

**From:** [leonard lamb](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Cannabinoid Profile  
**Date:** Sunday, March 14, 2021 12:47:09 PM

---

Greetings,

In Alaska, is the cannabinoid profile taken from the whole flower (bud) or after the bud has been tumbled and the kief removed?

If determined after tumbling so that testing reflects what actually goes into the package then labeling is correct.

However, if tested before tumbling then it will be inaccurate because it is not the same product that goes in the package.

Much of its potency accumulates on the leaves of the bud has been removed from the bud during the tumbling; to be used to make other products.

Thank you.

Leonard

**From:** [CED AMCO REGS \(CED sponsored\)](#)  
**To:** [teri@badgramm3r.com](mailto:teri@badgramm3r.com)  
**Cc:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** RE: Today's meeting  
**Date:** Thursday, April 1, 2021 12:14:35 PM

---

Teri,

This email thread is being sent to the Marijuana Control Board's inbox for the to review at their next regularly scheduled board meeting.

The curbside/window pick up was only effective through the governor's emergency declaration, this was written into the emergency regulations. The curbside/window pick up is no longer active, whether that's going to change in the future, we/AMCO don't know.

You are welcome to provide regarding your request at board meetings during public comment period. This means you need to monitor our website for notices of our meetings <https://www.commerce.alaska.gov/web/amco/> . The agenda should state whether public comment will be taken at the specific meeting.

You could also send your requests directly to [marijuana@alaska.gov](mailto:marijuana@alaska.gov) . The emails sent to this email address are compiled for the board to review at every regularly scheduled meeting.

Thank you

Jane P. Sawyer, Regulations Specialist  
DCCED-Alcohol and Marijuana Control Office  
550 W. 7<sup>th</sup> Avenue, Suite 1600  
Anchorage, AK 99501  
907-269-0490

---

**From:** Teri Zell <[teri@badgramm3r.com](mailto:teri@badgramm3r.com)>  
**Sent:** Wednesday, March 31, 2021 3:52 PM  
**To:** Marijuana Licensing (CED sponsored) <[marijuana.licensing@alaska.gov](mailto:marijuana.licensing@alaska.gov)>  
**Subject:** FW: Today's meeting

And if not, what is my next step to get this before the board? My customers want this back. I have a lot of handicap visitors, customers still not wanting to deal with the whole Covid thing...I sent in tons of informal customer responses we solicited, and have asked numerous times to have AMCO officers to come out and see what we have for a drive through. It is much safer for everyone and something I would like the Board to consider.

---

**From:** Teri Zell  
**Sent:** Wednesday, March 31, 2021 3:45 PM  
**To:** Marijuana Licensing (CED sponsored) <[marijuana.licensing@alaska.gov](mailto:marijuana.licensing@alaska.gov)>  
**Subject:** RE: Today's meeting

My understanding that it would be coming back up in today's meeting? Is this a done deal or is there a possibility that this can become permanent. Not curbside, but actual drive up window. Thank you.

---

**From:** Marijuana Licensing (CED sponsored) <[marijuana.licensing@alaska.gov](mailto:marijuana.licensing@alaska.gov)>  
**Sent:** Wednesday, March 31, 2021 3:31 PM  
**To:** Teri Zell <[teri@badgramm3r.com](mailto:teri@badgramm3r.com)>  
**Cc:** Marijuana Licensing (CED sponsored) <[marijuana.licensing@alaska.gov](mailto:marijuana.licensing@alaska.gov)>  
**Subject:** RE: Today's meeting

Teri, can you be more specific as to what you are asking? The emergency regulation allowing for curbside/window pick up is no longer active. It became inactive the moment the emergency declaration from the governor was not renewed or extended.

Thank you

Jane P. Sawyer, Regulations Specialist  
DCCED-Alcohol and Marijuana Control Office  
550 W. 7<sup>th</sup> Avenue, Suite 1600  
Anchorage, AK 99501  
907-269-0350

---

**From:** Teri Zell [<mailto:teri@badgramm3r.com>]  
**Sent:** Wednesday, March 31, 2021 2:17 PM  
**To:** Davies, Jason M (CED) <[jason.davies@alaska.gov](mailto:jason.davies@alaska.gov)>  
**Subject:** Today's meeting

Am I missing something? I don't see the Drive-Through issue on the agenda?  
Thank you!

Teri Zell  
Bad Gramm3r



**From:** [Walter, Melissa D \(CED\)](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** FW: Public comment  
**Date:** Monday, April 5, 2021 12:51:03 PM

---

**From:** Klinkhart, Glen Edward (CED) <[glen.klinkhart@alaska.gov](mailto:glen.klinkhart@alaska.gov)>  
**Sent:** Monday, April 5, 2021 12:49 PM  
**To:** Walter, Melissa D (CED) <[melissa.walter@alaska.gov](mailto:melissa.walter@alaska.gov)>  
**Subject:** FW: Public comment

Melissa,

Could you please add this the next MCB Mailbox?

Thanks,

Klink

---

**From:** dollynda Phelps <[jeffndol@yahoo.com](mailto:jeffndol@yahoo.com)>  
**Sent:** Monday, April 5, 2021 10:38 AM  
**To:** CED AMCO Enforcement (CED sponsored) <[amco.enforcement@alaska.gov](mailto:amco.enforcement@alaska.gov)>; Klinkhart, Glen Edward (CED) <[glen.klinkhart@alaska.gov](mailto:glen.klinkhart@alaska.gov)>  
**Subject:** Public comment

\*Please forward this email to the Marijuana Control Board members

Hello,

As an owner of a Limited Cultivation facility and Standard cultivation facility I am all too familiar with the marijuana excise tax required to be paid monthly to the Department of Revenue. With the fluctuating prices of cannabis flower and lower per pound prices, some months are more challenging than others. My complaint today is the absolute lack of enforcement or consequences that are implemented when licensed cultivators continuously neglect this tax obligation.

**3 AAC 306.480. Marijuana tax to be paid**

A marijuana cultivation facility, including a standard marijuana cultivation facility and a limited

marijuana cultivation facility, shall submit monthly reports to the Department of Revenue and

pay the excise tax required under AS 43.61.010 and 43.61.020 on all marijuana sold or provided

as a sample to a marijuana establishment. (Eff. 2/21/2016, Register 217)

A huge problem is this:

Cultivation facilities that do not pay regular excise tax can and are selling their product at a much lower price than the rest of us can compete with. This artificial market price is not sustainable, unless of course you remove the tax obligation. This is allowing businesses that are non-compliant to continue to pressure other cultivators to lower their prices, which will eventually force good business owners out of business. Now you're left with the non-compliant entities in this industry.

As a business that does good business, we make it a point to pay our tax obligation in a timely manner every month. In almost 5 years of operating, we have never been on AMCO's "naughty list" from the D.O.R. There are things we need, like new upgraded lights, watering systems, etc, but we pay our taxes first. So I ask, why aren't we just ignoring the excise tax like these other guys? There are no consequences, they keep getting renewed annually, I mean what's the deal? I have heard board members say "Oh well if we revoke their license, we won't ever collect the money." Well, the money isn't being collected now either. And these entities are hurting good business owners that DO pay the tax obligation, but we receive no protection from AMCO. One cultivator owed \$670,607.23 as of January 21, 2021. As of March 18, 2021 they owe \$719,338.00. What in the world!? It went UP \$48,730.77. But hey, just let them keep cruising, why not. And I'm over here worried about getting a "fine" if my employee forgets their badge at home.

The Marijuana Control Board must do something about this. The situation is harming good businesses in this industry, and the state is at a loss as well. I have an idea, let's get rid of the guys that don't pay taxes and allow room for good business to thrive.

\*If this was addressed at the last meeting in April, I was unable to hear the meeting as the ZOOM link was not functioning. I tried multiple times throughout the day. Thank you for your time and attention, have a great week.

Dollynda Phelps

907-252-8026

**From:** [CED AMCO REGS \(CED sponsored\)](#)  
**To:** [Troy Clancy](#)  
**Cc:** [CED AMCO REGS \(CED sponsored\)](#); [Marijuana, CED ABC \(CED sponsored\)](#); [CED AMCO Enforcement \(CED sponsored\)](#); [Marijuana Licensing \(CED sponsored\)](#)  
**Subject:** RE: Personal cultivation  
**Date:** Monday, April 19, 2021 10:34:57 AM

---

Hello,

Your email will be forwarded to the Marijuana Control Board. Emails get compiled for the board about three weeks before a regular meeting. If you wish to provide public comment during a regular board meeting, you may during the public comment period of such meeting. Meetings information is posted on our website here <https://www.commerce.alaska.gov/web/amco/>. The Public Notice should specify whether the board will be taking public comment at that meeting.

Thank you

Jane P. Sawyer, Regulations Specialist  
DCCED-Alcohol and Marijuana Control Office  
550 W. 7th Avenue, Suite 1600  
Anchorage, AK 99501  
907-269-0350

-----Original Message-----

From: Troy Clancy <troyclancy751@gmail.com>  
Sent: Thursday, April 15, 2021 10:08 AM  
To: CED AMCO REGS (CED sponsored) <amco.regs@alaska.gov>  
Subject: Personal cultivation

I have been growing since legalization and think the limits on plants is unreasonable. I grow out doors so my season is short and I can not grow enough flower for the year with only six plants. Auto flowers is the only way I have been successful growing like this and my yields have never approached legal limits so I was wondering what it would take to change this rules. I know policy's are made the board and commercial cultivators and think the needs of hobby farmers need to be addressed. Hope to get a reply and would like to approach the board at the next meeting!

Sent from my iPad

**From:** [Marijuana Licensing \(CED sponsored\)](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** FW: Application for Eagle River Establishment  
**Date:** Wednesday, April 21, 2021 10:10:34 AM

---

**From:** Jackie Welge [mailto:jawelge@yahoo.com]  
**Sent:** Monday, April 19, 2021 5:14 PM  
**To:** Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>  
**Subject:** Application for Eagle River Establishment

I would like the community to know that I, a resident in Chugiak, fully support the development of a marijuana establishment in Eagle River.

Jacquelyn Welge

**From:** [Marijuana Licensing \(CED sponsored\)](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** FW: Marijuana shop proposed for Eagle River  
**Date:** Wednesday, April 21, 2021 10:34:17 AM

---

-----Original Message-----

From: Gina Parks [<mailto:Parksgj@outlook.com>]  
Sent: Monday, April 19, 2021 2:53 PM  
To: Marijuana Licensing (CED sponsored) <[marijuana.licensing@alaska.gov](mailto:marijuana.licensing@alaska.gov)>  
Subject: Marijuana shop proposed for Eagle River

The Eagle River CC is hosting a brief by Alice's to bring marijuana shop to Eagle River.

I am adamantly opposed to any such establishment regardless of where they propose to set up shop. This includes the Eagle River and Chugiak area. There are more than enough shops in the surrounding areas (anchorage and the matsu).

Gina Parks  
Eagle River Resident

Sent from my iPhone



**From:** [Marijuana Licensing \(CED sponsored\)](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** FW: Eagle River  
**Date:** Monday, April 26, 2021 10:02:21 AM

---

-----Original Message-----

From: Renee Scott [<mailto:reneescott907@yahoo.com>]  
Sent: Friday, April 23, 2021 6:01 PM  
To: Marijuana Licensing (CED sponsored) <[marijuana.licensing@alaska.gov](mailto:marijuana.licensing@alaska.gov)>  
Subject: Eagle River

To whom it may concern,  
My husband and I own a home in Eagle River and are raising our children in this community. We chose Eagle River for many reasons. One of them being there are no pot shops out here.

I would ask that you keep it that way please.

Anchorage is a short drive and there are many shops to choose from in Anchorage. It is NOT needed in Eagle River.

Thank you for your time.

Sincerely,

Renee' Scott  
907-231-4740

**From:** [Marijuana Licensing \(CED sponsored\)](#)  
**To:** [Tony Bell](#)  
**Cc:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** RE: AMCO re: Alice's MJ Store  
**Date:** Monday, May 3, 2021 10:06:09 AM

---

Hello,

Your comment has been forwarded to the Marijuana Control Board's email which gets reviewed by the board at its regularly scheduled meeting. Comments to the board get posted on our website before the meeting.

Thank you

Jane P. Sawyer, Regulations Specialist  
DCCED-Alcohol and Marijuana Control Office  
550 W. 7th Avenue, Suite 1600  
Anchorage, AK 99501  
907-269-0350

-----Original Message-----

From: Tony Bell <1tbellak@gmail.com>  
Sent: Friday, April 30, 2021 5:50 PM  
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>  
Subject: AMCO re: Alice's MJ Store

My opinion is that Eagle River does not need one more source of mind altering, emotion destabilizing drug. Just because it is legal does not mean we have to have it in our community. Let Los Anchorage be the purveyor of marijuana.  
Just a decades long voter, 21 year Eagle River resident and 51 year Alaska resident's biased opinion.

Francis A. Bell  
17333 Toakoana Dr.  
Eagle River, AK  
email at the top

**From:** [Marijuana Licensing \(CED sponsored\)](#)  
**To:** [Elisa Fleener](#); [Marijuana, CED ABC \(CED sponsored\)](#)  
**Cc:** [Marijuana Licensing \(CED sponsored\)](#)  
**Subject:** RE: Amco  
**Date:** Monday, May 17, 2021 8:42:34 AM

---

Hello,

Your comment has been forwarded to the Board's email. It will be seen by the board and made public at their next regular meeting.

Sincerely,

Jane P. Sawyer, Regulations Specialist  
DCCED-Alcohol and Marijuana Control Office  
550 W. 7th Avenue, Suite 1600  
Anchorage, AK 99501  
907-269-0350

-----Original Message-----

From: Elisa Fleener <fleener@ak.net>  
Sent: Saturday, May 15, 2021 9:41 AM  
To: Marijuana Licensing (CED sponsored) <marijuana.licensing@alaska.gov>  
Subject: Amco

Dear Amco:

My family has lived in Eagle River for 28 years. We live here because it's a clean bedroom community. Therefore, we are contesting any marijuana shop that wants to have a retail store in Eagle River. There is already too many pot shops in Anchorage. We are asking as long time residents of Eagle River to not allow the licensing of any retail store that sells marijuana. Please keep our town as the sweet community it is.

Thank you,  
Elisa and Brad Fleener

Sent from my iPhone

**From:** [leonard.lamb](#)  
**To:** [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** Product Mislabeling  
**Date:** Sunday, May 30, 2021 12:52:07 PM

---

TO WHOM IT MAY CONCERN;

I am writing AMCO today because I believe that the cannabis that is being tested is not what actually goes into the package to be sold for consumption. My belief is largely because the regulations concerning this belief are ambiguous.

The reason for my belief is that after more than fifty years as a connoisseur of cannabis all of my knowledge tells me that the cannabis flower that is being packaged for sale is not the same percentage of THC as that is being tested.

If the flower is manicured prior to testing then what goes into the package is representative of what is tested and I am concerned for nothing.

If, however, the flower is manicured post testing then what goes into the package is not representative of what is tested and that is a real concern as this would be false labeling.

As it is now the regulations do not address this clearly.

This is best suggested by the fact that the concentrated products resulting from the manicured cannabis is testing at 80-90% THC content.

This is akin to skimming the cream off of whole milk. It is no longer whole milk. It is now skimmed milk.

However, since I have not been able to get any clarity on this subject matter from previous emails, text and phone calls with AMCO employees and the Attorney General's office the Ombudsman suggested I bring my concerns up through this path way and request that the board discuss this at their next meeting.

If I have not made my concerns clearly please do not hesitate to contact me.  
PH 907 562-8904/EM [lamblj@yahoo.com](mailto:lamblj@yahoo.com)

Respectfully,

Leonard Lamb  
Anchorage, AK 99508

**From:** [Hoelscher, James C \(CED\)](#)  
**To:** [Johnson, Steven M \(CED\)](#)  
**Cc:** [CED AMCO Enforcement \(CED sponsored\)](#); [Klinkhart, Glen Edward \(CED\)](#); [Marijuana, CED ABC \(CED sponsored\)](#)  
**Subject:** RE: Cannabinoid Profile  
**Date:** Tuesday, June 1, 2021 7:54:25 AM

---

Steve,

I brought this concern up to the board at the last meeting.

I will forward to the Director and to the marijuana email as well.

James

---

**From:** CED AMCO Enforcement (CED sponsored)  
**Sent:** Tuesday, June 1, 2021 7:43 AM  
**To:** Hoelscher, James C (CED) <james.hoelscher@alaska.gov>  
**Subject:** FW: Cannabinoid Profile

Investigator Steven M. Johnson

---

**From:** leonard lamb [<mailto:lamblj@yahoo.com>]  
**Sent:** Sunday, May 30, 2021 12:50  
**To:** CED AMCO Enforcement (CED sponsored) <[amco.enforcement@alaska.gov](mailto:amco.enforcement@alaska.gov)>  
**Subject:** Re: Cannabinoid Profile

TO WHOM IT MAY CONCERN;

I am writing AMCO today because I believe that the cannabis that is being tested is not what actually goes into the package to be sold for consumption. My belief is largely because the regulations concerning this belief are ambiguous.

The reason for my belief is that after more than fifty years as a connoisseur of cannabis all of my knowledge tells me that the cannabis flower that is being packaged for sale is not the same percentage of THC as that is being tested.

If the flower is manicured prior to testing then what goes into the package is representative of what is tested and I am concerned for nothing.

If, however, the flower is manicured post testing then what goes into the package is not representative of what is tested and that is a real concern as this would be false labeling.

As it is now the regulations do not address this clearly.

This is best suggested by the fact that the concentrated products resulting from the manicured cannabis is testing at 80-90% THC content.

This is akin to skimming the cream off of whole milk. It is no longer whole milk. It is now skimmed milk.

However, since I have not been able to get any clarity on this subject matter from previous emails, text and phone calls with AMCO employees and the Attorney General's office the Ombudsman suggested I bring my concerns up through this path way and request that the board discuss this at their next meeting.

If I have not made my concerns clearly please do not hesitate to contact me. PH 907 562-8904/EM [lamblj@yahoo.com](mailto:lamblj@yahoo.com)

Respectfully,

Leonard Lamb  
Anchorage, AK 99508

On Thursday, March 18, 2021, 09:52:30 AM AKDT, leonard lamb <[lamblj@yahoo.com](mailto:lamblj@yahoo.com)> wrote:

To Whom It May Concern;

It has come to my attention that there is possibly a problem with the current definitions concerning testing.

"This may vary from cultivator to cultivator. The current definitions do not define whether or not the representative sample is before or after the "manicure"."

I am concerned that many growers are submitting raw bud for testing but are then manicuring it before packaging it for sell and consumption.

A large percentage of the terpenes/thc/cbds/etc are found on the buds leaves as white crystals. If a cultivator submits raw bud for testing and then manicures for packing it then this would be akin to adding water to the beer before bottling it.

Not only would this be false advertising it would also explain why what is shown as high grade cannabis has less punch than Mexican marijuana back in the sixties.

Therefore, given this information, I would like to request an investigation into this matter and to do what is necessary to eliminate the possibility of false advertising.

Sincerely,

Leonard Lamb  
Anchorage, Ak 99508

----- Forwarded Message -----

**From:** leonard lamb <[lamblj@yahoo.com](mailto:lamblj@yahoo.com)>  
**To:** Bankowski, Joe (CED) <[joe.bankowski@alaska.gov](mailto:joe.bankowski@alaska.gov)>  
**Sent:** Thursday, March 18, 2021, 09:30:05 AM AKDT  
**Subject:** Re: Cannabinoid Profile

Thank you.

Can you tell me to whom I would express my concerns.

Leonard

On Wednesday, March 17, 2021, 09:51:43 PM AKDT, Bankowski, Joe (CED) <[joe.bankowski@alaska.gov](mailto:joe.bankowski@alaska.gov)> wrote:

Leonard,

This may vary from cultivator to cultivator. The current definitions do not define whether or not the representative sample is before or after the "manicure".

If you feel that the product you are consuming does not reflect the advertised potency than I would certainly encourage you to file a complaint if you feel that is appropriate.

**From:** [leonardlamb@gmail.com](mailto:leonardlamb@gmail.com) [<mailto:leonardlamb@gmail.com>]  
**Sent:** Monday, March 15, 2021 4:03 PM  
**To:** Davies, Jason M (CED) <[jason.davies@alaska.gov](mailto:jason.davies@alaska.gov)>  
**Subject:** Re: Cannabinoid Profile

No problem.

However, I am not complaining about one specific purchase.

I am inquiring about the process which I have been speaking of. I have been partaking of cannabis since the sixties and though marijuana is touted today as being of higher potency, myself and my friends find that marijuana purchased here is not appear to be anywhere near the potency it was back then.

Simply put if tested raw and then manicured for packaging then the label is not representative of the product inside.

Again, my question is the cannabis tested prior to manicuring or after?

Depending on the answer to that will provide me with the information whether to file a formal complaint or not.

Please advise.

Leonard

On Monday, March 15, 2021, 03:52:35 PM AKDT, Davies, Jason M (CED) <[jason.davies@alaska.gov](mailto:jason.davies@alaska.gov)> wrote:

Hello,

You are correct. Tests are collected from each harvest batch package that has been uniformly dried and cured. My apologies. I do take every question seriously. If you have seen any labeling that you feel is incorrect on a package please provide the sample and AMCO Enforcement will investigate.

Regards,

*Jason M Davies – Criminal Justice Tech II*



AMCO/ENFORCEMENT

[jason.davies@alaska.gov](mailto:jason.davies@alaska.gov)

907-754-3410

**From:** Leonard Lamb [<mailto:leonardlamb@gmail.com>]  
**Sent:** Monday, March 15, 2021 3:43 PM  
**To:** Davies, Jason M (CED) <[jason.davies@alaska.gov](mailto:jason.davies@alaska.gov)>  
**Cc:** CED AMCO Enforcement (CED sponsored) <[amco.enforcement@alaska.gov](mailto:amco.enforcement@alaska.gov)>  
**Subject:** Re: Cannabinoid Profile

Hmmm. That's not exactly what I read.

(1) collect a representative sample for testing from each harvest batch package that has been uniformly dried and cured,

Dried and cured are not the same as manicured. Dried and cured most likely refers to the level of temp/humidity, etc.

And if tested prior to manicuring then it doesn't have the same test data as raw buds dried, cured and not manicured.

Thus, labeling may not be correct.

As a consumer I have a vested interest in whether Alaskan cannabis is being properly labeled to reflect the contents that I am paying for.

I ask you to take my request seriously and if you are not sure please pass my question on to who may.

Thank you.

Leonard

On Mon, Mar 15, 2021, 3:13 PM Davies, Jason M (CED) <[jason.davies@alaska.gov](mailto:jason.davies@alaska.gov)> wrote:

Tests are done after drying and manicure of the harvest stated in 306.455(b)(1).

*Jason M Davies – Criminal Justice Tech II*

AMCO/ENFORCEMENT

[jason.davies@alaska.gov](mailto:jason.davies@alaska.gov)

907-754-3410

**From:** Leonard Lamb [mailto:[leonardlamb@gmail.com](mailto:leonardlamb@gmail.com)]  
**Sent:** Monday, March 15, 2021 3:08 PM  
**To:** Davies, Jason M (CED) <[jason.davies@alaska.gov](mailto:jason.davies@alaska.gov)>  
**Subject:** Re: Cannabinoid Profile

Thank you for the info Jason.

So it is tested prior trimming?

And then it is cleaned and most of the trichomes removed then packaged?

Is this correct?

Leonard

On Mon, Mar 15, 2021, 1:55 PM Davies, Jason M (CED) <[jason.davies@alaska.gov](mailto:jason.davies@alaska.gov)> wrote:

Hello-

Please refer to 3 AAC 306.455

### **3 AAC 306.455. Required laboratory testing**

(a) A marijuana cultivation facility shall provide samples from each harvest batch package of marijuana produced at the facility to a marijuana testing facility and may not sell or

transport any marijuana, except as provided for in (c) of this section, until all laboratory testing

required under 3 AAC 306.645 has been completed.

(b) To comply with (a) of this section, a marijuana cultivation facility shall

(1) collect a representative sample for testing from each harvest batch package

that has been uniformly dried and cured, in an amount as set out in the following table:

Harvest Batch Package Size (pounds)	Number of 1g sub-samples to make up required sample
1	4
2	4
3	5
4	6
5	8
6	10
7	11
8	13
9	14
10	16

(2) designate an individual responsible for collecting each sample; that individual shall

(A) prepare a signed statement showing that each sample is representative of the harvest batch package;

(B) provide the signed statement to the marijuana testing facility; and

(C) maintain a copy as a business record under 3 AAC 306.755; and

(3) transport the samples to the marijuana testing facility's licensed premises in compliance with 3 AAC 306.750.

(c) A marijuana cultivation facility shall segregate the harvest batch package from which

the testing sample was selected until the marijuana testing facility reports the results from its

tests. During this period of segregation, the marijuana cultivation facility that provided the

sample shall maintain the harvest batch package in a secure, cool, and dry location to prevent the

marijuana from becoming contaminated or losing its efficacy. The marijuana cultivation facility

that provided the sample may not sell or transport any marijuana from the segregated harvest

batch package until the marijuana testing facility has completed its testing, and provided those

results, in writing, to the marijuana cultivation facility that provided the sample, except that a

marijuana cultivation facility may transfer untested marijuana to a licensed marijuana

concentrate or marijuana product manufacturing facility to be used to make carbon dioxide- or

solvent-based extract. After processing, the carbon dioxide- or solvent-based extract must pass

all required tests. The marijuana cultivation facility shall maintain the testing results as part of its

business books and records.

*Jason M Davies – Criminal Justice Tech II*

*AMCO/ENFORCEMENT*

[jason.davies@alaska.gov](mailto:jason.davies@alaska.gov)

*907-754-3410*

---

**From:** Marijuana, CED ABC (CED sponsored)

**Sent:** Monday, March 15, 2021 9:07 AM

**To:** CED AMCO Enforcement (CED sponsored) <[amco.enforcement@alaska.gov](mailto:amco.enforcement@alaska.gov)>

**Subject:** FW: Cannabinoid Profile

---

**From:** leonard lamb <[leonardlamb@gmail.com](mailto:leonardlamb@gmail.com)>  
**Sent:** Sunday, March 14, 2021 12:47 PM  
**To:** Marijuana, CED ABC (CED sponsored) <[marijuana@alaska.gov](mailto:marijuana@alaska.gov)>  
**Subject:** Cannabinoid Profile

Greetings,

In Alaska, is the cannabinoid profile taken from the whole flower (bud) or after the bud has been tumbled and the kief removed?

If determined after tumbling so that testing reflects what actually goes into the package then labeling is correct.

However, if tested before tumbling then it will be inaccurate because it is not the same product that goes in the package.

Much of its potency accumulates on the leaves of the bud has been removed from the bud during the tumbling; to be used to make other products.

Thank you.

Leonard