THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Commerce, Community, and Economic Development

ALCOHOL AND MARIJUANA CONTROL OFFICE
550 West 7th Avenue, Suite 1600
Anchorage, AK 99501
Main: 907.269.0350

MEMORANDUM

TO:	Marijuana Control Board	DATE:	February 20, 2019
FROM:	Erika McConnell, Director	RE:	Releaf, #17961, Retail Store

The applicant for this retail store license is The Happy Farmer, LLC, which is owned 100% by Lori Brandt. The retail store is proposed to be located at 910 W. International Airport Road, in Anchorage. The Happy Farmer LLC also owns Releaf Alaska, a business located at 901 W. International Airport Road. According to their website, Releaf Alaska "provides professional and confidential medical cannabis evaluations and education in Anchorage, Alaska."

Releaf Alaska also advertises that for $150, they can provide authorization for a "higher plant count"—24 plants rather than the six allowed per person by AS 17.38.020 and AS 17.37.040.

In August of 2017, I sent Ms. Brandt a letter informing her that there was no legal basis for her to offer a higher plant count, and that she could be defrauding Alaskans. I received no response. As you can see from the attached 2/13/19 screenshot of her website, she continues to offer a higher plant count for a $150 fee.

For at least a year and a half and likely longer, Ms. Brandt has been misinforming Alaskans, and certainly causing many who gave her money to unknowingly break the law. When she was informed of this, she continued her actions of profiting from misleading and misinforming the public.

I recommend this license be denied, as it is not in the public interest for Ms. Brandt to hold a marijuana license.

Attachments: Releaf Alaska website
August 2017 letter

Tap To Call: 907-250-5453 (tel:907-250-5453) 0 item(s)

RELEAF ALASKA Medical Marijuana Doctors (http://releafak.com/)

MENU

Welcome To Releaf Alaska!

Releaf Alaska provides professional and confidential medical cannabis evaluations and education in Anchorage, Alaska. It is our goal to create a comfortable and stress-free environment for patients that wish to acquire their medical cannabis recommendation and ID card. We are able to answer questions and extend our knowledge to inquiring patients, however it is important to understand that our doctors are consulting with patients solely about their qualification for medicinal cannabis. Releaf Alaska serves ALL of Alaska, contact us to schedule an appointment!

(http://releafak.com/become-a-patient/)

There are more than 60 chemical compounds known as cannabinoids in the marijuana plant. Cannabinoids interact with your body by way of naturally occurring cannabinoid receptors embedded in cell membranes throughout your body. There are cannabinoid receptors in your brain, lungs, liver, kidneys, immune system and more; both the therapeutic and psychoactive properties of marijuana occur when a cannabinoid (such as the THC produced by the cannabis plant) activates a cannabinoid receptor. Your body also has naturally occurring endocannabinoids that stimulate your cannabinoid receptors and produce a variety of important physiologic processes, far beyond that of the traditional "highs" associated with THC. What is amazing is that your body is

actually hard-wired to respond to cannabinoids through this unique cannabinoid receptor system; research is still ongoing on just how extensive their impact is on our health, but to date it's known that cannabinoid receptors play an important role in many body processes, including metabolic regulation, cravings, pain, anxiety, bone growth, and immune function.

SUBSCRIBE FOR EXCLUSIVE DEALS & DISCOUNTS

Your Name (required)

Your Email (required)

Your Phone Number (required)

By law, I am 21 years of age or older. I consent to getting occasional promotions via email and/or text. I can unsubscribe at any time.

[recaptcha id:Security]

SEND

Shop CBD Products Online

$70.00 – $420.00

(http://releafak.com/product/cbd-oil/)

CBD Oil 100/350/550/1000/1500mg/3500mg

(http://releafak.com/product/cbd-oil/)

SELECT OPTIONS (HTTP://RELEAFAK.COM/PRODUCT/CBD-OIL/)

$35.00

(http://releafak.com/product/cbd-soothe-syrup/)

CBD Syrup 60mg

(http://releafak.com/product/cbd-soothe-syrup/)

SELECT OPTIONS (HTTP://RELEAFAK.COM/PRODUCT/CBD-SOOTHE-SYRUP/)

(http://releafak.com/product/cbd-capsules/)

CBD CAPSULES 750mg

(http://releafak.com/product/cbd-capsules/)

ADD TO CART (/?ADD-TO-CART=241)

Anchorage Fee Schedule:

New Patients: $225
Renewal Patients: $225
Patients Without Valid Cards Or Medical Records: $275
Higher Plant Count, 24 Plants/24 Oz: $150)

Contact Us:

910 W. International Rd
Anchorage, AK 99518

907-250-5453
releafak@gci.net

Easy Online Payments:

NEW OR RENEWAL PATIENT EVALUATION WITH RECORDS $300.00 USD

Add to Cart

CUSTOM PAYMENT FORM

Use this form if you are making a partial payment or reduced rate payment for services.

Pay Now with PayPal

Medical Cannabis can provide benefits for a wide variety of ailments and conditions including but not limited to:

- Multiple Sclerosis
- Premenstrual Syndrome
- Severe and Chronic Pain
- Arthritis

- Migraine headaches
- Glaucoma
- HIV/AIDS
- Cancer Chemo or radio therapy
- Chronic nausea/vomiting
- Anorexia (loss of appetite)
- Seizure disorders (Epilepsy)
- Gastric Esophageal Reflux
- Cerebral palsy
- Asthma
- Hepatitis C
- Lou Gehrig's Disease
- Nail Patella
- Chron's Disease or Ulcerative Colitis
- Repetitive Sprain Injury (RSI)
- Cumulative trauma disorder
- Fibromyalgia
- Scoliosis
- Carpal Tunnel
- Whiplash
- Neuropathy
- Muscle Spasm

"The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people." S might argue that the U.S. Constitution delegates powers to the feds to arrest MMJ providers because of the schedule 1 status of cannabis in the Controlled Substance Act . However, the CSA's schedule 1 requirements are: "1) Schedule I.– (A) The drug or other substance has a high potential for abuse. (B) The drug or substance has no currently accepted medical use in treatment in the United States. (C) There is a lack of accepted safety for use of the drug or other substance under medical supervision." Clearly, cannabis doesn't qualify on B and C, and the Merck Medical Manual of Diagnosis and Treatment clearly states that cannabis not physically addictive, so it doesn't meet criteria for A either.

Conclusion: The power to regulate MMJ is not delegated to the federal government because it does not meet their own criteria to be a schedule 1 drug. Therefo they have no power to regulate it and must reclassify or remove it from the list. Isn't it ironic that tobacco meets all three criteria of the CSA Schedule 1, and yet, tobacco companies are instrumental in preventing the consumption of the non-addictive, medically safe and effective cannabis (visualize outstretched politicia hands)? Meanwhile, tobacco, which clearly meets all three criteria of a schedule 1 drug (A) highly physically addictive, B) no medical use, C) not safe even wher under the directions of a physician and in fact proven to cause cancer), is legal, sold for a hefty profit, and the profits consequently used to influence the decisio politicians making laws. When will the Fed arrest Big Tobacco???

We will meet or beat any legitimate advertised price.

Insurance

Some insurance companies are now covering the cost of your Medical Cannabis Card, call your insurer to find out.

Cancellation Policy

If you choose to make an appointment KEEP IT! We do fill up quickly, space is limited. You will be charged a cancellation fee if you do not keep your appointment. The fee will be charged when you make another appointment. *Some exceptions apply

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© 2017 RELEAFAK.com. All Rights Reserved. We are not a dispensary. NO medical marijuana available here.

(HTTPS://WWW.FACEBOOK.COM/RELEAFALASKA)

THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Commerce, Community, and Economic Development

ALCOHOL & MARIJUANA CONTROL OFFICE
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August 22, 2017

Lori Brandt
Releaf Alaska
1934 Concord Hills Drive
Anchorage, AK 99515

Dear Ms. Brandt:

In your advertising for your service, Releaf Alaska, you offer an "extended plant count," suggesting to your customers that if they pay you a fee, you can authorize them to have a "higher plant count." You appear to offer the ability to have 24 plants for a fee of $150.

State law limits the number of plants allowed for personal cultivation. AS 17.38.020(2), which regulates marijuana, states that the following act is lawful:

> possessing, growing, processing, or transporting not more than six marijuana plants, with three or fewer being mature, flowering plants, and possession of the marijuana produced by the plants on the premises where the plants were grown, except that not more than 12 marijuana plants, with six or fewer being mature, flowering plants, may be present in a single dwelling regardless of the number of persons 21 years of age or older residing in the dwelling; *(emphasis added)*

The portion of state law that regulates medical marijuana, AS 17.37.040(a), states:

> (a) A patient, primary caregiver, or alternate caregiver may not
> . . .
> (4) possess in the aggregate more than
> (A) one ounce of marijuana in usable form; and
> (B) six marijuana plants, with no more than three mature and flowering plants producing usable marijuana at any one time. *(emphasis added)*

There is no provision in state law or regulation that allows any individual to possess more than six plants, or for any single dwelling with two or more persons 21 years of age or older to contain more than twelve plants.

By offering to provide a higher plant count for a fee, you are giving the perception to people who purchase this "service" that they are able to violate Alaska statutes. This could be a violation of AS 11.46.600, Scheme to Defraud.

Please remove the offer of an extended or higher plant count from all of your advertising and marketing materials immediately.

Sincerely,

Erika McConnell
Director

Cc: AMCO Enforcement

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MEMORANDUM

TO: Chair and Members of the Board DATE: February 6, 2019

FROM: Erika McConnell
Director, Marijuana Control Board

RE: Releaf License #17961

This is an application for a Retail Marijuana Store in the Municipality of Anchorage, by The Happy Farmer, LLC DBA Releaf.

Date Application Initiated:	5/4/2018
Objection Period Ends:	3/6/2019
Date Under Review Queue:	10/29/2018
Incomplete Letter(s) Date:	1/17/2019
Date Final Corrections Submitted:	1/27/2019
Determined Complete/Notices Sent:	2/4/2019
Local Government Response/Date:	2/5/2019 – Protest pending an approved municipal marijuana license and special land use permit.
DEC Response/Date:	Deferred
Fire Marshal Response/Date:	Deferred
Background check status:	Complete
Objection(s) Received/Date:	Not as of 2/5/19
Other Public Comments Received:	No
Staff Questions/Issues for Board:	No