



MEMORANDUM

TO: Marijuana Control Board DATE: October 16, 2018

FROM: Erika McConnell, Director RE: Greatland Ganja, #10015
Standard Cultivation Facility

The licensee, Lief Abel, requested to retest the harvest batch “PE 8/14/18L” which failed testing due to the detected presence of *aspergillus fumigatus*. Mr. Abel stated:

After a thorough inspection of our processes and a subsequent review of the product from the Harvest Batch I can safely say I do not believe the sample submitted was representative of the Harvest Batch.

The first reason I suggest this is that all other Harvest Batches from the exact same environment, strain and from the same Green House were cleared for sale by the lab. The second reason I suggest that the Harvest Batch should be retested is that the product looks very clean upon visual inspection. Even under a 100 power scope with a bright light we found nothing concerning. When broken apart or separated from the stem the flowers still look spore free. We even examined all of the trim grades, they look great, clear, clean trichome profiles and no spores.

Given the fact that we have always passed Harvest Batch testing in the past I would say our processes are proven, and if anything we have improved our system, cleanliness and attention to quality since our first day of operation.

I know that you bear a great responsibility in making these decisions. The health and safety of the public is always our primary concern. I feel we would in no way infringe upon said health and safety by retesting Harvest Batch PE 8/14/18L.

I have only sparingly approved retests in situations where the licensee has provided credible information of how the test sample could have been contaminated separately from the harvest batch. In my opinion, if a retest is performed and results in a passed test, then there is one failed test and one passed test and who knows which one is correct. *Aspergillus* spores are not uniform throughout a harvest batch, so a second passed test does not necessarily negate a first failed test. I believe that a first test result should stand unless there is a solid reason to doubt its validity. (In Colorado, licensees may have marijuana tested at three different labs—they have eleven labs in the state—and any two similar results stand. Unfortunately we do not yet have three different labs to use.)

Mr. Abel has provided no reason to think the test sample was contaminated separately from the harvest batch. I denied his request. Mr. Abel is requesting permission to retest from the board.