CORRESPONDENCE

From:	Marijuana Licensing (CED sponsored)
To:	"Eli Lehrmann"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Transfer Application Notice- Denali Fire (Standard Cultivation)- License #14073
Date:	Wednesday, September 04, 2019 11:49:00 AM
Attachments:	14073 Incomplete Transfer Application Letter.pdf image001.png

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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

Thank you,

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

THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

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 4, 2019

Denali Fire Black, LLC
DBA: Denali Fire
Via email: eslehrmann@gmail.com

Re: Standard Marijuana Cultivation Facility License #14073

Dear applicant,

AMCO has reviewed the documents submitted for the transfer of ownership for the license referenced above. This letter is notice under 3 AAC 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**
  - Section 3:
    - For James' Title, please correct it to say, "Member, Manager", since that is what Maverick Ventures, LLC's entity documents say.
    - Although I understand what you are trying to show in the percentages owned field, please remove the 20, 20, 30, 15, and 15 from the percentages owned field so that it is blank. But, please keep the, for example- "50% Member – One Denali LLC" in the Entity Official Name field.

- **MJ-00 Application Certifications**
  - For James' MJ-00: there were no initials on page 2. Please read each line, and then sign your initials in the box to the right of each statement.
  - Page 3 of Jason's MJ-00: 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**
  - Page 2, Section 3.1: please expand upon your answer to address what the signage will say. 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." Please adjust your answer accordingly.

- Page 3, Section 3.3: please correct the licensee-produced badge to reflect information for this license- (DBA: Denali Fire; License #14073; Standard Marijuana Cultivation Facility).
    - Additionally, please provide a sample of a visitor identification badge.

- **MJ-04 Cultivation Supplemental**
    - Page 2, Section 4.1: According to my calculations, 14x22=308, not 330. Please adjust your answer accordingly, including the total room area and the total area under cultivation.
    - Page 3, Section 4.6: There is no attachment as stated. Please either provide the attachment or adjust your wording. Additionally, providing the link to DEC's list of approved pesticides is not entirely helpful because the form is a PDF and the link is difficult to access. Please correct accordingly.
    - Page 3, Section 4.7: in this box, please specify if the chemicals will be used on marijuana or for cleaning the facility, or what exactly.
    - Page 6, Sections 8.1 and 8.2:
        - The label provided is rather blurry. Please provide a clearer label.
        - Additionally, there is a warning statement that is provided twice: "Keep out of the reach of children." Please remove one.
        - Furthermore, please correct the warning statement of, "Marijuana should not be used by women who are pregnant and/or breast feeding." to say, "Marijuana should not be used by women who are pregnant or breast feeding."
        - And, for Section 8.1: please discuss 3 AAC 306.470(a)(1)(A)- "A marijuana cultivation facility shall package its marijuana bud and flower for sale to a retail marijuana store, either in a package not exceeding one ounce for resale to consumers without additional handling by the retail marijuana store…"
        - Also, for Section 8.2: please discuss 3 AAC 306.470(a)(1)(B)- "A marijuana cultivation facility shall package its marijuana bud and flower for sale to a retail marijuana store, either in a wholesale package not exceeding five pounds for repackaging by the retail marijuana store; or to a marijuana product manufacturing facility..."

- **MJ-07 Public Notice Posting Affidavit**
    - Because the public notice is the MJ-17c, and the MJ-17c was signed and notarized on July 17, 2019 (in the middle of the posting period), a true copy of the application (signed and notarized) could not have been posted. After correcting the MJ-17c, please repost the application at both, the location of the proposed premises and another conspicuous location for ten days, and then submit a new MJ-07 completed and signed in front of a notary after the posting period has ended.

- **MJ-08 Local Government Notice Affidavit**
    - After correcting the MJ-17c, please re-notify the Municipality of Anchorage and the Community Council by submitting to them the application, and then submit a new MJ-08 completed and signed in front of a notary.

- **Entity Documents**
    - Please file the Initial Report for One Denali, LLC, and make sure that the Titles of "Member" match from the MJ-17c for Jason and Kalla.

- **Proof of Possession for Proposed Premises**
  - Because the Transfer has not been effectuated, and essentially, the current owners should still have legal right of possession to the premises, please correct the term dates on the lease.
  - Please provide the Master Lease and make sure that it includes the following:
    - 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.
    - Include written permission to further sublet to Denali Fire Black, LLC.

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,

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

From: Marijuana Licensing (CED sponsored)
To: "eslehrmann@gmail.com"
Cc: Marijuana Licensing (CED sponsored)
Subject: RE: Incomplete Transfer Application Notice- Denali Fire (Standard Cultivation)- License #14073
Date: Thursday, October 10, 2019 2:14:00 PM
Attachments: image001.png

Hi Eli,

Thank you for your corrections; however, there are more corrections needed:

- **MJ-04 Cultivation Supplemental**
  - The corrected MJ-04 that was submitted did not provide initials, checkmarks, or notarized signatures (this was also done with the corrected MJ-01, but this was not a problem because the pages needing corrections did not have spots for initials, checkmarks, or signatures). So, either provide initials, checkmarks, and notarized signatures on the corrected version of the MJ-04, **OR** make the requested corrections to the MJ-04 that was already notarized.
  - Additionally, for Page 3, Section 4.6: Do you plan on using all of the pesticides on the list? If so, please highlight all of the pesticides on the list. If not, please highlight the pesticides that you plan to use.

- **Proof of Possession of Proposed Premises**
  - In regard to the requested correction to the Master Lease of including written permission to further sublet to Denali Fire Black, LLC- unless I missed it somewhere, it seems this correction was not made. I see on page 9 of the Master Lease the reference to sublease to Black Bear Enterprises, LLC; Brown Bear Enterprises, LLC; and Green Bear Enterprises, LLC; however, I do not see permission for Revel Property Management, LLC to further sublet to Denali Fire Black, LLC. Please correct accordingly.

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

Thanks,

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

From: Eli Lehrmann <eslehrmann@gmail.com>
Sent: Tuesday, October 01, 2019 11:27 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Re: Incomplete Transfer Application Notice- Denali Fire (Standard Cultivation)- License #14073

Hi Jacqlene,

Please find listed below and attached, the corrections, additional documents and resubmittals you requested for the license transfer. If I missed anything or something else needs to be corrected, please let me know. Thanks for your help.

1. MJ-17c (corrected)
2a. MJ-00 for James (corrected)
2b. MJ-00 for Jason (corrected)
3. MJ-01 (corrected)
4. MJ-04 (corrected)
4a. ADEC Approved Pesticide List (addition)
5. MJ-07 (resubmittal)
6. MJ-08 (resubmittal)
7. One Denali LLC Initial Biennial Report (addition)
7a. One Denali LLC Change of Officials (addition)
8. Master Lease (addition)
8a. Denali Fire Black Sublease (addition)

Thanks,
Eli

On Sep 4, 2019, at 11:49 AM, Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov> wrote:

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