



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Commerce,  
Community,  
and Economic Development**  
ALCOHOL & MARIJUANA CONTROL OFFICE

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## MEMORANDUM

TO: Marijuana Control Board

DATE: January 29th, 2025

FROM: Joe Bankowski, Enforcement Supervisor

RE: Enforcement Report, Marijuana

AMCO Enforcement has continued to make significant progress towards increasing inspections of licensed marijuana establishments. We continue to use inspections as educational opportunities whenever possible.

I am happy to report an addition to the Enforcement Unit. Beth Rosenbaum has joined our team as a Criminal Justice Technician II. Beth comes to us from the Department of Corrections where she also served as Criminal Justice Technician II. She has hit the ground running and is eager to learn all of the complex details involved in our operations.

Human Resources and Classification have approved the minimum qualifications for the Special Investigator job class within AMCO to align with the recent regulation change requiring law enforcement certification. I plan on initiating recruitment for a Special Investigator I vacancy by the end of February.

### Discussion Topics

#### **A. Packaging and Labeling**

Over the past year, Enforcement has observed an increasing number of marijuana products that no longer represent the packaging and labeling requirements that were approved by the Marijuana Control Board. Products with cartoons, Disney font and other aspects that may be appealing to children have all been observed.

3 AAC 306.645 requires that a retail marijuana store shall ensure that marijuana sold on its licensed premises is packaged and labeled in compliance with 3 AAC 306.470 and 3 AAC 306.475 and any marijuana product sold on its licensed premises is packaged and labeled in compliance with 3 AAC 306.565 and 3 AAC 306.570.

Both 3 AAC 306.470 and 3 AAC 306.565 state that the packaging may not have any printed images, including cartoon characters, that specifically target persons under 21 years of age. It should be noted that 3 AAC 306.565(b) only states "edible" marijuana products, not marijuana products in general and may need to be corrected.

*“(b) A container or packaging for any edible marijuana product produced by a marijuana product manufacturing facility may not have any printed images, including cartoon characters, that specifically target individuals under 21 years of age...”*

**B. Metrc Data Analysis**

Metrc remains a critical reporting tool within the regulated market. There is a vast amount of data that can be used for various purposes. With over 400 licensees, it has proven challenging to use this data in the most efficient way possible. Metrc does include standard reports and generic notifications, but they are not always effective in identifying anomalies for investigative purposes. Other states have continually shown that a data analyst/scientist is a critical and required role within a regulatory agency such as ours. This individual can fully leverage the data with consistent monitoring, custom database queries and reports that can then be further analyzed and flagged for enforcement.

Metrc data has many other uses outside of enforcement. It is regularly used to monitor the economic health of the market and other important factors related to public health.

**C. Intoxicating Hemp**

AMCO is aware of the continued proliferation of intoxicating hemp products in the Alaskan marketplace. In coordination with the Division of Agriculture, we will begin distribution of an updated Advisory Notice regarding intoxicating hemp products. Unlike previous notices, this will be delivered to all retailers of hemp products, regardless of their registration status with the industrial hemp program. The process of identifying and communicating with all retailers will be labor-intensive and will be prioritized based on the volume of unauthorized products available for purchase. The notice can be viewed online [here](#).

In the weeks and months that follow, enforcement action will be taken against any retailer we have identified as failing to comply with the Division of Agriculture’s regulations under 11 AAC 40.010 – 11 AAC 40.910