



**DECISION OF THE
GENERAL MANAGER
LIQUOR CONTROL AND LICENSING BRANCH
IN THE MATTER OF**

A hearing pursuant to Section 51 of
The Liquor Control and Licensing Act, S.B.C. 2015, c. 19

Licensee:	Royal Coachman Inn (2015) Ltd. 84 Dogwood Street Campbell River, BC
Case:	EH17-064
Licensee's Representative	Nasir Ladha ("Licensee's Representative")
For the Branch:	Maria Caduhada
General Manager's Delegate:	R. John Rogers
Date of Hearing:	January 23, 2018
Date of Decision:	February 13, 2018

**Liquor Control and
Licensing Branch**

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INTRODUCTION

Royal Coachman Inn (2015) Ltd. (the "Licensee") holds Liquor Primary Licence No. 124547 (the "Licence"), pursuant to which it operates an establishment called "Royal Coachman Inn" at 84 Dogwood Street, Campbell River, B.C., V9W 2X7 (the "Establishment").

According to the terms of the Licence, the Licensee may sell liquor from 11:00 am to 1:00 a.m. Monday through Saturday and from 11:00 a.m. to Midnight on Sunday. The Licence establishes the capacity for the Establishment to be 142 inside the Establishment and 40 on the patio.

The Licence is, as are all liquor licences issued in the Province, subject to the terms and conditions contained in the publication "Liquor Primary, Terms and Conditions " (the "Terms and Conditions Handbook").

ALLEGED CONTRAVENTION AND PROPOSED PENALTY

The Liquor Control and Licensing Branch's (the "Branch") allegations and proposed penalty are set out in the Notice of Enforcement Action dated August 22, 2017 (the "NOEA") (Exhibit 1 tab 1).

The Branch alleges that on July 19, 2017, the Licensee contravened Section 77(1)(a) of the *Liquor Control and Licensing Act* S.B.C. 2015 c. 19 (the "Act") by selling, giving or otherwise supplying liquor to a minor ("Minor Agent #105"). Item 3, Schedule 2 of the *Liquor Control and Licensing Regulation* BC Reg 241/2016 (the "Regulation") sets out the range of penalties for a first contravention of this type: a 10 to 15 day licence suspension and/or a \$7,500 to \$10,000 monetary penalty. The Branch proposes either a 10 day license suspension starting on a Wednesday and continuing for successive business days until completed or a monetary penalty of \$7,500.

The Licensee has admitted that its employee sold liquor to Minor Agent #105 and to the facts as set out in the NOEA. However, the Licensee is pursuing a due diligence defence to the contravention.

The Licensee in its submissions at the hearing has requested that if a penalty is imposed that it is a monetary penalty rather than a suspension of the Licence.

For the purposes of this hearing and in accordance with Section 5 of the Act, the General Manager has delegated to me the powers, duties and functions provided to the General Manager by Section 51 of the Act.

RELEVANT STATUTORY PROVISIONS OF THE ACT AND REGULATION

Liquor Control and Licensing Act, S.B.C. 2015, c. 19

Supplying liquor to minors

77 (1) Subject to the regulations, a person must not

(a) sell, give or otherwise supply liquor to a minor.

Liquor Control and Licensing Regulation, B.C. Reg. 241/2016

Schedule 2

Monetary Penalties and Licence Suspensions

Minors

Item	Contravention	Period of Suspension (Days)			Monetary Penalty
		First Contravention	Second Contravention	Subsequent Contraventions	
3	Contravention of section 77 of the Act [<i>supplying liquor to minors</i>]	10-15	20-30	30-60	\$7 500 - \$10 000

ISSUES

1. Did the contravention occur?
2. If so, has the Licensee established a defence to the contravention?
3. If the contravention is proven, what penalty, if any, is appropriate?

EXHIBITS

- Exhibit 1: Branch book of documents, tabs 1 to 15.
- Exhibit 2: A copy of a voucher for free coffee offered by the Licensee.
- Exhibit 3: A copy of minutes of a staff meeting of staff members of the Licensee held on October 12, 2017.
- Exhibit 4: A copy of a sign posted in the Establishment advising patrons that they must be over 19 years of age to purchase liquor and must show 2 pieces of identification.
- Exhibit 5: A copy of a picture taken on the morning of the hearing showing the Serving It Right certificates held by the staff members of the Establishment, all of which certificates had been posted on the wall of the Establishment.

WITNESSES

The Branch called Inspector A, a member of the inspection team referenced in the NOEA and the author of the NOEA.

The Licensee's Representative, together with the catering manager (the "Catering Manager") of the Establishment, the night manager (the "Night Manager") of the Establishment, and the day manager (the "Day Manager") of the Establishment all gave evidence on behalf of the Licensee.

PROTECTING THE IDENTITY OF THE MINOR AGENT

As the Licensee was not disputing that the contravention had occurred, with the agreement of the parties and in order to protect the identity of Minor Agent #105, redacted colour photocopies of photographs of Minor Agent #105 and of a photograph of her identification were provided to the Licensee and included at tab 7 in Exhibit 1.

The original of these photographs will be kept on file with the Branch and not disclosed without a court order.

EVIDENCE—BRANCH

The NOEA - The Minor as Agents Program

The NOEA notes that in order to ensure that a licensee is not selling or supplying liquor to persons under the age of 19 in contravention of the Act, the Regulation requires that licensees check 2 pieces of identification in order to verify the age of a customer prior to selling liquor to or supplying this customer with liquor.

The NOEA further notes that the Act was amended to permit the Branch to employ minors as agents to test compliance with this prohibition and the requirement to ask for identification. Following this legislative change, in 2011 the Branch established its Minors as Agents Program (“MAP”) initiative whereby it employs 16-18 year old minors as agents of the Branch to carry out compliance inspections to test the compliance of licensees and their employees with the Act’s prohibition against selling liquor to minors and the requirement in the Regulation to check the 2 pieces of identification to verify age. These minor agents are given training on the Act, on making and documenting observations, and on safety considerations. As part of this training, these agents are directed not to attempt to deceive by disguise or other methods in order to portray themselves as a person older than their actual age.

Industry Associations and licensees under the Act and the Regulation were first notified of the institution of MAP by way of a letter from the Branch General Manager dated February 2011. Following this initial notification, there have been ongoing communications from the Branch to these licensees and the industry about MAP and its continuing activities.

The NOEA – The Alleged Contravention

The NOEA states that on July 19, 2017, Inspectors A, B, and C together with Minor Agent #105 constituted an inspection team pursuant to MAP to test compliance with the Act and the Regulation at several licensed establishments in the Campbell River area.

At the start of the shift on this date, Minor Agent #105 was photographed (redacted copies of which are included in Exhibit 1 tab 7), her identification viewed and photographed (a redacted copy of which is also included in Exhibit 1 tab 7), and her age was confirmed to be less than 19 years of age.

At 2:22 pm on July 19, 2017, Inspector B together Minor Agent #105 entered the Establishment and sat at a table to the left of the entry door approximately 20 feet from the bar. They were greeted by a female server (subsequently identified as the Day Manager) who provided them with menus and walked away.

The Day Manager then returned to the table and asked them what they would like to drink. Minor Agent #105 ordered two Kokanee beer and two glasses of water. The Day Manager returned with the beer and the water ordered by Minor Agent #105 and set them on the table. After the Day Manager walked away, Inspector B took pictures of Minor Agent #105 with the menu and the two bottles of Kokanee beer in front of her (Exhibit 1 tab 7).

Minor Agent #105 then went to the till, advised the Day Manager that she had to leave, paid for the beer with a twenty dollar bill, and was given change of nine dollars.

Upon leaving the Establishment, Minor Agent #105 completed the Minor Agent Observation Form and the Minor Agent Statement (Exhibit 1 tabs 5 and 6).

Inspector C subsequently returned to the Establishment, met with the Catering Manager, advised her that liquor had been served to Minor Agent #105, and issued Contravention Notice B020422 (Exhibit 1 tab 8).

The NOEA - Past Enforcement Action Taken

The NOEA also noted that there was no compliance history found for past enforcement action taken nor was there any history of compliance meetings held.

Evidence of Inspector A

Inspector A testified that she was the Regional Inspector for the Branch on Vancouver Island, a post that she has held for 2 years. Prior to this position she was employed as a liquor inspector with the Branch since 2006.

She identified a copy of the NOEA and confirmed that she was its author. She also confirmed that she was a member of the inspection team of which Minor Agent #105 was a member on July 19, 2017.

Inspector A noted that the Licence (Exhibit 1 tab 9) permits minors accompanied by a parent or guardian to be in the licensed area of the Establishment as set out on the LCLB Official Plan of the Establishment (Exhibit 1 tab 10) and that it was in this area that Minor Agent #105 was served liquor. She also noted that the Licence (Exhibit 1 tab 9) references the Terms and Conditions Handbook (Exhibit 1 tab 11) which includes the prohibition against serving liquor to minors and the requirement to ask for two pieces of identification.

Inspector A confirmed that there was no compliance history in the Branch records with respect to the Establishment (Exhibit 1 tab 13) and noted that Inspector C had discussed MAP with the management of the Establishment on May 20, 2017.

She further confirmed a copy of her notes (Exhibit 1 tab 2), a copy of the notes of Inspector B (Exhibit 1 tab 3), and a copy of the notes of Inspector C (Exhibit 1 tab 4), together with the Minor Agent Observation Form (Exhibit 1 tab 5) and the Minor Agent Statement (Exhibit 1 tab 6). Finally, she confirmed a copy of the Contravention Notice #B020422 (Exhibit 1 tab 8).

Inspector A testified that the Branch was recommending a minimum penalty of either a fine of \$7,500 or a 10 day license suspension.

EVIDENCE—LICENSEE

The Licensee's Representative

The Licensee's Representative testified that the Establishment has been in business since 1978, that in all its long business history there have been no prior contraventions of the Act or the Regulation. He noted that the Establishment's staff are all well experienced in the hospitality industry and that the Establishment's managers have been employed as managers for over 20 years.

The Licensee's Representative confirmed the Licensee's position that it did not dispute that the contravention as alleged by the Branch had occurred. However, he noted, since the contravention he together with the managers of the Establishment have attended the educational session put on by the Branch to make licensees aware of their obligations under the Act and the Regulation.

The Establishment, he emphasized, takes very seriously its obligations in the serving of liquor. This approach, the Licensee's Representative testified, is evidenced by Exhibit 2. He stated that this exhibit was an example of the voucher which the Establishment's staff put on the vehicle of a patron who had consumed too much liquor and had left his or her vehicle in the Establishment's parking lot to take a cab home. The voucher entitled the owner of the vehicle to have a free coffee at the Licensee's sister establishment when he or she returned to retrieve the vehicle the next morning.

The Licensee's Representative next addressed Exhibit 3 which he testified was a copy of minutes of a staff meeting of the Licensee held on October 12, 2017. He noted that these minutes confirmed that the staff meeting dealt with the contravention on July 19, 2017, the requirement of all staff members to ask for 2 pieces of identification from any patron who looks to be under the age of 30, the fact that new signage had been posted in the Establishment, and that the use of a log book had been introduced. This log book, the Licensee's Representative noted, met the Branch's recommendations.

Exhibit 4 he testified was a copy of a sign posted in the Establishment advising patrons that they must be over 19 to purchase liquor and must show 2 pieces of identification. He noted that the sign stipulated that the first piece of identification must be government issued and must include a photo and date of birth and that the second piece of identification must include the patron's name and a signature or picture.

Finally, the Licensee's Representative introduced into evidence Exhibit 5, which, he testified, was a copy of a picture taken on the morning of the hearing showing the Serving It Right certificates held by the staff members of the Establishment, all of which had been posted on the wall of the Establishment.

The Licensee's Representative confirmed the Licensee's commitment to follow the Act, the Regulation and the terms of the Licence in its service of alcohol and noted that when Inspector C had conducted an inspection of the Establishment in 2016, the inspector was quite complimentary towards the Establishment's management and staff with respect to their compliance in this respect.

Catering Manager

The Catering Manager testified that she had been catering manager at the Establishment for 2 years. Her responsibilities include the selection and hiring of employees, staff scheduling, and the maintenance of the log book introduced after the staff meeting on October 12, 2017. It is, as well, her responsibility for the signage and posters in the Establishment and for producing flyers for events held at it. She confirmed that Exhibit 4 was an example of her work.

When questioned, she agreed that the year of birth for a patron who was 19 years of age in 2018 had to be 1999, and not the year 1998 as was stated in Exhibit 4. She also confirmed that there was no signage similar to Exhibit 4 present in the Establishment on the date of the contravention.

The Catering Manager testified that the introduction of the vouchers for the patrons who leave behind their vehicles and get a ride home, as exemplified by Exhibit 2, was her idea. She also confirmed that she took the picture resulting in Exhibit 5.

The Catering Manager further testified that she was constantly reminding the staff of the Establishment that they had to ask any patron who looked to be under the age of 30 for two pieces of identification.

She stated that there was not a large staff turnover at the Establishment and that with a new hire, any training was done by the existing bar tenders and servers. She confirmed that once the initial training had taken place, that there was no ongoing testing of employees to ensure that they were fully aware of their compliance obligations.

Night Manager

The Night Manager testified that he had been working for the Establishment for 20 years. Part of his responsibilities included the training of servers and bar tenders. As part of this training, he stated, he has a one page written list of items for new hires to take away and study. He is constantly upgrading this list, but, upon questioning, he confirmed that there is no collection of written policies of the Establishment to make available to these new staff members.

He testified that there is not a lot of staff turnover for bar tenders and servers, so that he was not often called upon for the training of new hires. When questioned, he confirmed that he does not conduct written tests of staff members to ensure their comprehension with the Establishment's policies.

The Night Manager confirmed that other than the 2 annual staff meetings, there were no regular staff meetings or formal pre-shift meetings for bar staff. Rather for bar staff, as he is working from behind the bar, the Night Manager testified that he can verbally identify to people what needs to be done as the evening progresses.

He testified that prior to the October 12, 2017 staff meeting there was no log book in the Establishment. He agreed upon questioning that following the introduction of the use of this log book, that there had not been any staff training as to how to make a report in the log book when there was a minor found to be improperly in the Establishment.

He stated that prior to October 12, 2017 there was an incident book in which any incidents which occurred were recorded. He confirmed that this incident book was in existence at the time of the contravention, but that he had not brought a copy of it to provide as evidence at the hearing.

Day Manager

The Day Manager testified that she had worked in the hospitality industry for 27 years, 22 of these as a bar tender. When she was told by the Catering Manager that she had served a minor and that the Contravention Notice had been issued she was horrified and realized that she had made a serious error and a bad judgment call.

She confirmed that no disciplinary action had been taken against her and that she had apologized for making the mistake. She stated that following the contravention on July 19, 2017, she and the rest of the staff at the Establishment were extremely diligent to ensure that they asked any patron who appeared to be under 30 years old for 2 pieces of identification.

The Day Manager testified that although there have not been a lot of new servers joining the Establishment's staff during the last few years, for those new staff members she makes a point of telling them that they have to be much more careful than she was. Upon questioning, she confirmed that there were no written policies or manuals for the Establishment staff, only the Serving It Right material. She also confirmed that there was no ongoing retraining of staff, no written tests, and no any pre-shift staff meetings.

SUBMISSIONS – BRANCH

The Branch submitted that the fact that a very experienced staff member of the Establishment made an error of judgment and on July 19, 2017 served liquor to Minor Agent #105 suggested very strongly that there was no proper training of staff of the Establishment.

In addition the Branch pointed out, there did not appear to be sufficient attention to detail within the culture of the Licensee to ensure compliance. This was demonstrated by Exhibit 4 which was presented by the Licensee as an example of its ongoing efforts to ensure compliance, but which contained the wrong date.

The Branch noted that the other example put forward by the Licensee in the form of Exhibit 2 as an example of its compliance culture, while it might encourage impaired patrons not to drive, it was irrelevant to the issue of whether or not the Establishment had a culture of compliance with respect to the prohibition against serving alcohol to a minor.

The Branch noted that Exhibit 3 comprised minutes of a staff meeting held almost three months after the contravention on July 19, 2017. In addition, this meeting was a semi-annual meeting of staff and would not appear to meet with the demonstration of an effort to ensure staff awareness of an obligation for strict compliance with the Act, the Regulation and the Licence as regular, more formal staff meetings might evidence.

With respect to the use of a log, the Branch submitted, it did not appear to have been introduced until after the contravention and, even then, there was no evidence that there was staff training as to how to properly record an event in the log.

The Branch submitted that there was no evidence of formal training of new employees or retraining of existing employees, including reference as to what a staff member was to do if there was a minor seeking the service of liquor in the licensed area of the Establishment.

It appeared, the Branch submitted, that the Licensee had failed to demonstrate that a culture of compliance existed with its staff both before and after the contravention on July 19, 2017, and that, therefore, the Licensee had not demonstrated a due diligence defence and should be liable for the suspension or penalty as recommended by the Branch.

SUBMISSIONS – LICENSEE

The Licensee acknowledged that on July 19, 2017 the Day Manager sold liquor to Minor Agent #105 as alleged in the NOEA. However, the Licensee submitted that it had established that the defence of due diligence applied.

REASONS AND DECISION

Contravention

The Licensee has admitted that on July 19, 2017, as alleged in the NOEA, liquor was sold to Minor Agent #105 by the Day Manager, one of its employees, in contravention of section 77(1)(a) of the Act.

To address the Licensee's submissions on the defence of due diligence.

Due Diligence

As the Day Manager sold liquor to Minor Agent #105 in contravention of section 77(1)(a) of the Act, the Licensee is liable unless it can demonstrate that it was duly diligent in taking reasonable steps to prevent the contravention from occurring. The onus falls on the Licensee to demonstrate on a balance of probabilities this due diligence and, in doing so, the Licensee must not only clearly demonstrate that it has established procedures to identify and prevent from happening activities that might lead to this contravention of the Act, it must also clearly demonstrate that it continues to ensure that such procedures are consistently in operation and acted upon by its employees.

The leading case is: *R v. Sault Ste. Marie* (1979) 2 SCR 1299, where at page 1331, Dickson, J. sets out the test of due diligence:

One comment on the defence of reasonable care in this context should be added. Since the issue is whether the defendant is guilty of an offence, the doctrine of respondeat superior has no application. The due diligence which must be established is that of the accused alone. Where an employer is charged in respect of an act committed by an employee acting in the course of employment, the question will be whether the act took place without the accused's direction or approval, thus negating wilful involvement of the accused, and whether the

accused exercised all reasonable care by establishing a proper system to prevent commission of the offence and by taking reasonable steps to ensure the effective operation of the system. The availability of the defence to a corporation will depend on whether such due diligence was taken by those who are the directing mind and will of the corporation, whose acts are therefore in law the acts of the corporation itself.

The BC Supreme Court, in *Beverly Corners Liquor Store Ltd. v. British Columbia (Liquor Control and Licensing Branch)*, 2012 BCSC 1851, considered and clarified the application of the defence of due diligence in the context of the sale of liquor to a minor contrary to the Act (see paragraphs 41 to 44).

The Court states that the defence of due diligence is to be considered in two stages:

1. Whether the employee who sold liquor to the minor was a directing mind of the Licensee – if so, the defence of due diligence is not available and the inquiry stops there.
2. If the employee who took such action or failed to take such action was not a directing mind of the Licensee (and there is no requirement that a “directing mind” must be on the premises when the contravention occurs), then the questions to be considered and answered are whether the Licensee had:
 - a. implemented adequate training and other systems to prevent the contravention (the sale of liquor to minors); and,
 - b. taken reasonable steps to ensure the effective application of that education and the operation of those systems.

Both of these issues are factual, and will depend upon the evidence presented. In summary, *Beverly Corners* provides that the onus is on the Licensee to establish on a balance of probabilities that it had exercised all reasonable care by establishing adequate training and other systems and ensuring effective application of them.

Directing Mind

The Licensee's "directing mind" is someone who can design and supervise the policies of the Licensee rather than an employee who carries out these policies.

The evidence before me suggests that the Licensee's Representative would be considered to be the directing mind of the Licensee on July 19, 2017, and I so find. As the Licensee's Representative was not in the Establishment when the contravention occurred, I find that the Licensee's directing mind did not sell liquor to Minor Agent #105 and move to the second part of the analysis as set out in *Beverly Corners*.

Implementation of Adequate Training and Systems and Effective Application and Operation of these Systems

The onus is on the Licensee to prove on the evidence before me that it has met the test for due diligence and can demonstrate that it has implemented adequate training and other systems and has taken reasonable steps to ensure the application of this training and the operation of its systems in a consistent and effective manner.

Therefore, in addition to evidence of a reasonably rigorous initial training environment, the Licensee must provide evidence of ongoing reinforcement of this training and culture which should most likely include the following:

1. A minimum age policy which required any customer under a certain age to be asked for identification
2. Appropriate signage;
3. Appropriate training manuals including current best practices;
4. An incident log book utilized and regularly reviewed;
5. Regular staff meetings at which compliance matters are stressed; and
6. Written quizzes for the employees testing them for an understanding of the Act, the Regulation and Terms and Conditions Handbook.

I find that the Licensee has not met the test of proving the defence of due diligence on a balance of probabilities.

In his testimony before me, it was quite obvious that the Licensee's Representative was anxious to ensure that the Licensee and its staff were compliant in every respect with the Act, the Regulation, the Licence and the Terms and Conditions Handbook. Indeed, I have no doubt that the Licensee's Representative will continue in his efforts to follow on with the initiatives referenced in the meeting of the Licensee's staff on October 12, 2017. I would hope that these ongoing efforts would include a more detailed observation of the six items above listed to assist him in achieving the culture of compliance that he appears to seek to attain.

However, for the purpose of determining the Licensee's liability for the contravention admitted to and for the purpose determining whether or not the defence of due diligence applies, it is the culture of compliance at the date of the contravention and not the follow up efforts, no matter how laudatory, which determine the Licensee's liability. And to establish this defence, intentions alone are insufficient. There must be a clear demonstration of activities in the form of communication, training and enforcement that satisfies the onus placed on a licensee. In the matter before me, I find that the Licensee has not satisfied this onus.

Having denied the Licensee's claim of a defence of due diligence, I therefore find that on July 19, 2017 the Licensee contravened section 77(1)(a) of the Act, by selling, giving or otherwise supplying liquor to a minor.

PENALTY

Pursuant to section 51(2)(b) of the Act, having found that the Licensee has contravened the Act, the Regulation and/or the terms and conditions of the Licence, I may do one or more of the following:

- Take no enforcement action
- Impose terms and conditions on the Licence or rescind or amend existing terms and conditions
- Impose a monetary penalty on the Licensee
- Suspend all or any part of the Licence
- Cancel all or any part of the Licence
- Order the Licensee to transfer the Licence

I am not bound to order the penalty proposed in the NOEA. However, if I find that either a Licence suspension or a monetary penalty is warranted, I am bound to follow the minimums set out in Schedule 2 of the Regulation. I am not bound by the maximums and may impose higher penalties when it is in the public interest to do so.

As there is no record of a proven contravention of the same type as dealt with here for the Licensee within the preceding 12 months of this incident, I find this to be a first contravention for the purposes of Schedule 2 and calculating a penalty. As noted above, Item 3 in Schedule 2 provides a range of penalties for a first contravention of this type to be a 10 to 15 day suspension of the Licence and/or a \$7,500 to \$10,000 monetary penalty.

The Branch has recommended either a 10 day suspension of the Licence or a monetary fine of \$7,500. The Licensee has requested that if a penalty is to be imposed that it be a monetary fine.

The factors that I have considered in determining the appropriate penalty in this matter include:

- whether there is a proven compliance history;
- a past history of warnings by the Branch;
- the seriousness of the contraventions;
- the threat to the public safety; and
- the well-being of the community.

As the matter involves the sale of liquor to a minor, the most important of these factors is the public safety issue because of:

- The effects of alcohol on growing bodies and developing minds;
- The effects on individuals and society of irresponsible drinking behavior learned at an early age;
- A minor's lack of capacity to metabolize alcohol in the same manner as an adult with the result being a more intoxicating effect on minors; and
- The fact that liquor is a significant factor in many crimes committed by youth, including serious driving offences, assault, sexual assault and theft.

I find that the Branch's recommended monetary fine of \$7,500 is appropriate in the matter at hand.

ORDER

Pursuant to section 51(2)(b) of the Act, I order that the Licensee pay a monetary penalty of \$7,500 to the General Manager of the Branch on or before **March 16, 2018**.

Signs satisfactory to the General Manager notifying the public that such monetary penalty has been imposed will be placed in a prominent location in the Establishment by a Branch inspector or a police officer, and must remain in place during the period of suspension

Original signed by

R. John Rogers
General Manager's Delegate

Date: February 13, 2018

cc: Liquor Control and Licensing Branch, Victoria Regional Office
Attn: Stephen Hitchcock, Regional Manager

Liquor Control and Licensing Branch, Vancouver Regional Office
Attn: Maria Caduhada, Branch Advocate