



**DECISION OF THE
GENERAL MANAGER
LIQUOR AND CANNABIS REGULATION 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:	0731380 B.C. Ltd. dba Kitimat Hotel 506 Enterprise Avenue Kitimat, BC V8C 2E2
Case:	EH19-023
For the Licensee:	Susan Jiang
For the Branch:	Andeep Kang
General Manager's Delegate:	Paul Devine
Date of Hearing:	November 13, 2019
Date of Decision:	December 9, 2019

**Liquor and Cannabis
Regulation Branch**

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INTRODUCTION

The Licensee 073180 B.C. Ltd. operates a liquor primary business known as Kitimat Night Club, located at Enterprise Avenue in Kitimat, B.C. (the "Licensee"), under Liquor Primary Licence No. 005538 (the "Licence"). The Kitimat Night Club is located at 506 Enterprise Avenue in Kitimat, BC. Under the terms of the Licence, the establishment is authorized to sell liquor from Noon to 2:00 a.m. Monday to Wednesday, from Noon to 4:00 a.m. Thursday to Saturday, and 11:00 a.m. to 2:00 a.m. on Sunday.

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").

Ms. Susan Jiang is a principal of the Licensee and appeared as the Licensee's representative during the course of the hearing.

ALLEGED CONTRAVENTION AND PROPOSED PENALTY

The allegations of the Branch are contained in a Notice of Enforcement Action letter dated June 5, 2019, (the "NOEA"). The Branch alleged that a covert inspection of the premises of the Licensee was conducted on February 17, 2019. Two liquor inspectors entered the premises at approximately 2:15 a.m. A female door person was seen outside the entrance to the premises. Ms. Jiang was observed behind the bar as a server. A male person acting as a DJ was also observed.

The liquor inspectors conducted their inspection inside the premises for about one hour. Both of the liquor inspectors observed a young female who had difficulty standing and was seen stumbling and falling into people on the dance floor. On closer inspection, her eyes were half-closed and her speech was very slurred. She was observed to be drinking a can of Palm Bay by one of the inspectors. The patron fell into the other patrons on the dance floor and was observed to exhibit slurred speech, closed eyes, and emanating a strong odour of alcohol. During the observation periods, there was an opportunity for staff including the Licensee's representative to remove the patron from the premises.

The Branch concluded that the conduct which was observed constituted a breach of section 61(2)(b)(ii) of the *Act* (allowing an intoxicated person to enter or remain in a service area.) A licensee must not permit an intoxicated person to remain in the service area as it comprises a risk to the safety of the patron and to other patrons in the establishment. Further, there was an opportunity for the staff of the Licensee including the representative of the Licensee to identify and assess the patron for intoxication and to have her removed. A monetary penalty of \$5000.00 was proposed. This amount falls within Item 9 of then Schedule 2 of the *Liquor Control and Licensing Regulation*, B.C. Reg. 241/2016 for a first contravention.

The Licensee disputes the allegation that the patron in question was intoxicated at the time the observations were made by the liquor inspectors.

RELEVANT STATUTORY PROVISIONS

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

Conduct at event site or in establishment, service area or liquor store

61(1) In this section:

"**knife**" does not include cutlery provided, for the purpose of food services, by a licensee or permittee or an employee of either;

"**lawful excuse**" does not include possession for self-protection;

"**store manager**" has the same meaning as in the *Liquor Distribution Act*;

"**weapon**" means anything used or intended for use

(a) in causing death or injury to persons, whether designed for that purpose or not, or

(b) for the purpose of threatening or intimidating a person.

(2) A licensee or permittee or an employee of either must not

(a) sell or serve liquor to an intoxicated person or a person showing signs of intoxication, or

(b) allow

(i) a person in a service area to become intoxicated,

(ii) an intoxicated person to enter or remain in a service area,

- (iii) violent, quarrelsome, riotous or disorderly conduct in an establishment or at an event site,
 - (iv) unlawful activities or conduct in an establishment or at an event site, or
 - (v) a person to enter an establishment or an event site or to remain in an establishment or at an event site, if the licensee, permittee or employee knows that the person has, without lawful excuse, a knife or weapon in the person's possession.
- (3) A licensee or permittee or an employee of either may,
- (a) if he or she believes a person is intoxicated,
 - (i) request that the person leave a service area, or
 - (ii) forbid the person from entering a service area, and
 - (b) if he or she believes the presence of a person in an establishment or at an event site is undesirable or that the person has, without lawful excuse, a knife or weapon in the person's possession,
 - (i) request that the person leave the establishment or event site, or
 - (ii) forbid the person from entering the establishment or event site.
- (4) A person must not
- (a) remain in a service area, in an establishment or at an event site after the person is requested to leave in accordance with subsection (3),
 - (b) enter a service area, an establishment or an event site within 24 hours after the time the person was requested to leave the service area, establishment or event site in accordance with subsection (3), or
 - (c) without lawful excuse, the proof of which lies on the person, possess a knife or weapon in a service area, in an establishment or at an event site.
- (5) Subsections (2) to (4) apply in respect of liquor stores, and, for those purposes, a reference in those subsections to
- (a) a licensee or permittee must be read as a reference to a store manager,
 - (b) an employee of either must be read as a reference to an employee of the Liquor Distribution Branch, and
 - (c) an establishment must be read as a reference to a liquor store.
- (6) A peace officer may arrest, without a warrant, a person whom the peace officer believes on reasonable grounds is contravening subsection (4).

Liquor Control and Licensing Regulation, B.C. REG. 241/2016**Table**

9	Contravention of section 61 (2) (b) (ii) of the Act [<i>allowing intoxicated person to enter or remain in service area</i>]	4-7	10-14	18-20	\$5,000-\$7,000
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The *Regulation* has been amended with the new penalty Schedule 2 which came into effect on June 5, 2019. However, for the purpose of the matter at hand, as the alleged contravention occurred prior to the taking effect of the new schedule, the relevant basis for calculating a penalty is the provisions of Schedule 2 as above set out.

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 (CCTV USB TAB 14 Produced Separately)
- Exhibit 2: Serving it Right Program Manual (Extract)
- Exhibit 3: Contravention Notice January 27, 2019
- Exhibit 4: Summary of CCTV Shots
- Exhibit 5: Letter from Witness
- Exhibit 6: Email exchange regarding video clips
- Exhibit 7A: Licensee Bar Staff Rules and Police and Procedures Manual signed September 9, 2019
- Exhibit 7B: Licensee Bar Staff Rules and Police and Procedures Manual signed October 25, 2019

EVIDENCE

BRANCH

Liquor Inspector 1 testified that he joined the Branch after working for several years as a police officer in the RCMP. His duties with the Branch include administrative and public safety inspections of licensed facilities of every type. Covert inspections are included and may include checking to see if there are intoxicated persons on a site operated by a licensee. His police training and training with the Branch has included determining if a person is intoxicated. He looks for multiple factors including unusual behaviour or conduct, whether a person smells of alcohol, their speech is slurred or their eyes are glassy eyes; clothing may be disheveled, and a person may sway on his or her feet as balance is affected; an individual's interactions with others may be unusual, including staggering or spilling beverages.

The Liquor Inspector 1 testified that he issued a Contravention Notice to the Licensee on February 19, 2019. He did not issue the NOEA until June because of revisions that took place as well as reviews which were undertaken by management. The Inspector was part of a team of three liquor inspectors who conducted a covert public safety inspection at the premises of the Licensee early in the morning of February 17, 2019. The team had earlier conducted a covert inspection at one other facility in Terrace.

The Liquor Inspector did not take part in the covert inspection inside the Licensee's facility. His role was to stay outside and to come into the facility if assistance was needed. He kept in touch with the other liquor inspectors by text messaging. He was aware the RCMP had been inside the licensed facility earlier. When he was advised of the incident involving an intoxicated patron, he tried to call the RCMP to return. His call was not answered, and the police did not return during the covert inspection. He issued a Contravention Notice on February 19, 2019 in order to have an opportunity to speak with the Licensee about the issue. When he met with Ms. Jiang, he spoke about the intoxicated patron and about another Contravention Notice which was related to an RCMP-generated complaint. During the meeting, he told Ms. Jiang that he had not decided how to proceed with the intoxicated patron issue at that time. The other Contravention Notice related to a concern raised by the RCMP about someone selling

cocaine in a restroom inside the Licensee's facility. This issue was resolved in a compliance meeting with the Licensee's representative.

Liquor Inspector 2 testified that she has done thousands of administrative and public safety inspections during her career as an inspector with the Branch. Included in these is over one hundred inspections pertaining to the issue of intoxicated patrons inside a licensed facility. Signs of intoxication that may be observed typically include drowsiness, falling asleep, facial flush, hand-eye problems with coordination, difficulty walking, fumbling putting on or removing jackets, problems conversing coherently, and smelling of liquor.

On the evening of February 16th and morning of the 17th, she and another liquor inspector were conducting covert inspections inside licensed facilities in the Kitimat area. Liquor Inspector 1 remained outside during these inspections. One inspection had already been completed when the two inspectors entered the Licensee's facility. Ms. Jiang was behind the bar at the time. The liquor inspector noticed what appeared to be a DJ at the bar and another employee walking around inside the licensed area.

The two liquor inspectors entered the bar at about 2:15 a.m. Once inside, liquor inspector 2 recognized a patron who had been their server at a restaurant on a previous evening. She had been observed working as their server for about two hours. Her speech and base line activities then were fine. She interacted with other patrons and was pleasant throughout. She was next observed during an earlier covert inspection. There she was seen consuming alcohol from a pitcher of beer and drinking shots of liquor at the bar. Her behaviour was a bit obnoxious, and she was hanging onto other patrons. She was told to leave the facility or at least was not allowed to go onto the dance floor. The liquor inspector was not certain that she had been expelled from the facility.

The same individual was seen at Licensee's facility at 2:15 in the morning of February 17, 2019. There were about 40-50 patrons inside, so the facility was not too busy. The patron was on the dance floor about five feet away from the liquor inspector and so was readily observable. She wore pink pants and a hoodie. The patron appeared to be a lot more intoxicated than when she was seen during the previous covert inspection as she

was bumping into and holding onto people on dance floor. Her eyes were half closed and she was annoying and rude to others, who were observed walking away from her. She had a cooler in a can that she tried to drink from when she went off of the dance floor. She was seen speaking to the person who was acting as a DJ. Ms. Jiang also had a view of her from behind the bar.

On reviewing CCTV footage of the patron on that evening, Inspector 2 noted that the patron was seen staggering to the bar to speak with Ms. Jiang. On another camera feed, she leapt onto a male patron who does not engage with her. Her walk was unsteady. On another camera feed, she leapt onto another guest and then climbed onto a chair. Later she tried to lift patron off the ground, following which they both fell down. Then she tried to approach another male patron, but he walked away from her without engaging in discussion. She was recorded with her head on another patron as if she was falling asleep, which the liquor inspector regarded as another sign of intoxication. She was recorded near the door to the licensed facility where she was very unsteady on her feet while smoking inside the building. Next, while walking, she bumped into a door frame and fell backwards. In the last video, she was recorded leaving the Licensee's facility. As she left, she bumped into the door before opening it. The liquor inspector testified that the videos confirmed her own observations that the patron was intoxicated.

Liquor Inspector 3 testified that there is a large service area inside the licensed facility, so it was not crowded. The lighting was good, and she observed Ms. Jiang behind the bar. She spoke to a person at the bar who had a laptop that he was using to change the music playing inside the facility. He said he was a DJ. She also saw the female patron who had previously been their server at a restaurant. She had also been seen at the site of a covert inspection that had been conducted earlier.

The two inspectors remained at the Licensee's facility for almost two hours. During that time, the patron was seen swaying. She was caught by other patrons to prevent her from falling over. Her eyes opened and closed as she spoke. The patron had a Palm Bay cooler in her hands at all times, although she did not see the patron purchase it.

Liquor Inspector 3 testified that as a result of her observations, she concluded the patron was intoxicated and was being allowed to remain inside the Licensee's facility. The two inspectors left the facility at about 4 a.m. Since they were conducting a covert inspection, they did not tell Licensee to remove the patron. The video evidence confirmed their mutual observation that the female patron was intoxicated. As such, the allegations in the NOEA were accurate.

In cross examination, Liquor Inspector 3 testified the patron was close enough to stumble into her. Unlike the night in the restaurant, her speech was affected. The patron tried to speak to her, but her speech was incoherent.

LICENSEE

The Licensee testified that she knows the patron well, she is a regular. The patron is a hyper person and is quirky. She can also be serious like she was when seen on one of the CCTV cameras at about 1:15 a.m. as she entered the facility. Ms. Jiang testified that she spoke to the patron for about twenty minutes in front of bar. Later the videos show that she was dancing while three RCMP officers were in the bar. They did not appear concerned about her behaviour.

Ms. Jiang testified that she was upset about the length of time taken by the Branch to issue a NOEA. She met with Liquor Inspector 1 on February 19th and then on March 1st to provide the video evidence for the morning of February 17. After these meetings, she did not receive the NOEA until June. This made it very hard to find witnesses who remembered the events on the day in question.

Ms. Jiang observed that many patrons drink at home or elsewhere before coming to her facility because it is open late. It is often not busy until after 2 a.m. There is a door person who will not let anyone in who is intoxicated. Patrons may not, however, appear to be intoxicated when they arrive. If they show signs of intoxication after arriving, they are told to leave. There is a free ride system in place to take them home.

Ms. Jiang stated that the patron in question is a regular. She may appear to be staggering and not walking properly but she does this on purpose. She pretends to be stupid, but she appeared to be walking fine on the last video after she left the licensed facility with her friend. They are seen on camera going into a taxi. The patron provided a letter (Exhibit 5) but told Ms. Jiang she would not come to testify because of the time that had transpired since the day in question. She could no longer remember the events of the day that was of interest to the Branch. The letter seems to indicate she drank a can (a substance is not identified) before dancing. The amount she drank is not clearly stated.

Ms. Jiang testified that she has recently developed written policies for staff (Exhibits 7a and 7b). The policies are reviewed and signed by employees to confirm that they were read. The Policies contain information about assessing patrons for intoxication. As well, two additional staff persons have been hired. In February it was just Ms. Jiang and the door person. Ms. Jiang has a security licence and a Serving It Right certification. She is the main person involved in assessing patrons for intoxication. She testified that the rest of their staff know how to do this too because they have been in the liquor primary business before. As well, she has to watch for drug dealers and underage patrons. If she sees someone who is intoxicated, she tells them to go home.

Ms. Jiang keeps a log book but it is mainly for insurance purposes. If police are called for example, she will make a note in the log book. Staff meetings are conducted informally on Fridays. The door person checks for underage patrons and also keeps people from taking drinks outside. She may monitor patrons by going around to clean tables. On the early morning in February, there was no one working as a DJ, but patrons select and play music from the laptop. The patron ordered only one drink, although someone else may have given her shooters. She appeared to be fine when Ms. Jiang spoke to her for about twenty minutes after she entered the facility at about 1:15 a.m. She did tell Ms. Jiang that she had been at another bar. Later Ms. Jiang observed her on the dance floor and speaking to the police. Because she did not come to the bar to order drinks, Ms. Jiang did not check on her further. Otherwise her behaviour on the videos was typical

SUBMISSIONS - BRANCH

The Branch submits the video evidence and the oral testimony taken together show on the balance of probabilities that an intoxicated person was on the premises of the Licensee on the morning in question. The observation by the inspectors was over two hours, so they had enough time to conclude the patron was intoxicated. They had also observed her base line behaviour, so could tell there was a difference on the early morning in question. Her behaviour created safety issues and made people uncomfortable. She stated that she had been at a bar earlier, so she should have been observed more closely. There is a lack of logs or other evidence to establish due diligence. There were insufficient staff on duty to monitor all off the patrons and to perform routine duties. The overwhelming evidence shows that the Licensee allowed an intoxicated person to remain on its premises.

SUBMISSIONS- LICENSEE

Ms. Jiang submits that she is being asked to be able to judge how many drinks the patron had at another bar. She said she had been at home to sober up and did not order drinks at the Licensee's facility. She could not consume enough there to become intoxicated. As well, the RCMP had been inside the facility and did not do anything about the patron. Moreover, the late date of the NOEA made it difficult to obtain evidence.

Ms. Jiang submitted that if the contravention is upheld, the Licensee would prefer a licence suspension.

REASONS AND DECISION

Contravention

The Licensee disputes the conclusion of the liquor inspectors that the patron was intoxicated. She points to a CCTV feed where the patron was talking to Ms. Jiang and appeared to be coherent. As well, footage taken when the patron left shows her walking without staggering.

As Ms. Jiang acknowledged, the patron in question advised her that she had been drinking at another bar earlier. As well, she was unaware if other patrons had been buying her shots of liquor. In addition, two experienced liquor inspectors both came to the conclusion that the patron was intoxicated. The patron was first observed by them inside the licensed facility after she had been there for about one hour. The inspectors had an unusual opportunity to observe the patron when she was sober. In this, her base line behaviour was assessed. As well, the patron was seen previously at another licensed facility. While there, she seemed to be intoxicated and her access to the dance floor was barred. On this observation, she appeared to be less intoxicated than when she was at the Licensee's facility. The CCTV evidence taken as a whole corroborates the conclusion of the inspectors that the patron was intoxicated. Even if the patron is quirky, her gait was affected. In one video feed, she struck the door frame of the outside door and rolled off of it in a staggering motion. Following this, she nearly fell down onto the floor. While the RCMP were inside the licensed facility for a time, they did not remain there. The patron was seen for almost two hours and her behaviour including incoherent speech and half-closed eyes was readily observed by the two liquor inspectors who were conducting the covert inspection.

I am satisfied that the balance of the evidence supports the conclusion of the Branch that the patron in question was intoxicated inside the facility of the Licensee on the morning of February 17, 2019. Further, Ms. Jiang had every opportunity to assess the patron's behaviour but did not realize that she was intoxicated. Therefore, I conclude that the Licensee allowed an intoxicated patron to remain the premises as alleged in the NOEA.

Due Diligence

The Licensee is entitled to a defence if it can be shown that it was duly diligent in taking reasonable steps to prevent the contravention from occurring. The licensee must not only establish procedures to identify and deal with problems, it must ensure that those procedures are consistently acted upon and problems are dealt with.

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:

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, recently 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 *Liquor Control and Licensing Act* (see paragraphs 41 to 44).

In these circumstances, the defence of due diligence is to be considered in two stages:

1. Whether the employee who made the sale 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 made the sale was not a directing mind of the licensee (and there is no requirement that a “directing mind” must be on the premises when the sale is made), 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 on the evidence presented. The onus is on a 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.

In this case, the evidence establishes that the person who was mainly responsible for assessing the sobriety of the patron in question was Ms. Jiang. She was working behind the bar on the morning of February 17th and was in a position to observe the sobriety of the patrons who were inside the facility. The facility was not crowded, and the lighting was good, so her observations were not impaired. She knew that the patron had been drinking prior to entering the bar but took no action to observe her behaviour. Even if the patron's behaviour is quirky, her level of sobriety needs to be assessed. While the Licensee now has policies in place which include instructions on assessing patrons for intoxication, they were not in effect on the day of the covert inspection. Ms. Jiang did not appear to apply a coherent policy for assessing sobriety other than her reliance on the door person to screen incoming patrons. She has a responsibility to continue to assess her patrons throughout their stay inside the licensed facility. Moreover, Ms. Jiang is described in the Legal Entity Summary (Exhibit 1 Tab 7) as an owner of the licensed facility. As such, she would be a "directing mind" of the licensee and the defence of due diligence is not available.

PENALTY

Pursuant to section 51(2) of the *Act*, having found that the licensee has contravened the *Act*, the Regulations 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 Notice of Enforcement Action. 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.

The factors that I have considered in determining the appropriate penalty in this case include: whether there is a proven compliance history; a past history of warnings by the Branch and/or the police; the seriousness of the contravention; the threat to the public safety; and the well-being of the community.

Licensees are obliged to comply with the legislation and the terms and conditions of their licenses. Enforcement action is intended to both redress the licensee's non-compliance, and to encourage future compliance by way of deterrence. There is no record of a proven contravention of the same type for this Licensee at this establishment within the preceding twelve months of this incident. The Contravention in the NOEA was treated as a first contravention for the purposes of the penalties set out Schedule 2. and calculating a penalty. Item 9 in Schedule 2 provides a range of penalties for a contravention of this type consisting of a \$5000 - \$7000 monetary penalty or a 4 to 7-day licence suspension. There was no reasoning in the NOEA as to why a monetary penalty was selected instead of a licence suspension other than a finding that staff and the owner were present to remove the intoxicated patron.

I share some of the concerns raised by the Licensee as to the long delay in issuing a NOEA in this case. The reasons offered for the delay (obtaining supervisory approval) do not adequately explain a delay of almost four months. The lengthy delay appears to have had a deleterious effect on the Licensee's ability to obtain evidence about the events on the night in question. On the other hand, there was an early meeting with a liquor inspector in which Ms. Jiang was advised that a decision had not been made as to whether further action would be taken.

On balance, I conclude that penalty action is appropriate. The contravention constitutes a public safety issue affecting both the patron in question and other members of the public. I therefore direct that the Licence of the Licensee be suspended for a period of five (5) days.

ORDER

Pursuant to section 51(2)(c) of the *Act*, I order a suspension of Liquor Primary Licence No. 005538 for a period of five (5) days to commence at the close of business on Friday, January 10, 2020 and to continue each succeeding business day until the suspension is completed.

To ensure this order is effective, I direct that the Liquor Licence be held by the Branch or the Kitimat RCMP from the close of business on Friday, January 10, 2020 until the Licensee has demonstrated to the Branch's satisfaction that the suspension has been served.

Signs satisfactory to the general manager notifying the public that the Licence is suspended 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

A. Paul Devine
General Manager's Delegate

Date: December 9, 2019

cc: Liquor and Cannabis Regulation Branch, Kelowna Office
Attn: Kurt Lozinski, Regional Manager

Liquor and Cannabis Regulation Branch, Vancouver Office
Attn: Andeep Kang, Branch Advocate