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

March 20, 2019

Aurora Blaze, LLC
DBA: Aurora Blaze, LLC
Via email: brittanygitschel@gmail.com

Re: Standard Marijuana Cultivation Facility License #12328

Dear applicant,

The AMCO Office has reviewed the documents submitted for the transfer of ownership for the 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-17c License Transfer Application**
  - An old version of this form was submitted. Please visit the AMCO website for the most current version of this form and complete it first, as it will be necessary for your other corrections.
  - Page 1, Section 2 – Transferee Information:
    - The name listed in the Licensee field is inconsistent with the Alaska Entity # provided in this section. If you are applying to transfer controlling interest of a licensed entity, the name of the Licensee must be the name of the entity.
    - The Business License number listed is for a different entity and has also expired. Please verify that the corrected business license is listed.
  - Page 2, Section 3 – Entity Ownership Information:
    - In the Notice of Change of Officials provided with your application, Brittany Gitschel is listed as both a Member and Manager of Aurora Blaze, LLC. If this is accurate, please include "Manager" in the listed titles in this section.
  - Page 4, Section 7 – Transferor Certifications:
    - Branden Roybal's signature on its own is inadequate to represent the controlling interest of the current licensee. Brittany Gitschel's notarized signature will also be required in this section.
- **MJ-01 Operating Plan**
  - An outdated version of this form was submitted. Please visit the AMCO website and complete the current version of this form. Note that some of the page numbers and section numbers may be different on the current forms.
  - Page 1, Section 1 – Establishment & Contact Information:

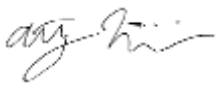
        - The mailing address listed in this section (2693 Arla Street) is different than the mailing address listed on MJ-17c (3140 Spafford Lane, Duplex B). Please verify which mailing address is accurate and correct either form as necessary.
    - Page 2, Section 3.1:
        - The response provided in this section describes admitting visitors into the facility, but does not describe how you will prevent unescorted members of the public from entering restricted access areas.
    - Page 2, Section 3.2:
        - Expand on your response to describe policies for admitting visitors into the facility and procedures that will be followed. Include details regarding the information recorded in the visitor's log and the ratio of visitors to escorting employees (or licensees/agents of licensees).
    - Page 4, Section 3.5:
        - Please re-review 3 AAC 306.715(e) and expand on your response to include at what point AMCO is contacted after an unauthorized breach has been alerted.
    - Page 7, Section 6.4:
        - Much of your response describes employees obtaining a marijuana handler's permit, but this section asks you to describe any in-house training that will be provided **apart from** a marijuana handler course. Will any other types of training be offered?
    - Page 8, Section 8.1:
        - You state that marijuana will be prepared and packaged in the following ways and list two items, but how are these items different?
        - Expand on your response to include details about the secure storage compartment in the transport vehicle, and how packages will be secured for transport.
- **MJ-02 Premises Diagram**
    - Diagram 1:
        - Where is marijuana stored in the facility? A Storage Area is defined in the Key, but doesn't appear to be indicated anywhere on the diagram.
    - Diagram 3 and 4:
        - These diagrams indicates that areas outside of the building, including the parking lots, are designated as the licensed premises and/or restricted access areas. Will marijuana be grown, processed, tested, stored, or stocked in these areas?
            - Please also see 3 AAC 306.990(23) for the definition of "licensed premises" in the regulations.
- **MJ-04 Cultivation Supplemental**
    - Page 2, Section 4.1:
        - A description of the areas that will be used for cultivation, including dimensions of the areas, was not provided. Please provide the requested information in the space provided, and include your calculations. Note that only areas that will be used for cultivation will need to be described. See 3 AAC 306.990(37) for the definition of square feet under cultivation in Alaska regulations.
    - Page 6, Section 8.1:
        - You state that this facility will package marijuana for sale to a retail store to sell without needing to repackage the marijuana, but then state that marijuana will be packaged in up to five pound increments. Please re-review 3 AAC 306.470(a).
    - Page 7 (Sample Labels):
            - The images provided are too blurry to see the details of. Please provide clearer sample labels that show how the requirements under 3 AAC 306.475 will be met. Note that warning statements must be written verbatim from regulation.
- **MJ-07 Public Notice Posting Affidavit**

- Due to the corrections required on Form MJ-17c, it will be necessary to re-post a complete copy of MJ-17c at the proposed premises and another conspicuous location for **ten (10)** days. Once this has finished, complete a new MJ-07.

- **MJ-08 Local Government Notice Affidavit**
  - Due to the corrections required on Form MJ-17c, it will be necessary to provide a complete copy of MJ-17c to your local government and complete a new MJ-08.
- **Publisher's Affidavit**
  - The advertisement states that "The Transfer involves a change in ownership percentage from Branden Roybal 50% and Brittany Gitschel 50% to Brittany Gitschel 50% and Brittany Gitschel 50%". For clarity, please revise this sentence to "…from Branden Roybal 50% and Brittnay Gitschel 50% to Brittnay Gitschel 100%". It will be necessary to run a corrected advertisement **one time** and provide a new affidavit from the publisher.
- **MJ-19 Creditors Affidavit**
  - Page 1, Section 2 – Debts and Taxes Owed:
    - No information was provided in this section. If there are no debts or taxes owed by the business, write "None" in the first field.
- **Applicant's Alaska Residency**
  - Brittany Gitschel's Alaska residency could not be verified. Did she apply for the Permanent Fund Dividend for 2019?

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:	Brittany Gitschel
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Transfer Application - Aurora Blaze, LLC License #12328
Date:	Wednesday, March 20, 2019 9:18:01 AM
Attachments:	image001.png 12328 Incomplete Transfer Notice.pdf

---

Good morning,

Your transfer 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:	Brittany Gitschel
Cc:	Marijuana Licensing (CED sponsored)
Subject:	RE: Incomplete Transfer Application - Aurora Blaze, LLC License #12328
Date:	Tuesday, June 04, 2019 9:52:15 AM
Attachments:	image001.png 12328 Incomplete Transfer Notice.pdf

---

Good morning,

This is a courtesy follow up email to remind you that the ninety-day deadline to submit corrections and additional documents for your transfer application is nearing. No additional documents can be submitted for this application after **June 18, 2019**. If the application is still incomplete after this deadline, the application will be returned and it will be necessary to file a new application to continue pursuing this transfer.

Sincerely,

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

From: Marijuana Licensing (CED sponsored)
Sent: Wednesday, March 20, 2019 9:18 AM
To: Brittany Gitschel <brittanygitschel@gmail.com>
Cc: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Incomplete Transfer Application - Aurora Blaze, LLC License #12328

Good morning,

Your transfer 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: Brittany Gitschel
Cc: Marijuana Licensing (CED sponsored)
Subject: RE: Incomplete Transfer Application - Aurora Blaze, LLC License #12328
Date: Friday, June 07, 2019 1:25:02 PM
Attachments: image001.png

Good afternoon Brittany,

Thank you, I have received your revisions and see that many of the necessary corrections have been made. However, there are a few more that will be required before your application can be deemed complete. Please make and submit the following corrections:

- **Form MJ-17c: License Transfer Application**
  - Page 3, Section 6 – Transferee Certifications:
    - This page must be signed in the presence of a notary.
- **Form MJ-01 Operating Plan**
  - Page 4, Section 3.8:
    - A statement that must be signed with your initials has been left blank.
- **Form MJ-02 Premises Diagram**
  - Diagram 3 and 4:
    - Remove the restricted access area label and red outline/shading from these diagrams.
- **Form MJ-04 Cultivation Supplemental**
  - Page 7 (Sample Labels):
    - The warnings on your label must be verbatim as written in regulation, but your warning statements are out of order. Please re-review 3 AAC 306.475.
    - Provide a sample label that shows how you will meet the labeling requirements for wholesale packages to include with Section 8.2.

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

From: Brittany Gitschel <brittanygitschel@gmail.com>
Sent: Friday, June 07, 2019 9:48 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Corrected Transfer Forms; License #4a-12328

Hello,

Here are the corrected versions of the transfer MJ forms that were kicked back to us for the transfer of Aurora Blaze (4a-12328) to Brittany Gitschel 100%.

Thanks,

Brittany Gitschel
(907) 347-1832