THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Commerce, Community, and Economic Development

ALCOHOL & MARIJUANA CONTROL OFFICE

550 West Seventh Avenue, Suite 1600
Anchorage, Alaska 99501
Main: 907.269.0350

August 04, 2026

To: Marijuana Control Board
From: Kevin Richard, Director
RE: Recommended Disciplinary Action
Enlighten Gardens, LLC d/b/a Enlighten Gardens
Standard Cultivation Facility 21551
AMCO Case No. AM26-0377

On March 25, 2026, AMCO conducted an inspection at Enlighten Gardens LLC d/b/a Enlighten Gardens standard marijuana cultivation facility license 21551. During the inspection, AMCO identified plants that were not accurately tracked in METRC. The facility was placed on an administrative hold. On March 27, 2026, the administrative hold was lifted after receiving documentation from the licensee that the inventory had been corrected and was accurately logged in METRC. On April 29th, 2026, an NOV was issued to the licensee. A response was received, and an informal conference requested, on May 7th, 2026.

AMCO and the licensee had an informal conference on June 30th, 2026. Parties discussed the NOV, the licensee's response, corrective actions, and the lack of disciplinary history for this license. The licensee explained that the missing tags in the Veg room were due to premature removal of plant tags prior to destruction. Staffing shortages contributed to the licensee falling behind on tagging the remaining plants. On July 1st, 2026, AMCO received a list of SOPs developed and implemented by the licensee to correct the mistakes that led to the initial NOV.

Based on the informal conference and documented SOP enhancements, AMCO recommends the following disciplinary actions:

For Enlighten Gardens, LLC d/b/a Enlighten Gardens, standard marijuana cultivation facility license 21551, it is recommended that the Marijuana Control Board impose a fine of $20,000 with $17,500 suspended for the period of probation. License 21551 will be placed on probation for 12 months after the board's acceptance of this recommendation, with conditions to not violate AS 17.38 or 3 AAC 306 and to provide quarterly inventory audits to AMCO Enforcement.

Under 3 AAC 306.809(f), the board may:

- Uphold the notice of violation and determine the appropriate fine or other disciplinary action based on board precedent.
- Vacate the notice of violation.
- Decrease the recommended disciplinary action.

- Order additional disciplinary action, including a request that the director prepare an accusation for suspension or revocation of the license.

Kevin Richard
Director, AMCO

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

March 25th, 2026

Enlighten Gardens, LLC
dba Enlighten Gardens (Standard Marijuana Cultivation Facility License #21551)
c/o Evan Levinton
524 E 48th Ave 1B
Anchorage, AK 99503
Evan@enlightenak.com

**NOTICE OF ADMINISTRATIVE HOLD ON MARIJUANA OR MARIJUANA PRODUCTS**

Pursuant to 3 AAC 306.830, AMCO has placed an administrative hold on all marijuana and marijuana products at your standard marijuana cultivation facility, Enlighten Gardens, license # 21551.

All marijuana and marijuana products in your establishment are placed under administrative hold under 3 AAC 306.830(a)(1) and (a)(5)(A) because the marijuana establishment has marijuana or marijuana product not properly logged into the marijuana establishment's marijuana inventory tracking system, and the development of reasonable grounds to believe that any marijuana or marijuana product constitutes evidence of a violation of a state statute or regulation.

On 1/2/26, an inspection was conducted at your facility. Investigators found approximately 175 untagged mature plants and multiple immature plant batches that were not entered in Metrc.

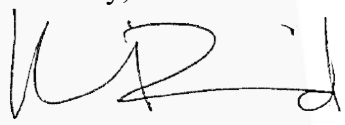
You are directed to physically separate all marijuana and marijuana products subject to this notice from the public and to store them in a secure and restricted-access area of your licensed premises. AMCO has placed a hold on the movement, transfer, or sale of the identified marijuana or marijuana product through Metrc. You must receive the express written consent of the Director to move, transfer, or sell any of these items.

You must continue care of the plants until the conclusion of any informal conference, any formal hearing, and any hearing under AS 44.62.330 - 44.62.630 (Administrative Procedure Act) and, if applicable, 2 AAC 64.100 - 2 AAC 64.990; and (2)

prohibit any transfer, sale, or commercial activity related to the plants, until the conclusion of any informal conference, any formal hearing, and any hearing under AS 44.62.330 - 44.62.630 (Administrative Procedure Act) and, if applicable, 2 AAC 64.100 - 2 AAC 64.990.

Your rights to challenge this administrative hold are set out at 3 AAC 306.830(e) through (k).[1] Not later than 15 days after your receipt of this notice, you may request (1) an informal conference before either the director or the board; *or* (2) a formal hearing before the board. If a hearing is requested and you do not request a delay**, an administrative hold hearing before the Marijuana Control Board will be held at a date to be determined.** If you elect an informal conference, the timing of an informal conference will be determined in compliance with 3 AAC 306.830(f). If an informal conference does not resolve the matter to your satisfaction, you will have 15 days from the last date of the informal conference to request a formal hearing. If requested, the timing of that hearing will be set in compliance with 3 AAC 306.830(g).

Sincerely,



Kevin Richard
AMCO Director

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

**Alaska Marijuana Control Board – AMCO Enforcement**

# Notice of Violation (3 AAC 306.806(e))

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

| | | | |
|---|---|---|---|
| **Licensee:** | Enlighten Gardens, LLC | **Date:** | 3/25/26 |
| **Doing Business As:** | Enlighten Gardens | **License #:** | 21551 |
| **License Type:** | Standard Cultivation Facility | **AMCO Case #:** | AM 260377 |
| **Mailing Address:** | 524 E 48th Ave 1B Anchorage, AK 99503 | | |

| | Date | Violation of | Fine | Date | Violation of | Fine |
|---|---|---|---|---|---|---|
| **Violation(s) of Statute/Regulation:** | 3/25/26 | 3 AAC 306.405 | $100 x 183 | | | |
| | 3/25/26 | 3 AAC 306.435 | $100 X 183 | | | |

| | Date | Violation of | Fine | Date | Violation of | Fine |
|---|---|---|---|---|---|---|
| **Prior Violation(s)** | | | | | | |
| | | | | | | |

**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 3/25/26 I performed a routine inspection of Enlighten Gardens standard cultivation facility, License # 21551, at 524 E 48th Ave Unit 1B in Anchorage, Alaska. I met with licensee Evan Levinton (MHP# 11586), Chad Foos (MHP #18341) and Lance Schwartz (MHP# 32489). We first checked the Veg room and found 49 untagged mother plants. Schwartz stated that he had removed the tags a few weeks ago because he was going to destroy the plants. The plants were physically measured with photographs.

In the R&D room upstairs there were 126 plants untagged. Schwartz stated that he hadn't tagged the plants because he was behind. Plants were measured with photographs taken. The shortest plant was 26 inches and the tallest was 52 inches.

Measurements were taken after I had left and returned with a tape measure. Investigator Hamilton assisted with measurements upon return.

A clone tent outside the 3 flower rooms was full of clones that had not been entered into metrc. There were 8 trays of clones totaling 292 plants with the strain and count as follows:
SG2-33
SG2-39
BD-41
DM#2-39
CC-40
SC4-40
BRG-30
BRG-30

An administrative hold was placed on the facility on 3/25/26. On 3/27/26 Levinton, through his attorney Jana Weltzin, provided a Declaration of Compliance and the hold was lifted.

On 4/1/26 Investigator Bankowski and I returned to Enlighten Gardens for a follow up inspection. Everything was in order.

This is a total of 183 violations of 3 AAC 306.435(a) and 183 violations of 3 AAC 306.405(a)(5).

3 AAC 306.405. Standard marijuana cultivation facility: privileges and prohibited acts. (a) A licensed standard marijuana

# Notice of Violation

**Disciplinary Action**

| | | | |
|---|---|---|---|
| **Civil Fine:** | $20,000 | **Probation:** | 3 Years |

Civil fine capped at $10,000 for both violations of 3 AAC 306.435 and 3 AAC 306.405 per the fine schedule.

**You may contest this notice of violation or recommended disciplinary action by filing a written response not later than 10 days after 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. Any appeal to the board will be heard at the next regularly scheduled meeting of the Board, unless an extension is agreed upon. A request for an informal conference will be scheduled by the director not later than 10 days after receipt of the request.**

**If you do not contest this notice, please describe in writing the remedial measures you are taking to address the violation and remit the associated fine within 30 days after receipt of this notice.**

**Failure to respond may result in additional enforcement action by AMCO or the Marijuana Control Board.**

**Please direct your response to the address below and include your marijuana license number, DBA and AMCO case number in any correspondence. Payments may be made by check (ensure checks or money orders are made out to State of Alaska or AMCO and appropriately signed) , by cash using the Department of Revenue's tax drop box (ensure to include a note with your payment clearly specifying what you are paying for), or credit card (please contact our office, we will send you an e-bill).**

**Marijuana Control Office**
**Attn: AMCO Enforcement**
**550 W. 7th Avenue Suite 1600**
**Anchorage, AK 99501**
**amco.enforcement@alaska.gov**

| | | | |
|---|---|---|---|
| **Issuing Investigator:** | J. Rukes | **Issued To:** | Evan Levinton |
| **Signature:** | Jeff Rukes | **Title:** | designated licensee |
| **Delivered VIA** | Via Email | **Issued Date:** | 4/28/26 |

JDW COUNSEL
ALIGNED FOR EXCELLENCE

Jana D. Weltzin
Licensed in Alaska & Arizona
901 Photo Ave, Second Floor
Anchorage, Alaska 99503
Phone 907-231-3750
JDW Counsel
jana@jdwcounsel.com

May 7, 2026

Alcohol & Marijuana Control Office
Attn: Director and AMCO Enforcement
550 W. 7th Avenue, Suite 1600
Anchorage, Alaska 99501

Sent Via Email

Re: Enlighten Gardens, LLC – License No. 21551
AMCO Case No. AM 260377

Dear Director Richard and Enforcement Team:

This firm represents Enlighten Gardens, LLC ("Enlighten Gardens" or "Licensee") regarding the Notice of Violation ("NOV") issued April 28, 2026, alleging violations of 3 AAC 306.435(a) and 3 AAC 306.405(a)(5). This response is submitted pursuant to 3 AAC 306.806, 3 AAC 306.844, and related applicable regulations.

Enlighten Gardens takes the matters identified in the NOV seriously and appreciates AMCO's regulatory oversight responsibilities. The Licensee does not dispute that administrative deficiencies existed at the time of inspection. However, the conditions identified during inspection arose from temporary workflow sequencing and administrative reconciliation issues—not from intentional misconduct, diversion, concealment of inventory, or disregard for regulatory compliance obligations. Accordingly, Enlighten Gardens respectfully requests reconsideration of both the characterization of the alleged violations and the magnitude of the assessed penalties and probationary terms.

## I. Background and Inspection Context

On March 25, 2026, AMCO investigators conducted a routine inspection of Enlighten Gardens' standard cultivation facility located at 524 E. 48th Avenue Unit 1B in Anchorage, Alaska. During the inspection, investigators identified: (1) untagged mother plants; (2) untagged plants located within the R&D area; and (3) clones that had not yet been entered into METRC.

The Licensee acknowledges that, at the time of inspection, certain physical inventory and METRC records were not fully synchronized. However, the surrounding circumstances are critical to understanding the nature of the issues identified.

As reflected in the inspection narrative itself, the larger mother plants had already been removed from active production and staged for destruction. The issue arose because physical tags were removed prematurely in anticipation of destruction, rather than remaining affixed until completion

of the destruction process and corresponding METRC reconciliation. This created a temporary procedural gap within the destruction workflow.

Similarly, the plants identified within the R&D area and certain propagated clones had not yet been administratively tagged or entered into METRC due to staffing constraints and backlog within routine processing workflows. Plant movement and cultivation activity temporarily progressed ahead of administrative tagging and data-entry procedures.

Importantly, all plants remained physically present within the licensed premises, under Licensee control, and within designated cultivation areas at all relevant times.

## II. Nature of the Administrative Tagging and Tracking Issues

The NOV characterizes the observed conditions as 183 separate violations of 3 AAC 306.435(a) and an additional 183 separate violations of 3 AAC 306.405(a)(5), resulting in stacked penalties totaling $20,000.00 and three years of probation.

Enlighten Gardens respectfully disputes the characterization of these conditions as hundreds of discrete and independently punishable violations. Rather, the inspection findings arose from a unified set of workflow sequencing and administrative reconciliation deficiencies affecting a single operational period.

### A. Mother Plants Staged for Destruction

The larger mother plants identified during inspection had already been removed from active production and staged for destruction. In anticipation of disposal, tags were removed before the destruction process and related METRC reconciliation were fully completed.

The plants themselves remained:

- physically present onsite;
- segregated within designated cultivation areas;
- readily identifiable;
- and continuously under Licensee control.

The inspection photographs further demonstrate that the plants remained openly maintained within ordinary cultivation areas of the licensed premises and were neither concealed nor removed from operational oversight. Several of the photographed mother plants visibly appear aged, woody, sparse, and no longer in active production condition, consistent with the Licensee's explanation that the plants had been staged for destruction and retirement from production inventory.

Accordingly, the issue was procedural sequencing—not diversion, concealment, or loss of inventory accountability.

### B. R&D Plants and Administrative Backlog

The plants located within the R&D area had not yet been administratively tagged due to staffing limitations and temporary backlog in routine processing procedures. Physical cultivation activity progressed ahead of tagging and METRC entry.

Although this resulted in temporary discrepancies between physical inventory and tracking records:

- all plants remained within the licensed premises;
- the plants were maintained openly within designated cultivation areas;
- and there is no allegation or evidence of unlawful transfer, diversion, or off-premises movement.

C. Clones Pending METRC Entry

The propagated clones identified during inspection similarly had not yet been entered into METRC due to delays in administrative processing. The clone inventory remained openly maintained within standard propagation areas and under Licensee control at all relevant times.

Across all categories identified in the NOV, the underlying issue was administrative lag and workflow reconciliation timing—not unlawful cultivation activity or diversion from the regulated system.

III. Inventory Accountability and Lack of Diversion Concerns

Enlighten Gardens acknowledges that discrepancies existed between certain physical inventory and METRC records at the time of inspection. However, several critical mitigating facts demonstrate that the issues identified were administrative and technical in nature rather than substantive threats to public safety or inventory control.

Specifically:

- all plants remained physically present within the licensed premises;
- inventory remained contained within restricted cultivation areas;
- investigators did not allege unlawful transfer, diversion, concealment, or off-premises movement;
- the facility remained organized, operational, and professionally maintained;
- the administrative hold was lifted promptly following corrective action; and
- upon follow-up inspection, investigators confirmed that "everything was in order."

The fact that the administrative hold was lifted within days, and that investigators subsequently confirmed compliance during reinspection, strongly demonstrates that the underlying issue was promptly correctable administrative noncompliance—not systemic inventory diversion or intentional regulatory evasion.

IV. Operational Circumstances and Mitigating Factors

The conditions identified during inspection occurred during a convergence of operational and staffing challenges that contributed to temporary delays in routine tagging and METRC reconciliation procedures.

These circumstances included:

- staffing limitations that created backlog in tagging and administrative processing;
- workflow inefficiencies related to destruction sequencing and reconciliation procedures;
- temporary lag between propagation activity and same-day METRC entry; and
- ongoing refinement of internal compliance systems and supervisory controls.

Collectively, these circumstances resulted in temporary administrative noncompliance—not intentional misconduct or disregard for regulatory obligations.

## V. Corrective Measures and Enhanced Compliance Procedures

Following inspection, Enlighten Gardens immediately implemented corrective actions and procedural safeguards designed to address the root causes of the issues identified.

These measures include:

- requiring that all plants remain physically tagged until destruction is fully completed and reconciled within METRC;
- implementing mandatory supervisory verification prior to tag removal during destruction workflows;
- prioritizing same-day tagging and METRC entry for newly propagated plants and R&D inventory;
- enhancing oversight procedures to ensure alignment between physical inventory, tag status, and METRC records;
- clarifying staff responsibilities regarding inventory reconciliation and tagging obligations; and
- implementing additional workflow checkpoints to ensure administrative procedures are completed before plants are moved, staged, or processed.

These corrective measures directly address the workflow sequencing and administrative reconciliation issues identified during inspection and substantially reduce the likelihood of recurrence.

## VI. Disproportionate Nature of the Assessed Penalties

Enlighten Gardens respectfully submits that the assessed civil penalties and probationary terms are disproportionate to both the nature of the conduct identified and the actual regulatory risk presented under the circumstances of this matter.

The NOV imposes the maximum scheduled civil fine under both cited regulations, resulting in a total assessed penalty of $20,000.00 in addition to a three-year probationary term. While the Licensee recognizes the importance of strict inventory tracking compliance, the facts presented

here involve temporary administrative reconciliation and workflow sequencing deficiencies—not diversion, unlawful transfer, concealment, or intentional circumvention of regulatory oversight.

As discussed below, several significant mitigating circumstances support substantial reduction of the assessed penalties and reconsideration of the proposed probationary terms, including:

- the unified nature of the conduct at issue;
- the absence of diversion or public harm;
- the administrative rather than substantive nature of the violations;
- the Licensee's prompt corrective action and verified compliance;
- the duplicative effect of stacked penalties under overlapping regulations; and
- the excessive punitive effect produced by per-plant penalty multiplication under the circumstances presented here.

A. Unified Course of Conduct

The conditions identified during inspection arose from a single course of operational and administrative conduct affecting one facility during one inspection period—not from hundreds of distinct and independently punishable acts.

B. No Evidence of Diversion or Public Harm

There is no allegation or evidence that marijuana inventory left the licensed premises unlawfully, entered the unregulated market, was transferred to unlicensed individuals or entities, or otherwise created risk to public safety or consumers.

To the contrary, the facts reflected in the NOV and accompanying inspection photographs demonstrate that all inventory remained physically present within the licensed premises, openly maintained within designated cultivation areas, and continuously subject to Licensee oversight and operational control. Investigators were able to readily access, observe, identify, count, photograph, and measure the plants at issue during the inspection process. The inventory was neither concealed nor hidden from regulatory inspection.

Importantly, the plants identified during inspection consisted primarily of mother plants, vegetative plants, clones, and immature cultivation inventory still within internal production workflows—not finished harvested marijuana prepared for commercial sale or distribution. Several of the larger mother plants had already been removed from active production and staged for destruction at the time of inspection.

The absence of any allegation involving:

- unlawful sales activity;
- off-premises transfer;
- diversion into the unregulated market;
- concealment of inventory;
- falsification of records; or
- consumer-facing marijuana product

is highly significant in evaluating both the severity of the conduct and the appropriate level of enforcement response.

The core regulatory concern underlying inventory tracking requirements is preventing diversion and ensuring accountability within the regulated system. Here, despite the temporary administrative discrepancies identified during inspection, the inventory itself remained fully recoverable, observable, and reconcilable within the licensed premises. The prompt corrective action taken by the Licensee, subsequent lifting of the administrative hold, and successful follow-up inspection confirming that "everything was in order" further demonstrate that the issues identified did not result in any actual loss of inventory control or threat to public safety.

Under these circumstances, the absence of diversion, public harm, or consumer risk strongly supports mitigation of the assessed penalties and probationary sanctions.

C. Administrative Rather Than Substantive Violations

The issues identified during inspection involved delayed tagging, premature tag removal during destruction staging, and delayed METRC reconciliation—not unlawful sales, unlawful transfer, concealment, or diversion from the regulated system.

Importantly, the plants at issue remained within internal cultivation workflows and were maintained onsite within designated cultivation areas under Licensee control at all times. The inspection photographs further reflect that the inventory primarily consisted of mother plants, vegetative plants, propagated clones, and immature cultivation inventory rather than flowering harvest-ready marijuana intended for immediate commercial distribution.

Several of the larger mother plants had already been removed from active production and staged for destruction, while the remaining plants identified during inspection were still within vegetative or propagation phases and had not yet progressed into finished harvest inventory. This distinction is significant because the conditions identified involved internal administrative tracking and reconciliation deficiencies within the cultivation process itself—not untracked finished product entering the stream of commerce.

Rather, the conditions identified reflected temporary discrepancies between physical inventory status and contemporaneous administrative tagging and METRC reconciliation procedures. While the Licensee acknowledges the importance of strict compliance with inventory tracking requirements, the conduct at issue was procedural and administrative in nature—not deceptive, evasive, or diversionary.

D. Prompt Remediation and Verified Compliance

Enlighten Gardens responded immediately and cooperatively upon identification of the issues noted during inspection. Following communication with AMCO and implementation of corrective measures, the Licensee worked diligently to reconcile inventory records, restore tagging compliance, and address the administrative deficiencies identified during the inspection process.

As reflected in the NOV itself, the administrative hold imposed on March 25, 2026 was lifted shortly thereafter following submission of a Declaration of Compliance through the undersigned.

Importantly, AMCO investigators returned to the facility on April 1, 2026 for a follow-up inspection and expressly noted that "everything was in order."

These facts are highly significant. The prompt removal of the administrative hold and successful follow-up inspection demonstrate that:

- the Licensee acted in good faith to correct the identified issues;
- the inventory remained fully recoverable and reconcilable within the regulated system;
- the deficiencies were administrative and procedural in nature rather than systemic inventory failures;
- and the Licensee possessed the operational capability and willingness to restore full compliance immediately upon identification of the workflow deficiencies.

Equally important, the rapid remediation confirms that the conditions identified during inspection did not reflect ongoing diversion concerns, intentional concealment, or a breakdown of inventory accountability requiring prolonged enforcement intervention. To the contrary, the issues proved readily correctable through procedural reconciliation and enhanced administrative controls.

The Licensee's prompt cooperation, immediate corrective action, and successful reinspection strongly support substantial mitigation of the assessed penalties and weigh against the necessity of extended probationary sanctions.

E. Stacked Penalties Based on the Same Underlying Conduct

The alleged violations under 3 AAC 306.405(a)(5) and 3 AAC 306.435(a) arise from the same underlying set of facts, namely temporary discrepancies between physical inventory status and contemporaneous tagging and METRC reconciliation procedures. Both cited provisions are directed toward the same core regulatory objective: maintaining accountability and traceability of marijuana inventory within the regulated system.

Under the circumstances presented here, the alleged violations are not meaningfully distinct acts occurring independently of one another. Rather, the alleged violations under 3 AAC 306.405(a)(5) are entirely derivative of the same tagging and inventory-tracking conditions alleged under 3 AAC 306.435(a). The NOV does not allege separate unlawful conduct supporting each regulation independently, but instead applies both regulations simultaneously to the same plants, during the same inspection period, based upon the same underlying administrative reconciliation issues.

As a result, the penalty calculation effectively compounds the same operational deficiency twice by:

- first treating each plant as a separate violation; and
- then applying two overlapping regulatory provisions to the same underlying conduct on a per-plant basis.

This methodology substantially inflates the resulting penalties beyond what is reasonably proportional to the actual nature of the conduct identified during inspection.

Importantly, the facts alleged do not involve separate categories of misconduct requiring independent deterrence. There are no allegations of diversion, unlawful transfer, falsification of records, concealment of inventory, or intentional efforts to circumvent regulatory oversight. The conditions identified instead arose from a unified workflow and administrative backlog issue affecting inventory reconciliation procedures during a discrete operational period.

Because the alleged conduct arises from one continuous course of administrative noncompliance, Enlighten Gardens respectfully requests that AMCO reconsider whether the simultaneous application of stacked per-plant penalties under both regulations accurately reflects the underlying facts, the purpose of the regulations, and principles of proportional enforcement.

## VII. Request for Clarification and Relief

In light of the foregoing, Enlighten Gardens respectfully requests that AMCO:

1. Reconsider the characterization of the alleged violations as hundreds of separate and independently punishable violations;
2. Recognize that the issues identified arose from administrative workflow and reconciliation deficiencies rather than diversion, concealment, or intentional misconduct;
3. Substantially reduce the assessed civil penalties to reflect the mitigating circumstances, prompt remediation, and absence of public harm;
4. Reconsider the imposition and duration of probationary terms;
5. Clarify the basis for calculating the assessed penalties, including the methodology used to characterize each plant as a separate violation under both cited regulations; and
6. Permit resolution of this matter through an informal conference pursuant to 3 AAC 306.844.

## VIII. Commitment to Compliance & Request for Informal Conference

Enlighten Gardens remains committed to full regulatory compliance and has implemented enhanced procedures designed to ensure continuous tagging integrity, timely METRC reconciliation, and alignment between physical inventory and tracking records. The Licensee values its relationship with AMCO and remains committed to operating in accordance with both the letter and intent of Alaska's marijuana regulations.

Respectfully, Enlighten Gardens also requests an informal conference with the Director pursuant to 3 AAC 306.844.

Thank you for your consideration of this response and request for relief.

Truly and Sincerely Yours,

Jana D. Weltzin, *Esq.*