CORRESPONDENCE

THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Commerce, Community, and Economic Development

Alcohol and Marijuana Control Office

550 West 7th Avenue, Suite 1600
Anchorage, AK 99501
Main: 907.269.0350

February 7, 2019

Aurora Development Group, Inc.
DBA: Aurora Development Group, Inc.
Via email: aurdevcorp@gmail.com

Re: Limited Marijuana Cultivation Facility License #15557

Dear applicant,

The AMCO Office has reviewed the documents submitted for the proposed marijuana establishment license referenced above. This letter is notice under 3 AAC 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.**

- **Miscellaneous**
  - Forms MJ-01, MJ-02, and MJ-04 list the Doing Business As name as Aurora Cannabis Co., which is inconsistent with the business license used to initiate this application (1061707), Aurora Development Group, Inc. Let me know if you want to continue with the application under the DBA Aurora Cannabis Co. and I will amend the Incomplete Notice with the required corrections, which would include re-advertising. If not, note that several sections of Forms MJ-01, MJ-02, and MJ-04 will need to have all instances of "Aurora Cannabis Co." be revised to "Aurora Development Group, Inc.".
- **MJ-01 Operating Plan**
  - Page 1, Section 1 – Establishment & Contact Information:
    - The Doing Business As field must be listed as Aurora Development Group, Inc.
  - Page 10, Section 9.2:
    - A sample logo was provided in this section but nothing else. Do you intend to distribute any advertising? If not, please state so in this section.
- **MJ-02 Premises Diagram**
  - Page 1, Section 1 – Establishment Information:
    - The DBA must be listed as Aurora Development Group, Inc.
  - Diagram 1:
    - Please identify on your diagram which area will be used for marijuana storage.
    - Per the legend, a blue line depicts the licensed premises of the cultivation facility. However, a blue outline also surrounds Flower Room (6) and Vegetation Room (7). To

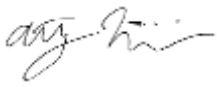
avoid confusion, please use different colors to depict the licensed premises and the areas under cultivation. Please also do this for Diagram 2 + 5.

- Diagram 4:
  - Include the License Number in the labeling of this diagram..

- **MJ-04 Cultivation Supplemental**
  - Page 1, Section 1 – Establishment Information:
    - The DBA must be listed as Aurora Development Group, Inc.
  - Page 2, Section 4.1:
    - Expand upon your description of the area under cultivation. For example, will any tables or multi-tiered racks/shelves be utilized as growing spaces? If so, their dimensions will need to be included in the area under cultivation.
  - Page 6, Section 8.1:
    - Please remove reference to marijuana being packaged in wholesale packages in your response in this section.
- **Entity Documents**
  - The following documents are required:
    - A current list of each corporate officer
    - A list of all shareholders 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:	aurdevcorp@gmail.com
Cc:	Marijuana Licensing (CED sponsored); Jana Weltzin; Valerie Mastolier; legal counsel
Subject:	Incomplete Application - Aurora Development Group, Inc. License #15557
Date:	Thursday, February 07, 2019 1:49:12 PM
Attachments:	15557 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:	Valerie Mastolier; Marijuana Licensing (CED sponsored)
Cc:	Jana Weltzin; Natt Navachai; Scott Wynne
Subject:	RE: Incomplete Application - Aurora Development Group, Inc. License #15557
Date:	Wednesday, February 27, 2019 9:06:59 AM
Attachments:	Incomplete Application - Aurora Development Group Inc. License #15557.msg image001.png

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Good morning Valerie,

Received, but there are many corrections that have not been made. Please see attached for a copy of the email with the Incomplete Notice included.

I do not have any record of asking for a new lease for this application. Can you send me correspondence showing when this was requested?

Sincerely,

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

From: Valerie Mastolier <valerie@jdwcounsel.com>
Sent: Wednesday, February 27, 2019 8:08 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Jana Weltzin <jana@jdwcounsel.com>; Natt Navachai <nnavachai@gmail.com>; Scott Wynne <frozenturd@gmail.com>
Subject: RE: Joe Notkin - License number 15557 - Aurora Development Group

Good Morning,

Please find the attached updated bylaws for License number 15557 - Aurora Development Group.

Can you also please send us clarification as to why you need a new lease when the current lease is still in effect?

Please let us know if there is anything else you need for this application.

Thank you!

--

Valerie Mastolier
JDW, LLC
Office Manager & Paralegal
3003 Minnesota Drive Suite 201
Anchorage, Alaska 99503
907-231-3750
info@jdwcounsel.com
valerie@jdwcounsel.com

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From: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Sent: Tuesday, December 18, 2018 3:46 PM
To: Valerie Mastolier <valerie@jdwcounsel.com>
Subject: RE: Joe Notkin - License number 15557 - Aurora Development Group

Received. Thanks

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

From: Valerie Mastolier <valerie@jdwcounsel.com>
Sent: Tuesday, December 18, 2018 12:59 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Natt Navachai <nnavachai@gmail.com>; Jana Weltzin <jana@jdwcounsel.com>; Scott Wynne <frozenturd@gmail.com>
Subject: RE: Joe Notkin - License number 15557 - Aurora Development Group

Good Afternoon AMCO Team,

Please find the attached documents for the new licenses for license No. 15557. Please let me know if there is anything else you may need.

I will drop fingerprints and fee's to your office on Thursday, when I am there for the MCB Hearing.

Thank you!

--

Valerie Mastolier
JDW, LLC
Office Manager & Paralegal
3003 Minnesota Drive Suite 201
Anchorage, Alaska 99503
907-231-3750
info@jdwcounsel.com
valerie@jdwcounsel.com

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From: Jana Weltzin <jana@jdwcounsel.com>
Sent: Thursday, November 08, 2018 2:18 PM
To: Scott Wynne <frozenturd@gmail.com>; Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Valerie Mastolier <valerie@jdwcounsel.com>; Natt Navachai <nnavachai@gmail.com>
Subject: RE: Joe Notkin - License number 15557 - Aurora Development Group

Hi TJ – Scott didn't get to the email invite you sent until after it expired, I apologize for the inconvenience, but can you resend the invite? Thanks so much, jana

Jana D. Weltzin, Esq.
JDW, LLC
Principal Owner
3003 Minnesota Drive Suite 201
ANC, AK
jana@jdwcounsel.com
630-913-1113
*Licensed in Alaska and Arizona

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Thank you.

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From: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Sent: Tuesday, October 30, 2018 11:45 AM
To: Jana Weltzin <jana@jdwcounsel.com>; McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>; Oates, Sarah D (CED) <sarah.oates@alaska.gov>; Dinegar, Harriet C (LAW) <harriet.dinegar@alaska.gov>
Cc: frozenturd@gmail.com; Natt <nnavachai@gmail.com>; Valerie Mastolier <valerie@jdwcounsel.com>; Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: RE: Joe Notkin - License number 15557 - Aurora Development Group

Good morning Jana,

I will not be able to grant you access, but I sent an invite for access to the other official listed on the application (Scott Wynne) at cripplecreekcustoms@gmail.com. Once he has access, he will be able to send other invites. This application has also been rolled back to New status so that changes can be made through MyAlaska.

Sincerely,

<image003.png>

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: Tuesday, October 30, 2018 10:31 AM
To: McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>; Oates, Sarah D (CED) <sarah.oates@alaska.gov>; Dinegar, Harriet C (LAW) <harriet.dinegar@alaska.gov>
Cc: frozenturd@gmail.com; Natt <nnavachai@gmail.com>; Valerie Mastolier <valerie@jdwcounsel.com>; Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: RE: Joe Notkin - License number 15557 - Aurora Development Group

Great – thank you! will you let us know when its rolled back to new – and come to think about it… I believe we initiated this license via Joe's myalaska – could you invite my email address to have access to it on your end?

From: McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>
Sent: Tuesday, October 30, 2018 9:19 AM
To: Jana Weltzin <jana@jdwcounsel.com>; Oates, Sarah D (CED) <sarah.oates@alaska.gov>; Dinegar, Harriet C (LAW) <harriet.dinegar@alaska.gov>
Cc: frozenturd@gmail.com; Natt <nnavachai@gmail.com>; Valerie Mastolier

<valerie@jdwcounsel.com>; Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: RE: Joe Notkin - License number 15557 - Aurora Development Group

Hi Jana,

This will work for us—thank you.

Erika

Erika McConnell
Director
Alcohol & Marijuana Control Office
State of Alaska

From: Jana Weltzin <jana@jdwcounsel.com>
Sent: Monday, October 29, 2018 3:25 PM
To: McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>; Oates, Sarah D (CED) <sarah.oates@alaska.gov>; Dinegar, Harriet C (LAW) <harriet.dinegar@alaska.gov>
Cc: frozenturd@gmail.com; Natt <nnavachai@gmail.com>; Valerie Mastolier <valerie@jdwcounsel.com>; Jana Weltzin <jana@jdwcounsel.com>
Subject: Joe Notkin - License number 15557 - Aurora Development Group

Hello – in July of this year I sent you the attached letter altering interested parties that a client of mine had passed and that I was in the process of seeking bar counsel advice on how to handle the pending issues etc. Since that time, Joe's heirs relinquished their rights in Aurora Development via a renunciation with another law firm's assistance.

The remaining shareholder has engaged me to continue the licensing process of Aurora Dev. Group and now that the heir's of Joe have relinquished their claims to said shares in the company I feel like I am to ethically and legally proceed with the licensing process. (See attached renunciation and letter from other counsel). The intent is to continue the license with Scott the current share holder, and add a new shareholder who will take Joe's place in the corporation.

I called Harriet today to just pick her brain about how to move this license forward, and together we concluded the follow (with the cavate being, in Harriet's words, Erika is the boss and its up to her and her staff to decide if this is the right course of action) – so that being said here is what we thought would make sense:

- The license is currently under review, I am not sure what number it is but I imagine its getting pretty close to being reviewed by amco staff;
- File change of ownership and put Natt Navachai as new shareholder in Joe's place;
- We keep the review place in line, but roll license back to new, add new share holder and complete Mj00 and Mj09 and renotice all notice requirements so the public has the opportunity to object, comment, or otherwise on the new owners;
- New notice would include – new newspaper notice for three weeks, new local gov (city and

borough), new ten day public posting at facility and one other conspicuous location.

Once the notice requirements are met and affidavit of publishers affidavit, MJ07 and MJ08 are resubmitted to AMCO, the application would then be reviewed for corrections.

Does this sound okay to you, Erika and Sarah? And Harriet pls correct me if I misunderstood or misrepresented anything in this email.

Thank you!

Jana D. Weltzin, Esq.
JDW, LLC
Principal Owner
Of Counsel to Hoban Law Group
3003 Minnesota Drive Suite 201
Anchorage, Alaska 99503
janaweltzin@gmail.com
jana@jdwcounsel.com
630-913-1113 (cell & text)
907-231-3750 (main office)
*Licensed in Alaska and Arizona

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Thank you.

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From: Marijuana Licensing (CED sponsored)
To: Jana Weltzin; Marijuana Licensing (CED sponsored)
Cc: Natt Navachai; Scott Wynne; Valerie Mastolier; Brenda Mills
Subject: RE: Incomplete Application - Aurora Development Group, Inc. License #15557
Date: Tuesday, March 19, 2019 9:14:57 AM
Attachments: image001.png

Good morning,

I have received your three emails with attachments. I see that most of the necessary corrections have been made, but there is one small revision to Diagram 1 of Form MJ-02 that will be necessary. You state in the MJ-01 that the entire licensed premises is a restricted access area, but the diagram doesn't have a restricted access label. One solution might be to update the legend to specify that Red represents "Licensed Premises/Restricted Access Area".

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: Monday, March 18, 2019 3:35 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Natt Navachai <nnavachai@gmail.com>; Scott Wynne <frozenturd@gmail.com>; Jana Weltzin <jana@jdwcounsel.com>; Valerie Mastolier <valerie@jdwcounsel.com>; Brenda Mills <brenda@jdwcounsel.com>
Subject: Aurora Dev Group, INC limited cultivation license number 15557 - Incomplete response part 1 of 3

Hello AMCO team – please find attached part one of three emails w attachments addressing your incomplete letter dated Feb 7th:

-mj02
- shareholder list and officer positions.

Jana D. Weltzin, Esq.
JDW, LLC
Principal Owner
3003 Minnesota Drive Suite 201
ANC, AK
jana@jdwcounsel.com

630-913-1113
*Licensed in Alaska and Arizona

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