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

June 4, 2019

Happy Valley, L.L.C.
DBA: Happy Valley
Via email: happyvalleyak@gmail.com

Re: Marijuana Product Manufacturing Facility License #20438

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-00 Application Certifications**
  - Page 2, Section 4 – Certifications:
    - Please read all statements on this page and only sign initials next to the applicable statements. You should not be able to certify all statements.
- **MJ-01 Operating Plan**
  - Page 11, Section 3.6 (Additional Space):
    - Your continued response states that James, Lisa, and the general manager will take steps to ensure that illegal conduct by an employee does not compromise the facility's license. Who are James and Lisa?
  - Page 6, Section 4.2:
    - You describe a separate office with a locked door in your response, but an office doesn't appear to be depicted on the diagrams that you provided. Which office is your response referencing?
  - Page 7, Section 6.4:
    - Please remove "6.4 Continued:" just before item (3).
- **MJ-02 Premises Diagram**
  - Diagram 2 & 5:
    - The Shop is labeled as an "Unrestricted Access area". Unless it will be designated as a part of your licensed premises, please remove the "unrestricted access area" label.
  - Diagram 3:
    - The labels on this page are hard to read. Please retype them in larger font.
  - Diagram 4:

        - Indicate which direction is true north.
        - Details on this image are very difficult to see. Is there a better aerial picture available?
- **MJ-05 Manufacturing Supplemental**
    - Page 2, Section 3.1:
        - You specify that 64 ounce jars will be used in your list of equipment, but the Packaging Description sections of Happy Valley Cannabis Coconut Oil and Happy Valley Tincture both state that they will be kept in glass jars of varying sizes. Please correct where appropriate so that all sections are consistent.
    - Page 3, Section 4.2:
        - Please provide examples of the compostable and non-compostable materials that will be used to render marijuana waste (solid and liquid) unusable in your response.
    - Page 4, Section 5.3:
        - You state that the facility will not be performing in-house testing in the previous section, but signed this statement saying that the in-house testing area is clearly defined on your MJ-02 diagrams. Please correct as necessary.
    - Happy Valley Cannabis Coconut Oil:
        - In the Standard Production Procedure, Step 3 mentions "carboxylated cannabis" as an ingredient, but it should have been decarboxylated in Step 1. Is this a typo?
        - Please correct the product name for consistency. It is referred to as "Happy Valley Cannabis Oil" on the first page, and "Happy Valley Coconut Oil" on the second page and sample label.
    - Happy Valley Gummies
        - If this product will be available in multiple flavors, please list all flavors that will be offered in either the Ingredients or Product Description sections.
        - In Step Three of your Standard Production Procedure, should "another post" be "another pot"?
    - Happy Valley Hard Candies
        - List all available flavors in either the Ingredients or Product Description sections.
        - In Step One of your Standard Production Procedure, should "post" be spelled "pot"?
    - Happy Valley Salted Coconut Caramels
        - Both Happy Valley Cannabis Coconut Oil and Happy Valley Tincture (or a tincture purchased from another licensed product manufacturer) are included in the ingredients section. Is this a typo? Tincture is not mentioned in the Standard Production Procedure.
        - In the sample label, the product name omits the word "salted" from "Happy Valley Salted Coconut Caramels".
    - Happy Valley Sour Candies
        - List all available flavors in either the Ingredients or Product Description sections.
        - In Step One of your Standard Production Procedure, should "post" be spelled "pot"?
    - Happy Valley Sour Gummies:
        - List all available flavors in either the Ingredients or Product Description sections.
        - In Step Three of your Standard Production Procedure, should "post" be spelled "pot"?
- **Publisher's Affidavit**
    - Under 3 AAC 306.025(c), your advertising period must be completed within ninety (90) days of submitting your application. Because more than ninety days passed between the last date of advertising and your application going into the queue, it will be necessary to re-post an advertisement in the newspaper once a week for three consecutive weeks. Once this is complete, provide a new affidavit from the publisher with a copy of the advertisement included.
- **MJ-09 Statement of Financial Interest**
    - Page 2 of this form was not submitted with your application.

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:	happyvalleyak@gmail.com
Cc:	Marijuana Licensing (CED sponsored); Jana Weltzin; Valerie Mastolier
Subject:	Incomplete Application - Happy Valley, License #20438
Date:	Tuesday, June 04, 2019 9:32:08 AM
Attachments:	20438 Incomplete Notice.pdf image001.png

Good morning,

I have reviewed your application for a marijuana establishment, but at this time your application 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 notice. If the submitted corrections for your application are inadequate to deem your application complete, or your application is still incomplete after ninety (90) days from the date of this notice, your application will be returned to you in accordance with 3 AAC 306.025(e)(1) and 3 AAC 306.025(f). Should you wish to continue pursuing licensure, it would be necessary to file a new application and pay new fees.

Ninety-day Due Date: 9/2/2019

Let us know if you require copies of any submitted documents, and feel free to call or email if you need clarification on any items in the Incomplete Notice. Correspondence should be sent 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:	"Jana Weltzin"; Marijuana Licensing (CED sponsored)
Cc:	Valerie Mastolier; Happy Valley LLC; Brenda Mills; legal counsel
Subject:	RE: Happy Valley Incomplete response - license number 20438
Date:	Wednesday, June 26, 2019 1:52:00 PM
Attachments:	image001.png

Good afternoon,

I will need to receive all components of the application before I will be able to deem it complete, so the affidavit from the publisher will be required first. I reviewed the corrections that were submitted before I noticed your message about the affidavit, and on those I see that all of the other necessary corrections were made.

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: Tuesday, June 18, 2019 6:17 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Valerie Mastolier <valerie@jdwcounsel.com>; Happy Valley LLC <happyvalleyak@gmail.com>; Brenda Mills <brenda@jdwcounsel.com>; legal counsel <legal@jdwcounsel.com>; Jana Weltzin <jana@jdwcounsel.com>
Subject: RE: Happy Valley Incomplete response - license number 20438

Hello AMCO – attached is mj05 revised per your incomplete. Regarding the publisher's affidavit – we got ad re running as soon as we got you're incomplete letter, in our incomplete response letter I miscalculated the days and said I think we will have it by June 25th but we wont have it until the 28th (we hope). Is there any way this can be deemed completed pending that we get the publishers affidavit to you before July 2nd?

Thank you so much for your consideration, Jana

From: Jana Weltzin <jana@jdwcounsel.com>
Sent: Tuesday, June 18, 2019 5:56 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Cc: Valerie Mastolier <valerie@jdwcounsel.com>; Jana Weltzin <jana@jdwcounsel.com>; Happy Valley LLC <happyvalleyak@gmail.com>; Brenda Mills <brenda@jdwcounsel.com>; legal counsel

<legal@jdwcounsel.com>
Subject: Happy Valley Incomplete response - license number 20438

Hello AMCO team! Please find attached documents for Part 1 of 2 incomplete response:
MJ09
MJ00
MJ01
Revised diagram set
Letter from JDW addressing incomplete items.

Thank you! and please confirm receipt

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

The information contained in this message is privileged and confidential. It is intended only to be read by the individual or entity named above or their designee. If the reader of this message is not the intended recipient, you are on notice that any distribution of this message, in any form is strictly prohibited. If you have received this message in error, please immediately notify the sender and delete or destroy any copy of this message.

IRS Circular 230 Disclaimer: To ensure compliance with IRS Circular 230, we are required to inform you that unless we have specifically stated to the contrary in writing, any advice we provide in this email or any attachment concerning federal tax issues or submissions is not intended or written to be used, and cannot be used, to avoid federal tax penalties.
Thank you.

Think green, please don't print unnecessarily