CORRESPONDENCE

From:	Marijuana Licensing (CED sponsored)
To:	"420onmain@gmail.com"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application- 420 on Main, LLC license #16718
Date:	Thursday, September 06, 2018 10:14:00 AM
Attachments:	16718 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

September 6, 2018

420 on Main, LLC
DBA: 420 on Main, LLC
Via email: 420onmain@gmail.com

Re: Marijuana Product Manufacturing Facility #16718

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.**

- **MJ-00 Application Certifications**
  - Page 1, Section 3: At the August Board Meeting, for your retail application, there was a lot of discussion about the amount of license numbers listed here. Please correct accordingly.

- **MJ-01 Operating Plan**
  - Page 2, Section 2.1: Your answer is geared toward your retail store application. Please correct your answer so that it reflects your marijuana product manufacturing facility.
  - Page 2, Section 3.1: The same entry process was provided on your retail and cultivation applications. Is this the same process used for your product manufacturing facility? If not, please correct accordingly.
  - Page 2, Section 3.2: Please accordingly incorporate in the Operating Plan the following-
    - Any visitor to the restricted access area must be escorted at all times by a licensee, employee, or agent of the marijuana establishment.
    - 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.
  - Page 5, Section 3.14: Is the surveillance room onsite or offsite of the proposed marijuana product manufacturing facility premises? Please clarify in the box.
  - Page 6, Section 4.2: In reference to the second sentence in this box, according to 3 AAC 306.755, records for the last six months must be maintained on the marijuana establishment's licensed premises; older records may be archived on or off premises. Please correct accordingly.

- **MJ-02 Premises Diagram**
  - Comparing your submitted diagrams for this manufacturing application to the diagrams from your retail application, the diagrams do not match. It seems as though the laundry area, the mechanical room, and the layout of the cultivation and product manufacturing facility are different. Did the setup change from when you originally submitted your product manufacturing application? If so, please submit a new MJ-02 that reflects the changes and meets all of the requirements needed. 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):
    - Please provide a color-coded legend/key on all applicable diagrams.
    - Clearly label the storage area (must be within the licensed premises of the product manufacturing facility), entrances, exits, surveillance room/area etc. of the proposed licensed premises.
    - Similar to Diagram #1 for your retail MJ-02, please provide an enlarged diagram of just the product manufacturing facility, and include the interior layout.
      - Similar to some of your diagrams for your retail MJ-02, please also provide a diagram of the entire facility in order to see the whole picture.
    - Outline/shade the entire perimeter/area of the proposed product manufacturing licensed premises and restricted access area (use separate colors and labels, and provide a legend/key). **OR**, <u>if applicable</u>, you may use one color and label it Restricted Access Area and Licensed Premises.
    - Since your MJ-05 states that you will be performing in-house testing, please show the area used for in-house testing.

- **MJ-05 Manufacturing Supplemental**
  - **3 Products:**
    - **Dark Chocolate Bar**
    - **Dark Chocolate Chili Bar**
    - **Dark Chocolate Mint Bar**
  - **For the 3 products listed above, please make the following corrections:**
    - In Section 7, in the "Packaging Description" field, please include the individual serving size. In other words, please explain what constitutes a serving. For example: 1 piece=1 serving, or 1 chocolate square=1 serving, or serving size 1 piece, or serving size 1 chocolate square.
    - In Section 7, in the "Sample Labels" field, please include the individual serving size.
    - In Section 7, in the "Sample Labels" field, the wording for the warning statements must be verbatim. For the warning statement of, "For use only by adults twenty-one or older", please correct it to say, "For use only by adults twenty-one and older."

  - **8 Products:**
    - **Dark Chocolate Cup**
    - **Dark Chocolate Chili Cup**
    - **Dark Chocolate Wild Alaskan Blueberry Cup**
    - **Dark Chocolate Wild Alaskan Salmonberry Cup**
    - **Gluten Free Chocolate Chip Cookie**

    - **Gluten Free Brownie**
    - **Gluten Free Wild Alaskan Blueberry Brownie**
    - **Gluten Free Wild Alaskan Salmonberry Brownie**
- **For the 8 products listed above, please make the following corrections:**
    - In Section 7, in the "Packaging Description" field, please include the total amount of THC.
    - In Section 7, in the "Packaging Description" field, please include the individual serving size. In other words, please explain what constitutes a serving. For example: 1 piece=1 serving, or 1 cup/cookie/brownie=1 serving, or serving size 1 piece, or serving size 1 cup/cookie/brownie.
    - In Section 7, in the "Sample Labels" field, please include the individual serving size.
    - In Section 7, in the "Sample Labels" field, the wording for the warning statements must be verbatim. For the warning statement of, "For use only by adults twenty-one or older", please correct it to say, "For use only by adults twenty-one and older."

- **2 Products:**
    - **CannaButter**
    - **CannaOil**
- **For the 2 products listed above, please make the following corrections:**
    - In Section 7, in the "Sample Labels" field, you are implying that you will be selling these products to a retail store, which is not allowed. In Section 6, you state that these products are used for cooking your edibles. Because selling these products to retail stores is not allowed, the sample labels that you provided are not necessary; please make corrections accordingly.
    - In Section 7, in the "Sample Labels" field, the wording for the warning statements must be verbatim. For the warning statement of, "For use only by adults twenty-one or older", please correct it to say, "For use only by adults twenty-one and older."

- **2 Products:**
    - **Cannabis Shatter**
    - **Cannabis Oil**
- **For the 2 products listed above, please make the following corrections:**
    - In Section 6, in the "Product Type" field, it seems to me that these products are concentrates, not edibles. Please correct accordingly.
    - In Section 7, in the "Product Type" field, it seems to me that these products are concentrates, not edibles. Please correct accordingly.
    - In Section 7, in the "Packaging Description" field, please address how many grams of these products that you will be packaging.
    - In Section 7, in the "Sample Labels" field, your label shows the servings to be (10) 1 gram pieces. However, according to 3 AAC 306.355, a retail marijuana store may not sell in a single transaction more than seven grams of marijuana concentrate for inhalation. Please correct accordingly.
    - In Section 7, in the "Sample Labels" field, the wording for the warning statements must be verbatim. For the warning statement of, "For use only by adults twenty-

one or older", please correct it to say, "For use only by adults twenty-one and older."

- **MJ-07 Public Notice Posting Affidavit**
  - Because you certified this form before the posting period had ended, please get the MJ-07 re-notarized and resubmit it so that it is notarized after 02/12/18.

- **MJ-08 Local Government Notice Affidavit**
  - Please notify the Kenai Peninsula Borough and submit another MJ-08 certifying that you have notified them.

- **Publisher's Affidavit**
  - The submitted publisher's affidavit and accompanied newspaper clipping is too blurry to review. Please submit a copy of the publisher's affidavit and newspaper clipping that is legible.

- **Proof of Possession for Proposed Premises**
  - I will need proof of right to possession for the LLC. I know you submitted a warranty deed, but we need proof that the LLC has the right to the proposed premises.
  - 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 or remove marijuana from the premises, and AMCO will be contacted in the event that this is necessary.

- **Entity Documents**
  - Please submit the Operating Agreement for 420 on Main, LLC.

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