### **Alcohol & Marijuana Control Office**

License Number: 10161

License Status: Active-Operating

License Type: Standard Marijuana Cultivation Facility

Doing Business As: THE FROST FRONTIER

**Business License Number: 1027910** 

Designated Licensee: Beth Brewington

Email Address: thefrostfrontier@gmail.com

Local Government: Anchorage (Municipality of)

Community Council: Taku Campbell

Latitude, Longitude: 61.143289, -149.874389

Physical Address: 8535 Dimond D Circle

Unit C

Anchorage, AK 99515 UNITED STATES

Licensee #1

Type: Entity

Alaska Entity Number: 10033033

Alaska Entity Name: The Frost Frontier LLC

Phone Number: 907-229-6007

Email Address: thefrostfrontier@gmail.com

Mailing Address: 3333 Lakeshore Dr, Unit 1

Anchorage, AK 99517 UNITED STATES **Entity Official #1** 

Type: Individual

Name: Evan Schlosberg

**Phone Number:** 971-237-9553

Email Address: eschlos@gmail.com

Mailing Address: 3333 Lakeshore Drive, Unit 1

Anchorage, AK 99517 UNITED STATES

**Entity Official #2** 

Type: Individual

Name: Beth Brewington

**Entity Official #3** 

Type: Individual

Name: David Shimek

Phone Number: 907-229-6007

Email Address: beth.brewington@gmail.com

Mailing Address: 3333 Lakeshore Drive Unit 1

Anchorage, AK 99517

UNITED STATES

Phone Number: 907-277-5330

Email Address: ddshimek@hotmail.com

Mailing Address: 2224 Arcadia Drive

Anchorage, AK 99517 UNITED STATES

Note: No affiliates entered for this license.



Alcohol and Marijuana Control Office 550 W 7<sup>th</sup> Avenue, Suite 1600 Anchorage, AK 99501

marijuana.licensing@alaska.gov

https://www.commerce.alaska.gov/web/amco Phone: 907.269.0350

#### 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 <u>by each licensee</u> (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 or	n the license applic	cation.		
Licensee:	re Frost Frontier	1 : «	License Number:	10161	
License Type:	andard Mari	grana C	ultivation fa	aulite	
Doing Business As:	re Good from A	FIER		7	
Premises Address:	3535 Duna	d D. Ci	rche Unit	C	
City:	nchorag		State:	ZIP: 9	9515
	0				
	Section 2 – Indi		mation		
Enter information for the individua	l licensee who is completing th	nis form.			
Name:	Ian Schlost	Deva			
Title:	Dunor				
Section 3	B – Changes to Lice	nsed Mariju	ıana Establishn	nent	
Read each line below, and then si	n your initials in the box to th	e right of only the	applicable statement:		Initials
I certify that <u>no changes have beer</u> prescribed by the Board, to this lice operating plan, and (for marijuana production of any new proposed m	n made, except for those that hensed establishment's business product manufacturers) that I derijuana products.	nave been previous name, ownership do not wish to req	sly reported or requeste , licensed premises diagi uest Board approval for	am, or	ES
certify that <u>a change has been or</u> understand that an additional for icense can be considered complete	n(s) and fee(s) must be submit e.	ted to AMCO befo	re any renewal applicati	on for this	
f you have selected the second cert	ification, please list any and all	of the types of cho	anges that need to be re	ported/requested	d:
		REGE	EUVED		
Form MJ-20] (rev 05/03/2018)		ALCOHUL MADIUUM, STATE OF	O ZUIB	Page	e 1 of 2



### Alaska Marijuana Control Board

## 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 <b>not</b> been convicted of any criminal charge in the previous two calendar years.	hf
I certify that I have <b>not</b> committed any civil violation of AS 04, AS 17.38, or 3 AAC 306 in the previous two calendar years.	KS
I certify that a notice of violation has <b>not</b> 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).	my
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.	rf
I certify that I meet the residency requirement under AS 43.23 for a permanent fund dividend in the 2018 calendar year.	ho
I certify that this establishment complies with any applicable health, fire, safety, or tax statute, ordinance, regulation, or other law in the state.	48
I certify that I am operating in compliance with the Alaska Department of Labor and Workforce Development's laws and requirements pertaining to employees.	48
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.	4.8
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.	48
As an applicant for a marijuana establishment license renewal, I declare under penalty of unsworn falsification that I have reafamiliar with AS 17.38 and 3 AAC 306, and that this application, including all accompanying schedules and statements, is true and complete. I agree to provide all information required that failure to do so by any deadline given to me by AM  Signature of licensee  L VAN  Signature of licensee  Wy commission expires:  My commission expires:  OF A  Printed name of licensee  Subscribed and sworn to before me this 25 day of 20 00 00 00 00 00 00 00 00 00 00 00 00	, correct, nderstand
[Form MJ-20] (rev 05/03/2018)  License #   6   6	ge 2 of 2

### **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: Thursday, September 28, 2017

License #/Type: 10161, Standard cultivation

Licensee: Beth Brewington

Address: 8535 Dimond D Cir, Unit C, Anchorage, AK

DBA: The Frost Frontier AMCO Case #: AB17-0461

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 Thursday, September 28th, 2017. The State of Alaska Marijuana & Alcohol Control Enforcement, received an email from Beth Brewington of The Frost Frontier - License # 10161 advising that the waste from approximately 67 harvest batches had not been recorded in the State approved METRC system. This caused a record keeping error in The Frost Frontier and METRC system total amounts of marijuana. The waste from any marijuana must be recorded and tracked in the METRC system.

On August 17, 2017 in an email correspondence between Enforcement supervisor James Hoelscher and Beth Brewington, the issue of notifying METRC was discussed. A solution of a one time, first option to work with METRC on getting the entry errors corrected was recommended.

This option was not completed causing additional record keeping errors.

This is a violation of:

- 3 AAC 306.435 (a) Marijuana inventory tracking system
- 3 AAC 306.730 (a) Marijuana inventory tracking system
- 3 AAC 306.740 (c)(1)(2) Waste disposal

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. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

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. 7<sup>th</sup> Ave, Suite 1600 Anchorage, Alaska 99501 amco.enforcement@alaska.gov

Issuing Investigator: K. Whiteman

SIGNATURE

Date:

: Ou

har 18 7017

SIGNATURE:

Delivered VIA: Mail

Article # 7013 2250 0000 9617 5873

Mariled: Sept 28, 2017
To:
AMCO Enforcement
Response to N.O.V

From: The Frost Frontier, Standard Cannabis Cultivation Facility 8535 Dimond D Circle, Unit C Anchorage, Alaska. 99517

We are trying to finish out our harvest batches (67 batches to date). As we recorded and reported our plant waste directly to AMCO (at the time it occurred) as well as manually logged the weight into our harvest ledger, we did not understand the waste is also to be reported through Metrc at the time waste occurs. We are showing many unfinished items in inventory even though all of our cured product has been tested and sold, the waste properly disposed of and accounted for, but just not in our Metric inventory system.

We want to finish out any harvest batches left, but want to know how to proceed per AMCO recommendations so we may complete this task before we have any new harvests, and that we may properly organize the next batches without these mistakes.

Thank you for your time and attention.

Beth Brewington, Co-Owner The Frost Frontier 229-6007



From: Beth Brewington

Archival Email

Sent: Friday, July 20, 2018 2:44 PM

To: Beth Brewington

Subject: Fwd: Harvest Batch Error(s)

Begin forwarded message:

Repens to AMCO'S N.O.V.

From: Beth Brewington < thefrostfrontier@gmail.com > Subject: Harvest Batch Error(s)

\*\* Date: September 28, 2017 at 11:32:22 AM AKDT

To: Amco Enforcement Ced < AMCO. Enforcement@alaska.gov>

Cc: Beth Brewington < beth.brewington@gmail.com>



From: Alaska Metrc support-ak@metrc.com

Subject: Fwd: Ticket Numbers

Date: October 23, 2017 at 12:57 PM

To: Beth Brewington thefrostfrontier@gmail.com

#### Beth,

Here are the ticket numbers from August 12th, 2017 through September 28th, 2017, excluding Training Registrations.

121677 - August 12

122565 - August 16

122830 - August 17

122831 - August 17

122982 -August 18

123080 - August 19

123092 - August 19

123288 - August 21

123685 - August /22

123995 - August 23

124488 - August 25

124551 - August 26

126638 - September 6

127691 - September 11

129201 - September 18

129902 - September 21

129904 - September 21

130195 - September 22

131036 - September 27

131056 - September 27

131062 - September 27

131283 - September 28

Jessica Chinn METRC Support Desk 877-566-6506 support@metrc.com







Date: October 24, 2017

FROM: License Number: 10161

The Frost Frontier Standard Cannabis Cultivation Facility 8535 Dimond D Circle, Upit C Anchorage, Alaska 99515

907-229-6007

TheFrostFrontier@gmail.com

TO: Alcohol & Marijuana Control Office ATTEN: Enforcement 550 West Seventh Avenue, Suite 1600 Anchorage, Alaska 99501

RE: Article # 7013 2250 0000 9617 5873 / Issuing Investigator: K Whiteman

#### To Whom it May Concern:

After the August 17th email reply from Mr. Hoelscher, his advice was taken very seriously and we continued our outreach to Metrc for course corrections, instruction and guidance as well as a request for on-site instruction (this was denied by Metrc). After the week of the 17th I personally registered for and attended the next available advanced training, August 24. Ticket call dates denoting The Frost Frontier communications with Metric have been included in this letter.

In summary the majority of errors stemmed from early entry mistakes regarding:

- inventorying harvest(s)
- 2. what constitutes a harvest batch
- when to package
- 4. reporting waste and
- finishing harvest batches.

After our on site training with Kelly Jenkins of Metrc (Oct. 17), we have full understanding of recording waste and have made arrangements with Mr. Jenkins to organize on going webinar trainings direct with him for The Frost Frontier staff. Currently we are working backward from the most current harvest to ensure entries and waste are reported correctly and are working hard to make good progress to ultimately organize past harvest(s); those which are correctable and are able to be finished within the system. We are committed to compliance, track-ability, being well organized and to operate transparently. With that, we are looking to hire a Metric administrator who will be responsible for operating our Metrc inventory system only.

hetter of resolution to Amoo



Included in this letter as well, please find a McConnell at AMCO after the Oct. 17th on poor start, positive strides have been made moving forward with clear, concise entry applications.

We hope this letter answers any concerns of the AMCO Board and AMCO Enforcement.

Respectfully,

Beth Brewington, Co-Owner

The Frost Frontier Standard Cannabis Cultivation Facility

8535 Dimond D Circle, Unit C

Anchorage, Alaska. 99515

907-229-6007

TheFrostFrontier@gmail.com



Resolution to AMCO's N.D.V. Re. From: Beth Brewington

Sent: Friday, July 20, 2018 2:57 PM

To: Beth Brewington

Subject: Re: The Frost Frontier - On Site Visit 10/16/17

Waste in Metrec. Reply from K. Jenki METRO

On Oct 22, 2017, at 3:12 PM, Beth Brewington < beth.brewington@gmail.com > wrote:

Beth Ann 907-229-6007

Begin forwarded message:

From: Kelly Jenkins < kelly.jenkins@franwell.com> Date: October 19, 2017 at 4:16:19 AM AKDT

To: Beth Brewington < beth.brewington@gmail.com >

Cc: "erika.mcconnell@alaska.gov" <erika.mcconnell@alaska.gov>

Subject: The Frost Frontier - On Site Visit 10/16/17

Hello Beth,

Thank you very much for meeting me on Tuesday. I will follow up with you at the end of the week to discuss setting up a webinar session to discuss the rest of the reconciliation process. My contact information is listed at the bottom of this email for you as well if you have any questions in the meantime.

Detailed below is a recap of the visit and what we discussed.

**Overview** 



- Frost Frontier
- Producer

#### <u>Analysis</u>

- Cultivation
  - Waste
    - Waste was being tracked by individual plants at multiple stages instead before being reported in Metrc
      - Discussed and demonstrated the process of reporting waste and informed them that the extra tracking was unnecessary and that they only need to report waste for the entire harvest batch
      - Discussed the ability to report waste multiple times (Prime Trim and Fine Trim)
    - Recording Rock Wool waste The cubed plots in which the plants are grown as a substitute for standard soil are left with roots after the harvest
      - I informed them to weigh the rock wool cubes and document them on the green waste log when the waste is destroyed and disposed of, as it is not created from trimming during the harvest

#### Harvests

- Baked Alaska 10-16-17-B
  - Originally, this harvest was accidentally split into two separate harvests when reporting in Metrc. I instructed Beth to waste and then finish these harvests, after which i instructed her to recreate the harvest by creating new plantings and phasing them through the system
- Discussed the process of finishing harvests and ensuring that they are finished with the remaining wet weight (moisture loss)

JUL 26 2018 |

- Several Harvest batches were recently trimmed and are awaiting the testing process
  - I informed Beth that-this product may remain as part of their harvest batch until they are ready to test the product, after which they may package it.

#### Summary

Overall, the inventory and processes seem to be efficient and accurate. Several harvests were looked into and had to be corrected (listed above) however the rest of the information entered appears accurate and has a well defined model for tracking harvests and plants.

They have also demonstrated clear improvement from entries made 3 months ago in comparison to the most recent entries. Many of the potential errors made in the past seem to have been corrected and i do not see the same issues recurring often if at all

Kelly Jenkins 303-667-3124 kelly.jenkins@franwell.com





Alcohol and Marijuana Control Office 550 W 7<sup>th</sup> Avenue, Suite 1600 Anchorage, AK 99501 <u>marijuana.licensing@alaska.gov</u> https://www.commerce.alaska.gov/web/amco

Phone: 907.269.0350

#### 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: License Number: License Type: Doing Business As: **Premises Address:** City: State: Section 2 - Individual Information Enter information for the individual licensee who is completing this form. Name: Title: 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:



### Alaska Marijuana Control Board

## 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 <b>not</b> been convicted of any criminal charge in the previous two calendar years.	5
I certify that I have <b>not</b> committed any civil violation of AS 04, AS 17.38, or 3 AAC 306 in the previous two calendar years.	3
I certify that a notice of violation has <b>not</b> 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).	1)5
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.	8
I certify that I meet the residency requirement under AS 43.23 for a permanent fund dividend in the 2018 calendar year.	3
I certify that this establishment complies with any applicable health, fire, safety, or tax statute, ordinance, regulation, or other law in the state.	8
I certify that I am operating in compliance with the Alaska Department of Labor and Workforce Development's laws and requirements pertaining to employees.	8
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.	5
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.	8
As an applicant for a marijuana establishment license renewal, I declare under penalty of unsworn falsification that I have reafamiliar with AS 17.38 and 3 AAC 306, and that this application, including all accompanying schedules and statements, is true and complete. I agree to provide all information required by the Marijuana Control Board in support of this application and uthat failure to do so by any deadline given to me by AMCO staff may result in additional fees or expiration of this license.	correct
Signature of licensee Notary Public in and for the State of Ala	 iska
Printed name of licensee  My commission expires: 6808	121
Subscribed and sworn to before me this day of 20 20 Cofficial Seal	

License # / 0/ 6/

### **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: Thursday, September 28, 2017

License #/Type: 10161, Standard cultivation

Licensee: Beth Brewington

Address: 8535 Dimond D Cir, Unit C, Anchorage, AK

DBA: The Frost Frontier

AMCO Case #: AB17-0461

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.

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This option was not completed causing additional record keeping errors.

This is a violation of:

- 3 AAC 306.435 (a) Marijuana inventory tracking system
- 3 AAC 306.730 (a) Marijuana inventory tracking system
- 3 AAC 306.740 (c)(1)(2) Waste disposal

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. 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

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. 7<sup>th</sup> Ave, Suite 1600 Anchorage, Alaska 99501 amco.enforcement@alaska.gov

Issuing Investigator: K. Whiteman

SIGNATURE:

Delivered VIA: Mail

Received by:

SIGNATURE:

October 18, 2017

Article # 7013 2250 0000 9617 5873

Mailed: Sept 28, 2017

To: AMCO Enforcement Reply to Amco/ N.O.V.

From:
The Frost Frontier,
Standard Cannabis Cultivation Facility
8535 Dimond D Circle, Unit C
Anchorage, Alaska. 99517

We are trying to finish out our harvest batches (67 batches to date). As we recorded and reported our plant waste directly to AMCO (at the time it occurred) as well as manually logged the weight into our harvest ledger, we did not understand the waste is also to be reported through Metrc at the time waste occurs. We are showing many unfinished items in inventory even though all of our cured product has been tested and sold, the waste properly disposed of and accounted for, but just not in our Metric inventory system.

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Thank you for your time and attention.

Beth Brewington, Co-Owner The Frost Frontier 229-6007



From: Beth Brewington

Archival Email

Sent: Friday, July 20, 2018 2:44 PM

To: Beth Brewington

Subject: Fwd: Harvest Batch Error(s)

Begin forwarded message:

Repens to AMCO'S N.O.V.

From: Beth Brewington < thefrostfrontier@gmail.com >

Subject: Harvest Batch Error(s)

¥ Date: September 28, 2017 at 11:32:22 AM AKDT

To: Amco Enforcement Ced < AMCO Enforcement@alaska.gov>

Cc: Beth Brewington < beth.brewington@gmail.com>



From: Alaska Metrc support-ak@metrc.com

Subject: Fwd: Ticket Numbers

Date: October 23, 2017 at 12:57 PM

To: Beth Brewington thefrostfrontier@gmail.com

#### Beth,

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129902 - September 21

129904 - September 21

130195 - September 22

131036 - September 27

131056 - September 27

131062 - September 27

131283 - September 28

Jessica Chinn METRC Support Desk

877-566-6506

support@metrc.com







Date: October 24, 2017

FROM: License Number: 10161

The Frost Frontier Standard Cannabis Cultivation Facility 8535 Dimond D Circle, Upit C Anchorage, Alaska 99515

907-229-6007

TheFrostFrontier@gmail.com

TO: Alcohol & Marijuana Control Office ATTEN: Enforcement 550 West Seventh Avenue, Suite 1600 Anchorage, Alaska 99501

RE: Article # 7013 2250 0000 9617 5873 / Issuing Investigator:

K Whiteman

#### To Whom it May Concern:

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Letter of Resolution to



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We hope this letter answers any concerns of the AMCO Board and AMCO Enforcement.

Respectfully,

Beth Brewington, Co-Owner

The Frost Frontier Standard Cannabis Cultivation Facility

8535 Dimond D Circle, Unit C

Anchorage, Alaska. 99515

907-229-6007

TheFrostFrontier@gmail.com



From: Beth Brewington

Sent: Friday, July 20, 2018 2:57 PM

To: Beth Brewington

Subject: Re: The Frost Frontier - On Site Visit 10/16/17

Resolution to AMCO's N.D.V. Re:

Waste in Metrec.
Reply from K. Jenkie
METRC

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Beth Ann 907-229-6007

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To: Beth Brewington < beth.brewington@gmail.com>

Cc: "erika.mcconnell@alaska.gov" <erika.mcconnell@alaska.gov>

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Detailed below is a recap of the visit and what we discussed.

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- Frost Frontier
- Producer

#### <u>Analysis</u>

- Cultivation
  - **Waste** 
    - Waste was being tracked by individual plants at multiple stages instead before being reported in Metrc
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LCONUL MANUUSIVA DOIVING UFFICE

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#### Summary

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They have also demonstrated clear improvement from entries made 3 months ago in comparison to the most recent entries. Many of the potential errors made in the past seem to have been corrected and i do not see the same issues recurring often if at all

Kelly Jenkins 303-667-3124 kelly.jenkins@franwell.com





Alcohol and Marijuana Control Office 550 W 7<sup>th</sup> Avenue, Suite 1600 Anchorage, AK 99501

marijuana.licensing@alaska.gov

https://www.commerce.alaska.gov/web/amco Phone: 907.269.0350

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 <u>by each licensee</u> (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: The Frost Konti		License Number: (6(6)	7	
- 25 1 0 4	arixana		$\dashv$	
Doing Business As: The Frost for		of g	$\dashv$	
Premises Address: 8535 Dimo	ad D. Cin	cle Unit C	$\exists$	
City: Annag		State: AL ZIP: 99515	1	
J		1/30	_	
Section 2 –	Individual Info	rmation		
Enter information for the individual licensee who is comple	ting this form.			
Name: Besh Brewn	1		٦	
Title: Our or			1	
Section 3 - Changes to 1				
Section 3 – Changes to L				
Read each line below, and then sign your initials in the box	to the right of only th	ne applicable statement: Initials		
I certify that <u>no changes have been made</u> , except for those prescribed by the Board, to this licensed establishment's bu operating plan, and (for marijuana product manufacturers) to production of any new proposed marijuana products.	siness name, ownership that I do not wish to red	p, licensed premises diagram, or quest Board approval for	P	
certify that a change has been or will be made to one or m understand that an additional form(s) and fee(s) must be so icense can be considered complete.	ore of the items listed ubmitted to AMCO befo	above for this establishment, and ore any renewal application for this		
f you have selected the second certification, please list any and all of the types of changes that need to be reported/requested:				
		The state of the s	7	
		JUL 2.6 2018		
Form MJ-20] (rev 05/03/2018)	ALCO	Once wandularyA Colvince of FICE STATE OF THE Page 1 of 2		



### Alaska Marijuana Control Board

## Form MJ-20: Renewal Application Certifications

	Section 4 - Certificat	tions	
Read each line below, and then sign your init	ials in the box to the right of <u>any a</u>	pplicable statements:	Initials
I certify that I have <b>not</b> been convicted of any o	criminal charge in the previous two	o calendar years.	CD
I certify that I have <b>not</b> committed any civil vio	lation of AS 04, AS 17.38, or 3 AAC	306 in the previous two calendar years.	BB
I certify that a notice of violation has <b>not</b> been	issued for this license.		
Sign your initials to the following statement o	nly if you are unable to certify one	e or more of the above statements:	Initials
I have attached a written explanation for why the type of violation or offense, as required un	/ I cannot certify one or more of th nder 3 AAC 306.035(b).	e above statements, which includes	PA
Read each line below, and then sign your initia	als in the box to the right of each s	tatement:	Initials
I certify that no person other than a licensee list direct or indirect financial interest, as defined in establishment license has been issued.	ted on my marijuana establishmen n 3 AAC 306.015(e)(1), in the busind	t license renewal application has a ess for which the marijuana	B13
I certify that I meet the residency requirement			BB.
I certify that this establishment complies with a other law in the state.	any applicable health, fire, safety, o	or tax statute, ordinance, regulation, or	B
I certify that I am operating in compliance with a requirements pertaining to employees.	the Alaska Department of Labor an	d Workforce Development's laws and	(DP)
I certify that I have not violated any restrictions operated in violation of a condition or restriction	pertaining to this particular license n imposed by the Marijuana Contro	e type, and that this license has not been of Board.	PAB
I certify that I understand that providing a false s by or to AMCO is grounds for rejection or denial	statement on this form, the online of this application or revocation of	application, or any other form provided fany license issued.	B
As an applicant for a marijuana establishment lice familiar with AS 17.38 and 3 AAC 306, and that the and complete. I agree to provide all information that failure to do so by any deadline given to me signature of licensee.  Printed name of licensee  Subscribed and sworn to before me this 25 deform MJ-20] (rev 05/03/2018)	required the Man Control of the	panying schedules and statements, is true Board in support of this application and ional fees or expiration of this license.  Notary Public in and for the State of Almand My commission expires:  JUL 26 2018	e, correct, understand
	License # 06	STATE OF ALASKA	

### **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: Thursday, September 28, 2017

License #/Type: 10161, Standard cultivation

Licensee: Beth Brewington

Address: 8535 Dimond D Cir, Unit C, Anchorage, AK

DBA: The Frost Frontier

AMCO Case #: AB17-0461

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 Thursday, September 28th, 2017. The State of Alaska Marijuana & Alcohol Control Enforcement, received an email from Beth Brewington of The Frost Frontier - License # 10161 advising that the waste from approximately 67 harvest batches had not been recorded in the State approved METRC system. This caused a record keeping error in The Frost Frontier and METRC system total amounts of marijuana. The waste from any marijuana must be recorded and tracked in the METRC system.

On August 17, 2017 in an email correspondence between Enforcement supervisor James Hoelscher and Beth Brewington, the issue of notifying METRC was discussed. A solution of a one time, first option to work with METRC on getting the entry errors corrected was recommended.

This option was not completed causing additional record keeping errors.

This is a violation of:

3 AAC 306.435 (a) Marijuana inventory tracking system

3 AAC 306.730 (a) Marijuana inventory tracking system

3 AAC 306.740 (c)(1)(2) Waste disposal

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, 3 AAC 306.810(3)(A)(B)(C) failed, within a reasonable time after receiving a notice of violation from the director, to correct any defect that is the subject of the notice of violation of AS 17.38 or this chapter, a condition or restriction imposed by the board or other applicable law.

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. 7<sup>th</sup> Ave, Suite 1600 Anchorage, Alaska 99501 amco.enforcement@alaska.gov

Issuing Investigator: K. Whiteman

SIGNATURE: 4

Delivered VIA: Mail

Received by:

SIGNATURE

Date

ctober 18, 2017

Article # 7013 2250 0000 9617 5873

Mailed: Sept 28, 2017

Reply to N.O.V

To:

**AMCO Enforcement** 

From:

The Frost Frontier, Standard Cannabis Cultivation Facility 8535 Dimond D Circle, Unit C Anchorage, Alaska. 99517

We are trying to finish out our harvest batches (67 batches to date). As we recorded and reported our plant waste directly to AMCO (at the time it occurred) as well as manually logged the weight into our harvest ledger, we did not understand the waste is also to be reported through Metrc at the time waste occurs. We are showing many unfinished items in inventory even though all of our cured product has been tested and sold, the waste properly disposed of and accounted for, but just not in our Metric inventory system.

We want to finish out any harvest batches left, but want to know how to proceed per AMCO recommendations so we may complete this task before we have any new harvests, and that we may properly organize the next batches without these mistakes.

Thank you for your time and attention.

Beth Brewington, Co-Owner The Frost Frontier 229-6007



From: Alaska Metrc support-ak@metrc.com

Subject: Fwd: Ticket Numbers

Date: October 23, 2017 at 12:57 PM

To: Beth Brewington thefrostfrontier@grnail.com

#### Beth,

Here are the ticket numbers from August 12th, 2017 through September 28th, 2017, excluding Training Registrations.

121677 - August 12

122565 - August 16

122830 - August 17

122831 - August 17

122982 -August 18

123080 - August 19

123092 - August 19

123288 - August 21

123685 - August /22

123995 - August 23

124488 - August 25

124551 - August 26

126638 - September 6

127691 - September 11

129201 - September 18

129902 - September 21

129904 - September 21

130195 - September 22

131036 - September 27

131056 - September 27

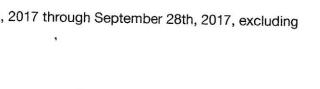
131062 - September 27

131283 - September 28

Jessica Chinn METRC Support Desk 877-566-6506 support@metrc.com









# Resolution letter

Date: October 24, 2017

FROM: License Number: 10161

The Frost Frontier Standard Cannabis Cultivation Facility 8535 Dimond D Circle, Unit C Anchorage, Alaska 99515

907-229-6007

TheFrostFrontier@gmail.com

TO: Alcohol & Marijuana Control Office ATTEN: Enforcement 550 West Seventh Avenue, Suite 1600 Anchorage, Alaska 99501

RE: Article # 7013 2250 0000 9617 5873 / Issuing Investigator: K Whiteman

To Whom it May Concern:

After the August 17th email reply from Mr. Hoelscher, his advice was taken very seriously and we continued our outreach to Metrc for course corrections, instruction and guidance as well as a request for on-site instruction (this was denied by Metrc). After the week of the 17th I personally registered for and attended the next available advanced training, August 24. Ticket call dates denoting The Frost Frontier communications with Metric have been included in this letter.

In summary the majority of errors stemmed from early entry mistakes regarding:

- 1. inventorying harvest(s)
- 2. what constitutes a harvest batch
- 3. when to package
- 4. reporting waste and
- 5. finishing harvest batches.

After our on site training with Kelly Jenkins of Metrc (Oct. 17), we have full understanding of recording waste and have made arrangements with Mr. Jenkins to organize on going webinar trainings direct with him for The Frost Frontier staff. Currently we are working backward from the most current harvest to ensure entries and waste are reported correctly and are working hard to make good progress to ultimately organize past harvest(s); those which are correctable and are able to be finished within the system. We are committed to compliance, track-ability, being well organized and to operate transparently. With that, we are looking to hire a Metric D administrator who will be responsible for operating our Metrc inventory system only.

JUL 26 2018

STATE OF ALASKA

Included in this letter as well, please find a McConnell at AMCO after the Oct. 17th on poor start, positive strides have been made moving forward with clear, concise entry applications.

We hope this letter answers any concerns of the AMCO Board and AMCO Enforcement.

Respectfully,

Beth Brewington, Co-Owner

The Frost Frontier Standard Cannabis Cultivation Facility

8535 Dimond D Circle, Unit C Anchorage, Alaska. 99515

907-229-6007

TheFrostFrontier@gmail.com



Resolution to AMCO's N.D.V. Re:

From: Beth Brewington

Sent: Friday, July 20, 2018 2:57 PM

To: Beth Brewington

Subject: Re: The Frost Frontier - On Site Visit 10/16/17

Archival & Mail

Con Oct 22, 2017, at 3:12 PM, Beth Brewington < beth.brewington@gmail.com > wrote:

Waste in Metre.

Beth Ann 907-229-6007

Begin forwarded message:

From: Kelly Jenkins < kelly.jenkins@franwell.com> Date: October 19, 2017 at 4:16:19 AM AKDT

To: Beth Brewington < beth.brewington@gmail.com>

Cc: "erika.mcconnell@alaska.gov" <erika.mcconnell@alaska.gov>

Subject: The Frost Frontier - On Site Visit 10/16/17

Hello Beth,

Thank you very much for meeting me on Tuesday. I will follow up with you at the end of the week to discuss setting up a webinar session to discuss the rest of the reconciliation process. My contact information is listed at the bottom of this email for you as well if you have any questions in the meantime.

Detailed below is a recap of the visit and what we discussed.

Overview



- Frost Frontier
- Producer

#### **Analysis**

#### Cultivation

#### Waste

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  - Discussed and demonstrated the process of reporting waste and informed them that the extra tracking was unnecessary and that they only need to report waste for the entire harvest batch
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Kelly Jenkins 303-667-3124 kelly.jenkins@franwell.com

