CORRESPONDENCE

THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Commerce, Community, and Economic Development

ALCOHOL & MARIJUANA CONTROL OFFICE
550 West 7th Avenue, Suite 1600
Anchorage, AK 99501
Main: 907.269.0350

February 14, 2019

Cannatrader, LLC
DBA: Cannatrader, LLC
Via email: info@cannatrader.net

Re: Limited Marijuana Cultivation Facility #19737

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.**

- **MJ-01 Operating Plan**
  - In general, your responses to each of the boxes in this application, are bare-boned, you do not really provide thorough answers. Re-review the latest version of our regulations found here https://www.commerce.alaska.gov/web/amco/MarijuanaRegulations.aspx , and provide more thorough responses at least to the sections outlined below:
    - Page 4:
      - 3.5: re-review 3 AAC 306.715(e) and add to your answer in this box describing how you will comply with that regulation, AND,
      - in this same 3.5 box you need to describe how and who gets notified in the event of a breach.
      - 3.6: your answer in this box must include how you will prevent diversion of marijuana or marijuana product by employees
    - Page 5, 3.13: the answer in this box does not fully address the question. You need to thoroughly describe how the video cameras will be placed to produce a clear view adequate to identify any individual inside the licensed premises, or within 20 feet of each entrance to the licensed premises.
    - Page 8, 8.1: re-review 3 AAC 306.750 and thoroughly describe how you will comply with it. For example, you do not mention anything about the required manifest. Just FYI, to say that you will comply with certain regulation but not explain how is not an adequate answer.
    - Page 10, 9.2: will you have a logo(s). Provide your answer in this box, and sample of the logo(s) if applicable.

- **MJ-02 Premises Diagram**

- Please number all your diagrams according to the guide on form MJ-02, and make sure that the requirements for each diagram are there.
- Assuming that the diagram that shows only the proposed cultivation facility is number 1, please address the following:
  - The light green color should be labeled as Licensed Premises and Restricted Access Area (you should know the difference between the two terminologies). HOWEVER, grab a different color you have not used and tightly outlined the perimeter of the bathroom, label that licensed premises but not restricted access area.
  - The dimensions for the veg., and the flowering room are not readable. Please remark them.
- The diagrams labeled First Floor Plan, and Second Floor Plan, what are you showing here?. Again, number the diagrams accordingly, AND make sure your color coding is consistent throughout the diagrams.

- **MJ-04 Cultivation Supplemental**
  - Page 3, 4.7: You are not fully answering the question. You need to describe all other fertilizers, chemicals, gases, and delivery systems, including carbon dioxide management, you will use. If there are things you will not do/use as it pertains to the question, then state it.
  - Page 4, 5.2: two things regarding this section:
    - The answer you are providing in the 'Additional Space as Needed', does not fully answer the question of how you will store, manage, and dispose solid marijuana waste. Re-review 3 AAC 306.740 and re-do your response, there are very specific steps you must follow.
    - Provide your answer in the 5.2 box, not in the additional page.
  - Page 5, 7.3: Re-review 3 AAC 306.455 and provide an answer that better reflects your understanding of this regulation. To state that you will comply with a certain regulation and not describe how is inadequate.

- **Entity Documents**
  - Please file your Initial Report with Division of Corporations https://www.commerce.alaska.gov/cbp/main/Search/EntityDetail/10093891 . Make sure the percentages owned by each of you match what your LLC's Operating Agreement states. Provide me with a copy of filed Initial Report.

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:	"marc@redruncannabiscompany.com"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Courtesy Status Email: Red Run Cannabis Cultivators, LLC license 19372
Date:	Monday, March 11, 2019 3:03:00 PM
Attachments:	Hashade.pdf Premium Infused Almond Butter.pdf Premium Infused Honey.pdf

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Marc,

I am sending you this courtesy email to let you know of what I am waiting for in order to move this application/licensee to Active-Pending Inspection:

- Approval from DEC-Food Safety. Jessica Davison is the contact jessica.davison@alaska.gov

The below products were approved with delegation by the board. I will need them corrected before you can start manufacturing them:

- Corrections/amendments/more info to the products below:
  - Hashade—you will need to use a child resistant cap for the bottle. Please show that on the Packaging Description of the form, AND the data sheet for the micro-emulsion equipment.
  - Premium Infused Almond Butter—serving demarcations on the jar, AND documented consultation with DEC-Food Safety on nut-labeling.
  - Premium Infused Honey—serving demarcations on the jar.

Please remember that the products that were not addressed at this February meeting will be in front of the board at the May meeting. You will need to be in attendance.

Thank you

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:	"info@cannatrader.net"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Follow up on corrections received 3.5.19-Cannatrader LLC license 19737
Date:	Monday, March 11, 2019 9:33:00 AM
Attachments:	second version-pg 4-mj-01-not initialed.pdf second version-pg 5-mj-01-3.14-more info.pdf second version mj-02.pdf second version-pg 7 mj-04-read regulation.pdf

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Good morning, James:

I am following up on the corrections I received 3.5.19. The application is still incomplete. This email does not extend the 90-day deadline to get your application in complete and accurate, the deadline is 5.15.19. However, and I cannot stress this enough, your application is subject to get returned to you altogether (and start over including fees) if you do not submit a complete and accurate application the second time around and within the 90-day deadline.

- The corrected page 4 of MJ-01 you submitted (attached) now has typed initials on the box. The box needs to be hand-initialed.
- The corrected page 5 of MJ-01 you submitted (attached) now has an incomplete answer on 3.14, you left out how you will ensure the area is accessible only to authorized personnel, law enforcement, or an agent of the Marijuana Control Board.
- On the second version of the entire MJ-02 (attached): call me, I'm still somewhat confused on what the legal right to possession for Cannatrader, LLC is versus the other business in that building.
- The corrected page 7 of MJ-04 you submitted (attached), did you actually read the waste regulation, because your answer does not reflect that. The marijuana waste needs to be stored, and the notice to enforcement must be given, three days **before** the marijuana waste is rendered unusable. You answer here states **after.**

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: "info@cannatrader.net"
Cc: Marijuana Licensing (CED sponsored)
Subject: Incomplete Application Notice-Cannatrader, LLC license 19737
Date: Thursday, February 14, 2019 3:43:00 PM
Attachments: 19737 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
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Anchorage, AK 99501
907-269-0350