CORRESPONDENCE

THE STATE of ALASKA
GOVERNOR MIKE 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

April 26, 2021

Matanuska Apothecary, LLC
DBA: Matanuska Apothecary, LLC
Via email: csaunders@greenjarak.com

Re: Marijuana Product Manufacturing Facility License #27222

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.**

Instructions:

Modify your procedures to include all points below for each section and sub section for each application that requires corrections; then amend your narrative to include each point.

You must ensure that all answers include all required points from regulation as well as each point.

Do not copy and paste the language from this notice into your application. This is merely a guide.

We do not accept appendices, if you want to demonstrate an example, attach the demonstration to the application in order for review. I am happy to show you how to combine files.

Do not send word or adobe documents that are editable. To fix this, simply print your document to a .pdf and save it. After you do so, make sure your formatting is correct before sending.

- **Online Application**
  - **Your DBA is Matanuska Apothecary, not Matanuska Apothecary, LLC**
    - Correct your DBA
    - Add suite number to the physical address
      - I have rolled back your online application, make sure you do this BEFORE you repost any ads or re-do your public posting
    - Per the Matanuska Susitna Borough, your Mailing address is Palmer, not Wasilla

            - Correct your online application and ALL corresponding applications to show the correct mailing address
- **MJ-00- Application Certifications**
    - Make sure your DBA is Matanuska Apothecary
    - Add suite number to the physical address
    - Per the Matanuska Susitna Borough, your Mailing address is Palmer, not Wasilla
        - Correct your online application and ALL corresponding applications to show the correct mailing address
- **MJ-01 Operating Plan**
    - Make sure your DBA is Matanuska Apothecary
    - Add suite number to the physical address
    - Per the Matanuska Susitna Borough, your Mailing address is Palmer, not Wasilla
        - Correct your online application and ALL corresponding applications to show the correct mailing address
    - 3.2
        - Limit the number of visitors to not more than five visitors for each licensee, employee, or agent of the licensee who is actively engaged in supervising those visitors
        - Must wear visitors' badge at all times
            - Must be easily distinguished from employee id
    - 3.3
        - Visitor – provide a copy of a visitors badge as well
            - "Visitor" or something to clearly identify them as such
            - Must be very different from staff/employee ID's
        - Provide samples of licensee-produced identification badges that will be displayed by each licensee, employee, or agent while on the premises and of visitor badges that will be worn by all visitors in restricted access areas.
    - 3.5
        - "dome" cameras, not done.
            - Please correct
        - Notify the Department of Commerce, Community, and Economic Development, Alcohol and Marijuana Control Office as soon as reasonably practical and in any case not more than 24 hours after any unauthorized access to the premises or the establishment's knowledge of evidence or circumstances that reasonably indicate theft, diversion, or unexplained disappearance of marijuana, marijuana products, or money from the licensed premises.
    - 3.6
        - Will there be any areas in your facility that are not covered by cameras?
            - If so, discuss where, if not address it in this point.
        - Discuss employee training
            - How often are the cameras reviewed for diversion?
            - What other procedures are in place?
        - Discuss how METRC is used to prevent diversions
    - 3.13
        - Unobstructed views within restricted area
    - 3.14
        - How is there limited access to the room?
            - Signs
            - Video surveillance
            - What types of locks are used?
                - Commercial grade (306.715)
        - How long will you keep video surveillance footage?

            - 40 days per regulation
        - How is surveillance kept in the main office keeping it from unauthorized individuals?
    - 4.2
        - Describe the storage of physical and electronic records.
        - How is there limited access to the room?
            - Signs
            - Video surveillance
            - What types of locks are used?
                - Commercial grade (306.715)
        - Address backup of records and length of storage onsite.
            - 40 days
    - 8.1
        - 10lbs is the maximum currently allowed, you may want to update your limit to that
            - If you want to change this later, it will require an MJ-15
        - Transporter must have current marijuana handler permit
- **MJ-02 Premises Diagram**
    - Make sure your DBA is Matanuska Apothecary
    - Add suite number to the physical address
    - Per the Matanuska Susitna Borough, your Mailing address is Palmer, not Wasilla
        - Correct your online application and ALL corresponding applications to show the correct mailing address
    - The diagram labeled Diagram 5 is actually a copy of diagram 2
        - Please send diagram 5
    - Is the apothecary on only one floor or are you requesting overlapping premises?
        - You cannot have overlapping premises in this facility, all of the owners on both licenses are not the same.
            - Please clarify which business is on which floor
        - Please show in detail which premises is where for each facility and how they do not overlap in any way.
    - Diagram 1/ Diagram 2 are the same, but with different color shading
        - You can label them Diagram 1,2 instead of submitting 2 identical forms
        - Label the sinks in the bathroom
- **MJ-05 Manufacturing Supplemental**
    - Make sure your DBA is Matanuska Apothecary
    - Add suite number to the physical address
    - Per the Matanuska Susitna Borough, your Mailing address is Palmer, not Wasilla
        - Correct your online application and ALL corresponding applications to show the correct mailing address
    - All Products Section 7
        - List the THC range possible for this product
            - Example “Total THC for this product will range from 25-99%, actual amount will be listed on the label, per the testing results”
    - Powderized Cannabinoid Blend
        - Product Type
            - Wholesale/In house
        - Packaging Description
            - This should include the word “wholesale”
        - This product should be labeled as wholesale/In-house only
- **MJ-07 Public Notice Posting Affidavit**
    - Make sure your DBA is Matanuska Apothecary

    - Add suite number to the physical address
    - Per the Matanuska Susitna Borough, your Mailing address is Palmer, not Wasilla
        - Correct your online application and ALL corresponding applications to show the correct mailing address
    - After the suite number is added, THEN re-post your public posting for 10 days in two places
- **MJ-08 Local Government Notice Affidavit**
    - Make sure your DBA is Matanuska Apothecary
    - Add suite number to the physical address
    - Per the Matanuska Susitna Borough, your Mailing address is Palmer, not Wasilla
        - Correct your online application and ALL corresponding applications to show the correct mailing address
    - Have this form notarized with the correct information and re-submit
- **MJ-09 Statement of Financial Interest**
    - Make sure your DBA is Matanuska Apothecary
    - Add suite number to the physical address
    - Per the Matanuska Susitna Borough, your Mailing address is Palmer, not Wasilla
        - Correct your online application and ALL corresponding applications to show the correct mailing address
- **Proof of Possession for Proposed Premises**
    - Provide a lease between Dharma Holdings LLC and Matanuska Apothecary LLC
        - Along with all the other requirements of a legally binding lease, the lease must contain:
            - The disclaimer that the landlord may not take possession of any marijuana or marijuana product, and that AMCO will be contacted in the event that this is necessary.
- **Entity Documents**
    - Provide a list of all members and managing members of Matanuska Apothecary with each individual and their percentage of ownership.
- **Food Permit Application**
    - Make sure your DBA is Matanuska Apothecary
    - Add suite number to the physical address
        - Submit a new application with the correct information
- **Miscellaneous- Affidavit of Publication**
    - **You must re-run the ad 1x a week for 3 weeks with the language corrected**
      Matanuska Apothecary, LLC is applying under 3 AAC 306.500(a)(1) for a new Marijuana Product Manufacturing Facility license, license #27222, doing business as Matanuska Apothecary, located at 11709 E Palmer-Wasilla Hwy ENTER SUITE HERE, Wasilla, AK, 99645, UNITED STATES.
      Interested persons may object to the application by submitting a written statement of reasons for the objection to their local government, the applicant, and the Alcohol & Marijuana Control Office (AMCO) not later than 30 days after the director has determined the application to be complete and has given written notice to the local government. Once an application is determined to be complete, the objection deadline and a copy of the application will be posted on AMCO's website at https://www.commerce.alaska.gov/web/amco. Objections should be sent to AMCO at marijuana.licensing@alaska.gov or to 550 W 7th Ave, Suite 1600, Anchorage, AK 99501.

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,

Randi Baker, Occupational Licensing Examiner
For,
Glen Klinkhart, Interim Director
marijuana.licensing@alaska.gov

From:	Marijuana Licensing (CED sponsored)
To:	csaunders@greenjarak.com
Cc:	Marijuana Licensing (CED sponsored)
Subject:	27222 Matanuska Apothecary Incomplete Memo
Date:	Monday, April 26, 2021 10:01:46 AM
Attachments:	27222 Matanuska Apothecary Incomplete Notice.pdf

---

Good Morning:

Your application has been reviewed, attached is correspondence regarding corrections, additional documents, and/or resubmittals that must be addressed in full before the application can be deemed complete.

Please understand that there is a high possibility of more corrections after these. I must have appropriate time to review the corrections and give you time to get more corrections if needed. Please understand that the quality of your corrections directly correlate to my ability to get you on the next agenda.

Please make sure to read the entire notice, and make each correction requested.

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: July 25, 2021

Let us know if you require copies of any submitted documents, and feel free to email if you need clarification on any items in the Incomplete Notice. Correspondence should be sent to marijuana.licensing@alaska.gov.

Randi Baker

Occupational Licensing Examiner
Alcohol and Marijuana Control Office
Phone: 907.334.0892
Cell: 907.717.3640
alcohol.licensing@alaska.gov
marijuana.licensing@alaska.gov

Please consider the environment before printing this e-mail.

Make sure to include your license number and DBA in the subject line of emails

ALCOHOL Deadline and CORRECTION Reminders:

- 5/13/2021 at 4:00pm – **LICENSEE DEADLINE** for June 7, 2021 ABC Meeting.
- ***Final*** corrections must be submitted by 4:00PM.
- **Anything** submitted after that date and time is not guaranteed to make the agenda.

- You must **return all corrections at once.** Piecemealed corrections are NOT accepted.
- Appendices for applications are not accepted.

MARIJUANA Deadline and CORRECTION Reminders:

- 5/14/2021 at 4:00pm – **LICENSEE DEADLINE** for TENATIVELY SCHEDULED, (SUBJECT TO CHANGE)June 8-9, 2021 MCB Meeting.
- ***Final*** corrections must be submitted by 4:00PM.
- **Anything** submitted after that date and time is not guaranteed to make the agenda.
- You must **return all corrections at once**. Piecemealed corrections are NOT accepted.
- Appendices for applications are not accepted.
- Submit your corrections ASAP- multiple rounds of corrections are almost always needed
- Do not wait until the 90 day deadline to submit application corrections- all deadlines are for final corrections.
- If anything is incorrect after the 90 day deadline, your application will be returned and you will have to reapply.

Any guidance provided by this electronic communication is not a binding legal opinion, ruling, or interpretation that may be relied upon, but merely guidance concerning existing statutes and regulations. There may be other unique or undisclosed facts, circumstances, and information that may have changed any guidance provided in this communication.

CONFIDENTIALITY NOTICE: This communication is intended for the sole use of the individual or entity to whom it is addressed, is covered by the Electronic Communications Privacy Act (18 USC § 2510-2521), and may contain Confidential Official Use Only Information that may be exempt from public release under the Freedom of Information Act (5 USC § 552). If you are not the intended recipient, you are prohibited from disseminating, distributing, or copying any information contained in this communication.The State of Alaska cannot guarantee the security of e-mails sent to or from a state employee outside the state e-mail system. If you are not the intended recipient or receive this communication in error, please notify the sender by reply e-mail and delete the original message and all copies from your computer.