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

September 25, 2019

Majestic Gardens, LLC
DBA: Majestic Gardens, LLC
Via email: majesticgardens@alaska.net

Re: Standard Marijuana Cultivation Facility #15395

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.**

- **Online Application**
  - According to the Division of Corporations, Business, and Professional Licensing website, Ronald D Isaacs is an Entity Official with 50% ownership in the LLC. I have rolled the application back to "New" status so you can make changes to your online application (in MyAlaska). As long as the information stated above is corrects, please add Ronald D Isaacs as an Entity Official.
    - An updated Public Notice will generate which you will need as part of your corrections outlined below under MJ-07, and MJ-08. Additionally, an updated Advertisement Notice will generate which you will need as part of your corrections outlined below under Publisher's Affidavit. Once you make the corrections to the online application, please send an email notifying me that you have done so, so that I may update the application status from "New" to "Incomplete".

- **MJ-00 Application Certifications**
  - The MJ-00 was submitted on an old form. Please submit the updated MJ-00 for both Deniece and Ronald found on our website at the following link: https://www.commerce.alaska.gov/web/amco/MarijuanaLicenseApplication.aspx.
    - Additionally, please make sure that the licensee in Section 1 says, Majestic Gardens, LLC.

- **MJ-01 Operating Plan**

- Page 2, Section 2.1: please address if you will be checking ID's to prevent persons under the age of 21 from gaining access to any portion of the licensed premises and marijuana items.
- Page 2, Section 3.1: please expand upon your answer. According to 3 AAC 306.710 Restricted access areas, each entrance to a restricted access area must be marked by a sign that says "Restricted access area. Visitors must be escorted." Please adjust your answer accordingly.
- Page 3, Section 3.3: please correct the license type (Standard Marijuana Cultivation Facility) and license number (15395) on all three licensee-produced ID badges.

- **MJ-02 Premises Diagram**
  - It seems that you submitted almost the same diagrams as your retail marijuana store. The diagrams are pretty good, but they should be geared toward this application for your cultivation facility:
    - Please label your diagrams, such as, Diagram 1, Diagram 2, etc.
    - Diagram 1 should be the detailed diagram of the cultivation facility.
      - Please outline the entire perimeter of the proposed <u>licensed premises and restricted access area</u> of the cultivation facility (use separate colors and labels and include them in the key/legend). **OR**, if applicable, you may use one color and label it Restricted Access Area and Licensed Premises.
        - Note- the bathroom can be a part of the licensed premises, but it should not be a part of the restricted access area because restricted access areas need cameras, and bathrooms should not have cameras.
    - Diagram 2 and 5 should show all areas for which the licensee has legal right of possession and the entire building in which the licensed premises is located.

- **MJ-04 Cultivation Supplemental**
  - Page 2, Section 4.1: Is the Multiple use room Dry/store/work room an area that will be under cultivation? If not, please adjust your answer accordingly.
    - Additionally, please provide the overall square footage that will be under cultivation.
  - Page 3, Section 4.2: please read the statement and sign your initials in the box.
  - Page 3, Section 4.6: for the product "3 in 1 concentrate ii, EPA registration #59913-13", I could not find this product in the list of approved products from DEC. Please provide the exact name and registration # from DEC's list of approved pesticides.
  - Page 3, Section4.7: please describe all gases, including carbon dioxide management, to be used, if any.
  - Page 4, Section 4.8: please describe the waste water systems to be used, if any.
  - Page 6, Section 8.2: please provide a sample label that the facility will use to meet the labeling requirements set forth in 3 AAC 306.475.

- **MJ-07 Public Notice Posting Affidavit**
  - The Public Notice must be given within the 90 days preceding the submittal of all application requirements (3 AAC 306.025(c)). So, please repost the Public Notice (after correcting and submitting the online application) at both, the location of the proposed

premises and another conspicuous location for ten days, and then submit a new MJ-07 completed and signed in front of a notary.

- **MJ-08 Local Government Notice Affidavit**
  - The local government notice must be given within the 90 days preceding the submittal of all application requirements (3 AAC 306.025(c)). So, please re-notify the local government by submitting to them the Public Notice (after correcting and submitting the online application), and then submit a new MJ-08 completed and signed in front of a notary.
    - Additionally, the MJ-08 was submitted on an old form. Please submit the updated MJ-08 found on our website at the following link: https://www.commerce.alaska.gov/web/amco/MarijuanaLicenseApplication.aspx.
      - Furthermore, please make sure that the licensee in Section 1 says, Majestic Gardens, LLC.

- **MJ-09 Statement of Financial Interest**
  - The MJ-09 was submitted on an old form. Please submit the updated MJ-09 for both Deniece and Ronald found on our website at the following link: https://www.commerce.alaska.gov/web/amco/MarijuanaLicenseApplication.aspx.
    - Additionally, please make sure that the licensee in Section 1 says, Majestic Gardens, LLC.

- **Publisher's Affidavit**
  - Because the advertisement is beyond the 90 days preceding the submittal of all application requirements (3 AAC 306.025(c)), you will need to redo the 3 week advertising. Please re-advertise for 3 weeks, then, submit a new Publisher's Affidavit with a copy of the newspaper clipping. Make sure to use the updated Advertisement Notice from MyAlaska after you make corrections to and submit the Online Application.

- **Proof of Possession for Proposed Premises**
  - Because the Deed submitted does not show the physical address nor that the LLC has legal right of possession, and because you submitted a lease for your retail marijuana store, please either:
    - Submit documentation that links the legal description of the property with its physical address, such as the most recent property tax assessment, and that the LLC has legal right of possession of the premise; **OR**
    - Because you have a lease on file for you retail marijuana store, please submit the lease.
      - Make sure that the lease incorporates the following:
        - A disclaimer that the landlord/lessor will not take possession of or remove marijuana from the premises, and that AMCO will be contacted in the event that this is necessary.

- **Entity Documents**
  - Please provide a list of all partners with the percentage of ownership of each partner.

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,

Jacqlene Drulis

Jacqlene Drulis, Occupational Licensing Examiner
For,
Erika McConnell, Director
marijuana.licensing@alaska.gov

From:	Marijuana Licensing (CED sponsored)
To:	"majesticgardens@alaska.net"
Cc:	Marijuana Licensing (CED sponsored)
Subject:	Incomplete Application- Majestic Gardens, LLC license #15395
Date:	Wednesday, September 25, 2019 8:36:00 AM
Attachments:	15395 Incomplete Application Letter.pdf image001.png

---

Hello,

Your application has been reviewed, and 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. Feel free to call or email if you need clarification on any items from the Incomplete Letter.

Please send any documents/correspondence to marijuana.licensing@alaska.gov

Thank you,

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

Drulis, Jacqlene M (CED)

From: Marijuana Licensing (CED sponsored)
Sent: Wednesday, November 20, 2019 1:46 PM
To: majesticgardens@alaska.net
Cc: Marijuana Licensing (CED sponsored)
Subject: Incomplete Application- Majestic Gardens, LLC license #15395

Good afternoon,

Thank you for your corrections; however, there are more corrections needed:

- **MJ-02 Premises Diagram**
  - Diagrams 1, 2, & 5:
    - I see that you are no longer including the receiving area, the employee restroom, the mech closet, etc. in the licensed premises. This should be alright, but I am just checking that this is what you meant to do, because this diagram does not match the diagram on file for your retail license, and it implies that you will be receiving product in the receiving area. Please clarify.
    - Label the restricted access area and the licensed premises. Please refer to the first Incomplete Letter for guidance.
    - Label the "Rental" area that is not a part of the licensed premises as "residential rental", "commercial rental", "non-marijuana rental", or something similar so the it is clear what this area is.
  - Diagram 3:
    - Clearly show where the building is on this diagram.

- **MJ-04 Cultivation Supplemental**
  - Due to all of the issues surrounding pesticides recently, we need the exact name and registration number for DEC's list of approved products. Please correct accordingly. Here are how they are listed on DEC's list:
    - ORGANOCIDE 3-IN-1 GARDEN SPRAY CONCENTRATE exempt-25(b)
      ORGANOCIDE 3-IN-1 GARDEN SPRAY READY TO SPRAY exempt-25(b)
  - Also, it is my understanding that the board does not want to see pictures of the actual products, so, the pictures will not be attached to your MJ-04. And, please remove the wording of, "attached a copy of product for your convenience."

- **MJ-07 Public Notice Posting Affidavit**
  - I did not see that this correction was received. Please submit the previously requested correction.

Please send any documents/correspondence to marijuana.licensing@alaska.gov.

Thank you,

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

From: Majestic Gardens llc [mailto:majesticgardens@alaska.net]
Sent: Sunday, November 10, 2019 12:41 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: 15395 MJ-01 redacted with cover

Attached you will find

cover for MJ-01 and Mj-01 redacted ;)

Thanks
Deniece & Ronald Isaacs
majesticgardens@alaska.net

Drulis, Jacqlene M (CED)

From: Marijuana Licensing (CED sponsored)
Sent: Thursday, December 12, 2019 11:37 AM
To: magicalgardens@alaska.net
Cc: Marijuana Licensing (CED sponsored)
Subject: RE: Incomplete Application- Majestic Gardens, LLC license #15395
Attachments: Diagram 1, 2, & 5.pdf

Good morning,

I have reviewed your corrections, and everything appears to be in order except for a couple of additional items. Please note, your 90-day deadline is approaching quickly (12/24/19):

- **MJ-02 Premises Diagram**
  - Because we need to know the cultivation facility's licensed premises and restricted access area (outlined or shaded), at the top of Diagram 1, 2, & 5 where it says, "15395 Standard M.F." (in pink marker), please amend it to say, "15395 Standard M.F. Licensed Premises and Restricted Access Area".
  - Additionally, I took your Diagram 1, 2, & 5 to management to discuss some discrepancies and there are corrections/clarifications needed:
    - Basically, this was not noticed from your last diagram because the entrance/exit on the north side of the building was not labeled as, "only fire exit/fire exit only" before, so it did not stick out as an issue, but, now looking further into your diagram, we do not see another door leading to the standard marijuana cultivation facility licensed premises. The licensed premises must be separated by a secure door and/or wall. Are there doors leading from the non-marijuana rental and/or the retail marijuana store into the cultivation facility, or do the red lines represent walls? If so, please show the door(s) and/or wall(s). The red marker and two RA references are not necessary because if you make the correction above, it will be obvious where your cultivation licensed premises and restricted access areas are; so, you may remove the red marker and two RA references, if you prefer, but a secure door (at least showing separation from the retail marijuana store), and/or walls are required. Are the two red lines in marker walls or open doorways or secure doors? Please clarify and amend accordingly.

  - Lastly, this will not affect your cultivation application, but since the diagram has changed significantly from your active-operating retail store, you may want to consider submitting an MJ-14 Premises Diagram Change for your retail store.

Please send any documents/correspondence to marijuana.licensing@alaska.gov.

Thank you,

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

From: Marijuana Licensing (CED sponsored)
Sent: Wednesday, November 20, 2019 1:46 PM
To: majesticgardens@alaska.net
Cc: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Incomplete Application- Majestic Gardens, LLC license #15395

Good afternoon,

Thank you for your corrections; however, there are more corrections needed:

- **MJ-02 Premises Diagram**
  - Diagrams 1, 2, & 5:
    - I see that you are no longer including the receiving area, the employee restroom, the mech closet, etc. in the licensed premises. This should be alright, but I am just checking that this is what you meant to do, because this diagram does not match the diagram on file for your retail license, and it implies that you will be receiving product in the receiving area. Please clarify.
    - Label the restricted access area and the licensed premises. Please refer to the first Incomplete Letter for guidance.
    - Label the "Rental" area that is not a part of the licensed premises as "residential rental", "commercial rental", "non-marijuana rental", or something similar so the it is clear what this area is.
  - Diagram 3:
    - Clearly show where the building is on this diagram.

- **MJ-04 Cultivation Supplemental**
  - Due to all of the issues surrounding pesticides recently, we need the exact name and registration number for DEC's list of approved products. Please correct accordingly. Here are how they are listed on DEC's list:
    - ORGANOCIDE 3-IN-1 GARDEN SPRAY CONCENTRATE exempt-25(b)
      ORGANOCIDE 3-IN-1 GARDEN SPRAY READY TO SPRAY exempt-25(b)
  - Also, it is my understanding that the board does not want to see pictures of the actual products, so, the pictures will not be attached to your MJ-04. And, please remove the wording of, "attached a copy of product for your convenience."

- **MJ-07 Public Notice Posting Affidavit**
  - I did not see that this correction was received. Please submit the previously requested correction.

Please send any documents/correspondence to marijuana.licensing@alaska.gov.

Thank you,

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

From: Majestic Gardens llc [mailto:majesticgardens@alaska.net]
Sent: Sunday, November 10, 2019 12:41 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: 15395 MJ-01 redacted with cover

Attached you will find

cover for MJ-01 and Mj-01 redacted ;)

Thanks
Deniece & Ronald Isaacs
majesticgardens@alaska.net

Drulis, Jacqlene M (CED)

From: Marijuana Licensing (CED sponsored)
Sent: Wednesday, December 18, 2019 4:11 PM
To: majesticgardens@alaska.net
Cc: Marijuana Licensing (CED sponsored); magicalgardens@alaska.net
Subject: RE: Incomplete Application- Majestic Gardens, LLC license #15395

Good afternoon,

We are getting closer to being able to Complete your application. There are still more corrections needed. Please note, your 90-day deadline to complete your application is approaching (12/24/19):

- The bathroom can be a part of the licensed premises, but it should not be a part of the restricted access area because restricted access areas need cameras, and bathrooms should not have cameras. So, please shade the bathroom a different color and label that color as Not Restricted in the legend/key.
- Additionally, I spoke with Enforcement about the chain that is separating the retail marijuana store and the standard cultivation facility, and they said that a secure door is needed to separate the two licensed premises. Also, this is mentioned in the regulations; according to 3 AAC 306.405(b)(1), "A licensed standard marijuana cultivation facility may also apply for a marijuana product manufacturing facility license and a retail marijuana store license. A standard marijuana cultivation facility that obtains a marijuana product manufacturing facility license or a retail marijuana store license shall conduct any product manufacturing or retail marijuana store operation in a room completely separated from the marijuana cultivation facility by a secure door when co-located." Please address and correct this issue accordingly.

I will need these corrections to be addressed before I can deem your application complete.

Please send any documents/correspondence to marijuana.licensing@alaska.gov.

Respectfully,

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

From: Magical Gardens llc [mailto:magicalgardens@alaska.net]
Sent: Sunday, December 15, 2019 9:59 PM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: RE: Incomplete Application- Majestic Gardens, LLC license #15395

Marvelous Monday to you, I believe I have completed the necessary amendments just in the nick of time.

On Thu, 12 Dec 2019 20:37:23 +0000, "Marijuana Licensing (CED sponsored)" <marijuana.licensing@alaska.gov> wrote:

Good morning,

I have reviewed your corrections, and everything appears to be in order except for a couple of additional items. Please note, your 90-day deadline is approaching quickly (12/24/19): ***OH MY !!!***

- **MJ-02 Premises Diagram**
  - Because we need to know the cultivation facility's licensed premises and restricted access area (outlined or shaded), at the top of Diagram 1, 2, & 5 where it says, "15395 Standard M.F." (in pink marker), please amend it to say, "15395 Standard M.F. Licensed Premises and Restricted Access Area".
  - **correction made**
  -
  -
  - Additionally, I took your Diagram 1, 2, & 5 to management to discuss some discrepancies and there are corrections/clarifications needed:
    - Basically, this was not noticed from your last diagram because the entrance/exit on the north side of the building was not labeled as, "only fire exit/fire exit only" before, so it did not stick out as an issue, but, now looking further into your diagram, we do not see another door leading to the standard marijuana cultivation facility licensed premises.
    - **We shaded the receiving area it is now pink with restricted access. The receiving area will have NO live plants, so nothing can be seen while doors are open.**
  -
    -
    - The licensed premises must be separated by a secure door and/or wall. Are there doors leading from the non-marijuana rental and/or the retail marijuana store into the cultivation facility, or do the red lines represent walls?
    - **The non-marijuana rental area can only be accessed by its own separate door, it is separated by sheet rock walls. one door in one door out.**

We shaded in room #4 work/misc room to page 3. Room 4 will have No live plants but dry ones that we are examining or photographing, drink coffee and collaborate.

-
  -
    - If so, please show the door(s) and/or wall(s). The red marker and two RA references are not necessary because if you make the correction above, it will be obvious where your cultivation licensed premises and restricted access areas are; so, you may remove the red marker and two RA references, if you prefer, but a secure door (at least showing separation from the retail marijuana store), and/or walls are required. Are the two red lines in marker walls or open doorways or secure doors? Please clarify and amend accordingly.

I indicated doors where there are doors, chains where there are boundary yellow chains,removed the RA's and put them on receiving area doors or entry/exit.

Also

Diagram 3 page 4 amendment to reflect receiving and work room 4 division of building

Diagram 4 page 5 indicated receiving and work room also depicting the building division

-
  - Lastly, this will not affect your cultivation application, but since the diagram has changed significantly from your active-operating retail store, you may want to consider submitting an MJ-14 Premises Diagram Change for your retail store.

Thank you yes if our previous plans had been approve we would proceed, however they were holding up our process and are no longer relevant.

MJ-04 Amended for review pg 2, 4.1 adding receiving area and work room 4
Please send any documents/correspondence to marijuana.licensing@alaska.gov.
I hope I have covered everything,
Thank you,
Deniece M Isaacs

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

From: Marijuana Licensing (CED sponsored)
Sent: Wednesday, November 20, 2019 1:46 PM
To: majesticgardens@alaska.net
Cc: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: Incomplete Application- Majestic Gardens, LLC license #15395

Good afternoon,

Thank you for your corrections; however, there are more corrections needed:

- **MJ-02 Premises Diagram**
  - Diagrams 1, 2, & 5:
    - I see that you are no longer including the receiving area, the employee restroom, the mech closet, etc. in the licensed premises. This should be alright, but I am just checking that this is what you meant to do, because this diagram does not match the diagram on file for your retail license, and it implies that you will be receiving product in the receiving area. Please clarify.
    - Label the restricted access area and the licensed premises. Please refer to the first Incomplete Letter for guidance.
    - Label the "Rental" area that is not a part of the licensed premises as "residential rental", "commercial rental", "non-marijuana rental", or something similar so the it is clear what this area is.
  - Diagram 3:
    - Clearly show where the building is on this diagram.

- **MJ-04 Cultivation Supplemental**
  - Due to all of the issues surrounding pesticides recently, we need the exact name and registration number for DEC's list of approved products. Please correct accordingly. Here are how they are listed on DEC's list:
    - ORGANOCIDE 3-IN-1 GARDEN SPRAY CONCENTRATE exempt-25(b)
      ORGANOCIDE 3-IN-1 GARDEN SPRAY READY TO SPRAY exempt-25(b)
  - Also, it is my understanding that the board does not want to see pictures of the actual products, so, the pictures will not be attached to your MJ-04. And, please remove the wording of, "attached a copy of product for your convenience."

- **MJ-07 Public Notice Posting Affidavit**
  - I did not see that this correction was received. Please submit the previously requested correction.

Please send any documents/correspondence to marijuana.licensing@alaska.gov.

Thank you,

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

From: Majestic Gardens llc [mailto:majesticgardens@alaska.net]
Sent: Sunday, November 10, 2019 12:41 AM
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>
Subject: 15395 MJ-01 redacted with cover

Attached you will find

cover for MJ-01 and Mj-01 redacted ;)

Thanks
Deniece & Ronald Isaacs
majesticgardens@alaska.net