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 20, 2018

Haystack Investments, Inc.
DBA: Haystack Investments, Inc.
Via email: mongoose32216@gmail.com

Re: Limited Marijuana Cultivation Facility Facility #18111

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-01 Operating Plan**
  - Page 2, Section 3.1:
    - The response you provided describes admitting visitors into the facility, but does not address how you will prevent unescorted members of the public from entering restricted access areas.
  - Page 2, Section 3.2:
    - Expand upon your response to describe the procedures for escorting visitors through restricted access areas. Include the ratio of visitors to licensees or employees escorting them.
  - Page 3, Section 3.3:
    - No sample badges were provided.
  - Page 4, Section 3.5:
    - Please expand upon your description of the alarm system for the proposed premises. Include procedures that will be followed if an unauthorized breach is alerted, and include at what point AMCO is contacted as required under 3 AAC 306.715(e).
  - Page 4, Section 3.7:
    - Include a description of the procedures to be followed if an individual is suspected to be loitering on the premises.
  - Page 5, Section 3.13:
    - You state in your response that cameras will be placed to allow a clear, unobstructed view of faces and individuals in all areas of the facility, and that

exterior camera will allow a clear view of entry point. Please expand on your response to describe how.

- Page 7, Section 6.4:
  - Your response does not provide the information that is being requested in this section.
- Page 9, Section 9.1:
  - Your response in this section is inadequate.
- Page 10, Section 9.2:
  - No response was provided in this section.

- **MJ-02 Premises Diagram**
  - Page 1, Section 1 – Establishment Information:
    - The License Number field has been left blank.
  - All Diagrams:
    - Please number your diagrams according to the list provided on Page 1 of Form MJ-02.
  - Diagram of the Licensed Premises:
    - The diagram provided does not give a clear view of the interior layout of your proposed premises, and appears to depict wiring information. Please re-review the requirements of Diagram 1 and provide a diagram that meets the listed requirements.
    - You certified on page 5, Section 3.11 of Form MJ-01 that the surveillance room or area is clearly defined on Form MJ-02. However, this area is not depicted.
    - You certified on page 3, Section 4.2 of Form MJ-04 that the proposed areas for cultivation are defined on Form MJ-02, but these areas are not depicted or labeled clearly.
  - Property Summary Map:
    - If this diagram was submitted to meet the requirements of Diagram 3, it does not show all structures on the property or show which areas will be part of the licensed premises.
  - Aerial Photo:
    - Please indicate where the licensed premises is located in this photo.
- **MJ-04 Cultivation Supplemental**
  - Page 2, Section 4.1:
    - The total area under cultivation has not been specified. Note that a Limited Marijuana Cultivation Facility must have **fewer than** five hundred square feet under cultivation.
    - Describe the Veg Room in more detail. For example, are any tables or racks used as growing spaces, and do they have multiple tiers or shelves?
  - Page 3:
    - There is additional information required on this form regarding pesticides and pest control products that is not requested on the version of the form you completed. Please visit the AMCO website to download the latest version of Form MJ-04 and complete all sections on the updated Page 3. The direct link to this form is:

https://www.commerce.alaska.gov/web/Portals/9/pub/MCB/MarijuanaApplication/MJ-04.pdf

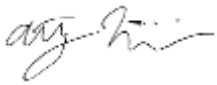
  - Page 3, Section 4.6 (4.7 on the updated form):
    - Any fertilizers that will be used must be listed in this section. Include specific brands, as applicable.

- Page 5, Section 6.1:
  - The box next to the statement "I am attaching to this form documentation of my odor control exemption from the local government" should not be signed with initials unless you have attached an odor control exemption from your local government.
- Page 6, Sections 8.1 and 8.2:
  - Sample labels are required for each of these sections to demonstrate how you will comply with 3 AAC 306.475 for marijuana packaged for a retail store to sell without repackaging, and marijuana packaged in wholesale packages, respectively.

- **MJ-07 Public Notice Posting Affidavit**
  - Section 2 – Certifications:
    - Provide the address of the other conspicuous location that your Public Notice was posted at.
- **MJ-08 Local Government Notice Affidavit**
  - Section 2 – Certifications:
    - The printed name of the licensee signing this form has not been listed.
- **Proof of Possession for Proposed Premises**
  - A lease must contain a disclaimer that the landlord/lessor will not take possession of or remove marijuana from the premises, and that AMCO will be contacted in the event that this is necessary (typically under the "Default" section of the lease).
- **Entity Documents**
  - The following required documents were not provided:
    - A copy of the corporation's Certificate of Incorporation
    - The name of each corporate officer
    - A list of all shareholders and their ownership percentage
    - A copy of the corporation's by-laws
- **Applicant's Alaska Residency**
  - Alaska residency of James Dunlap and Richard Ingram Jr. could not be verified. Did they apply for the Permanent Fund Dividend in 2018?

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:	mongoose32216@gmail.com
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application - Haystack Investments, Inc. License #18111
Date:	Tuesday, November 20, 2018 3:57:30 PM
Attachments:	18111 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: Jana Weltzin; jimdunlap5202@gmail.com
Cc: Marijuana Licensing (CED sponsored); Richard Ingame; legal counsel; Valerie Mastolier
Subject: RE: Incomplete Application - Haystack Investments, Inc. License #18111
Date: Wednesday, January 30, 2019 11:17:50 AM
Attachments: 18111 2nd Incomplete MJ-04.pdf
image001.png

Good morning,

I have completed my review of the corrections submitted, but at this time there are additional revisions required on Form MJ-04: Cultivation Supplemental before the application can be deemed complete. Please see attached for a copy of this form.

With this submission, two copies of Page 3 were provided but one shows less detail than the other. Please verify which page should be submitted. Additionally, Page 4 was not provided.

I noted in the Incomplete Notice that the box on Page 5, Section 6.1 should not be initialed unless odor control exemption documentation from the local government is being provided also. The box was still signed on the revised copy, but I did not see a copy of any odor control exemptions.

Corrected pages can be scanned and emailed 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: Jana Weltzin <jana@jdwcounsel.com>
Sent: Thursday, January 24, 2019 3:19 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Richard Ingame <mongoose32216@gmail.com>; legal counsel <legal@jdwcounsel.com>; Jana Weltzin <jana@jdwcounsel.com>; Valerie Mastolier <valerie@jdwcounsel.com>
Subject: Haystack Incomplete Response part 4 - license 18111

Hi AMCO team – please see attached documents for part 4 of this incomplete response – please let us know if you need anything else to get these items deemed complete and the application on the Feb agenda:
-MJ01
MJ18 for Richard

Thank you, Jana

From: legal counsel <legal@jdwcounsel.com>
Sent: Thursday, January 24, 2019 3:09 PM
To: Jana Weltzin <jana@jdwcounsel.com>
Subject: Haystack

Brenda Mills
JDW, LLC
Legal Assistant
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info@jdwcounsel.com
legal@jdwcounsel.com

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P Think green, please don't print unnecessarily