#### Alaska Marijuana Control Board - AMCO Enforcement

# Notice of Violation (3 AAC 306.805)

Alcohol and Marijuana Control Office 550 W 7<sup>th</sup> Avenue, Suite 1600 Anchorage, AK 99501

amco.enforcement@alaska.gov https://www.commerce.alaska.gov/web/amco

Phone: 907.269.0350

This form, all information provided and responses are public documents per Alaska Public Records ACT AS 40.25

Licensee:	DANIELLE PETERS	Date:	3/5/25
Doing Business As:	GOODSINSE	License #:	26251
License Type:	Retail Marijuana Store	AMCO Case #:	25-0165
Mailing Address:	2750 PARKS HWY, NORTH POLE, AK 99705	Million	

	Date	Violation of	Fine	Date	Violation of	Fine
Violation(s) of	2/24/25	3 AAC 306.710	TBA	2/24/25	3 AAC 306.710	TBA
Statute/Regulation:	2/24/25	3 AAC 306.700	TBA	2/24/25	3 AAC 306.700	ТВА
TATE	Date	Violation of	Fine	Date	Violation of	Fine
Prior Violation(s)			A 196. 19		11/2	
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This is a notice to you as a licensee that you are being issued a notice of violation for the purposes described in 3 AAC 306.806(e). A description of the violation is as follows,

NOTE: This is not an accusation or criminal complaint.

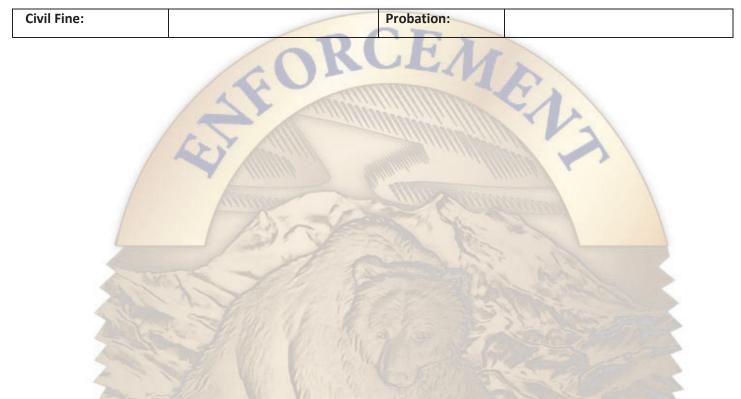
On 2-24-25, an inspection was conducted at your establishment. Employee's Ian Lingerfelter and Santana Duran did not have their marijuana handlers permit or store identification on or near them, nor was there a copy on the premises. Both were in the restricted access area and not signed into the visitors log

Your attention is directed to 3 AAC 306.700. Marijuana handler permit which reads in part, "(d) A licensee, employee, or agent of a marijuana establishment shall keep the marijuana handler permit card described in (c) of this section in that person's immediate possession or a valid copy on file on the premises at all times when on the licensed premises of the marijuana establishment" and 3 AAC 306.710. Restricted access areas which reads in part, "(c) In a restricted access area, a licensee, employee, or agent of the marijuana establishment shall have on display, either on the person or in a readily accessible location on the licensed premises, a current identification badge bearing the person's photograph. A person under 21 years of age may not enter a restricted access area. Any visitor to the restricted access area must"



## **Notice of Violation**

#### **Disciplinary Action**



You may choose to contest or not contest the violation or recommended disciplinary action. If you do not contest, please describe in writing the remedial measures you are taking to address the violation and remit the requested fine, if applicable You may contest the violation or recommended disciplinary action by filing a written response not later than 10 days after your receipt of this notice. You may elect to appeal this notice directly to the Marijuana Control Board under 3 AAC 306.845 or request an informal conference with the director under 3 AAC 306.844. if your informal conference with the director is not to your satisfaction, you may still elect to appeal this notice to the board by filing written notice of the same with AMCO. Any appeal to the board will be heard at the next regularly scheduled meeting of the Board, unless both AMCO and you agree to an extension. You may appeal any final decision by the board to the superior court under AS 44.62.560, excluding a request that the director prepare an accusation for suspension or revocation of a license.

Please send your response, including any potential fine, your request for an informal conference, or appeal to the board to the address below and include your marijuana license number in your response.

Marijuana Control Office
Attn: AMCO Enforcement
550 W. 7<sup>th</sup> Avenue Sute 1600
Anchorage, AK 99501
amco.enforcement@alaska.gov

Issuing Investigator:	J. Hamilton	Issued To:	Danielle Peters
Signature:	F.R. HAMALTON	Title:	Designated Licensee
Delivered VIA	Via Email	Issued Date:	3/5/25

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Licensee:	Corey M	1auldin	THE THEFT		Date:	2/19/20	
Doing Business As:	Candid	Candid Farms			License #:	30905	
License Type:	Limited	Limited Cultivation Facility			AMCO Case #:	AM 25-0144	
Mailing Address:	17690 E	Idle Drive, F	Palmer, AK 99645	THE PERSON NAMED IN	Million III		
		Date	Violation of	Fine	Date	Violation of	Fine
Violation(s) of		2/18/25	3 AAC 306.430	2	Part -		1
Statute/Regulation:		1	1	The same	100		3
	VETER	Date	Violation of	Fine	Date	Violation of	Fine
Prior Violation(s)	17	12/30/24	3AAC 306.430	e ec. 13		2011	
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This is a notice to you as a licensee that you are being issued a notice of violation for the purposes described in 3 AAC 306.806(e). A description of the violation is as follows,

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On February 18, 2025, AMCO enforcement Investigator Linger received an odor complaint in regards to Candid Farms, Limited Marijuana Cultivation Facility located at 17690 E Idle Dr. in Palmer. At approximately 0922 hours I was driving on N Placid PL, Witherspoon Rd/N Witherspoon Rd., which is behind Candid Farms. While in the area I detected a strong noticeable odor of marijuana coming from your facility. The odor was detectable from the driveway of a private residence on N Witherspoon Rd., which is located approximatley 490' SW of the facility.

Your attention is directed to 3 AAC 306.430(c)(2) Restricted access area: A marijuana cultivation facility shall ensure that any marijuana at the marijuana cultivation facility does not emit an odor that is detectable by the public from outside the cultivation facility except as specifically allowed by a local government.

See Map



## **Notice of Violation**

#### **Disciplinary Action**

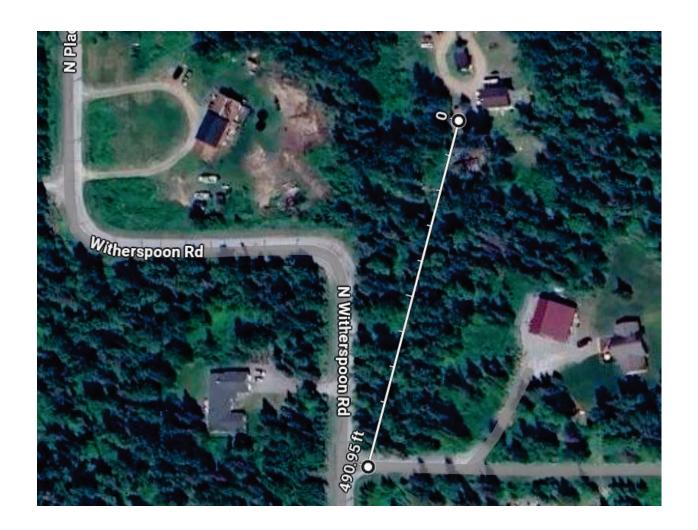
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Marijuana Control Office
Attn: AMCO Enforcement
550 W. 7<sup>th</sup> Avenue Sute 1600
Anchorage, AK 99501
amco.enforcement@alaska.gov

Issuing Investigator:	J. Linger	TA -	Issued To:	Corey Mauldin
Signature:	Just Mali	AK	Title:	Licensee
Delivered VIA	Via Email		Issued Date:	2/19/25



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Licensee:	Sarah A	Sarah Alexander			Date:	2/21/25	
Doing Business As:	Ganja E	G <mark>anja</mark> By Sarah			License #:	33305	
License Type:	Retail M	Retail Marijuana Store			AMCO Case #:	AM25-0137	
Mailing Address:	7830 O	ld Seward Hi	ighway	Tille	Allina		
		Date	Violation of	Fine	Date	Violation of	Fine
Violation(s) of		2/21/25	3 AAC 306.730	TBD	1000		1
Statute/Regulation:		1	1	The same	10 50		
	WE I T	Date	Violation of	Fine	Date	Violation of	Fine
Prior Violation(s)	13	1	March 18	100		2/11/	
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This is a notice to you as a licensee that you are being issued a notice of violation for the purposes described in 3 AAC 306.806(e). A description of the violation is as follows,

NOTE: This is not an accusation or criminal complaint.

On 2/13/2025 Investigator Murray conducted a random inspection at Ganja By Sarah (Retail License 33305). Metro showed that there were 1291 packages in inventory. A search filtering out all packages of 1 gram and above dropped the number down to 832 packages. During the inspection 189 packages were counted by hand and 250 tags were picked up by the Metro scanner. Licensee Sarah Alexander stated that she uses flow hub as a point-of-sale system and that she audits products once a month. Sarah stated that flow hub is what updates Metro. Due to the possibility of flow hub not communicating to Metro properly Inv. Murray gave Sarah until Tuesday 2/18/2025 to get the Metro inventory corrected.

Inv. Murray returned to Ganja by Sarah on 2/18/2025 at 1:00pm. Inv. Murray checked Metrc and the number of packages had remained the same at 1291 packages. The number of packages equal to or greater than one gram decreased to 780 packages. Inv. Murray with the help of Sarah and an employee counted and weighed every product in the store. A total of 233 products were counted and inventoried. Multiple products were not correct in flow hub. Package number 7471 Atomic Wifi had 114 grams of flower. Flow hub stated that there were 194-grams, Metrc showed 97 grams. Package 0229 Train wreck flower had 101.98 grams Flow Hub showed 138 grams and Metrc showed 142.5 grams. Package 3528 Lilac diesel showed 14.7g flow hub showed 65.1g, Metrc showed 65.1g, there were multiple other inconsistencies with flower packages. When asked why Metrc was not updated Sarah stated that she had been working all weekend in flow hub. Inv. Murray told her that it needed to be updated in Metrc and AMCO does not check flow hub. Inv. Murray gave Sarah until Friday 2/21/2025 to update Metrc.

On Friday 2/21/2025 Inv. Murray checked Metrc and the number of packages was reduced to 244 packages that were equal or greater than one gram. Review of the package adjustment report from 2/13/2025 to 2/21/2025 showed 770 adjustments most of the adjustments were 1 gram or less. However multiple adjustments were plus or minus 1000g or more grams for reasons of API Conversion Error, API Duplicate sales entry, and Over/Under Pulled. There were adjustments in the hundreds of grams with the reason of entry error. Almost all of the adjustments had in the note section a question mark, unsure, or "Sold out, some product still showing in METRC, unsure." Thousands of grams of Marijuana were not properly tracked, and the licensee is unsure of what happened to them.

#### This is a violation of:

3AAC 306.730(a) A marijuana establishment shall use a marijuana inventory tracking system capable of sharing information with the system the board implements to ensure all marijuana cultivated and sold in the state, and each marijuana product processed and sold in the state, is identified and tracked from the time the marijuana is a seed or cutting to a completed sale of marijuana or a marijuana product, or disposal of the harvest batch of marijuana or production lot of marijuana product.

## **Notice of Violation**

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Marijuana Control Office
Attn: AMCO Enforcement
550 W. 7<sup>th</sup> Avenue Sute 1600
Anchorage, AK 99501
amco.enforcement@alaska.gov

Issuing Investigator:	C. Murray	Issued To:
Signature:	Cordell Munny	Title:
Delivered VIA	Via Email	Issued Date:

## Ganja by Sarah

7830 Old Seward Highway, Suite 420

Anchorage, Alaska 99518

907-244-1707 (Sarah Alexander)

907-440-9176 (Allen Choy)

Marijuana Control Office

Attn: AMCO Enforcement

550 West 7<sup>th</sup> Avenue, Suite 1600

Anchorage, Alaska 99501

Amco.enforcement@alaska.gov

Ganja By Sarah is responding to the notice of violation and is requesting an informal conference with the Director under 3 AAC 306.844. We do so because we have taken various measures and actions since the problems in the NOV were first brought to our attention by Investigator Murray. I acknowledge that there was issues, but since discovering it we have been working constantly to remedy any issues that existed or have the potential to inadvertently happen in the future.

When we first opened our Dispensary, we hired people that had been involved in the industry and had a good working knowledge of METRC. The day that we opened our doors, the person we had hired as our store manager K.H., was unable to work due to health and personal issues. The male shift-lead that we had been talking to as a back-up employee was able to work on opening day since it was his day off at his normal Dispensary job at Cold City Dispensary. Subsequently, he decided to become a full-time employee. The employee hereafter referred to as T.G. had previously worked for the bar business (Al's Alaskan Inn) in approximately 2007 as a non-inventory and non-cash handling karaoke DJ, and had no reason to be mistrusted in that capacity, and it was assumed that he was a solid person.

At the time of opening the Dispensary, the business was very slow. We had between 2 and 3 employees working for us at a time, and generally only one on

shift at a time due to the small space and customer capacity. Typically, one of the owners, Sarah Alexander or Allen Choy would be in the building. They were the only two people that were key holders to both the bar and dispensary.

My genuine belief is that the female shift-lead that was originally hired to serve as store manager knew the proper techniques and a good working knowledge and understanding of METRC, our POS System, and dealing with the inventory.

Unfortunately, the person that was hired as essentially a shift lead, T.G., represented that he understood Dispensary management and was able to take over K.H.'s job and help us navigate thru the learning process of METRC, marijuana, and THC knowledge in general, and perform these duties of the day to day tasks of running a dispensary since neither owner is a user of marijuana products.

A former employee K.B., whom I spoke to today, helped us to do several comprehensive inventories and audits where we eventually had to discrepancy out products due to what we believe was theft by T.G., but could never definitively prove. At the time of T.G. "quitting" (realizing we had figured out something was up), he went into other parts of our building where he thought there were not as many cameras and eyes watching and stole many random things which really hit home regarding how much else had been taken at that point. It was a shock to watch the video and think that this could be a much deeper problem. There were things such as lightbulbs, tools, cords, and things you would never think someone would take from you which were gone, taken visibly on bar cameras and admitted to via voicemail to another employee, as well as customers he saw out at the Carousel Lounge (where he lived) at later dates when he was no longer working for the company.

When K.B. (the employee who helped with the inventory) and I went through everything we discrepancied out of Flowhub many items, with a note of theft. At that time, I was under the belief that Flowhub and METRC interacted with each other and that it was fixing the inventory in both places.

Now I have completely learned about finishing tags, and am working every day to getting a complete understanding of METRC, Flowhub, and ensuring everything is done correctly. I did believe prior to Investigator Murray coming out that it had been done so, and I also thought prior to him coming back to the Dispensary the

second time, that we had fixed the METRC tag issue. I Now have gone back through and done 3 inventories since that time. Two totally complete, and one with just a raw count of products. By complete, I mean that we counted and weighed each item, depending on how it is measured, and then checked the inventory amount and the metrc tag number in flowhub, as well as METRC.

We are a small store still, and only have two owners, me and Allen Choy, as well as two other employees. We have all been participating in, and going through the processes, so that everyone can work together to make sure that past inadvertently made mistakes do not get happen again.

In response to the events outlined in the letter, this is why I believe it occurred and what we are actively doing to correct it:

On the Feb 13<sup>th</sup>, 2025 when Investigator Murray first came to do an inspection, my initial belief was that the main issue was a lot of "open" inventories. Essentially, my POS system was showing zero packages left under a specific Metrc tag, or possibly some small amount of flower that never got taken out of the system as waste, theft, loss or whatever the case may have been. My priority at that point became to fix flowhub and get rid of all the small discrepancies. As we were going through this process, I did see the large amounts of flower that Investigator Murray mentioned in his report. I have combed through and asked questions and basically what I have been able to come to the conclusion of is that a combination of the following factors occurred:

- A. In the early stages of the dispensary (Late Nov 2023-April 24, 2024) theft. Many of the METRC tags were linked to samples that I now realize the former employee, T.G. helped himself to (I cannot prove this, but we have heard from him bragging to others after the fact about doing so). Additionally, I believe he took flower and other products. After his departure from employment, and not answering calls or texts, he began bragging to others about taking upwards of \$10,000 worth of "stuff" from us.
- B. The only items we ever actually saw on camera being taken were the non-THC items, and never high in value. This leads me to believe that a lot of things stolen in the Dispensary happened over a significant period of time

- not being noticed due to trusting (not thinking that in the past, he had a non-inventory and non-cash handling job working for Allen Choy, whom trusted him based on the past working relationship and integrity from 16 years prior which had unknowingly changed)
- C. When first inputting product into the system there has been more than one time where it has said that there was a duplicate entry for a metrc tag, and that it was already attached to inventory. What I realized was that some growers/manufacturers will assign one tag to essentially what I sell as two separate items (example: 0.5g and 1g pre-rolls, but of the same flower). I have since figured out how to separate that out, but I know that there were times when while I thought what I was doing was right, and it was not.
- D. The "Discrepancy" option was being used too much and should not have been used for those purposes. Flowhub will allow you to add a product into the system by discrepancying it in, under a former inventory. I believe that this is part of where a large amount of the flower weighing discrepancy issues originated. We would have a product on the shelves that someone wanted to buy and it would get added as a discrepancy instead of Metrc'd into the system. To remedy this, I have disabled the ability to discrepancy product from everyone's user account, except my own, and if a product is not immediately added into the POS system it is locked in the safe until it can be done.
- E. Other than the previously listed issues, the only things that I can possibly see having happened to have the 1,000 gram overage/underage of flower is that someone put in a duplicate entry or used the discrepancy option to put flower into the inventory. Possibly the wrong flower name into the system, or the wrong quantity. We sell a lot of half ounces and ounces of flower, as well as, other things like many varieties of baller joints in ½ and full gram packages. Basically, human error, but it still should not have happened.

The things that we are implementing to rectify what can be done improperly, as well as to ensure things go correctly going forward are as follows:

1. Existing staff, as well as any new hires, will be watching and rewatching various training videos from both METRC as well as Flowhub.

- 2. We are writing up our own "Metrc User's Manual," for our store. I will be including a draft copy with this letter as well. We want everyone who works at the store to understand METRC whether they deal with it hands on or not. From the point of an order being delivered to the Dispensary and on to the product being sold to zero, and a tag being finished.
- 3. Inventory is being done weekly, and at random times as well, with varying staff. As theft has been an issue in the past, Allen or I will complete an inventory at least once weekly with one of the other employees of the store. This should help us to figure out if there is any theft occurring again and narrow down the source if it is a problem.
- 4. If an issue arises with the metrc tag provided by the grower or manufacturer we will issue one of our metric tags to the item.
- 5. Weekly when going through the inventory, Sarah will also be going through metrc finishing any tags with no product assigned to them anymore, as it has been sold out, and also checking metric and flow hub to make sure the quantities match the inventory being counted. Should there be any discrepancy, we will be looking at the previous inventories to discover when it likely happened since it should be caught within a week reviewing camera footage, sales receipts and generally just talking to employees to see if we can figure out where the discrepancy happened. With the safeguards we have put in place we do not anticipate this happening but intend on taking every precaution to make sure everything is accurate, up to date, and properly tagged.

This whole situation has been a big wake up call for us. Our other business which we operate also falls under AMCO jurisdiction. We are proud to say that we have never had a violation since it became operational 1961 when Allen's father opened it as the Candle Inn originally.

We did fill out all our own paperwork for the marijuana license and have lots of sweat and financial equity into the business. Both Allen and I work there seven days a week and are hands on with both businesses. I can honestly say the mistakes made will not be repeated. They were both unintentional as well as something we were committed to remedy immediately. I have already begun this

week trying to track down to the best of my abilities where any of the missing inventory went, or if it was an issue of input errors, and basically trying to track down and solve what happened to any product that has not been accounted for whether it's an overage or underage. What we have spent the last week doing since we got the NOV from investigator Murray, is to make sure that currently everything is accurate and that going forward it will continue to be accurate. My commitment to you is to spend the next week trying to go through the packages that have the issues and trying to discover what happened and providing you with as much information as possible.

We humbly ask you to please let us make the situation right, and not punish us with fines, and have the opportunity to show you that we can operate above board to where at any point and time if someone came in to inspect our Dispensary, there wouldn't be any issues.

Our sole sources of income are the dispensary, as well as the bar and motel, and in the current climate they have all been slow. Please allow us the opportunity to show you we can do things correctly and that we know the system as well as you yourselves through continuing education and hands on work with it daily.

Thank you for taking the time to read this, please let me know what else you need from us or if you have any further guidance for us going forward to help make sure

from as of it you have any further guidance for as going forward to help make surv
we operate a business that we can be proud of, and that can be a good example
for other businesses and operators that are in our industry.
Sincerely,

Sarah Alexander

Allen Choy

## Ganja by Sarah

## **Procedures regarding METRC**

(Employee Draft Instructions)

All orders containing THC that come into the store should have METRC tags that correspond to each separate line item. Example: One pound of Blue Dream Flower should have a metrc tag assigned to it as long as it is part of the same metrc package number. If Red Run brings 5 Cotton Candy one-gram cartridges, there would be one metrc tag assigned to those 5. If Red Run forgot 5 more Cotton Candies and had to deliver the next day, it would require a new tag, as well as a new METRC manifest.

The METRC tags must match up to the METRC Manifest. It is the duty of the person receiving the delivery, as well as the person delivering the order, to match the tags to product and to the manifest. At that point if everything is accurate then both parties sign the paperwork in the appropriate place.

Once all the products have been accounted for and the paperwork is signed then the order can be received into the METRC System. We have two locations that we use: 1) the Sales Floor and Safe 2) the Back Stock area adjacent to the safe

If the metrc tags are not already labeled by the manufacturer/grower, an employee of Ganja By Sarah will go through the manifest and invoice, and subsequently label each tag with the item name and the amount per unit (Example: 1 gram versus a 0.5 Gram Cartridge). As we put the inventory on the shelves, we hole punch the tag and put it with the product which it coincides. In the event the product needs to be put into 2 locations (Sales Floor/Safe), then the tag shall be split, both top and bottom labeled, and placed with the product.

Once a product is sold out, the METRC tag is stored, and then when the weekly inventory is completed, the METRC tags that have the product completely sold out are completed as ZERO into the METRC system. Should there be a discrepancy, due to the implementation of a weekly inventory count, it should narrow down what/who caused the discrepancy.

When an item is sold using the Flowhub system, the employee ringing out the transaction needs to match the Metrc tag number listed next to the product in the system with the tag physically on the product.

If the tag number does not match anything in the inventory with the POS system, the product cannot be sold until it is discovered what the issue is and fixed, whether it be a 1 gram tag where a 1/2 gram tag should be, or whatever other issue it could be.

If someone goes into the system to sell something and they cannot find the product either due to a not being put into the system, as can occasionally happen when a large order comes in and there's multiple variants of the same item, the item shall not be sold until it is properly metrc'd into the system.