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 14, 2018

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

Re: Standard Marijuana Cultivation Facility Facility #17346

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.**

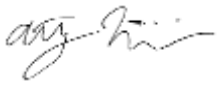
- **MJ-00 Application Certifications**
  - Page 1, Section 1 – Establishment Information for all:
    - The "Doing Business As" name must be listed as Great Northern Cultivation, Inc. to be consistent with your state business license.
    - The Premises Address field must include "Suite 101".
  - Section 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).
- **MJ-01 Operating Plan**
  - Page 1, Section 1 – Establishment & Contact Information:
    - The "Doing Business As" name must be listed as Great Northern Cultivation, Inc. to be consistent with your state business license.
  - 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**
  - Page 1, Section 1 – Establishment Information:
    - The "Doing Business As" name must be listed as Great Northern Cultivation, Inc. to be consistent with your state business license.
    - The Premises Address field must include "Suite 101".
  - Diagram 1A:

        - The room labeled "Staff Lockers" (that contains a changing stall) has been designated as a restricted access area, which would require it to be under video surveillance. Was this intentional?
- **MJ-04 Cultivation Supplemental**
    - Page 1, Section 1 – Establishment Information:
        - The "Doing Business As" name must be listed as Great Northern Cultivation, Inc. to be consistent with your state business license.
    - Page 3:
        - Additional information regarding pest control products is required on this page that is not listed on the version of the application you completed. Please visit the AMCO website to download the latest version of Form MJ-04 and complete the new Page 3 to replace the current page. The direct link to Form MJ-04 is https://www.commerce.alaska.gov/web/Portals/9/pub/MCB/MarijuanaApplication/MJ-04.pdf
    - Page 3, Section 4.5:
        - Your response references Attachment B, but this was not included.
    - Page 3, Section 4.6 (4.7 on the new version of this form):
        - Please include examples of specific nutrient brands that will be used (rather than specific vitamins or minerals).
        - Attachment C was not provided.
    - Page 4, Section 4.7:
        - Attachment D was not provided.
    - Page 6, Section 8.1 and 8.2:
        - Sample labels were not provided. If this information was on Attachments E and F (referenced in your response), these attachments were not included with your application.
- **MJ-08 Local Government Notice Affidavit**
    - Section 1 – Establishment Information:
        - The License Type has been listed as "Retail Marijuana Store".
        - The "Doing Business As" name must be listed as Great Northern Cultivation, Inc. to be consistent with your state business license.
- **MJ-09 Statement of Financial Interest**
    - Page 1, Section 1 – Establishment Information for all:
        - The "Doing Business As" name must be listed as Great Northern Cultivation, Inc. to be consistent with your state business license.
        - The Premises Address field must include "Suite 101".
    - 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).
- **Proof of Possession for Proposed Premises**
    - The lease provided is inadequate to show that Great Northern Cultivation, 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**
    - For Great Northern Cannabis, Inc.:
        - Please provide a list of the ownership interest of each shareholder.

- For Murder Lake, LLC:
  - A signed copy of the LLC's Operating Agreement
  - A list of all LLC Members and their ownership interest

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 Cultivation, Inc. License #17346
Date:	Wednesday, November 14, 2018 3:33:24 PM
Attachments:	17346 Incomplete Notice.pdf image001.png

Good afternoon,

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; jredden@greatnortherncannabis.com
Cc: Marijuana Licensing (CED sponsored); Jason Brandeis
Subject: RE: Incomplete Application - Great Northern Cultivation, Inc. License #17346
Date: Thursday, January 17, 2019 1:13:06 PM
Attachments: image001.png
image002.png

Good afternoon,

Thank you for clarifying. I have finished my review of the revised documents, but there are additional corrections needed before this application can be deemed complete. Note that if these subsequent revisions are still inadequate to deem the application complete, your application will be returned to you and it will be necessary to submit a new application and pay new fees if you wish to continue pursuing licensure.

MJ-01 Operating Plan

On Page 4, Section 3.5, the correction required per the Incomplete Notice stated "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".

Your response on the revised form answers the question regarding when AMCO is contacted, but the other information in your response was all removed and it no longer fully addresses the questions being asked.

Form MJ-02 Premises Diagram

On Diagrams 1A and 1B, please remove the "Phase 1" and "Phase 2" labels. Additionally, the Staff Lockers and bathrooms are presently marked as restricted access areas, which will need to be corrected.

Form MJ-04 Cultivation Supplemental

You state in Section 2.1 that cultivation will not be taking place at the facility during Phase 1. However, your response in Section 4.1 lists rooms that will be utilized during this phase which includes rooms that are labeled on MJ-02 as non-licensed areas (such as the grow rooms). There also do not appear to be any differences to the information provided for Phase 1 and Phase 2 (Attachment J).

Your response on Attachment D also appears to be incomplete. The last sentence states "When wastewater cannot be recycled or is not needed for additional" and then cuts off. Is there more information you want to include?

Form MJ-09 Statement of Financial Interest

The revised MJ-09 submitted for Jerad Brown lists a place of birth instead of a date of birth on Page 1, so a corrected page is necessary.

Let me know if you have any questions or need copies of any documents,

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

From: John Redden <jredden@greatnortherncannabis.com>
Sent: Thursday, January 17, 2019 9:46 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Jason Brandeis <jbrandeis@BHB.com>; Steve Brashear <steve@greatnortherncannabis.com>
Subject: RE: Phased Buildout Question

Good morning TJ,

Thank you for following up with me. Please use the MJ-02 labeled Phase I—We have no additional changes to make to the MJ-02 diagrams.

If you have any additional concerns, please feel free to reach out to me directly.

Sincerely,
John

John E. Redden
General Counsel

Great Northern Cannabis, Inc.
Anchorage, Alaska
816.830.6978 |
JRedden@GreatNorthernCannabis.com
GreatNorthernCannabis.com

From: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Sent: Thursday, January 17, 2019 9:20 AM
To: Licensing <licensing@greatnortherncannabis.com>; Jason Brandeis <jbrandeis@BHB.com>
Cc: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: RE: Phased Buildout Question

Good morning,

I have received the amended MJ-01 and MJ-04 that incorporate both phases and will begin reviewing your corrections today, but I would like to clarify which Form MJ-02: Premises Diagram you would like to submit for this application. I am assuming Phase I but just want to make sure that there are no additional amendments that you might still want to make. Please let me know.

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: Wednesday, January 16, 2019 3:06 PM
To: Sawyer, Jane Preston (CED) <jane.sawyer@alaska.gov>
Subject: RE: Phased Buildout Question

Hi Jane. I'm writing to follow up on the phased buildout application. Attached are revised MJ-01 and MJ-04 forms that incorporate both phases.

This should comply with what you explained below. If you need additional information, please let me know.

Thanks,
Jason

From: Sawyer, Jane Preston (CED) [mailto:jane.sawyer@alaska.gov]
Sent: Thursday, January 10, 2019 8:37 AM
To: Jason Brandeis
Subject: RE: Phased Buildout Question

Jason:

I took a look at the operating plans you submitted as your for GNC corrections. There is a misunderstanding about the operating plans: in terms of the diagrams, as we discussed, you will do MJ-14 to expand the licensed premises as you go (whether that's one MJ-14 or two or however many), but in terms of the MJ-01/04 your phases do need to be in one operating plan you would just talk about the phases in each box where the phases apply. Essentially, you need to combine your phases into one operating plan which is what would be presented to the board.

Thanks,
Jane