CORRESPONDENCE

From:	Marijuana Licensing (CED sponsored)
To:	everlifeband@gmail.com
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application- 420 Grow Tech license #10231
Date:	Wednesday, August 22, 2018 4:51:11 PM
Attachments:	10231 Incomplete Application Letter .pdf image001.png

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Hello,

Your application has been reviewed, attached is correspondence regarding corrections, additional documents, and/or resubmittals that need to be addressed. Please send any documents/correspondence to marijuana.licensing@alaska.gov

Please let me know if you need any of the documents I have for this application. I want to make sure you receive this email and incomplete letter attached first.

Thank you,

Jacqlene Drulis
Occupational Licensing Examiner
Alcohol & Marijuana Control Office
Direct: (907) 754-3588
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501

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

August 22, 2018

Gregory P Hoffman
DBA: 420 Grow Tech
Via email: everlifeband@gmail.com

Re: Limited Marijuana Cultivation Facility #10231

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.**

- **State Business License**
  - Please renew your State Business License.

- **MJ-00 Application Certifications**
  - Page 3: the last two initialed statements contradict each other. Please re-read the last two statements and correct accordingly. As long as the statement does not apply to you, you would want to remove your initials from the second to last statement.

- **MJ-01 Operating Plan**
  - Your operating plan needs substantial improvement. Your answers do not reflect you have a good understanding of the statutes and regulations, either in general or specific to the license type you are applying for. Please re-review Title 17.38 of Alaska Statutes and Chapter 306 of the Alaska Administrative Code both found on our website, re-do your MJ-01 Marijuana Establishment Operating Plan, and re-submit for review. You really need more elaborate detail on each box explaining how your establishment is going to meet the requirements of the statutes and regulations. The following are examples of what to watch out for when re-doing your operating plan (**these are examples but they may not be the only things you need to address**):
    - Page 2, first box: please expand upon how you will prevent unescorted members of the public from entering restricted access areas. For example, according to 3 AAC 306.710 Restricted access areas, each entrance to a restricted access area must be marked by a sign that says "Restricted access area. Visitors must be escorted." Additionally, there is a log that you need to maintain with certain information of the visitors being escorted into restricted access areas.

- Page 2, second box: you refer to "only licensed personal will be allowed into restricted access areas ever, meaning only control board, inspectors and handlers." What do you mean by "licensed"? If you are referring to a marijuana handler's permit, the permit is not a license. Additionally, the control board and investigators do not need to be licensed, nor possess a marijuana handler's permit. Please correct that term and wording accordingly.
    - Furthermore, you are not including the following: a marijuana establishment shall limit the number of visitors to not more than five visitors for each licensee, employee, or agent of the licensee who is actively engaged in supervising those visitors. Any visitor to the restricted access area must show identification to prove that person is 21 years of age or older before entering the restricted access area. Any visitor to the restricted access area must be escorted at all times by a licensee, employee, or agent of the marijuana establishment.
- Page 3, first box: Again, in general, not all visitors are licensed personnel. Please correct that term and/or wording accordingly. In this box, continue addressing your prevention of unescorted members of the public entering Restricted Access Area(s) **incorporating** your record keeping of visitors who are escorted into Restricted Access Areas. For example, according to 3 AAC 306.755 Business records, a marijuana establishment shall maintain in a format that is readily understood by a reasonably prudent business person a log recording the name, and date and time of entry of each visitor permitted in a restricted access area.
- Page 3, second box: please provide a copy of a sample identification badge to be displayed by each licensee, employee, or agent while on the premises.
- Page 4: please expand upon your answers, such as, how many lights will you have? At what point do they light up? How do the cameras and alarms meet the requirements? What do you mean by local security? Please be more specific.
- Page 5, first box: please expand upon your answer, and make sure to include your policies and procedures for preventing diversion of marijuana or marijuana product by employees.
- Page 5, second box: how will you prevent loitering and what actions will you take when loiterers do not want to comply?
- Page 7, second box: where is the surveillance room located?
- Page 11: other than making sure employees possess a marijuana handler permit, are you going to provide in-house training? Please add to your answer and explain in the box.
- Page 12-13: please re-review 3 AAC 306.740 and adjust your answers accordingly. For example, you are not addressing how and where you will store, manage, and dispose of any solid or liquid waste, including wastewater generate during marijuana cultivation, in compliance with applicable federal, state, and local laws and regulations; how will the marijuana waste be disposed of in accordance to the requirements? You are not describing how you will store and manage the waste during the three-day waiting period. The board must be given notice not later than three days before rendering the waste unusable, not only once the waste is ready for disposal, etc.
- Page 15: the answers on this page do not adequately address 3 AAC 306.470; 3 AAC 306.475, and 3 AAC 306.750. Please correct accordingly.

- **MJ-02 Premises Diagram**
  - The premises diagram submitted with this application does not meet the requirements needed. Please carefully follow the directions on form MJ-02 and submit another MJ-02 that meets all of the requirements needed. Please be very detailed and specific. There are new MJ-02 forms on our website that will help to be detailed and specific. The following are examples of what to watch out for when re-doing your premises diagram (**these are examples but they may not be the only things you need to address**):
    - Provide a Google-like aerial view that very clearly labels the proposed marijuana cultivation facility, and that shows what surrounds the premises and the property (businesses, houses, etc.) Make sure you label it.
    - Remove the cameras from any/all of the diagrams.
    - Outline the entire perimeter of the proposed licensed premises and restricted access area (use separate colors and labels). **OR**, if applicable, you may use one color and label it Restricted Access Area and Licensed Premises.
    - What type of structure is the building? (include it on the diagram)
    - On all diagrams, please include a true north arrow.
    - Page 7 of your MJ-01 states that the surveillance room or area is clearly defined on the premises diagram. If this statement is accurate, please clearly define it on your premises diagram.
    - Clearly label the entrances, exits, windows, storage areas, and the interior layout of the proposed licensed premises and areas under cultivation, etc.

- **MJ-04 Cultivation Supplemental**
  - Page 2: Please provide a detailed answer that is congruent with the diagram(s) from MJ-02; be very specific. This box on the MJ-04 is to describe what is outlined on the MJ-02 and it must be easily decipherable. For example, please describe the areas/spaces/rooms under cultivation including their dimensions. Additionally, you refer to the multi-dimensional room, a false wall, and the rest of the shop; what do you mean exactly? Please describe the multi-dimensional room, and if the false wall will be secure. And, what is the rest of the shop used for?
  - Page 3, second box: please describe the marijuana cultivation facility's fertilizers, chemicals, and gases, including carbon dioxide management, to be used.
  - Page 4, first box: did you mean to say, "… until it is unusable…" as opposed to "usable"? Please make sure that this box is congruent with the corrected pages 12-13 of MJ-01.
  - Page 5: please re-review 3 AAC 306.455 and 3 AAC 306.465 and expand upon your answer.
  - Page 6: please provide a sample of the label(s) (including logo(s) if you will have one) of how you will comply with the labeling and packaging under 3 AAC 306.470 & 3 AAC 306.475.
  - Page 7: please address the method(s) used to ensure that any marijuana at the marijuana cultivation facility cannot be observed by the public from outside the facility in regards to the window(s) and door(s).

- **Proof of Possession for Proposed Premises**
  - What you provided as proof of possession is inadequate. Do you own the property? If so, please provide a recorded Warranty Deed and the property tax assessment that clearly shows you are the sole owner, including the complete physical address of the proposed cultivation facility; **OR** if the Deed is not recorded, and if you are going to provide a

commercial lease, the lease must be a legally binding lease and it should include the following:

- An acknowledgment from the landlord/lessor that the premises will be used as a marijuana establishment, and
- A disclaimer that the landlord/lessor may 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**
  - Gregory, will you please verify the third number of your social security number (SSN)? I don't need it in writing, you can call me, if you prefer. There may be a discrepancy; the number on your fingerprint card does not match the number on your MJ-09. Additionally, please clarify how you would like to correct this. Do you want to come to the office to fix the SSN on the fingerprint card, or would you like us to fix the SSN on the fingerprint card?

It is very important that you submit the above corrections and/or documents as soon as possible 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,

Jacqlene Drulis, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov

From:	Marijuana Licensing (CED sponsored)
To:	"everlifeband@gmail.com"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	FW: Incomplete Application- 420 Grow Tech license #10231
Date:	Wednesday, October 31, 2018 3:45:00 PM
Attachments:	10231 Incomplete Application Letter .pdf image001.png

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Hello,

This email is a reminder that we have not received any corrections/correspondence for the new application for a limited marijuana cultivation facility mentioned in the subject line. This email does not extend the 90-day deadline to get the application complete.

Thank you,

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

From: Marijuana Licensing (CED sponsored)
Sent: Wednesday, August 22, 2018 4:51 PM
To: 'everlifeband@gmail.com' <everlifeband@gmail.com>
Cc: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Incomplete Application- 420 Grow Tech license #10231

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Direct: (907) 754-3588
550 West 7th Avenue, Suite 1600
Anchorage, Alaska 99501

From: Marijuana Licensing (CED sponsored)
To: 420growtech1@gmail.com
Cc: Marijuana Licensing (CED sponsored); everlifeband@gmail.com
Subject: Incomplete Application- 420 Grow Tech license #10231
Date: Tuesday, November 20, 2018 1:59:06 PM
Attachments: image001.png

Good afternoon, Gregory,

Thank you for the corrections. Everything appears to be in order, except for one additional item:

- **MJ-02 Premises Diagram**
  - The surveillance room appears to be non-contiguous to the rest of the proposed licensed premises. The surveillance room can be separate from the licensed premises, but the Restricted Access Areas cannot be separate. Here is the link to a Memorandum discussing issues relating to contiguous licensed premises: https://www.commerce.alaska.gov/web/Portals/9/pub/MCB/Minutes/2017/9.14/Tab%204%20-%20Report%20of%20Subcommittee%20on%20Licensed%20Premises.pdf
    - Basically, we want to see the surveillance room on your diagrams, but since it is not connected to your licensed premises and restricted access area, please remove the blue and red outline, as well as the wording, "Restricted Access Area" from the surveillance room on any/all applicable diagrams.

*Note- Your 90-day deadline to have your application completed is today, November 20, 2018. Please submit your corrections by close of business (4pm) today, in order to meet this deadline.

Please send any documents/correspondence to marijuana.licensing@alaska.gov

Respectfully,

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