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

November 8, 2018

North Road Buds, LLC
DBA: North Road Buds, LLC
Via email: smith.vernonlee@outlook.com

Re: Standard Marijuana Cultivation Facility Facility #17811

Dear applicant,

The AMCO Office has reviewed the documents submitted for the proposed marijuana establishment license referenced above. This letter is notice under 3 ACC 306.025(e)(2) that your application is incomplete and additional items are needed to complete the application. The additional items that need correction or resubmittal are listed below—please be sure to read the entire letter. **Please note that if the corrections and/or additional documents submitted in response to this letter are not found to be complete, your application will be returned to you in accordance with 3 AAC 306.025(e)(1), and you will need to file a new application and pay a new fee should you wish to continue pursuing licensure.**

- **Online Application**
  - Because there is an existing marijuana establishment at this address that is owned by a different entity (License #11794), it will be necessary to designate the address for this proposed establishment with a suite number, unit number, or some way to differentiate it from the other address. I have rolled your application status back to New so that you can make changes to the premises address through MyAlaska. Note that the PO Box should not be included in the Premises Address.
  - Once you resubmit your application through MyAlaska, a new Public Notice and Advertisement Notice will be generated. Be sure to retain copies of these documents for your records.
  - Note that the Premises Address sections on all application forms will need to be updated with the suite/unit number.
- **MJ-00 Application Certifications**
  - Page 1, Section 1 – Establishment Information for Vernon L Smith:
    - The Licensee must be listed as "North Road Buds, LLC" to be consistent with your application.
  - Larry Lewis and Lynn Smith must also complete and submit form MJ-00.
- **MJ-01 Operating Plan**
  - Page 1, Section 1:
    - The Licensee must be listed as "North Road Buds, LLC" to be consistent with your application.
  - Page 2, Section 3.2:

        - Expand upon your response to include the ratio of visitors to licensees/employees/agents who will escort them.
    - Page 3, Section 3.3:
        - A sample visitor's badge is also required in this section.
    - Page 4, Section 3.5:
        - There have been updates to 3 AAC 306.715 since your application was initiated. Please review 3 AAC 306.715(e) and expand upon your response to include at what point AMCO is contacted after an unauthorized breach has been alerted.
    - Page 8, Section 8.1:
        - You specify in this section that marijuana will be packaged in one-gram, one-ounce, and one-to-five pound packages. However, you indicate on Page 6 of Form MJ-04 that you will not be packaging marijuana in wholesale packages. Please re-review the packaging requirements under 3 AAC 306.470 and clarify your responses as appropriate.
    - Page 10, Section 9.2:
        - A business logo was provided, but also describe any advertising that you intend to distribute for this establishment, including what types of mediums you plan to use.
- **MJ-02 Premises Diagram**
    - Page 1, Section 1 – Establishment Information:
        - The Licensee must be listed as "North Road Buds, LLC" to be consistent with your application.
    - All Diagrams:
        - Label each diagram with your license number and DBA (Doing Business As name).
    - Diagram 1 and 1a:
        - The details of this diagram are blurry, and the green text on green backgrounds/red text on red backgrounds are difficult to read. Please provide clearer diagrams.
        - Please outline (in color) and label the boundary of the licensed premises for this proposed establishment.
        - Per the Legend, the green shading depicts Public Access Areas. Are sections of your proposed establishment intended to be open to the public?
    - Diagram #3:
        - The property line depicted on this diagram is inconsistent with what is depicted on Diagram #2 / #4.
        - On this diagram and Diagram #2 / #4, please include a label for License #11794.
- **MJ-04 Cultivation Supplemental**
    - Page 1, Section 1 – Establishment Information:
        - The Licensee must be listed as "North Road Buds, LLC" to be consistent with your application.
    - Page 2, Section 2.1:
        - You describe packaging marijuana in wholesale packages up to five pounds in this section, but indicate in Section 8.2 that you will NOT package marijuana in wholesale packages. Please correct for consistency.
    - Page 3:
        - Additional information regarding pest control products is required, but is not requested on the version of Form MJ-04 that you submitted. Please visit AMCO's

website to download the latest version of Form MJ-04 and complete all of Page 3 to replace the current page.

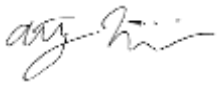
- Page 4, Section 5.2:
  - Include in your response a description of how you intend to dispose of solid marijuana waste.
- Page 6, Section 8.1:
  - Your response in this section describes packaging marijuana in wholesale packages, but this section asks you to describe packaging marijuana for a retail marijuana store to sell without repackaging. Additionally, you indicate in Section 8.2 that this facility will NOT be packaging marijuana in wholesale packages. Please clarify which procedure is accurate.
- Section 8.1 Sample Label:
  - Please re-review 3 AAC 306.475. The sample labels provided do not list pesticides, fungicides, or herbicides that may have been used during cultivation.
- Section 8.2 Sample Label:
  - If you do answer "Yes" in this section, note that a sample label for wholesale packages will be required.

- **MJ-07 Public Notice Posting Affidavit**
  - Section 1 – Establishment Information:
    - The Licensee must be listed as "North Road Buds, LLC" to be consistent with your application.
- **MJ-08 Local Government Notice Affidavit**
  - Section 1 – Establishment Information:
    - The Licensee must be listed as "North Road Buds, LLC" to be consistent with your application.
- **MJ-09 Statement of Financial Interest**
  - Page 1, Section 1 – Establishment Information for all:
    - The Licensee must be listed as "North Road Buds, LLC" to be consistent with your application.
- **Proof of Possession for Proposed Premises**
  - The document provided is inadequate to show that North Road Buds, LLC has right to possession of the proposed premises, and a lease may be required. Note that a lease must be legally binding, and contain the following:
    - Acknowledgement from the landlord/lessor that the premises will be used as a marijuana establishment.
    - A disclaimer that the landlord/lessor will not take possession of or remove marijuana from the premises, and that AMCO will be contacted in the event that this is necessary (typically under the "Default" section of the lease).
  - If you require assistance with drafting a lease, you are strongly encouraged to seek professional legal counsel.
- **Fingerprint Cards**
  - The fingerprint card provided for Lynn Smith has not been dated or signed by the official taking fingerprints. A new fingerprint card will be required.
- **Miscellaneous**
  - The Initial Biennial Report for this entity has not been filed with the Division of Corporations, Business and Professional Licensing (CBPL). Once this report has been filed, please provide a copy of the Initial Report that has been stamped as received by CBPL.

Note that the list of officials and their ownership interest must be consistent with the information you provide in your Entity Documents.

It is very important that you submit the above corrections and/or documents in a timely manner so that AMCO staff has adequate time to review the corrections and/or additional documents which must be found to be complete within 90 days of the date of this letter.

Respectfully,



TJ Zielinski, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov

From:	Marijuana Licensing (CED sponsored)
To:	smith.vernonlee@outlook.com
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application - North Road Buds LLC License #17811
Date:	Thursday, November 08, 2018 12:08:12 PM
Attachments:	17811 Incomplete Notice.pdf image001.png

Good afternoon,

Your application for your marijuana establishment license has been reviewed, and at this time is considered incomplete. See the attached notice regarding corrections, additional documents, and/or resubmittals that need to be addressed in your application.

Please make sure to read the entire letter. If the submitted corrections are not found to be complete, your application will be returned to you in accordance with 3 AAC 306.025(e)(1), and you will need to file a new application and pay a new fee should you wish to continue pursuing licensure. Essentially, we will accept corrections one time within your 90-day deadline period. Feel free to call or email if you need clarification on any items from the Incomplete Notice.

Let us know if you require copies of any documents that were submitted.

If you have any questions or concerns, please address them to marijuana.licensing@alaska.gov.

Sincerely,

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

From:	Marijuana Licensing (CED sponsored)
To:	smith.vernonlee@outlook.com
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application - North Road Buds LLC License #17811
Date:	Tuesday, November 20, 2018 11:59:23 AM
Attachments:	image001.png

Good morning,

I have finished reviewing the corrections that were submitted for your application. Most of the needed corrections have been addressed, but there are still some revisions required for your application to be considered complete. You will have one additional opportunity to submit the remaining corrections, which will be detailed below.

- **Form MJ-00: Application Certifications**
  - Only Page 1 of Form MJ-00 was submitted for Vernon Smith, Lynn Smith, and Larry Lewis. The complete form is required.
- **Form MJ-01: Operating Plan**
  - On Page 3, Section 3.3, a sample licensee/employee badge and sample visitor's badge are required. You submitted a sample visitor's badge with your last resubmission, but did not include a sample licensee/employee badge.
- **Form MJ-02: Premises Diagram**
  - On Diagrams 1 and 1a, please change the labeling for "The Boundary" to "Licensed Premises".
  - The Diagram labeled #2 does not meet the requirements of Diagram 2 listed on Page 1 of Form MJ-02, but can be labeled as "Diagram 3". However, please indicate on this diagram where the licensed premises of License #11794 is located, and label appropriately.
  - The diagram labeled "Diagram 3" should be labeled as "Diagram 4". Also indicate where License #11794 is located.
  - The diagram currently labeled Diagram 4 can be omitted.
- **Form MJ-04: Cultivation Supplemental**
  - On Page 4, Section 5.2, your response should include specific examples of the materials you will be mixing with ground marijuana to render it unusable. This information was present on your first draft, but was removed in your revision. This will need to be added back. You also included roots as marijuana plant waste, but 3 AAC 306.740 has been revised to no longer define roots as plant waste.
  - The sample label provided does not contain all of the necessary information, but please review the response that you provided in Section 8.2 for assistance in drafting the sample label.
- **Form MJ-08: Local Government Notice Affidavit**
  - The date and name of the local government official you provided your Public Notice to were left blank on your revised form.
- **Proof of Possession for Proposed Premises**
  - The Premises Address on your lease must specify the unit number.
  - This lease does not contain the required disclaimer that the landlord/lessor will not

take possession of or remove marijuana from the premises, and that AMCO will be contacted in the event that this is necessary.

- **Fingerprint Card for Lynn Smith**
    - I am including this for reference, but it may be with today's mail.

Please let me know if you have any questions or need copies of any documents.

Sincerely,

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

From: Marijuana Licensing (CED sponsored)
To: Smith, Lynn (DFG); smith.vernonlee@outlook.com
Cc: Marijuana Licensing (CED sponsored)
Subject: RE: Incomplete Application - North Road Buds LLC License #17811
Date: Monday, November 26, 2018 11:44:23 AM

Good morning,

I have finished reviewing your revisions and see that the necessary corrections have been made. At this time, the remaining item that is needed to deem your application complete is a new fingerprint card for Lynn Smith, which was discussed via telephone today.

Thank you,

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

-----Original Message-----
From: Smith, Lynn (DFG) <lynn.smith@alaska.gov>
Sent: Monday, November 26, 2018 8:41 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Smith application # 17811

TJ,

I have enclosed the corrections we made to our license per your instructions. I am mailing the hard copy today, including my fingerprints, but I did email the letter I received from AMCO enforcement indicating it wasn't necessary as my background was completed. Thank you for your help with this process.

Sincerely,

Lynn