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

September 14, 2018

RCFC, LLC
DBA: Rosie Creek Farm
Via email: mike@rosiecreekfarm.com

Re: Marijuana Product Manufacturing Facility Facility #12511

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 6, Section 4.2:
    - Your response indicates that hard copies of records will be kept in a locked office. As a reminder, 3 AAC 306.750(a)(1) requires that records from the last six months must be maintained on the licensed premises of the product manufacturing facility.
- **MJ-02 Premises Diagram**
  - The separate buildings labeled as "Manufacturing Facility" and "Marijuana Storage 3" are indicated as the licensed premises, however a licensed premises must be contiguous.
    - Additionally, these buildings are currently part of the licensed premises of License #10005. You would need to submit Form MJ-14: Licensed Premises Diagram Change and Form MJ-15: Operating Plan Change and pay the required fees to amend your diagram and operating plan for License #10005 to de-designate these areas as part of its licensed premises.
  - Please number your diagrams according to the list on Page 1 of Form MJ-02.
  - The licensed premises of License #10005 has not been outlined and labeled on the diagrams.
  - The bathroom has been included in the restricted access area, which would require it to be under video surveillance. Please use a different color to outline and label the bathroom as a part of the licensed premises but not a restricted access area.
  - An aerial photo of the entire lot and surrounding lot was not provided with your application. This can be obtained from sources like Google Earth, for example.
- **MJ-05 Manufacturing Supplemental**

- Page 4, Section 5.3:
  - It was stated in Section 5.2 that the facility will not be performing in-house testing. However, it was certified in this section that the area where in-house testing will occur is identified on Form MJ-02. Please correct accordingly.
- Dry Sift Hash:
  - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
  - The Product Description states that this product will be packaged in glass jars for wholesale. Please specify to whom the wholesale packages will be sold to.
- Dry Sift Hash (Decarboxylated)
  - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
  - The Product Description states that this product will be packaged in glass jars for wholesale. Please specify to whom the wholesale packages will be sold to.
  - The Product Name on the Sample Label does not match the Product Name given for this product.
- Ice Water Hash:
  - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
  - The Product Description states that this product will be packaged in glass jars for wholesale. Please specify to whom the wholesale packages will be sold to.
- Ice Water Hash (Decarboxylated):
  - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
  - The Product Description states that this product will be packaged in glass jars for wholesale. Please specify to whom the wholesale packages will be sold to.
  - The Product Name on the Sample Label does not match the Product Name given for this product.
- Rosin:
  - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
  - The Product Description states that this product will be packaged in glass jars for wholesale. Please specify to whom the wholesale packages will be sold to.
- Rosin (Decarboxylated):
  - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
  - The Product Description states that this product will be packaged in glass jars for wholesale. Please specify to whom the wholesale packages will be sold to.
  - The Product Name on the Sample Label does not match the Product Name given for this product.
- Essential Oil Infused Rosin:
  - Please include a description of the product's texture in the Product Description.
  - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
- Cannabis Infused Vegetable Oils (Decarboxylated):
  - The Product Name on the Sample Label does not match the Product Name given for this product.
- Cannabis Tincture:

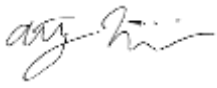
        - The Packaging Description states that the serving size will be clearly indicated on the bottle for consumers. Please depict this in the graphic representation.
    - Cannabis Tincture Decarboxylated:
        - The Packaging Description states that the serving size will be clearly indicated on the bottle for consumers. Please depict this in the graphic representation.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Rosin Tincture:
        - The Packaging Description states that the serving size will be clearly indicated on the bottle for consumers. Please depict this in the graphic representation.
    - Rosin Tincture (Decarboxylated)
        - The Packaging Description states that the serving size will be clearly indicated on the bottle for consumers. Please depict this in the graphic representation.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Cannabis Valerian Tincture:
        - The Packaging Description states that the serving size will be clearly indicated on the bottle for consumers. Please depict this in the graphic representation.
    - Cannabis Valerian Tincture (Decarboxylated):
        - The Packaging Description states that the serving size will be clearly indicated on the bottle for consumers. Please depict this in the graphic representation.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Cannabis Glycerite:
        - The Packaging Description states that the serving size will be clearly indicated on the bottle for consumers. Please depict this in the graphic representation.
    - Cannabis Glycerite (Decarboxylated)
        - The Packaging Description states that the serving size will be clearly indicated on the bottle for consumers. Please depict this in the graphic representation.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Rosin Glycerite:
        - The Detailed Manufacturing Process states that cannabis rosin will be infused in food-grace glycerin, but the ingredients do not include rosin.
        - The Packaging Description states that the serving size will be clearly indicated on the bottle for consumers. Please depict this in the graphic representation.
    - Rosin Glycerite (Decarboxylated):
        - The Detailed Manufacturing Process states that cannabis rosin will be infused in food-grace glycerin, but the ingredients do not include rosin.
        - The Packaging Description states that the serving size will be clearly indicated on the bottle for consumers. Please depict this in the graphic representation.
    - Cannabis Salve (Decarboxylated)
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Cannabis Healing Salve (Decarboxylated)
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Cannabis Rosin Capsules

        - Please specify the amount of THC per capsule in the Packaging Description. If multiple options will be available (a capsule with 2.5 mg of THC and a capsule with 5 mg of THC, for example), they can be listed separately in this section.
    - Cannabis Rosin Capsules (Decarboxylated)
        - The Product Name on the Sample Label does not match the Product Name given for this product.
        - Please specify the amount of THC per capsule in the Packaging Description. If multiple options will be available (a capsule with 2.5 mg of THC and a capsule with 5 mg of THC, for example), they can be listed separately in this section.
    - Cannabis Capsules:
        - Please specify the amount of THC per capsule in the Packaging Description. If multiple options will be available (a capsule with 2.5 mg of THC and a capsule with 5 mg of THC, for example), they can be listed separately in this section.
    - Cannabis Capsules (Decarboxylated)
        - Please specify the amount of THC per capsule in the Packaging Description. If multiple options will be available (a capsule with 2.5 mg of THC and a capsule with 5 mg of THC, for example), they can be listed separately in this section.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Cannabis Pre-rolls:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Hash Pre-rolls:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
    - Mullein Hash Pre-rolls:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Mullein Tulsi Hash Pre-rolls:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Cannabis Mullein Artemisia Hash Pre-rolls:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Cannabis Mullein Hash Pre-rolls:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Cannabis Mullein Kinnikinnick Hash Pre-rolls:

        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Cannabis Mullein Tulsi Hash Pre-rolls:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Cannabis Mullein Tulsi Hash Pre-rolls:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
        - The Product Name on the Sample Label does not match the Product Name given for this product.
    - Mullein Wraps:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
    - Hash and Rosin Mullein Wraps:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
    - Hash Mullein Wraps:
        - The Packaging Description states that the product will be packaged in a resealable, opaque and child-resistant mylar bag. Please provide a sample image.
- **MJ-09 Statement of Financial Interest**
    - Page 1, Section 1 – Establishment Information for both:
        - The Premises Address was listed as 2658 Livingston Loop, which is inconsistent with the premises address provided in the Online Application.
- **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).

It is very important that you submit the above corrections and/or documents as soon as possible 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:	Mike Emers
Cc:	Marijuana Licensing (CED sponsored); Jana Weltzin; Valerie Mastolier; Sherri Lindfors
Subject:	Incomplete Application - Rosie Creek Farm License #12511
Date:	Friday, September 14, 2018 9:36:53 AM
Attachments:	12511 Incomplete Application Notice.pdf image001.png

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Good morning,

Your application for your marijuana establishment license has been reviewed, and at this time is considered incomplete. Please see the attached notice regarding corrections, additional documents, and/or resubmittals that need to be addressed in your application. 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:	Mike Emers
Cc:	Marijuana Licensing (CED sponsored); Jana Weltzin; Valerie Mastolier; Sherri Lindfors
Subject:	RE: Incomplete Application - Rosie Creek Farm License #12511
Date:	Friday, November 16, 2018 1:53:56 PM
Attachments:	12511 Incomplete Application Notice.pdf image001.png

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Good afternoon,

I am following up with you regarding your incomplete application for a Marijuana Product Manufacturing Facility, Rosie Creek Farm License #12511. I do not show that we have received a response to this notice at this time, so this is just a reminder that the ninety-day deadline to submit corrections for this application is **December 13, 2018**.

Sincerely,

TJ Zielinski

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

From: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Sent: Friday, September 14, 2018 9:37 AM
To: Mike Emers <mike@rosiecreekfarm.com>
Cc: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>; Jana Weltzin <jana@jdwcounsel.com>; Valerie Mastolier <valerie@jdwcounsel.com>; Sherri Lindfors <sherri@jdwcounsel.com>
Subject: Incomplete Application - Rosie Creek Farm License #12511

Good morning,

Your application for your marijuana establishment license has been reviewed, and at this time is considered incomplete. Please see the attached notice regarding corrections, additional documents, and/or resubmittals that need to be addressed in your application. 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:	Mike Emers
Cc:	Marijuana Licensing (CED sponsored); Jana Weltzin; Valerie Mastolier; legal counsel
Subject:	RE: Incomplete Application - Rosie Creek Farm License #12511
Date:	Tuesday, December 11, 2018 8:44:21 AM
Attachments:	image001.png

Good morning,

I have completed my review of your revisions and see that most of the needed corrections have been made. However, there will be some additional revisions required on Forms MJ-02: Premises Diagram and MJ-05: Manufacturing Supplemental.

On **Diagram 1** of **Form MJ-02**, please outline and label the Licensed Premises boundary. Looking at your Diagram 1, this may be the same area presently labeled as "Restricted access area".

On **Form MJ-05**, the Packaging Description of some of the marijuana concentrates state that they will be packaged in up to 1 pound containers for wholesale to marijuana retailers and product manufacturers. 3 AAC 306.565(c) allows for non-edible marijuana products to be packaged in wholesale packages not to exceed five pounds for other product manufacturers, but not for retail stores. Please remove reference to marijuana being packaged in wholesale packges for retailers in the following products:

- Dry Sift Hash
- Dry Sift Hash (Decarboxylated)
- Ice Water Hash
- Ice Water Hash (Decarboxylated)
- Rosin
- Rosin (Decarboxylated)

Please let me know if you have any questions or need copies of any documents.

Sincerely,

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

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-----Original Message-----
From: Mike Emers <mike@rosiecreekfarm.com>
Sent: Friday, December 07, 2018 12:53 PM

To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Jana Weltzin <jana@jdwcounsel.com>; Valerie Mastolier <valerie@jdwcounsel.com>; legal counsel <legal@jdwcounsel.com>
Subject: Completed Supplemental Forms; License # 12511, email 1 of 1

Hi TJ,

Here enclosed are the combined files of MJ-01 and MJ-02 for license 12511. My apologies for not combining the documents.

Mike Emers, Rosie Creek Farm