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

MEMORANDUM

TO: Marijuana Control Board

DATE: June 21, 2022

FROM: Jane P. Sawyer, Regulations Specialist

RE: Alaska Wild Coyote, Inc. licenses 12125 & 12471

At the April 2022 meeting, the board approved with delegation the transfer applications and the 2021-2022 renewal applications for Alaska Wild Coyote, Inc. licenses 12125 and 12471 doing business as Alaska Marijuana Gardens (AMG) and AMG Concentrates, respectively.

The delegation included for the licensee to be either on a payment plan or be fully paid up (zero (0) balance) with Alaska Department of Revenue within 60 days with that deadline being June 13, 2022.

As of June 20, 2022, both transfer applications continue to be marked as not compliant/owes taxes by DOR.

Further, and this statement will be updated orally at the meeting, as of May 26, 2022, Alaska Marijuana Gardens (AMG), 12125, continues to be listed on DOR's tax delinquent list owing $61,305. Alaska Marijuana Gardens (AMG), 12125, has been on the list continuously since December 2021.

Conclusion: The 60 days for the licensee to be compliant with DOR have passed and they are not compliant, but at the April 2022 meeting the board approved the applications with delegation with 60 days to comply; it did not deny the applications with a 60-day abeyance, for example.

Potential board actions: to be discussed at meeting

As a reminder: the transfer applications are to remove Carmen Silvia Villlamides from Alaska Wild Coyote, Inc. The transfers were in the queue in July 2021, AMCO staff did not review them until December 2021.

Applicable regulation in case is needed:

3 AAC 306.080. Denial of license or endorsement application. (a) After review of the application, including the applicant's proposed operating plan and all relevant information, the board will deny an application for a new license or new onsite consumption endorsement if the board finds that

(1) the application is not complete as required under the applicable provisions of 3 AAC 306.020 - 3 AAC 306.055, or contains any false statement of material fact;

(2) the license or endorsement would violate any restriction in 3 AAC 306.010 or 3 AAC 306.015; (3) the license or endorsement would violate any restriction applicable to the particular license or endorsement type authorized under this chapter;

(4) the license or endorsement is prohibited under this chapter as a result of an ordinance or election conducted under AS 17.38.210, 3 AAC 306.200, or 3 AAC 306.230;

(5) the applicant's actions or the operating plan does not adequately demonstrate that the applicant will comply with applicable provisions of this chapter;

(6) the license or endorsement would not be in the best interests of the public; or

(7) a protest by the local governing body is not arbitrary, capricious, and unreasonable.

(b) After review of the application and all relevant information, the board will deny an application for renewal of a marijuana establishment license or onsite consumption endorsement if the board finds

(1) any cause listed in (a) of this section;

(2) repealed 8/21/2019;

(3) that the license or endorsement has been operated in violation of a condition or restriction the board previously imposed;

(4) that the applicant is delinquent in the payment of taxes due in whole or in part from operation of the licensed business;

(5) that a protest by the local governing body is not arbitrary, capricious, and unreasonable; or

(6) that the applicant has lost right to possession of the applicant's licensed premises.

(c) After review of the application and all relevant information, the board will deny an application for transfer of license to another person if the board finds

(1) any cause listed in (a) of this section;

(2) that the transferor has not paid all debts or taxes arising from the operation of the business licensed under this chapter unless the transferor gives security for the payment of the debts or taxes satisfactory to the creditor or taxing authority;

(3) that transfer of the license to another person would result in violation of the provisions of this chapter relating to identity of licensees and financing of licensees;

(4) that the prospective transferee does not have the qualifications of an original applicant required under this chapter; or

(5) that a protest by the local governing body is not arbitrary, capricious, and unreasonable.

(d) If the board denies an application for a new license, renewal of a license, license conversion, or transfer of a license to another person, the board will, not later than 15 days after the board meeting at which the application was denied, furnish a written statement of issues to the applicant, explaining the reason for the denial in clear and concise language, and identifying any statute or regulation on which the denial is based. In the notice of denial the board will inform the applicant of the right to an informal conference under 3 AAC 306.085 and to a formal hearing under 3 AAC 306.090.

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

June 20, 2022

Department of Revenue, Tax Division
Via email: bradley.talbert@alaska.gov
ben.roundy@alaska.gov

License Number:	12471
License Type:	Marijuana Concentrate Manufacturing Facility
Physical Address:	838 Bonanza Avenue Anchorage, AK 99518-1707

Transferor (current licensee):	Alaska Wild Coyote, Inc. see highlight below
Doing Business As:	AMG Concentrates
Designated Licensee:	Evanjelina De La Asuncion Gonzalez
Phone Number:	907-787-9178
Email Address:	evanjelina.gonzalez@gmail.com
EIN:	82-4808420

Transferee (new licensee):	Alaska Wild Coyote, Inc. see highlight below
Doing Business As:	AMG Concentrates
Designated Licensee:	Evanjelina De La Asuncion Gonzalez
Phone Number:	907-787-9178
Email Address:	evanjelina.gonzalez@gmail.com

☒ **Transfer of Controlling Interest:** The transfer involves the change in controlling interest in Alaska Wild Coyote, Inc. by removing Carmen Silvia Villamides 36% and leaving Armando Gonzales with 35% and Evanjelina De La Asuncion Gonzalez with 65%.

3 AAC 306.300(a)(2)(B), 3 AAC 306.400(b)(2)(B), 3 AAC 306.500(b)(2)(B), and 3 AAC 306.605(b)(2)(B) require that an applicant for a marijuana establishment license operate in compliance with each applicable public health, fire, safety, and tax code and ordinance of the state and the local government in which the applicant's proposed licensed premises are located. This letter serves to provide written notice and request for compliance status from the above referenced entities regarding the above application (see attached application documents for more information). **Please complete and return this form to the AMCO office at the email below.**

REVIEWER: Bradley Talbert

DATE: 6/20/2022 PHONE: (907)-269-2047

COMMENTS: Reviewed MJ-17c and all financially interested parties,

☑ DOR Tax Division

☐ Compliant/Does not owe tax
☑ Non-compliant/Owes tax

If you have any questions, please send them to marijuana.licensing@alaska.gov

Sincerely,

Joan M. Wilson, Director

Alcohol and Marijuana Control Office
550 W 7th Avenue, Suite 1600
Anchorage, AK 99501
marijuana.licensing@alaska.gov
https://www.commerce.alaska.gov/web/amco
Phone: 907.269.0350

Alaska Marijuana Control Board

Marijuana Establishment
Form MJ-17c: License Transfer Application

What is this form?

This form must be used to initiate a transfer of ownership of a marijuana establishment license under 3 AAC 306.045. This transfer application must be completed and submitted to AMCO's main office, along with all necessary supplemental documents and fees listed in **Form MJ-17b: License Transfer Application Checklist**, before a transfer of ownership, including a change that affects the controlling interest of an entity, will be considered by the Marijuana Control Board.

Please note that licensees seeking to change controlling interest of an entity that owns multiple licenses must submit a separate completed copy of this form and the required supplemental documents and fees for each license.

Section 1 – Transferor Information

Enter information for the *current* licensee and licensed establishment.

Licensee:	Alaska Wild Coyote, Inc.	**License Number:**	12471		
License Type:	Marijuana Concentrate Manufacturing Facility				
Doing Business As:	AMG Concentrates				
Premises Address:	838 Bonanza Avenue				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99518-1707
Email:	silvia@gci.net				
Local Government:	Municipality of Anchorage				

☐ Regular ownership transfer ☑ Transfer of controlling interest in the licensed entity

Section 2 – Transferee Information

Enter information for the *new* applicant seeking to be licensed. The business license # should be issued for the DBA listed below, and held by the transferee.

Licensee:	Alaska Wild Coyote, Inc	**Alaska Entity #**	10049755		
Mailing Address:	PO Box 242023				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99524
Doing Business As:	AMG Concentrates				
Business License #:	1050919	**Business Phone:**	9077979178		

Designated Licensee:	Evanjelina De La Asuncion Gonzalez		
Contact Email:	evanjelina.gonzalez@gmail.com	**Phone #**	907-787-9178

Received by AMCO 6.18.21

Alaska Marijuana Control Board

Form MJ-17c: License Transfer Application

Section 3 – Entity Ownership Information

This section must be completed by any entity, including a corporation, limited liability company (LLC), partnership, or limited partnership, that is applying for a license. Sole proprietors should skip to Section 4. If any entity official is another entity, you must include the AK Entity # of that entity in the Entity Official Name field, attach a separate completed copy of this page that breaks down the ownership information for that entity, and submit the supplemental documents and fingerprint fees listed on Form MJ-17b required for each individual entity official. Entity documents must be submitted for each entity listed on this form.

If more space is needed, please attach additional completed copies of this page.

- If the applicant is a corporation, list each *officer or director, and owner of any of the corporation's stock.*
- If the applicant is a limited liability company, list each *member holding any ownership interest and each manager.*
- If the applicant is a partnership or limited partnership, list each *partner holding any interest and each general partner.*

Entity Official Name:	Armando Gonzalez				
Title(s):	Secretary, Director, Shareholder	**Phone:**	907-233-6802	**% Owned:**	35
Email:	gonzalezmondo80@gmail.com				
Mailing Address:	PO Box 242023				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99524-2043

Entity Official Name:	Evanjelina De La Asuncion Gonzalez				
Title(s):	President, Treasurer, Shareholder, Director	**Phone:**	907-787-9178	**% Owned:**	65
Email:	evanjelina.gonzalez@gmail.com				
Mailing Address:	PO Box 242023				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99524-2043

Entity Official Name:					
Title(s):		**Phone:**		**% Owned:**	
Email:					
Mailing Address:					
City:		**State:**		**ZIP:**	

Entity Official Name:					
Title(s):		**Phone:**		**% Owned:**	
Email:					
Mailing Address:					
City:		**State:**		**ZIP:**	

Entity Official Name:					
Title(s):		**Phone:**		**% Owned:**	
Email:					
Mailing Address:					
City:		**State:**		**ZIP:**	

Received by AMCO 6.18.21

Alaska Marijuana Control Board

Form MJ-17c: License Transfer Application

Section 4 – Other Licenses

Ownership and financial interest in other marijuana establishments:

	Yes	No
Does any representative or owner named as a transferee in this application have any direct or indirect financial interest in any other marijuana establishment that is licensed in Alaska?	✓	

If "Yes", disclose which individual(s) has the financial interest, which license number(s), and license type(s):

Both licensees have financial interest in Concentrates license #12471 ✓

Section 5 – Authorization

Communication with AMCO staff:

	Yes	No
Does any person other than a licensee named in this application have authority to discuss this license with AMCO staff?	✓	

If "Yes", disclose the name of the individual and the reason for this authorization:

JDW, LLC - Attorney Jana Weltzin and staff

Section 6 – Transferee Certifications

Read the line below, and then sign your initials in the box to the right of the statement:

	Initials
I certify that all proposed licensees (as defined in 3 AAC 306.020) have been listed on this application.	EG
Completed copies of all required documents and fees listed on Form MJ-17n are attached to this form.	EG
I certify that I understand that providing a false statement on this form or any other form provided by AMCO is grounds for rejection or denial of this application or revocation of any license issued.	EG
I agree to provide all information required by the Marijuana Control Board in support of this application.	EG

As an applicant for a marijuana establishment license, I declare under penalty of perjury that I have read the laws and regulations that govern the marijuana industry, including AS 17.38 and 3 AAC 306, and that the information I have provided in this application and statements contained herein are true, correct, and complete.

STATE OF ALASKA
NOTARY PUBLIC
Mercedes Curran
My Commission Expires Dec 20, 2023

Signature of transferee

Notary Public in and for the State of Alaska

Evanjelina De La Asuncion Gonzalez

Printed name of transferee

My commission expires: 12/20/2023

Subscribed and sworn to before me this 30th day of April 2021

[Form MJ-17c] [rev 03/26/2019]

12471

License #

Page 3 of 4

Received by AMCO 1.5.22

Section 7 – Transferor Certifications

Additional copies of this page may be attached, as needed, for the controlling interest of the current licensee to be represented.

I declare under penalty of unsworn falsification that the undersigned represents a **controlling interest** of the current licensee. I additionally certify that I, as the current licensee (either the sole proprietor or the controlling interest of the currently licensed entity) approve of the transfer of this license, and that the information on this form is true, correct, and complete.

STATE OF ALASKA
NOTARY PUBLIC
Mercedes Curran
My Commission Expires Dec 20, 2023

Signature of transferor

Carmen S. Villamides
Printed name of transferor

Notary Public in and for the State of Alaska.

My commission expires: 12/20/2023

Subscribed and sworn to before me this 27th day of April, 2021.

Signature of transferor

Printed name of transferor

Notary Public in and for the State of Alaska.

My commission expires: _____

Subscribed and sworn to before me this ____ day of _____, 20____.

Signature of transferor

Printed name of transferor

Notary Public in and for the State of Alaska.

My commission expires: _____

Subscribed and sworn to before me this ____ day of _____, 20____.

Received by AMCO 6.18.21

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

June 20, 2022

Department of Revenue, Tax Division
Via email: bradley.talbert@alaska.gov
ben.roundy@alaska.gov

License Number:	12125
License Type:	Alaska Marijuana Gardens (AMG)
Physical Address:	838 Bonanza Avenue Anchorage, AK 99518-1707

Transferor (current licensee):	Alaska Wild Coyote, Inc. see highlight below
Doing Business As:	AMG Concentrates
Designated Licensee:	Evanjelina De La Asuncion Gonzalez
Phone Number:	907-787-9178
Email Address:	akmarijuanagardens@gmail.com
EIN:	82-4808420

Transferee (new licensee):	Alaska Wild Coyote, Inc. see highlight below
Doing Business As:	AMG Concentrates
Designated Licensee:	Evanjelina De La Asuncion Gonzalez
Phone Number:	907-787-9178
Email Address:	akmarijuanagardens@gmail.com

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3 AAC 306.300(a)(2)(B), 3 AAC 306.400(b)(2)(B), 3 AAC 306.500(b)(2)(B), and 3 AAC 306.605(b)(2)(B) require that an applicant for a marijuana establishment license operate in compliance with each applicable public health, fire, safety, and tax code and ordinance of the state and the local government in which the applicant's proposed licensed premises are located. This letter serves to provide written notice and request for compliance status from the above referenced entities regarding the above application (see attached application documents for more information). **Please complete and return this form to the AMCO office at the email below.**

REVIEWER: Bradley Talbert

DATE: 6/20/2022 PHONE: (907)-269-2047

COMMENTS: Reviewed MJ-17c and all financially interested parties.

☒ DOR Tax Division

☐ Compliant/Does not owe tax
☒ Non-compliant/Owes tax

If you have any questions, please send them to marijuana.licensing@alaska.gov

Sincerely,

Joan M. Wilson, Director

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marijuana.licensing@alaska.gov
https://www.commerce.alaska.gov/web/amco
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Alaska Marijuana Control Board

Marijuana Establishment

Form MJ-17c: License Transfer Application

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Please note that licensees seeking to change controlling interest of an entity that owns multiple licenses must submit a separate completed copy of this form and the required supplemental documents and fees for each license.

Section 1 – Transferor Information

Enter information for the *current* licensee and licensed establishment.

Licensee:	Alaska Wild Coyote, Inc.	**License Number:**	12125		
License Type:	Standard Marijuana Cultivation Facility				
Doing Business As:	Alaska Marijuana Gardens (AMG)				
Premises Address:	838 Bonanza Avenue				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99518-1707
Email:	silvia@gci.net				
Local Government:	Municipality of Anchorage				

☐ Regular ownership transfer ☑ Transfer of controlling interest in the licensed entity

Section 2 – Transferee Information

Enter information for the *new* applicant seeking to be licensed. The business license # should be issued for the DBA listed below, and held by the transferee.

Licensee:	Alaska Wild Coyote, Inc	**Alaska Entity #**	10049755		
Mailing Address:	PO Box 242023				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99524
Doing Business As:	Alaska Marijuana Gardens (AMG)				
Business License #:	1058661	**Business Phone:**	9077979178		

Designated Licensee:	Evanjelina De La Asuncion Gonzalez		
Contact Email:	evanjelina.gonzalez@gmail.com	**Phone #**	907-787-9178

Received by AMCO 6.18.21

Alaska Marijuana Control Board

Form MJ-17c: License Transfer Application

Section 3 – Entity Ownership Information

This section must be completed by any entity, including a corporation, limited liability company (LLC), partnership, or limited partnership, that is applying for a license. Sole proprietors should skip to Section 4. If any entity official is another entity, you must include the AK Entity # of that entity in the Entity Official Name field, attach a separate completed copy of this page that breaks down the ownership information for that entity, and submit the supplemental documents and fingerprint fees listed on Form MJ-17b required for each individual entity official. Entity documents must be submitted for each entity listed on this form.

If more space is needed, please attach additional completed copies of this page.

- If the applicant is a corporation, list each *officer or director, and owner of any of the corporation's stock.*
- If the applicant is a limited liability company, list each *member holding any ownership interest and each manager.*
- If the applicant is a partnership or limited partnership, list each *partner holding any interest and each general partner.*

Entity Official Name:	Armando Gonzalez				
Title(s):	Secretary, Director, Shareholder	**Phone:**	907-233-6802	**% Owned:**	35
Email:	gonzalezmondo80@gmail.com				
Mailing Address:	PO Box 242023				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99524-2043

Entity Official Name:	Evanjelina De La Asuncion Gonzalez				
Title(s):	President, Treasurer, Shareholder, Director	**Phone:**	907-787-9178	**% Owned:**	65
Email:	evanjelina.gonzalez@gmail.com				
Mailing Address:	PO Box 242023				
City:	Anchorage	**State:**	Alaska	**ZIP:**	99524-2043

Entity Official Name:					
Title(s):		**Phone:**		**% Owned:**	
Email:					
Mailing Address:					
City:		**State:**		**ZIP:**	

Entity Official Name:					
Title(s):		**Phone:**		**% Owned:**	
Email:					
Mailing Address:					
City:		**State:**		**ZIP:**	

Entity Official Name:					
Title(s):		**Phone:**		**% Owned:**	
Email:					
Mailing Address:					
City:		**State:**		**ZIP:**	

Received by AMCO 6.18.21

Alaska Marijuana Control Board

Form MJ-17c: License Transfer Application

Section 4 – Other Licenses

Ownership and financial interest in other marijuana establishments:	Yes	No
Does any representative or owner named as a transferee in this application have any direct or indirect financial interest in any other marijuana establishment that is licensed in Alaska?	✓	

If "Yes", disclose which individual(s) has the financial interest, which license number(s), and license type(s):

Both licensees have financial interest in Concentrates license #12471 ✓

Section 5 – Authorization

Communication with AMCO staff:	Yes	No
Does any person other than a licensee named in this application have authority to discuss this license with AMCO staff?	✓	

If "Yes", disclose the name of the individual and the reason for this authorization:

JDW, LLC - Attorney Jana Weltzin and staff

Section 6 – Transferee Certifications

Read the line below, and then sign your initials in the box to the right of the statement:	Initials
I certify that all proposed licensees (as defined in 3 AAC 306.020) have been listed on this application	EG
Completed copies of all required documents and fees listed on Form MJ-17b are attached to this form	EG
I certify that I understand that providing a false statement on this form or any other form provided by AMCO is grounds for rejection or denial of this application or revocation of any license issued	EG
I agree to provide all information required by the Marijuana Control Board in support of this application	EG

As an applicant for a marijuana establishment license, I declare under penalty of unsworn falsification that I have read and am familiar with AS 17.38 and 3 AAC 306, and that this application, including all accompanying schedules and statements, is true, correct, and complete.

STATE OF ALASKA
NOTARY PUBLIC
Mercedes Curran
My Commission Expires Dec 20, 2023

Signature of transferee

Notary Public in and for the State of Alaska

Evanjelina De La Asuncion Gonzalez

Printed name of transferee

My commission expires: 12/20/2025

Subscribed and sworn to before me this 30th day of April, 2022

[Form MJ-17c] (rev 09/27/2018)

License #: 12125

Page 3 of 4

Received by AMCO 1.5.22

Section 7 – Transferor Certifications

Additional copies of this page may be attached, as needed, for the controlling interest of the current licensee to be represented.

I declare under penalty of unsworn falsification that the undersigned represents a **controlling interest** of the current licensee. I additionally certify that I, as the current licensee (either the sole proprietor or the controlling interest of the currently licensed entity) approve of the transfer of this license, and that the information on this form is true, correct, and complete.

STATE OF ALASKA
NOTARY PUBLIC
Mercedes Curran
My Commission Expires Dec 20, 2023

Signature of transferor

Carmen S. Villamides
Printed name of transferor

Notary Public in and for the State of Alaska.

My commission expires: 12/20/2023

Subscribed and sworn to before me this 29th day of April, 2021.

Signature of transferor

Printed name of transferor

Notary Public in and for the State of Alaska.

My commission expires: _____

Subscribed and sworn to before me this ____ day of _____, 20____.

Signature of transferor

Printed name of transferor

Notary Public in and for the State of Alaska.

My commission expires: _____

Subscribed and sworn to before me this ____ day of _____, 20____.

Received by AMCO 6.18.21