CORRESPONDENCE

From:	Marijuana Licensing (CED sponsored)
To:	Eli Lehrmann
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Transfer Application Notice- Denali Fire Extracts (Manufacturing)- License #14619
Date:	Wednesday, September 04, 2019 11:49:00 AM
Attachments:	14619 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 Brown, LLC
DBA: Denali Fire Extracts
Via email: eslehrmann@gmail.com

Re: Marijuana Product Manufacturing Facility License #14619

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**
  - 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**
  - Please refer to the requested clarification below under, MJ-17d Unaltered Operating Plan and/or Premises Diagram Affidavit.

- **MJ-05 Manufacturing Supplemental**
  - Please refer to the requested clarification below under, MJ-17d Unaltered Operating Plan and/or Premises Diagram Affidavit.

- **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 Brown, LLC.

- **Food Establishment Permit (or application for permit)**
  - Please apply for a Food Safety Permit with the Department of Environmental Conservation (DEC) under the new Entity, and then submit the application that was submitted to DEC to AMCO.

- **MJ-17d Unaltered Operating Plan and/or Premises Diagram Affidavit**
  - In Section 2, you did not certify that there will be no changes to the operating plan for this license. Because you did not certify this, you are not required to submit form MJ-01 Operating Plan and form MJ-05 (Operating Plan Supplemental), but you only submitted one signature page from the MJ-05.
  - So, **either**:
    - Submit form MJ-01 (Operating Plan) and MJ-05 (Operating Plan Supplemental), to be reviewed; **OR**,
    - Clarify that you do not want the MJ-01 and MJ-05 included in the application packet and certify that there will be no changes to the operating plan for this license by initialing the first statement.

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

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 Extracts (Manufacturing)- License #14619
Date: Thursday, October 10, 2019 2:20:00 PM
Attachments: image001.png

Hi Eli,

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

- **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 Brown, 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 Brown, LLC. Please correct accordingly.

- **MJ-05 Manufacturing Supplemental**
  - Page 4, Section 5.4 was left blank. Please complete this section.
  - Products needing correction/clarification:
    - **Amended products:**
      - Denali Fire Shatter: In Section 7, Packaging Description- Please discuss how many grams of product that the containers will hold.
      - Denali Fire Tincture: In Section 7, Packaging Description- Your answer says, "54-6mg THC servings…" Did you mean to write 4-6mg THC servings?
      - Denali Fire Lip Balm: The ingredients listed in Section 6 do not seem to match the sample label in Section 7. Please correct accordingly.
      - Denali Fire body Lotion: The ingredients listed in Section 6 do not seem to match the sample label in Section 7. Please correct accordingly.
      - Denali Fire Salve: The ingredients listed in Section 6 do not seem to match the sample label in Section 7. Please correct accordingly.
      - Denali Fire Canna Caps: The ingredients listed in Section 6 do not seem to match the sample label in Section 7. Please correct accordingly.

    - **New Products:**
      - Denali Fire Breath Spray: Please discuss all of the flavoring in the ingredients listed in Section 6.
      - Denali Fire Candy:
        - Please discuss all of the flavoring in the ingredients listed in Section 6.

    - Additionally, in Section 7, Packaging Description- I understand the packaging provided is just an example, but you may want to consider removing the reference to “medicated”, being that AMCO licenses commercial marijuana facilities, not medicinal marijuana.
- Denali Fire Chews: Please discuss all of the fruit flavoring in the ingredients listed in Section 6.
- Denali Fire Chocolates: Please discuss all of the flavoring in the ingredients listed in Section 6.
- Denali Fire Canna Coffee:
    - Although I see that this is discussed in Section 6 in the Product Description field, please discuss in Section 7, Packaging Description- the amount of THC per serving and the total THC per bottle.
    - Additionally, I see that you mention the ten (10) vertical graduation lines to delineate a serving size; but, please clearly show the markings or demarcations delineating each serving of the product on the bottle.
- Denali Fire Ground CannaCoffee: In Section 7, Packaging Description- please discuss the amount of THC per serving, and how many servings per scoop.
- Denali Fire Gummies: Please discuss all of the fruit flavoring in the ingredients listed in Section 6.
- Denali Fire Honey Sticks: Please discuss all of the flavoring in the ingredients listed in Section 6.
- Denali Fire Iced Tea:
    - Please discuss all of the flavors in the ingredients listed in Section 6.
    - Additionally, although I see that this is discussed in Section 6 in the Product Description field, please discuss in Section 7, Packaging Description- the amount of THC per serving and the total THC per bottle.
    - Furthermore, I see that you mention the ten (10) vertical graduation lines to delineate a serving size; but, please clearly show the markings or demarcations delineating each serving of the product on the bottle.
- Denali Fire Lemonade:
    - Please discuss all of the flavors in the ingredients listed in Section 6.
    - Additionally, although I see that this is discussed in Section 6 in the Product Description field, please discuss in Section 7, Packaging Description- the amount of THC per serving and the total THC per bottle.
    - Furthermore, I see that you mention the ten (10) vertical graduation lines to delineate a serving size; but, please

clearly show the markings or demarcations delineating each serving of the product on the bottle.

- Denali Fire Lollipop: Please discuss all of the flavoring in the ingredients listed in Section 6.
- Denali Fire Lubricant: The ingredients listed in Section 6 do not seem to match the sample label in Section 7. Please correct accordingly.
- Denali Fire Oral Strips: Please discuss all of the alcohol based flavoring in the ingredients listed in Section 6.
- Denali Fire Cannasoda:
    - Please discuss all of the natural flavors in the ingredients listed in Section 6.
    - Additionally, although I see that this is discussed in Section 6 in the Product Description field, please discuss in Section 7, Packaging Description- the amount of THC per serving and the total THC per bottle.
    - Furthermore, I see that you mention the ten (10) vertical graduation lines to delineate a serving size; but, please clearly show the markings or demarcations delineating each serving of the product on the bottle.

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 1:05 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Re: Incomplete Transfer Application Notice- Denali Fire Extracts (Manufacturing)- License #14619

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)

2. MJ-00 for Jason (corrected)
3. MJ-07 (resubmittal)
4. MJ-08 (resubmittal)
5. One Denali LLC Initial Biennial Report (addition)
5a. One Denali LLC Change of Officials (addition)
6. Master Lease (addition)
6a. Denali Fire Black Sublease (addition)
7. ADEC Food Establishment Permit Update Application (addition)
8. MJ-01 Operating Plan (addition)
9. MJ-05 Operating Supplement (addition)
9a. MJ-05 Product Portfolio (addition) [File too large to email - download url: https://www.dropbox.com/s/osj9f4800z3qanq/9a.%20MJ-05%20Product%20Portfolio%20copy.pdf?dl=0]
Thanks,
Eli

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

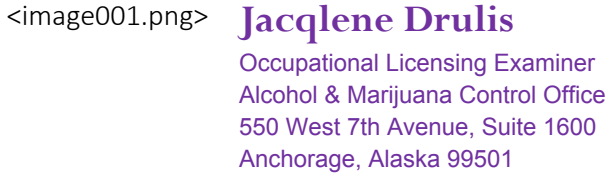
Hello,

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,



<14619 Incomplete Transfer Application Letter.pdf>

From: Marijuana Licensing (CED sponsored)
To: eslehrmann@gmail.com
Cc: Marijuana Licensing (CED sponsored)
Subject: RE: Incomplete Transfer Application Notice- Denali Fire Extracts (Manufacturing)- License #14619
Date: Tuesday, October 22, 2019 4:22:07 PM
Attachments: image001.png

Good afternoon, Eli,

I have finished my review of all three of your applications. Everything appears to be in order except for a few additional items for your manufacturing license (License #14619):

- **New Products:**
  - Denali Fire Canna Coffee
  - Denali Fire Iced Tea
  - Denali Fire Lemonade
  - Denali Fire Cannasoda

All four of these products still contain the language of, "cannabis oil and/or distillate" in the ingredients section. Is it your intension to keep this language for the board to consider? Or do you want to correct these products and submit the corrections by this Friday, October 25, 2019 (the November meeting deadline)?

Thank you,

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: Wednesday, October 16, 2019 8:19 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Re: Incomplete Transfer Application Notice- Denali Fire Extracts (Manufacturing)- License #14619

Hi Jacqlene,

Please find attached the requested items:

10. Affiliates Letter to address Proof of Possession of the Proposed Premises
9. MJ-05 Operating Supplement with Section 5.4 completed
9a. MJ-05 Products that needed correction/clarification
9b. MJ-05 Product Flavor List