



MEMORANDUM

TO: Marijuana Control Board DATE: September 11, 2019

FROM: Erika McConnell, Director RE: Raspberry Roots, #10098, Standard
Cultivation Facility

Raspberry Roots is a standard cultivation facility located in the Municipality of Anchorage, owned by Raspberry Roots, LLC. At the time of the requests discussed in this memo, Raspberry Roots, LLC, was owned 100% by Kim Kole. A transfer of controlling interest was effectuated in March of 2019, and the entity is currently owned 55% by Jerry Workman and 45% by Kim Kole.

In November of 2018, Ms. Kole sent a request to transfer multiple failed harvests to her manufacturing facility for extraction in accordance with 3 AAC 306.660(b). Several days later a request relating to additional harvest batches was submitted. Twenty-eight MJ-22b forms for the various harvests were submitted on December 10, 2018.

Of those 28 harvests, eight had already been transferred from Raspberry Roots cultivation facility to Raspberry Roots product manufacturing facility (#10856) without approval from the director or the board in violation of 3 AAC 306.660(b).

For 27 of the 28 requests, each entire harvest was packaged as leaf/trim with the exception of 4 grams from each harvest that was packaged as bud/flower to send for testing. As all the harvests were marked Finished in Metrc, all marijuana from the harvest was packaged, so the implication is that each harvest produced only 4 grams of bud/flower for a total of 108 grams of bud/flower (0.3%) out of the 34,653 grams that were harvested from the 755 plants that make up those 27 harvests. This is not a believable conclusion.

When asked about the situation, licensee's counsel responded in the attached email, admitting to entering incorrect information into Metrc.

For the 28th request, the package tag provided with the MJ-22b request was incorrect, and the package tag provided with a "corrected" request does not show in Metrc.

This situation continues to be under investigation and I am working on an accusation to bring to the board. The issues related in this memo will be included in the accusation. **I request that the board take no action on this matter at this time.**

Attached: Kim Kole email 11/1/18
 Kim Kole email 11/5/18
 MJ-22b requests
 Weltzin response 8/20/19
 Weltzin response 8/21/19

From: [Kim Kole](#)
To: [McConnell, Erika B \(CED\)](#)
Cc: [Jana Weltzin](#)
Subject: Raspberry Roots Extraction Permission
Date: Thursday, November 01, 2018 5:04:36 PM
Attachments: [16671 CC SPD Wax.pdf](#)

Dear Ms McConnell,

I am emailing you in order to gain permission to extract, via Raspberry Roots 5a-10856 manufacturing license, our 4a-10098 cultivation failed product. Recently, our cultivation has had some struggles and some harvest batches failed microbial testing, so I am asking permission to run them through our manufacturing so we can recover some of the financial loss associated with such a result.

I want to first apologize and own up to the fact that we almost made a mistake regarding our manufacturing. We have had numerous cultivators call us to take their failed product to extract (they are trying to recoup losses so we understand but haven't purchased any) and also have purchased extracted material (concentrates, vapes, etc.) for our retail that were produced with Failed Product. Therefore, I made an assumption that transferring and extracting failed material was an everyday norm. As I was refreshing myself on the Regulations regarding manufacturing testing guidelines I came across the line which states one must get permission from the Director to extract failed material so that brings me to this email.

I have already transferred failed product to our Manufacturing License, even paid taxes on some of the product, and have run some of that product through our extraction process. We, as an internal decision based on the integrity of our brand and character and prior to refreshing ourselves on the regulations, actually sent a sample to CannTest (Metric# 1A40203000070E5000000017) of our first run to make sure we were in fact able to clean out any fungus or microbial. The average closed-loop hydrocarbon extraction unit (same as our process) uses 20-25 filtered paper, but we have gone to a more expensive 5 micron filter polyester bag to ensure that it would produce clean product. The Passed microbial result extracted from failed material is attached to this email. We have not sold / transferred any finished product out of our manufacturing facility yet - nor have we submitted any of the product for official potency/solvent/microbial testing yet.

With your permission, we would like to finish the Extraction process on the failed batches listed below:

(we do understand that there is an extra cost burden of the need to get an additional Microbial test done prior to sell of product)

208 KBK 053118 - 1A4020300003BC5000000989 = Manufacturing 5a-10856
207 GRM 073118 - 1A4020300003BC5000001037 = Manufacturing 5a-10856
207 SPD 073118 - 1A4020300003BC5000001109 & 1A40203000070E5000000015 = Manufacturing 5a-10856
208 TRW 082118 - 1A4020300003BC5000001111 & 1A4020300003BC5000001112 = Manufacturing 5a-10856
208 ATR 082118 - 1A4020300003BC5000001106 = Manufacturing 5a-10856
208 DKS 082118 - 1A40203000070E5000000022 = Manufacturing 5a-10856
208 FTP 082118 - 1A40203000070E5000000019 = Manufacturing 5a-10856
208 QTK 082118 - 1A4020300003BC5000001108 = Manufacturing 5a-10856
Q CHC 092118 - 1A4020300003BC5000001151 = Cultivation 4a-10098
Q TPH 092118 - 1A4020300003BC5000001152 = Cultivation 4a-10098
Q ATR 092118 - 1A4020300003BC5000001154 = Cultivation 4a-10098

Q TRW 092118 - 1A4020300003BC5000001149 = Cultivation 4a-10098
207 BBY 100418 - harvested and in Cure Room drying = Cultivation 4a-10098
207 BRB 100418 - harvested and in Cure Room drying = Cultivation 4a-10098
207 DKS 100418 - harvested and in Cure Room drying = Cultivation 4a-10098
207 DKY 100418 - harvested and in Cure Room drying = Cultivation 4a-10098
207 FOG 100418 - harvested and in Cure Room drying = Cultivation 4a-10098
207 MGT 100418 - harvested and in Cure Room drying = Cultivation 4a-10098

Also, we submitted samples Tuesday for the latest harvest, and we do not know what to expect from that room. Given the situation, we do expect some to come back with issues. However, that will be the last Harvest for a long while as we have decided to “clean house”. We do believe we have found the source of the issue, so we finished the crops that were mid season and have since not loaded anymore plants.

Corrective actions taken:

- > Destroyed the plants that could have been the root of the issue.
- > Evacuated all rooms of plants and cleansed thoroughly with bleach.
- > Repainted a room with mold-resistant paint.
- > Installed higher temperature rated Fire Sprinkler gauges so that we could use the lights to reach 130 degrees temperature within the rooms - all the equipment stays in the rooms as well - and temperatures that high will kill any living organism, which the fungus needs to live/grow. We will heat the rooms multiple times prior to adding plants.

To express the magnitude of this situation and further display the financial burden we are undergoing to rectify the current situation, the rooms cost us about \$2,000 a day being empty (overhead costs) and one of them has been empty for over a month now.

Thank you so much for your prompt consideration of this matter.

Kim Kole
Raspberry Roots
907-727-6584

From: [Kim Kole](#)
To: [McConnell, Erika B \(CED\)](#)
Cc: [Jana Weltzin](#)
Subject: Re: Raspberry Roots Extraction Permission
Date: Monday, November 05, 2018 11:14:36 AM

Good morning Erika,

I hope you had a good weekend!

I wanted to update you on the latest harvest. Just as we unfortunately suspected, 10 out of the 12 strains did not pass the rigorous microbial testing.

We would like permission to run these batches through Manufacturing as well please:

208 WMZ 102418

208 TYJ 102418

208 FOG 102418

208 BBY 102418

208 SPD 102418

208 JOG 102418

208 FTP 102418

208 TPH 102418

208 MDC 102418

208 MOG 102418

Also, to reiterate the situation moving forward; we are currently without any plants in Flowering. All rooms are now empty as we work to eliminate the problem at hand. We have been paying professional consultants to educate my lead cultivator on how best to eliminate and control the issue. An all natural remedy of essential oils and specific heavy light treatments is the basis of our improvement plan. Given that this is agriculture, the problem will not go away 100% overnight, but by cleaning out the rooms completely and starting from scratch we should gain back control and slowly progress into 100% elimination! I am sorry to have to bother you with these time draining requests, but this is my livelihood. I have sank everything into this dream of mine and I am barely hanging on financially so this is so important to me.

Thanks,
Kim Kole
907-727-6584

On Thu, Nov 1, 2018 at 5:04 PM Kim Kole <kim@raspberryroots.com> wrote:

Dear Ms McConnell,

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I want to first apologize and own up to the fact that we almost made a mistake regarding our manufacturing. We have had numerous cultivators call us to take their failed product to

extract (they are trying to recoup losses so we understand but haven't purchased any) and also have purchased extracted material (concentrates, vapes, etc.) for our retail that were produced with Failed Product. Therefore, I made an assumption that transferring and extracting failed material was an everyday norm. As I was refreshing myself on the Regulations regarding manufacturing testing guidelines I came across the line which states one must get permission from the Director to extract failed material so that brings me to this email.

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Thank you so much for your prompt consideration of this matter.

Kim Kole
Raspberry Roots
907-727-6584



Alaska Marijuana Control Board

Form MJ-22b: Request to Transfer Failed Test Material

What is this form?

Use this form if you wish to request that a batch of marijuana that failed a required test be used to make a carbon dioxide- or solvent-based extract in accordance with 3 AAC 306.660(b). Use one form for each request. When complete, email to the director and amco.enforcement@alaska.gov. Transferring to a product manufacturer is not permitted until the approved form is returned to you.

Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 TRW 082118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001111 & 1A4020300003BC5000001112
Weight of Product to be Transferred:	923 g 1,362 g
Package Tag Number of Failed Test:	1A4020300003BC5000001073
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots <small>*Already transferred in METRC due to operational mistake</small>

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Date



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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 QTK 082118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001108
Weight of Product to be Transferred:	477 g
Package Tag Number of Failed Test:	1A4020300003BC5000001071
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots <small>*Already transferred in METRC due to operational mistake</small>

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License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 FTP 082118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001107
Weight of Product to be Transferred:	1,008 g
Package Tag Number of Failed Test:	1A4020300003BC5000001077
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots <small>*Already transferred in METRC due to operational mistake</small>

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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 DKS 082118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001105
Weight of Product to be Transferred:	1,748 g
Package Tag Number of Failed Test:	1A4020300003BC5000001064
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots <small>*Already transferred in METRC due to operational mistake</small>

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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 ATR 082118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001106
Weight of Product to be Transferred:	1,223 g
Package Tag Number of Failed Test:	1A4020300003BC5000001074
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots <small>*Already transferred in METRC due to operational mistake</small>

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 KBK 053118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000000989
Weight of Product to be Transferred:	1,650 g
Package Tag Number of Failed Test:	1A4020300003BC5000000931
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots <small>*Already transferred in METRC due to operational mistake</small>

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	207 SPD 073118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001109
Weight of Product to be Transferred:	1,911 g
Package Tag Number of Failed Test:	1A4020300003BC5000001027
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots <small>*Already transferred in METRC due to operational mistake</small>

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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	207 GRM 073118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001037
Weight of Product to be Transferred:	1,016 g
Package Tag Number of Failed Test:	1A4020300003BC5000001025
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots <small>*Already transferred in METRC due to operational mistake</small>

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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	207 BBY 100418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001281
Weight of Product to be Transferred:	924 g
Package Tag Number of Failed Test:	1A4020300003BC5000001193
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

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License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	207 BRB 100418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001275
Weight of Product to be Transferred:	1,631 g
Package Tag Number of Failed Test:	1A4020300003BC5000001194
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

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License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	207 DKS 100418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001274
Weight of Product to be Transferred:	1,765 g
Package Tag Number of Failed Test:	1A4020300003BC5000001195
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

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Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	207 DKY 100418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001218
Weight of Product to be Transferred:	515 g
Package Tag Number of Failed Test:	1A4020300003BC5000001198
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director_____
Printed name of Director

Approved

☐

Disapproved

☐_____
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Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	207 FOG 100418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001279
Weight of Product to be Transferred:	1,655 g
Package Tag Number of Failed Test:	1A4020300003BC5000001199
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director_____
Printed name of Director

Approved

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Disapproved

☐_____
Date



Alaska Marijuana Control Board

Form MJ-22b: Request to Transfer Failed Test Material**What is this form?**

Use this form if you wish to request that a batch of marijuana that failed a required test be used to make a carbon dioxide- or solvent-based extract in accordance with 3 AAC 306.660(b). Use one form for each request. When complete, email to the director and amco.enforcement@alaska.gov. Transferring to a product manufacturer is not permitted until the approved form is returned to you.

Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 WMZ 102418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001276
Weight of Product to be Transferred:	1,050 g
Package Tag Number of Failed Test:	1A4020300003BC5000001215
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Date



Alaska Marijuana Control Board

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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 TYJ 102418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001278
Weight of Product to be Transferred:	787 g
Package Tag Number of Failed Test:	1A4020300003BC5000001216
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Alaska Marijuana Control Board

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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 FOG 102418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001271
Weight of Product to be Transferred:	1,335 g
Package Tag Number of Failed Test:	1A4020300003BC5000001217
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 BBY 102418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001266
Weight of Product to be Transferred:	684 g
Package Tag Number of Failed Test:	1A4020300003BC5000001218
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 SPD 102418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001273
Weight of Product to be Transferred:	658 g
Package Tag Number of Failed Test:	1A4020300003BC5000001222
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 JOG 102418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001272
Weight of Product to be Transferred:	793 g
Package Tag Number of Failed Test:	1A4020300003BC5000001223
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Date



Alaska Marijuana Control Board

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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 FTP 102418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001270
Weight of Product to be Transferred:	1,589 g
Package Tag Number of Failed Test:	1A4020300003BC5000001224
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director_____
Printed name of Director

Approved

☐

Disapproved

☐_____
Date



Alaska Marijuana Control Board

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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 TPH 102418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001264
Weight of Product to be Transferred:	1,588 g
Package Tag Number of Failed Test:	1A4020300003BC5000001225
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 MDC 102418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001277
Weight of Product to be Transferred:	103 g
Package Tag Number of Failed Test:	1A4020300003BC5000001226
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	208 MOG 102418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001265
Weight of Product to be Transferred:	920 g
Package Tag Number of Failed Test:	1A4020300003BC5000001227
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	Q CHC 092118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001151
Weight of Product to be Transferred:	932 g
Package Tag Number of Failed Test:	1A4020300003BC5000001170
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director_____
Printed name of Director

Approved

☐

Disapproved

☐_____
Date



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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	Q TPH 092118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001268
Weight of Product to be Transferred:	1,852 g
Package Tag Number of Failed Test:	1A4020300003BC5000001168
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director_____
Printed name of Director

Approved

☐

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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	Q ATR 092118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001267
Weight of Product to be Transferred:	1,788 g
Package Tag Number of Failed Test:	1A4020300003BC5000001167
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director_____
Printed name of Director

Approved

☐

Disapproved

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Date



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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	Q TRW 092118
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001149
Weight of Product to be Transferred:	2,658 g
Package Tag Number of Failed Test:	1A4020300003BC5000001169
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Doing Business As:	Raspberry Roots		
License Type (drop down):	Standard Cultivation - 4a	Date:	12/04/18
Licensee:	Raspberry Roots LLC	License Number:	10098

Harvest Batch Name:	207 MGT 100418
Package Tag Number(s) of Product to be Transferred:	1A4020300003BC5000001283
Weight of Product to be Transferred:	1,622 g
Package Tag Number of Failed Test:	1A4020300003BC5000001196
Testing Facility:	CannTest 6a-10009
Reason for Test Failure:	aspergillus flavus
License # and DBA of Product Manufacturer to Whom You Propose to Transfer:	#10856 Raspberry Roots

Signature of Director	Printed name of Director	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
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Date

From: [Jana Weltzin](#)
To: [McConnell, Erika B \(CED\)](#)
Cc: [Jason Brandeis](#); [Kim Kole](#); [Legal Counsel](#); [Jana Weltzin](#); [Brenda Mills](#)
Subject: Raspberry Roots Extraction Permission
Date: Tuesday, August 20, 2019 1:56:55 PM
Attachments: [September Filing - RR.pdf](#)
[October Filing - RR.pdf](#)
[207 MGT 100418.pdf](#)
[9.24.18.pdf](#)

Good afternoon Erika, thank you for your email dated Aug. 15th.

The Leaf/Trim denomination was just a place holder as there was no IMMATURE BUD option available at that time. All of the marijuana at issue was immature bud and very leafy, creating a majority of trim. Raspberry Roots entered in metrc all of the product as trim, but based on visual (because there was no business sense in trimming larfy immature and leafy bud and therefore no way to note the differing weights in metrc), which resulted in all the product being entered as trim in metrc. However, Raspberry Roots did assigned a percentage to the harvests as bud/flower for tax reporting reasons, and paid the bud/flower tax for 25-30% of the harvests. As you will see, for example, on page 6 of the October filing, Raspberry Roots paid between 25%-30% of the product as if it were bud/flower, based on visual estimation of the harvest and identifying how much could be classified as bud/flower and paid that amount to revenue in addition to trim tax.

Raspberry Roots had full intentions on paying an estimated tax split between Leaf/Trim and Bud/Flower as they have displayed this integrity in their previous filings.

Like mentioned before, as new license holders going through learning curves, they had moved failed product to their Manufacturing License prior to getting permission and they did in fact pay an estimated split between Leaf/Trim & Bud/Flower. There is no feasible way to actually decipher the exact breakdown percentage (as this product cannot be sold as Bud/Flower and there is no pointing spending more costs Trimming the product), but their estimate shows to be very acceptable as their estimates equated to slightly above the new rate of \$25/OZ of Immature Bud.

OCTOBER TAX FILING

METRC	BATCH	WEIGHT	AMT PAID	Price / OZ	
*1A4020300003BC5000001037	207 GRM 073118	35.838 OZ	\$913.84	\$25.50	
1A4020300003BC5000000989	208 KBK 053118	58.201 OZ	\$1,484.12	\$25.50	(wasted b/c BudRot)

SEPTEMBER TAX FILING

METRC	BATCH	WEIGHT	AMT PAID	Price / OZ
*1A4020300003BC5000001109	207 SPD 073118	61.658 OZ	\$1,572.28	\$25.50
*1A4020300003BC5000001106	208 ATR 082118	43.139 OZ	\$1,100.05	\$25.50
*1A4020300003BC5000001105	208 DKS 082118	35.556 OZ	\$906.67	\$25.50
*1A4020300003BC5000001107	208 FTP 082118	16.826 OZ	\$429.05	\$25.50
*1A4020300003BC5000001108	208 QTK 082118	67.407 OZ	\$1,718.89	\$25.50
*1A4020300003BC5000001111	208 TRW 082118	32.557 OZ	\$830.21	\$25.50
*1A4020300003BC5000001112	208 TRW 082118	48.042 OZ	\$1,225.08	\$25.50

**Which these packages have also been in for a request for approval for the same amount of time. Some are already combined into other package tags prior to rage but they were all noted in the original request*

We have also attached their notes from their Tax Filing and Letter of Protest that accompanied the filings. Please let us know if you have any additional questions.

Jana D. Weltzin, Esq.
JDW, LLC
Principal Owner
901 Photo Avenue
Anchorage, Alaska 99503
jana@jdwcounsel.com
907-231-3750 Office Line
630-913-1113 Cell
*Licensed in Alaska and Arizona

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Thank you.



Think green, please don't print unnecessarily

----- Forwarded message -----

From: **McConnell, Erika B (CED)** <erika.mcconnell@alaska.gov>
Date: Thu, Aug 15, 2019 at 4:32 PM
Subject: RE: Raspberry Roots Extraction Permission
To: Jana Weltzin <jana@jdwcounsel.com>, Kim Kole <kim@raspberryroots.com>
Cc: Valerie Mastolier <valerie@jdwcounsel.com>, Jason Brandeis <jbrandeis@bhb.com>, Hoelscher, James C (CED) <james.hoelscher@alaska.gov>

Good afternoon,

On the following requests, the product to be transferred is all leaf/trim. What is happening to the bud/flower from these harvests?

Q TRW 092118
Q ATR 092118
Q TPH 092118
207 FOG 100418
207 DKY 100418
207 DKS 100418
207 BBY 100418
207 BRB 100418

208 MOG 102418
208 MDC 102418
208 TPH 102418
208 FTP 102418
208 JOG 102418
208 SPD 102418
208 BBY 102418
208 FOG 102418
208 TYJ 102418
208 WMZ 102418

For the request for 207 MGT 100418, the tag number listed (1A4020300003BC5000001283) is for 90 seeds of LSD, not for a package related to the harvest of 207 MGT 100418.

For the request for Q CHC 092118, the harvest was made into a package of leaf/trim (1A4020300003BC5000001151). Then, a package of bud/flower was derived from the package of trim to send for testing (1A4020300003BC5000001170). Would you please explain how 4 grams of bud/flower was created from a package of leaf/trim?

Thank you,
Erika

Erika McConnell

Director
Alcohol & Marijuana Control Office
State of Alaska

From: Jana Weltzin <jana@jdwcounsel.com>

Sent: Tuesday, July 23, 2019 3:56 PM

To: McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>; Kim Kole <kim@raspberryroots.com>

Cc: Valerie Mastolier <valerie@jdwcounsel.com>; Jana Weltzin <jana@jdwcounsel.com>; Jason Brandeis <jbrandeis@BHB.com>

Subject: RE: Raspberry Roots Extraction Permission

Hello – this issue is still outstanding and we have not received a answer regarding the request to extract failed material that was originally submitted November 2018 – can you please approve this request? We have received no reason for the delay in response or any reason as to why this request has not been granted while similar requests from other licensees have been timely responded to and approved. Thank you in advance! Jana

From: [Jana Weltzin](#)
To: [McConnell, Erika B \(CED\)](#)
Cc: [Valerie Mastolier](#); [Brenda Mills](#); [Legal Counsel](#); [Kim Kole](#); [Jason Brandeis](#); [Jana Weltzin](#); [Jerry Workman](#)
Subject: FW: Raspberry Roots Extraction Permission
Date: Wednesday, August 21, 2019 2:45:20 PM
Attachments: [September Filing - RR.pdf](#)
[October Filing - RR.pdf](#)
[207 MGT 100418.pdf](#)
[9.24.18.pdf](#)

Hi Erika – the text of my email below got cut off – here is the remainder of my email below, which are Kim’s explanations on two of the questions you answered (that I didn’t include in my last email below that I SHOULD’VE included:

For '207 MGT 100418' = From Kim Kole;

For the request for 207 MGT 100418, it has come to our attention that the package was not completed. During training process of a new Employee, Dana Gillian, the tag number 1A4020300003BC5000001283 was mistakenly used - and then discontinued. We checked the history of the 207 MGT 100418 Batch and there was never a package finalized so we have given the product a new METRC tag to satisfy the organizational purpose of transferring the product to another license. Pictures of the product with the 1A4020300003BC5000001283 tag is attached. As well as the corresponding new tag and new request from.

For 'Q CHC 092118' = From Kim Kole;

We heard that other cultivators had gotten product retested when they didn't think the results were accurate. We thought it was as simple as being able to pull 4 grams from the package and resending it to the lab. Since Metrc also allowed us to do so, it didn't occur to us that this would be a problem. I have attached the manifest with the 4 g sample to Canntest included.

As far as “Bud/Flower” classification, that is just a habit and the way I thought all samples are supposed to be submitted. It has no effect on our opinion of the situation and we will no longer do that moving forward.

Additionally, given the length of time it has been taking to get responses from you on this matter – if we don’t hear back from you by end of day tomorrow, please consider this our formal request to appeal your determination to the marijuana control board and please confirm this will be calendared for the September MCB hearing.

Thank you very much, Jana

From: Jana Weltzin <jana@jdwcounsel.com>
Sent: Tuesday, August 20, 2019 1:52 PM
To: McConnell, Erika B (CED) <erika.mcconnell@alaska.gov>
Cc: Jason Brandeis <jbrandeis@bhb.com>; Kim Kole <kim@raspberryyroots.com>; Legal Counsel <legal@jdwcounsel.com>; Jana Weltzin <jana@jdwcounsel.com>; Brenda Mills <brenda@jdwcounsel.com>