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plichtman@clearcreekcounty.us

KATHERINE PARKER
ASST. COUNTY ATTORNEY
303-679-2498
kparker@clearcreekcounty.us



Clear Creek County
Office of the County Attorney
Post Office Box 2000
Georgetown, Colorado 80444

NANETTE REIMER
EXECUTIVE ASSISTANT
SENIOR PARALEGAL
(303) 679-2314
nreimer@clearcreekcounty.us

<https://www.clearcreekcounty.us/185/County-Attorney>

M E M O R A N D U M

TO: Board of County Commissioners

FROM: Nanette Reimer
Office of the County Attorney

DATE: March 3, 2026

RE: MARIJUANA BUSINESS LICENSE RENEWAL APPLICATIONS

Licensee: Avicenna Products, LLC dba High Tech Concentrates

Retail Marijuana Products Manufacturer
State License #404R-00383

Medical Marijuana - Infused Products Manufacturer
State License #404-00621

Current Expiration: January 8, 2026

We will be bringing these applications before the Chairman of the Board of County Commissioners for his approval on Tuesday, January 21, 2025. Pursuant to the provisions of Resolution 2021-51, this is an administrative action which does not require a public hearing or formal action by the entire Board. These licenses have expired, however because complete renewal applications were filed prior to the expiration date, the licenses remain valid until action is taken by the local authority and the State Marijuana Enforcement Division (MED).

RENEWAL CRITERIA

Avicenna Products, LLC. submitted its applications for the renewal of these licenses on November 25, 2024. These applications have been going through the review process since that time. The final department comments were received on February 18, 2026.

Pursuant to the provisions of Section 9.04, of the Clear Creek County Marijuana Licensing Regulations, the approval criteria for approval of a new license shall be applicable to an application for renewal. Therefore, the Local Licensing Authority shall determine that all of the following requirements have been met by the Applicant:

1. The appropriate application is complete and the full application or renewal fee and license fee have been paid; **The applications were deemed complete on January 5, 2026.**
2. The Planning Department has determined that the use is permitted and the owner or operator

has obtained any required approvals under the Clear Creek County Zoning Regulations; **We recommend that the premises be found to comply with zoning.**

3. No zoning violations exist on the premises; **We recommend this be found satisfied.**
4. All existing or proposed signs meet the requirements of the Clear Creek County Zoning Regulations; **We recommend this be found satisfied.**
5. All existing or proposed lighting meets the Clear Creek County Zoning Regulations; **We recommend this be found satisfied.**
6. Any structure in which the use is located has been inspected by the Clear Creek County Building Official or her designee, the structure complies with all applicable building code provisions, and all necessary building permits have been obtained; **We recommend this be found satisfied**
7. The premises comply with all applicable Site Development regulations including, but not limited to, driveway, grading, and BMP regulations; **We recommend this be found satisfied.**
8. The premises has all required well and sanitation system permits or is adequately served by public water and/or sewer; **We recommend this be found satisfied.**
9. Evidence of a legal water supply has been established for marijuana cultivation. **We recommend this be found satisfied.**
10. The premises are not subject to unresolved enforcement action by the Clear Creek County Department of Public Health and Environment; **We recommend this be found satisfied.**
11. The premises comply with the applicable Fire Code; **We recommend the premises be found to comply with the applicable Fire Code.**
12. All personal property tax schedules related to the Premises have been submitted timely and are complete. **We recommend this be found satisfied.**
13. All property taxes have been paid and no tax liens exist on the premises; **We recommend this be found satisfied.**
14. All Clear Creek County Sales taxes have been timely reported and paid; **N/A**
15. All Clear Creek County retail marijuana cultivation facility excise taxes have been timely reported and paid. **We recommend this be found satisfied.**
16. The applicant and premises are in compliance with all other applicable County regulations; **We recommend this be found satisfied;** and
17. The application, including any required attachments and submissions, does not contain a material falsehood or misrepresentation. **We recommend this be found satisfied.**
18. The Licensed Premises are located in a Location permitted by these Regulations. **We recommend this be found satisfied.**
19. The applicant is eligible for a state license for the activity at that premises as provided in the CMM Code, based on information provided by the state. **The State Marijuana Enforcement Division is still conducting their license renewal investigation and has not yet issued its Conditional Licenses for these retail operations. These licenses have been administratively continued by the State MED pending the outcome of that investigation.**

Comments were received from all of the reviewing departments, and are attached for your review and consideration. After review and inspection, these renewal applications appear to meet the criteria for approval.

We recommend approval of these renewal applications and issuance of both of these licenses. The Licensee is fully compliant with our regulations.

cc: Avicenna Products, LLC.

Colorado Marijuana Licensing Authority

Regulated Marijuana Business License Renewal Application

License Types & Fees (See Application Checklist for details on license types and fees.)			
<input type="checkbox"/> Retail Marijuana Store <input type="checkbox"/> Retail Marijuana Cultivation Facility (Select Tier) <input type="checkbox"/> Retail Marijuana Testing Facility <input type="checkbox"/> Hospitality Business <input type="checkbox"/> Hospitality and Sales Business <input type="checkbox"/> Mobile Hospitality Business <input type="checkbox"/> Hospitality Business within a Retail Food Establishment	<input type="checkbox"/> Tier 1 (Up to 1800 plants) <input type="checkbox"/> Tier 2 (1801 to 3600 plants) <input type="checkbox"/> Tier 3 (3601 to 6000 plants) <input type="checkbox"/> Tier 4 (6001 to 10200 plants) <input type="checkbox"/> Tier 5 (10201 to 13800 plants) <input type="checkbox"/> Tier 5+ (_____ plants in excess of 13801)	<input type="checkbox"/> Retail Marijuana Products Manufacturer <input type="checkbox"/> Retail Marijuana Business Operator <input type="checkbox"/> Retail Marijuana Transporter	
<input type="checkbox"/> Medical Marijuana Store <input checked="" type="checkbox"/> Medical Marijuana Products Manufacturer <input type="checkbox"/> Medical Marijuana Testing Facility <input type="checkbox"/> Medical Marijuana Business Operator <input type="checkbox"/> Medical Marijuana Transporter	<input type="checkbox"/> Marijuana Research & Development Facility <input type="checkbox"/> Medical Marijuana Cultivation Facility <input type="checkbox"/> Class 1 (1-500 Plants) <input type="checkbox"/> Class 2 (501-1500 Plants) <input type="checkbox"/> Class 3 (1501-3000 Plants) <input type="checkbox"/> Class 3+ _____ (increments of 3000)		
Applicant's Legal Business Name (Please Print) AVICENNA PRODUCTS LLC		Marijuana License Number 404-00621	
Registered Trade Name (DBA) High Tech Concentrates			
Federal Taxpayer ID 47-3737097	Affiliated Colorado Sales Tax License # 30507378-0005	Name of Registered Agent (with CO SoS) Babak Behzadzadeh	
Physical Address			
Street Address of Marijuana Business (include unit number) 35715 US Highway 40, D 106			
City Evergreen	County Clear Creek	State CO	ZIP 80439
Business Phone Number (303) 917-8828	Email Address babak@avicennaproducts.com		
Mailing Address (if different from Business Address) *Correspondence and licenses will be mailed to this address.			
Address (include unit or apartment number) 3950 Grape St.			
City Denver	County Denver	State CO	ZIP 80207
Primary Contact Person			
Primary Contact Person for Business Babak Behzadzadeh		Primary Contact Phone Number (303) 917-8828	
Primary Contact Email Address babak@avicennaproducts.com			

1. Do you have legal possession of the licensed premises?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2. Is the licensee (including any of the partners, if a partnership; members or manager if a limited liability company; or officers, stockholders or directors if a corporation) under the age of twenty-one years?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Has the applicant or any business entity owned by the applicant ever owned or applied for a Marijuana license in this or any other jurisdiction, foreign or domestic that has been subject to any of the following actions since the last renewal: (1) denial; (2) surrender; (3) order to show cause; (4) suspension; (5) fine; (6) revocation; (7) stipulation or settlement; (8) withdrawn. If YES, provide details on a separate sheet, including jurisdiction, type of action, and date of action.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Since the last renewal, has the licensee (including all parent or subsidiary companies, if any) had a tax lien filed against it, or become delinquent in the payment or filing of any taxes, interest, penalties or judgments owed to the State of Colorado. If Yes, explain in detail on a separate sheet and attach copies of all available documentation.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Since the last renewal, has the licensee (including all parent or subsidiary companies, if any) been indicted, served with a criminal summons, charged with, or convicted of ANY crime or offense in any manner? Include ALL offenses regardless of class of crime or outcome, even if the charges were dismissed or you were found not guilty. If Yes, explain in detail on a separate sheet and attach it to your application. Provide official documentation from the court showing the final disposition for any felony charge or those related to a controlled substance. (Sealed or expunged non-convictions need not be disclosed).	<input type="checkbox"/>	<input type="checkbox"/>
6. Since the last renewal, has there been a change in ownership or ownership allocation, a transfer of stock, a change in the incorporation or in the corporate by-laws, or any other change affecting ownership or organizational structure of the licensee or its subsidiaries/affiliates? If yes, explain in detail on a separate sheet and attach copies of all available documentation concerning the changes. (i.e. New operating agreement)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Ownership Structure
List all CBOs 10% or greater and all Executive Officers, Managers and any other individual and/or entity that Controls the RMB.

Name	Title	Direct Ownership % in Owner Entity	Direct Ownership % in RMB
Babak Behzadzadeh	Owner		100.0%
Name	Title	Direct Ownership % in Owner Entity	Direct Ownership % in RMB
Name	Title	Direct Ownership % in Owner Entity	Direct Ownership % in RMB
Name	Title	Direct Ownership % in Owner Entity	Direct Ownership % in RMB
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Name	Title	Direct Ownership % in Owner Entity	Direct Ownership % in RMB

7. Are there any outstanding options and/or warrants or other contracts, that may be exercised into an Owner's Interest in the RMB within the next 60 days that would constitute a CBO? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No *If YES, attach list of persons	
8. Are there any other Persons, other than those listed in the Ownership Structure, that can Control the RMB? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No *If YES, attach list of persons	
9. Are any owners renewing their Owners Licenses with this application? If YES, then each must submit the Owner Renewal Applications (DR 8516 & DR 8581 - see website)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

10. Has the applicant exercised reasonable care to confirm that its CBO's, PBO's (that are Non-Objecting PBO's), Qualified Institutional Investors and Indirect Financial Interest Holders are NOT Person(s) prohibited under Section C.R.S. 44-10-307? (Publicly Traded Companies excluded) If NO, explain on a separate sheet	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
11. Have any CBO's been removed or moved to PBO ownership status since the prior application? If YES, list and explain.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
12. Have there been any changes to the licensed premises as defined in Rule 2-260. If YES, fill out and provide details on Addendum E - Modification of Premises.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Local Licensing Authority (To be filled out by licensee) Include copy of Local License or Approval			
Local Licensing Authority County of Clear Creek		Local Licensing Authority Contact Name Timolthy J. Mauck	
Contact Phone	Contact Email		
Current License Status With Local Authority Approved		Date of Expiration 01/08/2026	

Indirect Financial Interest Holder - List those with 2 or more interests (PBO, lease, Intellectual Property agreements, finance and/or equipment lease agreements, etc.) or loans that are 50% or more of the operating capital as defined in Rule 2-230-1(A)(3).

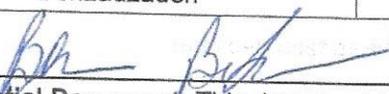
Name of Interest Holder NA		Date of Birth (MMDDYYYY)	FEIN/SSN	
Address		City	State	ZIP
List Types of Interests				
Name of Interest Holder		Date of Birth (MMDDYYYY)	FEIN/SSN	
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List Types of Interests				
Name of Interest Holder		Date of Birth (MMDDYYYY)	FEIN/SSN	
Address		City	State	ZIP
List Types of Interests				

Affirmation & Consent

I, Babak Behzadzadeh, as an owner for the applicant business, state under penalty for offering a false instrument for recording pursuant to 18-5-114 C.R.S. that the entire Renewal License Application statements, attachments, and supporting schedules are true and correct to the best of my knowledge and belief, and that this statement is executed with the knowledge that misrepresentation or failure to reveal information requested may be deemed sufficient cause for the refusal to issue a Marijuana license by the State Licensing Authority. Further, I am aware that later discovery of an omission or misrepresentation made in the above statements may be grounds for denial of the marijuana business application. I am voluntarily submitting this application to the Colorado Marijuana Licensing Authority, under oath, with full knowledge that I may be charged with perjury or other crimes for intentional omissions and misrepresentations pursuant to Colorado law or for offering a false instrument for recording pursuant to 18-5-114 C.R.S. I further consent to any background investigation necessary to determine my present and continuing suitability and that this consent continues as long as I hold a Colorado Marijuana License.

Note: If your check is rejected due to insufficient or uncollected funds, the Department of Revenue may collect the payment amount directly from your banking account(s) electronically.

Print Full Legal Name of Owner clearly below:

Applicant's Legal Business Name AVICENNA PRODUCTS LLC		Trade Name (DBA) High Tech Concentrates
Applicant's Last Name (Please Print) Behzadzadeh	Applicant's First Name Babak	Applicant's Middle Name NMN
Signature 		Date (MMDDYYYY) 12/26/25

REQUIRED

Confidential Document: This document is the property of the Colorado Marijuana State Licensing Authority and the Colorado Marijuana Enforcement Division, and is provided for Official Use Only. This document may not be further reproduced nor its contents disclosed without the written permission of the Division or State Licensing Authority.

Colorado Marijuana Licensing Authority

Regulated Marijuana Business License Renewal Application

License Types & Fees (See Application Checklist for details on license types and fees.)			
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Street Address of Marijuana Business (include unit number) 35715 US Highway 40, D 106			
City Evergreen	County Clear Creek	State CO	ZIP 80439
Business Phone Number (303) 917-8828	Email Address babak@avicennaproducts.com		
Mailing Address (if different from Business Address) *Correspondence and licenses will be mailed to this address.			
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Local Licensing Authority County of Clear Creek		Local Licensing Authority Contact Name Timolthy J. Mauck	
Contact Phone	Contact Email		
Current License Status With Local Authority Approved			Date of Expiration 01/08/2026

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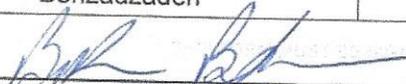
Name of Interest Holder NA		Date of Birth (MMDDYYYY)	FEIN/SSN	
Address		City	State	ZIP
List Types of Interests				
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List Types of Interests				
Name of Interest Holder		Date of Birth (MMDDYYYY)	FEIN/SSN	
Address		City	State	ZIP
List Types of Interests				

Affirmation & Consent

I, Babak Behzadzadeh, as an owner for the applicant business, state under penalty for offering a false instrument for recording pursuant to 18-5-114 C.R.S. that the entire Renewal License Application statements, attachments, and supporting schedules are true and correct to the best of my knowledge and belief, and that this statement is executed with the knowledge that misrepresentation or failure to reveal information requested may be deemed sufficient cause for the refusal to issue a Marijuana license by the State Licensing Authority. Further, I am aware that later discovery of an omission or misrepresentation made in the above statements may be grounds for denial of the marijuana business application. I am voluntarily submitting this application to the Colorado Marijuana Licensing Authority, under oath, with full knowledge that I may be charged with perjury or other crimes for intentional omissions and misrepresentations pursuant to Colorado law or for offering a false instrument for recording pursuant to 18-5-114 C.R.S. I further consent to any background investigation necessary to determine my present and continuing suitability and that this consent continues as long as I hold a Colorado Marijuana License.

Note: If your check is rejected due to insufficient or uncollected funds, the Department of Revenue may collect the payment amount directly from your banking account(s) electronically.

Print Full Legal Name of Owner clearly below:

Applicant's Legal Business Name AVICENNA PRODUCTS LLC		Trade Name (DBA) High Tech Concentrates
Applicant's Last Name (Please Print) Behzadzadeh	Applicant's First Name Babak	Applicant's Middle Name NMN
Signature 		Date (MMDDYYYY) 12/26/25

REQUIRED

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Clear Creek County
Post Office Box 2000
Georgetown, Colorado 80444
Telephone (303) 679-2300 – Fax (303) 679-2440

License Renewal:
Retail MJ Products Mfg.
Med. MJ Infused Prod Mfg.

TO: Board of County Commissioners
FROM: Sanitarian
RE: Marijuana Business License Application for:
Avicenna Products, LLC dba High Tech Concentrates
35715 Hwy 40, Unit D106, Evergreen

ok This office has reviewed the site plan for the property and the attached marijuana business license application. *Marijuana Licensing Regulations Sections 5.01.2 and 5.02.3(5).*

ok The Premises has all required well and sanitation system permits or is adequately served by public water and/or sewer service. *Marijuana Licensing Regulations Sections 6.01(8).*

ok The Premises are not subject to any unresolved enforcement action by the Clear Creek County Department of Public Health and Environment. *Marijuana Licensing Regulations Sections 6.01(10).*

N/A This office has reviewed the attached marijuana business license application and finds that the applicant is in violation of the County Environmental Health Regulations for the following reasons:

Gay Hager
Environmental Health Specialist Date

RECEIVED
By N Reimer at 10:30 am, Jan 06, 2026



Clear Creek County

Post Office Box 2000

Georgetown, Colorado 80444

Telephone (303) 679-2300 – Fax (303) 679-2440

Renewal Application:

Med MJ Infused Prod. Mfg.

Retail MJ Products Mfg.

TO: Board of County Commissioners

FROM: County Assessor

RE: Marijuana Business License Application for:

Avicenna Products, LLC dba High Tech Concentrates

35715 Hwy 40, Unit D106, Evergreen

This office has reviewed the attached marijuana business license application. All assessment records and personal property schedules are current and complete. *Marijuana Licensing Regulations Sections 5.02.3(1) and 6.01(12).*

No assessment records or personal property schedules have been submitted.

Comments:

I have received 2025 personal property schedules. 2026 is not due till 04/15/2026.

Donna Gee____
County Assessor

1/5/2026
Date

RECEIVED

By N Reimer at 12:13 pm, Jan 06, 2026



Clear Creek County Sheriff's Office

405 Argentine Street Post Office Box 2000

Georgetown, Colorado 80444

TO: Board of County Commissioners
FROM: Clear Creek County Sheriff's Office
RE: Marijuana Business License Application for:

~~_____~~

This office has reviewed the attached marijuana business license application and finds no record of violations. *Marijuana Licensing Regulations Sections 5.01.1(14), 5.02.3(9).*

This office has reviewed the attached marijuana business license application and found the following violations:

Sheriff's Office

Date

RECEIVED
By N Reimer at 12:14 pm, Jan 06, 2026



Clear Creek County

Post Office Box 2000

Georgetown, Colorado 80444

Telephone (303) 679-2300 – Fax (303) 679-2440

TO: Board of County Commissioners
FROM: Site Development
RE: Marijuana Business License Application for:

SS

This office has reviewed the site plan for the property and the attached marijuana business license application and inspected the establishment. To the best of our knowledge the premises comply with the provisions of the County Site Development regulations, including driveway, grading and BMP regulations. *Marijuana Licensing Regulations Sections 5.01.2, 5.02.3(6) and 6.01(7).*

_____ This office has reviewed the attached marijuana business license application and finds that the applicant is in violation of the following provisions of the County Site Development Regulations:

Stoy Streepey
Site Development

1/6/2026
Date

RECEIVED

By N Reimer at 12:15 pm, Jan 06, 2026



Clear Creek County

Post Office Box 2000

Georgetown, Colorado 80444

Telephone (303) 679-2300 – Fax (303) 679-2440

LICENSE RENEWAL:

Retail MJ Products Mfg.

Medical MJ Products Mfg.

TO: Board of County Commissioners

FROM: Building Inspector

RE: Marijuana Business License Application
for:

Avicenna Products, LLC dba High Tech Concentrates

35715 Highway 40, Unit D106, Evergreen

- The Licensed Premises are not subject to any active code enforcement action.
- The Licensed Premises continue be in compliance with all applicable county building regulation provisions.
- This office has reviewed the attached marijuana business license application and finds that the licensed structure is in violation of the following provisions of the County Building Codes:

[Click or tap here to enter text.](#)

David Danielson
Building Inspector

1/12/2026
Date

RECEIVED

By N Reimer at 2:38 pm, Jan 12, 2026



Clear Creek County

Post Office Box 2000

Georgetown, Colorado 80444

Telephone (303) 679-2300 – Fax (303) 679-2440

LICENSE RENEWAL:

Retail MJ Products Mfg.

Medical MJ Products Mfg.

TO: Board of County Commissioners

FROM: Planning Director

RE: Marijuana Business License Application for:

Avicenna Products, LLC dba High Tech Concentrates

35715 Highway 40, Unit D106, Evergreen

The current zoning of the property is PD, a district in which the sale or manufacturing of marijuana, as contemplated, is permitted, and the applicant has obtained all approvals required under the Clear Creek County Zoning Regulations.

The property is currently in compliance with Clear Creek County Subdivision and Zoning Regulations.

Comments:

Manufacturing is a permitted use per the ODP for the property.

Garrett McAllister
Planning Director

1/22/2026
Date

RECEIVED

By N Reimer at 12:29 pm, Jan 22, 2026

Clear Creek Fire Authority

P.O. Box 507, Dumont, CO 80436 (303) 567-4342 * Fax (303) 567-4739

License Renewal:

Retail MJ Products Mfg.

Med. MJ Infused Prod Mfg.

TO: Board of County Commissioners

FROM: Fire Chief

RE: Marijuana Business License Application for:

Avicenna Products, LLC dba High Tech Concentrates

35715 Hwy 40, Unit D106, Evergreen

KB

This office has reviewed the attached marijuana business license application and the storage plan relative to toxic, flammable, hazardous, or other materials regulated by a federal, state or local government authority having authority, that will be used, kept or created at the Premises (or the Property of which the Premises are a part) and the Material Safety Data Sheets for each. They comply with all applicable County Fire Codes. *Marijuana Licensing Regulations Section 5.01.1(15)*

N/A

This office has reviewed the plan specifying whether and how CO2 gas will be used in the cultivation and the location of the generation, use or storage has been identified on the site plans. *Marijuana Licensing Regulations Section 5.01.3.*

_____ This office has reviewed the site plan for the property and inspected the establishment. To the best of our knowledge, the premises comply with all applicable provisions of all the County Fire Codes. *Marijuana Licensing Regulations Sections 5.02.3(10), and 6.01(11).*

_____ This office has reviewed the attached marijuana business license application and finds that the premises are in violation of the following provisions of the County Fire Code:

1. Correction in progress

OK to renew license's

Fire Inspector

Kelly Bohm

2/10/26

Date

RECEIVED

By N Reimer at 4:45 pm, Feb 11, 2026



Clear Creek County

Post Office Box 2000
Georgetown, Colorado 80444
Telephone (303) 679-2300 – Fax (303) 679-2440

License Renewal:
Retail MJ Products Mfg.
Med. MJ Infused Prod Mfg.

TO: Board of County Commissioners

FROM: County Treasurer

RE: Marijuana Business License Application for:
Avicenna Products, LLC dba High Tech Concentrates
35715 Hwy 40, Unit D106, Evergreen

X This office has reviewed the attached marijuana business license application. Property taxes for this property have been paid and no tax liens exist for the premises. *Marijuana Licensing Regulations Sections 5.02.3(7) and 6.01(13).*

X Real or Personal Property taxes for this business are due by 04/30/26, for calendar year 2025, as follows:

Schedule Number	Amount Due
R 164564	\$6465.12
P 161047	\$1371.68

_____ There is currently a tax lien for the property, as follows:

RECEIVED
By N Reimer at 12:16 pm, Feb 18, 2026

N Reimer County Treasurer 02-18-26
02-09-26
Date