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 8, 2018

E & M Holdings, LLC
DBA: Stoney Moose Kitchens
Via email: akmark21@gmail.com

Re: Marijuana Product Manufacturing Facility #16991

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.**

- **Online Application (call me if you have any questions before you resubmit the online application)**
  - The online application has been rolled back to 'New' so that you can make corrections to it through your MyAlaska:
    - You need to add Suite 104 to the physical address/proposed premises. Your lease designates a unit number, and one of your diagrams clearly indicates that.
    - While you are in your online application, remove E & M Holdings, LLC from under the Entity Officials tab and the Affiliates tab, E & M Holdings, LLC should only be under Licensee.
  - When you make the above corrections and resubmit, the system will generate a new Public Notice, and a new Advertisement Notice template. You will need these updated documents for part of your corrections.
  - Let me know when you have re-submitted your online application.

- **MJ-00 Application Certifications**
  - You only submitted one (1) MJ-00 (for Eric Riemer). This MJ-00 is missing the suite number on the premises address, and the name of the licensee needs to be completed (it should include the 'LLC' at the end of E & M Holdings), all of this on page 1.
  - MJ-00 for each person needs to be submitted, make sure the information is put in correctly: Melissa Brooks-Johnson, John Dempsey, Madonna Hall, Scott Hall, Kevin Johnson, Allegra Machado, Bo Meredith, and Mark Woodward.

- **MJ-01 Operating Plan**

- Page 1: under section 1, you need to complete the name of the company applicant/proposed licensee. It should be E & M Holdings, **LLC**.
- Page 2:
  - 3.1: add to your answer in this box and describe what information of the visitor your establishment will log. Re-review 3 AAC 306.755(6). ALSO, FYI, the restricted access area sign as it pertains to our regulations must state "Restricted access area. Visitors must be escorted".
  - 3.2: in this box you imply that your restricted access area starts upon entering the kitchen, but your diagram shows otherwise. So which is it? either the diagram or this box will need to be corrected properly. I will talk about the diagram later in this letter.
- Page 4, 3.5: please add to your answer in this box and describe how you will comply with 3 AAC 306.715(e), please read it, it is a fairly new subsection of the regulation.
- Page 8, 8.1: re-review 3 AAC 306.750 and add to your answer in this box by describing how you will comply with the requirements of the manifest.
- Page 10, 9.12: in this box you state you provided a sample of the logo, but it is not attached. Please attach it.

- **MJ-02 Premises Diagram**
  - Page 1: under section 1, you need to complete the name of the company applicant/proposed licensee. It should be E & M Holdings, **LLC**.
  - On Diagram 1&2:
    - outline in color, and label that outline, the perimeter of the licensed premises. Within the licensed premises, outline in a different color, and label that color, the restricted access area. On your 3.2 answer in MJ-01, you imply that the restricted access area starts upon entering the kitchen, but on this diagram you have a label of restricted access area before entering the kitchen. Which is it? NOW, you have a storage on the bathroom side, what kind of storage is that? because if it is marijuana or marijuana product then this area needs to be restricted access area or move your storage to the back in the kitchen.
    - note: your bathroom should be licensed but not restricted access area which also needs to be notated on your diagram.
    - What is the second floor of this suite 104? Where does it lead to? What is it used for? Your lease is only specifically to the bottom floor, so who has legal possession to the upper floor?
    - I need a continuation of your Diagram 1&2 that shows/depicts the upper floor; this is where you can answer the questions I asked immediately above.
  - On Diagram 3:
    - since only the bottom floor is the proposed licensed premises, please change your red label/outline to state something along the lines of it being the building but only the bottom floor is the proposed licensed premises.
  - On Diagram 5:
    - since only the bottom floor is the proposed licensed premises, please change your red label/outline to state something along the lines of it being the building but only the bottom floor is the proposed licensed premises.

- **MJ-05 Manufacturing Supplemental**

- Page 1: under section 1, you need to complete the name of the company applicant/proposed licensee. It should be E & M Holdings, **LLC**. AND the address needs the suite number.
- Page 3, 4.1: add to your answer in this box and describe the marijuana waste to compostable/non-compostable material ratio you will use to render the marijuana waste unusable. Re-review 3 AAC 306.740. ALSO, what will be your waste disposal process for expired or outdated marijuana products.

Products

- **Green Butter:** the way you are proposing to sell this product (stand-alone edible product) is not allowed, 3 AAC 306.555(b)(2). It will be removed from your application.

- **Ganjacrisp:**
  - Ingredients: which "infused coconut oil" are you referring to here? Your proposed Moose Coconut Oil? Make it clear in the box.
  - Packaging Description: in this box it needs to be very clear what constitutes a serving size. Example, serving size=half of crisp.
  - Sample Label: the ingredients on your sample label do not match what you stated in the ingredients box. ALSO, your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Moose milk Creamer:**
  - Ingredients: what type of marijuana is being used for this product? Make it clear in this box.
  - Standard Production: what type of marijuana is being used for this product? Make it clear in this box.
  - Packaging Description: need a graphic representation or photo of the vial(s) and bottle proposed here. Both the vial(s) and the bottle must depict how the serving sizes will be demarcated on them.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Raw Energy Moose Balls:**
  - Ingredients: which "infused coconut oil" are you referring to here? Your proposed Moose Coconut Oil? Make it clear in the box.
  - Packaging Description: you need to show in numbers the various packaging sizes, to include what constitutes a single serving, total number of servings, total THC content of the single serving, and total THC content of the package.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Chocolate Moose Truffle**
  - Ingredients: assuming you are talking about marijuana infused chocolate, which "infused chocolate" are you referring to here? I did not see it as one of your proposed products. Please specify.
  - Packaging Description: you need to show in numbers the different packaging sizes, to include what constitutes a single serving, total number of servings, total THC content of the single serving, and total THC content of the package. ALSO, you need to show a

graphic representation or picture of the cardboard box you mention here. AND, is the bag part of the packaging too?
    - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Mooses' Mousse**
    - Ingredients: assuming you are talking about marijuana infused chocolate, which "infused chocolate" are you referring to here? I did not see it as one of your proposed products. Please specify.
    - Packaging Description: show a photo or graphic representation of the cup you will be using depicting the serving size. Is the cup then going into the bag you show here? Describe the bag.
    - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Moose Antler (pretzel)**
    - Ingredients: assuming you are talking about marijuana infused chocolate, which "infused chocolate" are you referring to here? I did not see it as one of your proposed products. Please specify.
    - Packaging Description: you need to show in numbers the various packaging sizes, to include what constitutes a single serving, total number of servings, total THC content of the single serving, and total THC content of the package. ALSO, you need to show a graphic representation or picture of the cardboard box you mention here.
    - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations
- **Chocolate Bar (the whole presentation of this product is confusing)**
    - Product Description: the chocolate bar has 24 squares. If I understand your serving size correctly, the total THC content of this bar is 60mg.
    - Ingredients: the alcohol is infused with what? And where is it coming from? Will there even be marijuana in this product.
    - Depiction: I cannot see the 24 squares in the depiction of this chocolate bar. Make it clearer.
    - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Moose Gems**
    - Ingredients: the alcohol is infused with what? And where is it coming from? Will there even be marijuana in this product.
    - Package Description: what is the total THC content of the package?
    - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Gummy Squares**
    - Ingredients: the alcohol is infused with what? And where is it coming from? Will there even be marijuana in this product.
    - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Peppermint Pot Brownie**
    - Ingredients: which "infused coconut oil" are you referring to here? Your proposed Moose Coconut Oil? Make it clear in the box.
    - Standard Production: what infused oil are you referring to here?

  - Packaging Description: make it clear what constitutes a serving. ALSO, is the depiction of the bag you show here the paper bag you intend to use? Because it looks more like plastic.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Blueberry Ganja Muffin**
  - Ingredients: which "infused coconut oil" are you referring to here? Your proposed Moose Coconut Oil? Make it clear in the box.
  - Packaging Description: you need to show a graphic representation or picture of the cardboard box you mention here. Is the cardboard box then being put in the bag shown here?
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Alaskan Snickerdoodle**
  - Ingredients: which "infused coconut oil" are you referring to here? Your proposed Moose Coconut Oil? Make it clear in the box.
  - Standard Production: which "coconut oil" are you referring to here?
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Mountain Moose Oatmeal Raisin Cookie**
  - Ingredients: which "infused coconut oil" are you referring to here? Your proposed Moose Coconut Oil? Make it clear in the box.
  - Standard Production: which "infused coconut oil" are you referring to here?
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Moose Chip Cookie**
  - Ingredients: which "infused coconut oil" are you referring to here? Your proposed Moose Coconut Oil? Make it clear in the box.
  - Standard Production: which "infused coconut oil" are you referring to here?
  - Package Description: make it clear what constitutes a serving.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Moose Droppings**
  - Ingredients: assuming you are talking about marijuana infused chocolate, which "infused chocolate" are you referring to here? I did not see it as one of your proposed products. Please specify.
  - Standard Description: what infused chocolate are you referring to here?
  - Your packaging description for this product is too confusing, breakdown the packaging sizes you intend to do,
  - Packaging Description: you need to show in numbers the various packaging sizes, to include what constitutes a single serving, total number of servings, total THC content of the single serving, and total THC content of the package. ALSO, you need to show a photo or graphic representation of the glass jar you are talking about here, AND is this glass jar going into the bag you show here?
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Live Resin**

  - Packaging Description: show a photo or graphic representation of the sealed pouch you are referring to here.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **BBQ Moose Sauce**
  - Ingredients: which "infused coconut oil" are you referring to here? Your proposed Moose Coconut Oil? Make it clear in the box.
  - Standard Production: what cannabis tincture are you referring to here? Who is making it/where is it coming from?
  - Packaging Description: show a picture or graphic representation of the jar, and the resealable child resistant Cannaline packaging. Furthermore, the jar must depict how the serving sizes will be demarcated on the jar.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Moose-agrette Salad Dressing**
  - Ingredients: which "infused olive oil" are you referring to here? Your proposed Moose Olive Oil? Make it clear in the box.
  - Packaging description: in your standard production box, you talk about a plastic bottle but there is no mention of it in your packaging description and it needs to be included here. ALSO, you need show a photo or graphic representation of the plastic bottle, and the Cannaline packaging you intend to use. Furthermore, the plastic bottle must depict how the serving sizes will be demarcated on the plastic bottle.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Mooseberry Jam**
  - Ingredients: which "infused coconut oil" are you referring to here? Your proposed Moose Coconut Oil? Make it clear in the box. ALSO, what cannabis tincture are you referring to here?
  - Standard Production: what cannabis tincture are you referring to here?
  - Packaging Description: show a picture or graphic representation of the jar, and the resealable child resistant Cannaline packaging. Furthermore, the jar must demarcate the serving size.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Moose Olive Oil**
  - Ingredients: the decarboxilated cannabis flower/trim you mention in your standard production procedures should be listed in this box, because that's one of your ingredients, correct?
  - Packaging Description: depict how the serving sizes will be demarcated on the bottle.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Moose Coconut Oil**
  - Packaging Description: show demarcations on the jar that depict the single serving sizes.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Pot Pesto**

  - Ingredients: which "infused olive oil" are you referring to here? Your proposed Moose Olive Oil? Make it clear in the box.
  - Standard Production: what infused oil are you referring to here? Infused with what?
  - Packaging Description: you need to show in numbers the various packaging sizes, to include what constitutes a single serving, total number of servings, total THC content of the single serving, and total THC content of the package. ALSO, the jar needs to depict how the serving sizes will be demarcated on the jar.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Infused Kombucha**
  - Ingredients: Ingredients: which "infused vegetable glycerin" (assuming is marijuana infused) are you referring to here?
  - Packaging Description: you need to show in numbers the various packaging sizes, to include what constitutes a single serving, total number of servings, total THC content of the single serving, and total THC content of the package.
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Brain Tonic**
  - Ingredients: which "infused vegetable glycerin" (assuming is marijuana infused) are you referring to here?
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Sex Drive**
  - Ingredients: which "infused vegetable glycerin" (assuming is marijuana infused) are you referring to here?
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Sweet Dreams**
  - Ingredients: which "infused vegetable glycerin" (assuming is marijuana infused) are you referring to here?
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **High Voltage**
  - Ingredients: which "infused vegetable glycerin" (assuming is marijuana infused) are you referring to here?
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Chillax**
  - Ingredients: which "infused vegetable glycerin" (assuming is marijuana infused) are you referring to here?
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.
- **Warrior**
  - Ingredients: which "infused vegetable glycerin" (assuming is marijuana infused) are you referring to here?
  - Sample Label: your warning statement "For use (only) by adults…" is missing the *only*; warning statements must be verbatim to the regulations.

- **MJ-07 Public Notice Posting Affidavit**
  - As mentioned above, under Online Application, post a copy of the updated Public Notice at both the location of the proposed premises, and another conspicuous location (the bulletin board at the gas station is fine).
  - You will need to complete a brand new MJ-07 and submit it to me.

- **MJ-08 Local Government Notice Affidavit**
  - As mentioned above, under Online Application, please re-notify the Ketchikan Gateway Borough of your application by providing them with a copy of the updated Public Notice that should have generated after submitting your corrected online application.
  - You will need to complete a brand new MJ-08 and submit it to me.

- **MJ-09 Statement of Financial Interest**
  - The company applicant/licensee is E & M Holdings, **LLC.** The MJ-09 for every single person is missing the 'LLC' at the end of E & M Holdings. Please correct that.
  - Furthermore, MJ-09 for each Kevin Johnson, and Melissa Johnson was not submitted with this application. Make sure their MJ-09 has the information input correctly.

- **Publisher's Affidavit**
  - As mentioned above, under Online Application, using the updated template that should have generated after submitting your corrected online application, please run a one-time ad that includes the suite number (104) of your proposed location. I will need an affidavit of publication along with a copy of the ad for this re-run.

- **Entity Documents**
  - E & M Holdings, LLC membership/ownership information should be updated with Division of Corporations https://www.commerce.alaska.gov/cbp/main/Search/EntityDetail/10039813 . All the names you list on your marijuana application should also be listed with Division of Corporations (a separate state office) along with their percentages owned. I will need copies of what you submit to that office to get that updated.
  - Also, provide an updated list, to go with your entity documents, of all the members of E & M Holdings, LLC and their percentages owned. The percentages owned should total 100%, and should also match the information you provide to Division of Corporations.

- **Proof of Possession for Proposed Premises**
  - The lease needs actual signatures of Eric and Mark. The signatures on the lease look more like a type of text font, and they do not look like the actual signatures of these persons as they have signed other documents in this application.
  - Appropriately incorporate in the lease, with involved parties' signatures and/or initials, the following:
    - Landlord/lessor will not remove or take possession of marijuana or marijuana products, and AMCO enforcement will be contacted. This is usually under the 'Default' section of the lease.

- **Food Safety Permit Application**

- This application is for a physical location of 100 Mud Bay Road #104. Please provide a copy of the Application for Food Establishment Permit you submit to State-Department of Environmental Conservation for address 9737 Mud Bay Road, Suite 104, Ketchikan which is the address you applied for and in all your paperwork. Said application must be stamped as received by DEC.

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,

Jane Sawyer, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov

From:	Marijuana Licensing (CED sponsored)
To:	"akmark21@gmail.com"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Follow up on corrections received 1.30.19-Stoney Moose Kitchens license 16991
Date:	Thursday, January 31, 2019 5:08:00 PM
Attachments:	16991 in-house ingredients-incomplete.pdf pages from MJ-05.pdf

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Mark,

Will you please call me tomorrow. The attached items are not complete:

- The THC Infused Olive Oil, and the THC Infused Coconut Oil can only:
  - Be made as in-house ingredient and/or
  - For wholesale to another licensed manufacturing facility to use as an ingredient.
  - The packaging description on the second page of both products imply you will be selling them to a retail store for sale to a consumer. This is not allowed per 3 AAC 306.555 (a)(2).
  - You need to re-do these two products appropriately.
- I forgot to ask you about this, look at the pages from MJ-05 I attached here, why can you not put your answer into the box in 5.4 instead of making it look so messy? Please give me a new page with initials and appropriate boxes checked.

Call me tomorrow if you want, take the weekend to work on the above items. It needs to be in my email by Monday morning. Please, take the time, Mark. If this application is not complete by 2.6.19, you will start over, and there will be nothing I can do about it.

Respectfully,

Jane P Sawyer
Occupational Licensing Examiner|Alcohol & Marijuana Control Office
550 W 7th Avenue, Ste. 1600, Anchorage, AK 99501| 907-269-0350

From:	Marijuana Licensing (CED sponsored)
To:	"akmark21@gmail.com"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Following up on corrections received 1.28.19-Stoney Moose Kitchens license 16991
Date:	Wednesday, January 30, 2019 7:56:00 AM
Attachments:	missing text on standard production--Stoney"s Spicy Smoked Salmon.pdf missing one word--Dark Chocolate Moose Bar.pdf missing text on standard production --Stoney"s Smoked Salmon.pdf pages from MJ-05.pdf needs lic.prem. outline-16991 diagram 1.pdf legal right to possession question-diagram 2.pdf 16991 MJ-05 minus the products.pdf

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Mark,

I finished reviewing the corrections for your application. It is still incomplete:

- Products Stoney's Spicy Smoked Salmon, and Stoney's Smoked Salmon is missing text in the Standard Production box for each.
- Product Dark Chocolate Moose Bar is missing the word 'Moose' on the second page.
- The diagram 1 attached here needs the licensed premises perimeter outline in a different color and labeled
- I also need to ask you questions about your THC infused ingredients, basically you are saying you will be using THC-Infused: alcohol, olive oil, and coconut oil, but I don't see these base ingredients as part of your product line in this application and they need to be.

Please call me to make sure you understood my email. You do not have very much time. The 90-day deadline for you to get this application complete is 2.6.19, or you will have to start over from scratch. Furthermore, the deadline to get on the Feb. meeting is 2.1.19, AND the application is subject to be returned altogether if corrections are not adequate second time around.

Thank you

Jane Sawyer
Occupational Licensing Examiner
Alcohol and Marijuana Control Office
907-269-0350

From: Marijuana Licensing (CED sponsored)
Sent: Tuesday, January 29, 2019 5:01 PM
To: 'akmark21@gmail.com' <akmark21@gmail.com>
Cc: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Mark, please call me tomorrow about your application-16991 SMK

I am reviewing your corrections and have some questions. call me tomorrow

please.

Jane P Sawyer
Occupational Licensing Examiner|Alcohol & Marijuana Control Office
550 W 7th Avenue, Ste. 1600, Anchorage, AK 99501| 907-269-0350

From:	Marijuana Licensing (CED sponsored)
To:	"akmark21@gmail.com"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application Notice-Stoney Moose Kitchens license 16991
Date:	Thursday, November 08, 2018 10:14:00 AM
Attachments:	16991 Incomplete Application Notice.pdf

Hello,

Your marijuana establishment license 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

Respectfully,
Jane Sawyer
Occupational Licensing Examiner
Alcohol and Marijuana Control Office
550 W 7th Avenue Ste. 1600
Anchorage, AK 99501
907-269-0350