writing, to the Notice.

IT IS RECOMMENDED THAT YOU RESPOND IN WRITING TO DOCUMENT YOUR RESPONSE FOR THE MARIJUANA CONTROL BOARD.

*Please send your response to the address below and include your Marijuana Establishment License Number in your response.

Alcohol & Marijuana Control Office
ATTN: Enforcement
550 W. 7th Ave, Suite 1600
Anchorage, Alaska 99501
amco.enforcement@alaska.gov

Issuing Investigator: J. Bankowski

Received by:

SIGNATURE:

SIGNATURE:

Delivered VIA: In-Person

Date:



620 E Whitney Road, Suite B
Anchorage, AK 99501
Phone: 907-258-6878

May 9, 2017

Erika McConnell, Director
Alcohol & Marijuana Control Office
550 W. 7th Ave, Suite 1600
Anchorage, AK 99501

RE: CannTest Notice of Violation License #: 10009

In response to Notice of Violation AB17=00110 for Canntest #10009, I would like to explain the entire process that led to this violation. I received a call that informed me the solvent testing equipment at Steep Hill Alaska had broken down, and a client who had several samples at Steep Hill wanted to bring the samples to CannTest to complete testing. Three of the samples completed testing with no issue, but the fourth tested slightly over 800PPM isobutane, but was very low in n-butane. The customer said that in all previous tests conducted by Steep Hill they had never found more than 1PPM of either butane or isobutane. I contacted the owner Brian Coyle to ask about results of similar samples from previous batches. Brian indicated he had never seen either n-butane or isobutane in any of the client's previous samples. With the conflicting information on results I decided I was not comfortable with having a sample that came from Steep Hill Alaska. I wanted a sample that came directly from the batch at the customer's location. The customer brought another sample the following day and that sample tested very low in both isobutane and butane. Results were entered for this sample into METRC which changed both METRC tags to TestingInProgress. I called METRC for direction, and they told me to hold off on further action until I heard from them. They called a few days later telling me to enter results from the first test. I entered a failed result for the initial test. In the future I agree that I should not accept a second sample from a customer without first notifying AMCO of the situation and asking permission after explaining the reason I am not comfortable with the initial test. I also understand that in keeping with the regulations requirement that I enter all results within 24 hours and that I should immediately contact AMCO for clarification on regulations if needed.

Sincerely,

Mark Malagodi, Ph.D
CEO, CannTest, LLC