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 1, 2018

AK Rime, LLC
DBA: AK Rime
Via email: kyle@anseralaska.com

Re: Marijuana Product Manufacturing Facility License 10865

Dear applicant,

AMCO has reviewed the documents submitted for the transfer of controlling interest for the 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-17c License Transfer Application**
  - Make and initial the following corrections to this application (or fill out a brand new one which must be signed by all appropriate parties and notarized). The corrected application will need to re-posted, and the local government and community council will need to be re-notified.
    - Page 2: write/type the title of Blackstone Investments, LLC in relation to AK Frost, LLC.
    - You submitted Exhibit 3.1 as the breakdown of membership of Blackstone Investments, LLC. However, this list is missing required information requested on section 3 of MJ-17c. In other words, in addition to what is already listed in this paper, every person listed here needs their title, telephone number, and email address listed. So, to keep it clean and consistent please grab extra copies of page 2 of MJ-17c and put the information of these individuals in those pages.
    - Page 3, section 4: "Seeking concurrent transfers of:…" does not answer the question of disclosing which individual(s) has the financial interest. Please make a clear reference that what you are referring to is the individuals listed on the breakdown of Blackstone Investments, LLC (which should be part of the MJ-17c).
    - Signature line on page 3: please print the name of the person who signed this form.

- **MJ-00 Application Certifications**
  - The suite number for the licensed premises on Kelly Wilmes, and Marc Eid's MJ-00s needs to be corrected. It should be 101 not 100.

- **MJ-01 Operating Plan**
  - Page 4:
    - 3.5: please add to your answer in this box and describe how you will comply with 3 AAC 306.715(e). Please read it, it is a fairly new subsection of the regulation.
    - 3.6: in this box you mention "The growing marijuana plants…" Please provide an answer that is more tailored to the marijuana product manufacturing facility.

- **MJ-02 Premises Diagram**
  - Diagram SK-1a:
    - Please remark the text, it is too faded to read when printed out.
    - Your dotted outline should be labeled licensed premises and restricted access area (with the understanding that you should know the difference between the two terms).
    - Grab a different color, outline/shade the bathroom and label that outline/shade licensed but not restricted access area.
    - Please label entrance(s)/exit(s)
    - Since this diagram is also your Diagram 5 per the MJ-02 guidelines, please include cross streets and points of reference.
  - Diagram SK-2:
    - Is it possible to re-do the text and all the lettering, it is too faded to read.
    - Outline in color the perimeter of the licensed premises and restricted access area. HOWEVER, the bathroom should be licensed but not restricted access area.
  - Diagram SK-4b:
    - Please draw an outline on the "roof" of the building that very closely resembles the perimeter of the licensed premises for this license, and label it AK Rime.

- **MJ-05 Manufacturing Supplemental**
  - Page 2:
    - 3.1: please provide a thorough answer in this box. For example, you are not describing the equipment you will use to create marijuana concentrates.
  - Page 3:
    - 4.2: your answer in this box is sort of incomplete. The three-day notice to AMCO enforcement must be given **before** (not after) the marijuana or marijuana product is rendered unusable. Furthermore, you are not describing how you will store the marijuana or marijuana product waste during the three-day waiting period **before** rendering it unusable. Please re-review 3 AAC 306.740.
  - Page 4:
    - 5.4: you left this box blank. Please describe the testing procedures and protocols the marijuana product manufacturing facility will follow.
  - Products:
    - Shatter:
      - The answer in the standard production box appears shorted *"The ethanol/cannabis mixture is filtered through a before the ethanol is removed via distillation and evaporation at reduced pressure".* Please correct.
      - The label should list the Net Weight (I only see Weight).

    - The warning statement "For use only by adults twenty-one and older. Keep out of the reach of children" is missing the *'The',* please correct.
- Live Resin:
    - The label should list the Net Weight (I only see Weight).
    - The warning statement "For use only by adults twenty-one and older. Keep out of the reach of children" is missing the *'The',* please correct.
- SAP:
    - The label should list the Net Weight (I only see Weight).
    - On the Depiction box, please provide a photograph of the actual SAP concentrate itself.
    - On the Packaging Description box, please provide a picture of each of the three types of packaging you plan to use (glass container, syringe, vaporizer cartridge).
    - The warning statement "For use only by adults twenty-one and older. Keep out of the reach of children" is missing the *'The',* please correct.
- SAP Caps:
    - The label should list the Net Weight
    - On the Product Description box, is the SAP Distillate you mention here the same SAP concentrate talked about immediately above in this letter or is it a different product? Please clarify.
    - On the Packaging Description box, please clearly state what constitutes one serving (i.e. serving size: 1 capsule), and what is the total THC content of the 10-piece package. NOW, I understand that you plan to sell them in packages of 10 capsules per package, what I am not clear on is what you mean by "or sold individually in bulk for wholesale". Considering that manufacturing facilities cannot wholesale to retailers at all, what do you mean by your wholesale statement?
    - The warning statement "For use only by adults twenty-one and older. Keep out of the reach of children" is missing the *'The',* please correct.
- Tincture:
    - On the Packaging Description box, please clearly state the total THC content of the bottle.
    - The label should list the Net Weight
    - The warning statement "For use only by adults twenty-one and older. Keep out of the reach of children" is missing the *'The',* please correct.
- MJ Caramels:
    - On the Ingredients box: where are you getting the marijuana concentrate or oil you intend to use in this caramel? Is it one of your products, another manufacturing facility? Please clarify.
    - On the Packaging Description box, please clearly state what constitutes one serving (i.e. serving size: 1 caramel), and what is the total THC content of the 10-piece package. ALSO, please include a photo or graphic representation of the mylar bag that will be used.
    - The label should list the Net Weight
    - The warning statement "For use only by adults twenty-one and older. Keep out of the reach of children" is missing the *'The',* please correct.

- MJ Chocolates:
  - On the Ingredients box: where are you getting the marijuana concentrate or oil you intend to use in this caramel? Is it one of your products, another manufacturing facility? Please clarify.
  - On the Packaging Description box, please clearly state what constitutes one serving (i.e. serving size: 1 chocolate), and what is the total THC content of the 10-piece package. ALSO, please include a photo or graphic representation of the mylar bag that will be used.
  - The label should list the Net Weight
  - The warning statement "For use only by adults twenty-one and older. Keep out of the reach of children" is missing the *'The',* please correct.

- **MJ-07 Public Notice Posting Affidavit**
  - As mentioned above, under bullet point MJ-17c License Transfer Application, you will need to re-post a copy of the corrected/new transfer application at both the licensed premises and another conspicuous location. NOW, please make sure that the other conspicuous location is a store such as Fred Meyer or Carrs where there is a public bulletin board, and can be left up for the entire ten days.
  - You will need to fill out a new MJ-07, and submit it to me.

- **MJ-08 Local Government Notice Affidavit**
  - As mentioned above, under bullet point MJ-17c License Transfer Application, please submit a copy of the corrected/new transfer application to the Municipality of Anchorage, and Taku/Campbell community council.
  - You will need to fill out a new MJ-08, and submit it to me.

- **MJ-09 Statement of Financial Interest**
  - The suite number for the licensed premises on Kelly Wilmes, and Marc Eid's MJ-00s needs to be corrected. It should be 101 not 100.

- **Publisher's Affidavit**
  - The newspaper ran in the Mat-Su Valley. It needs to run in Anchorage, in a newspaper of regular circulation (the Alaska Journal of Commerce is not acceptable, just FYI). Please run your transfer of controlling interest ad in Anchorage once a week for three consecutive weeks, and submit the affidavit of publication with a copy of the ad. The wording of the ad looks fine.

- **Entity Documents**
  - AK Rime, LLC (licensee)
    - Is it possible you can provide me with a filled-out (but not filed, yet) Notice of Change of Officials for AK Rime, LLC that will be submitted to Division of Corporations (a separate state agency) once and if the transfer application is approved by the Marijuana Control Board.
  - Blackstone Investments, LLC (proposed 100% member of AK Frost, LLC)
    - The list of members for this company on Division of Corporations' website https://www.commerce.alaska.gov/cbp/main/Search/EntityDetail/10083469 should list all the members of this company, it does not appear they are according

to your list of members titled as Exhibit 3.1 of the operating agreement. For our purposes, this particular company does not need to wait for the MCB to approve the transfer application.

- Please submit the operating agreement signed by all members.

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,

Jane Sawyer, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov

From:	Marijuana Licensing (CED sponsored)
To:	"kyle@anseralaska.com"; "Jana Weltzin"; Valerie Mastolier; Sherri Lindfors
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Transfer Application Notice-AK Rime license 10865
Date:	Thursday, November 01, 2018 2:53:00 PM
Attachments:	10865 Incomplete Transfer Application Notice.pdf

---

Hello,

Your transfer application has been reviewed, attached is correspondence regarding corrections, additional documents, and/or resubmittals that need to be addressed.

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 Letter.

Please let me know if you need copies of the transfer paperwork I have. I want to make sure you receive this email and its attachment first. Send any documents/correspondence to marijuana.licensing@alaska.gov

Respectfully,
Jane Sawyer
Occupational Licensing Examiner
Alcohol and Marijuana Control Office
550 W 7th Avenue Ste. 1600
Anchorage, AK 99501
907-269-0350