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

October 22, 2018

Great Northern Manufacturing, Inc.
DBA: Great Northern Manufacturing, Inc.
Via email: licensing@greatnortherncannabis.com

Re: Marijuana Product Manufacturing Facility Facility #17336

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.**

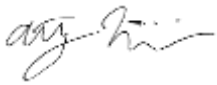
- **MJ-00 Application Certifications**
  - Section 1 – Establishment Information for all:
    - The "Doing Business As" name is inconsistent with your application, which lists the DBA as Great Northern Manufacturing, Inc.
    - The Premises Address field is inconsistent with your application, which includes "Suite 100".
  - Section 2 – Individual Information and Section 4 - Certifications for Louis John Kuest:
    - The name listed and signed on this form (John Kuest) does not match what was listed on the application through MyAlaska (Louis John Kuest) or the Division of Corporations, Business and Professional Licensing (CBPL).
  - Section 4 – Certifications for Smart Capital Holding, LLC:
    - The name of the individual signing as a licensee (John Kuest) does not match the name of a licensee listed on the application through MyAlaska (Louis John Kuest) or with CBPL.
- **MJ-01 Operating Plan**
  - Page 4, Section 3.5:
    - Please review 3 AAC 306.715(e) and expand upon your response to include when AMCO is contacted in the event of an unauthorized breach.
- **MJ-02 Premises Diagram**
  - Section 1 – Establishment Information:
    - The "Doing Business As" name is inconsistent with your application, which lists the DBA as Great Northern Manufacturing, Inc.

        - The Premises Address field is inconsistent with your application, which includes "Suite 100".
    - Diagram 1:
        - The bathroom has been included as a restricted access area, which would require it to be under surveillance. Using a different color, outline the restroom to label it as part of the licensed premises but not a restricted access area.
- **MJ-05 Manufacturing Supplemental**
    - Kief:
        - The sample label does not list the manufacturer's license number, and lists the name of a different company as the manufacturer (Great Northern Cannabis, Inc.).
        - The sample label is missing the following required information:
            - The license number of the manufacturing facility
            - The production lot number.
    - Garden of Delights Chocolate A La Kush
        - In the Packaging Description section, please specify how much of the product makes up an individual serving.
        - The net weight has not been listed on the sample label.
        - The warning statements on the sample label are illegible. Please provide a clearer image.
    - Garden of Delights Gourmet Gummies
        - In the Packaging Description section, please specify how much of the product makes up an individual serving.
        - The net weight has not been listed on the sample label.
        - The warning statements on the sample label are illegible. Please provide a clearer image.
    - Garden of Delights Lozenges
        - In the Packaging Description section, please specify how much of the product makes up an individual serving.
        - The net weight has not been listed on the sample label.
        - The warning statements on the sample label are illegible. Please provide a clearer image.
    - The Torch
        - The Standard Production Procedure and Packaging Description reference cannabis honey oil, which is not listed as one of the product's ingredients. Where does cannabis honey oil come from?
        - The sample label does not list the manufacturer's license number, and lists the name of a different company as the manufacturer (Great Northern Cannabis, Inc.).
    - Garden of Delights Uncommon Caramels
        - In the Packaging Description section, please specify how much of the product makes up an individual serving.
        - The net weight has not been listed on the sample label.
        - The warning statements on the sample label are illegible. Please provide a clearer image.
- **MJ-09 Statement of Financial Interest**
    - Section 1 – Establishment Information for all:

        - The "Doing Business As" name is inconsistent with your application, which lists the DBA as Great Northern Manufacturing, Inc.
        - The Premises Address field is inconsistent with your application, which includes "Suite 100".
    - Section 2 – Individual Information and Section 3 - Certifications for Louis John Kuest:
        - The name listed and signed on this form (John Kuest) does not match what was listed on the application through MyAlaska (Louis John Kuest) or the Division of Corporations, Business and Professional Licensing (CBPL).
    - Section 3 – Certifications for Smart Capital Holding, LLC:
        - The name of the individual signing as a licensee (John Kuest) does not match the name of a licensee listed on the application through MyAlaska (Louis John Kuest) or with CBPL.
- **Proof of Possession for Proposed Premises**
    - The lease provided is inadequate to show that Great Northern Manufacturing, Inc. has right to possession of the proposed premises. The tenant named in the lease provided is Great Northern Cannabis, Inc. A sublease may be necessary.
        - A sublease will also need to specify the suite or unit number.
- **Entity Documents**
    - The following documents were not received for Great Northern Manufacturing, Inc:
        - A list of each corporate officer and director.
    - The following documents were not received for Great Northern Cannabis, Inc:
        - A list of each corporate officer and director.
        - A list of all shareholders' ownership percentages.
    - The following documents were not received for Murder Lake, LLC:
        - A signed copy of the LLC Operating Agreement.
        - A list of all LLC Members with their ownership percentage.

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:	licensing@greatnortherncannabis.com
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application - Great Northern Manufacturing, Inc. License #17336
Date:	Monday, October 22, 2018 9:17:25 AM
Attachments:	17336 Incomplete Notice.pdf image001.png

Good morning,

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:	Jason Brandeis; Marijuana Licensing (CED sponsored)
Cc:	Sawyer, Jane Preston (CED); Steve Brashear
Subject:	RE: Incomplete Application - Great Northern Manufacturing, Inc. License #17336
Date:	Friday, October 26, 2018 12:31:28 PM
Attachments:	17336 Incomplete Notice - Amended.pdf image001.png

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Good afternoon Jason,

You are correct, my reference to a Food Safety Permit Application from the Municipality for this manufacturing license application was an error on my part. The food safety permit application (and plan review) originally submitted are adequate to meet the requirement, but I will include your attachments in this email to that document also.

Please see attached for an amended Incomplete Notice that removes reference of the Food Safety Permit Application. I apologize for the confusion.

Sincerely,

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

From: Jason Brandeis <jbrandeis@BHB.com>
Sent: Friday, October 26, 2018 12:06 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Sawyer, Jane Preston (CED) <jane.sawyer@alaska.gov>; Steve Brashear <steve@greatnortherncannabis.com>
Subject: RE: Incomplete Application - Great Northern Manufacturing, Inc. License #17336

TJ-

I am writing in response to your incomplete letter about the Manufacturing license application for Great Northern Manufacturing (Lic. 17336). We are putting together materials responsive to your request and expect to be able to provide a complete response next week. However, as we go through the points you identified, we have some questions.

For instance, the very last bullet point is titled “Food Permit Application” and states: “Applications in the Anchorage Municipality must apply for a Food Permit with the Municipality of Anchorage. Please provide a copy of this application (that has been stamped received by the Municipality).”

We are a little confused about this request because our understanding was that manufacturing applications for facilities within the Municipality of Anchorage (MOA) do not require an MOA food safety permit. Rather, they are governed by the State of Alaska Department of Environmental Conservation (DEC). Unless this protocol has changed, we believe your reference to the MOA is incorrect and the requisite documentation from DEC is what is required. Please confirm whether the reference to MOA was an error and what is required is the DEC permit.

On that point, you requested a copy of the food permit application, as AMCO has accepted stamped received copies of applications for such permits in lieu of the actual permit (due to timing issues related to permit issuance). In this case, I believe that Great Northern Manufacturing provided a copy of the Plan Review Approval Letter, which is confirmation that the Plan Review Application had already been received and approved by DEC. In other words, this is one step beyond just submitting the application. It shows the application was submitted and approved. I attached a copy of that letter to this message. Additionally, in the interim, Great Northern Manufacturing has been issued a Food Safety Permit for this facility. A copy of the permit is attached.

Please let me know if this satisfies the part of the incomplete letter that requested additional information on the Food Safety Permit issue.

Thank you,
Jason Brandeis

From: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Sent: Monday, October 22, 2018 9:17 AM
To: Licensing <licensing@greatnortherncannabis.com>
Cc: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Incomplete Application - Great Northern Manufacturing, Inc. License #17336

Good morning,

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:	licensing@greatnortherncannabis.com
Cc:	Marijuana Licensing (CED sponsored); "Jason Brandeis"
Subject:	Incomplete Application - Great Northern Manufacturing, Inc. License #17336
Date:	Tuesday, October 30, 2018 10:39:00 AM
Attachments:	17336 Incomplete MJ-00 Tom DeSalvo.pdf 17336 Incomplete MJ-09 - Jerad Brown_Redacted.pdf image001.png

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Good morning,

I have finished reviewing the corrections submitted for your application, but there are two additional revisions that will be required before the application can be deemed complete. The incomplete documents are attached for your reference.

On Page 3 of Form MJ-00 for Tom DeSalvo, one of the statements that was signed should only be signed on an application for a marijuana testing facility license.

On Page 1 of Form MJ-09 for Jerad Brown, the "Doing Business As" name is given as Great Northern Cannabis Manufacturing, Inc.

Corrected documents can be delivered, or emailed to marijuana.licensing@alaska.gov.

Sincerely,

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