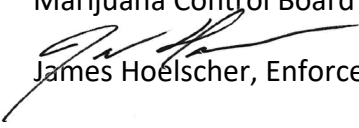




MEMORANDUM

TO: Marijuana Control Board

DATE: Friday, April 26, 2019

FROM:  James Hoelscher, Enforcement Supervisor

RE: Enforcement Report, Marijuana

This year marks the first three years that we will have alcohol and marijuana licenses operating during the summer and it has proven to have been a continuing challenge for Enforcement regarding many investigations and inspections. Our seasonal alcohol licenses will be a priority during the months of May and June, then our priorities will shift to renewal inspections for marijuana licenses from July and will continue until September. An anticipated high amount of investigations, during the times we are trying to focus on inspections generally creates an extremely busy environment for us and I do not anticipate this changing.

Challenges aside, Enforcement has made a concerted effort in communicating with licensees, the public and working with other law enforcement agencies.

Approved Packaging

Is it acceptable for a standard or limited marijuana cultivation facility to modify or change the packaging, colors, and name of an item (not approved or looked at by the board) for a product made by a marijuana product or concentrate manufacturing facility if they follow the labeling requirements set forth in 3 AAC 306.565 and 3 AAC 306.570.

AMCO Enforcement is noticing that after marijuana is sent to a marijuana product/concentrate facility, the marijuana product/concentrate facility will create a product from their approved product list, renaming the product under the cultivation facility or strain name, repackaging the product in different color packaging, using the logo from the cultivation and adding the labels set out in 3 AAC 306.565 and 3 AAC 306.570.

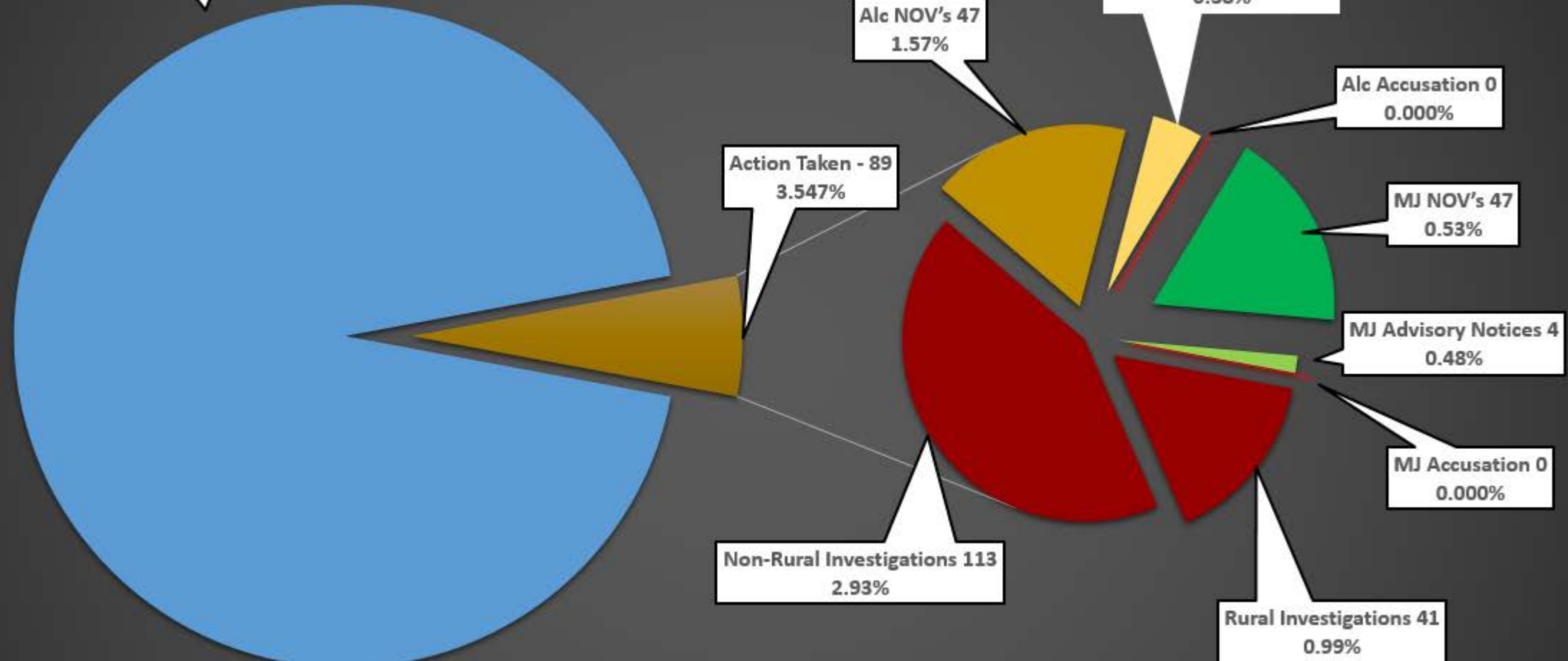
This causes some confusion, not only in the repackaging, but the name of the product that was approved by the board. It almost looks as though the cultivation is the one producing the products.

Can manufacturing licensees change the overall look of their approved product packaging if they are in compliance with 3 AAC 306.565 and 3 AAC 306.570. Or do they need to adhere to the approved packaging as submitted to the board? (3 AAC 306.520(3)(C))

Enforcement Activity	1/1/19 to 4/15/19
Investigations	154
Alcohol Walk-throughs	127
Alcohol Inspections	133
Alcohol NOVs	47
Alcohol Advisory Notices	12
Alcohol Permits reviewed	234
Marijuana Walk-throughs	44
Marijuana Inspections	33
Marijuana NOVs	47
Marijuana Advisory Notices	4
Marijuana Background Conducted (MJ-18)	2
Marijuana Handler Cards Issued	525
Compliance Checks/Shoulder Taps	0
Criminal Charges	0
Training Provided	1
Public Appearance	1

January 1, 2019 to April 15, 2019

Combined Contacts, Calls, and
Emails - 4255
100%



Combined Contacts, Calls, and Emails - 4255

- Combined Contacts, Calls, and Emails - 4255
- Alc NOV's 47
- MJ NOV's 47

- Rural Investigations 41
- Alc Advisory Notices 12
- MJ Advisory Notices 4

- Non-Rural Investigations 113
- Alc Accusation 0
- MJ Accusation 0