



**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: 0926770 B.C. Ltd.
dba North Shore Liquor Shop (Lynn Valley)
1262 Lynn Valley Road
North Vancouver, BC V7J 2A3

Case #: EH19-044

For the Licensee: Imroz Rupani

For the Branch: Andeep Kang

General Manager's Delegate: Paul Devine

Date of Hearing: October 16, 2019

Date of Decision: November 4, 2019

**Liquor and Cannabis
Regulation Branch**

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INTRODUCTION

The Licensee 0926770 B.C. Ltd. operates a licensed retail store known as the North Shore Liquor Shop (Lynn Valley). The licensed facility is located at 1262 Lynn Valley Road in North Vancouver BC. Under the terms of Licence No. 195304, the facility is licenced to sell liquor to the public from 9 a.m. to 11 p.m., Monday to Sunday inclusive.

Mr. I. Rupani is a principal of the Licensee and appeared as its representative during the course of the hearing.

The licence is, as are all liquor licences issued in the province, subject to the terms and conditions contained in the publication "Licensee Retail Store Terms and Conditions" (the "Terms and Conditions Handbook").

ALLEGED CONTRAVENTION AND PROPOSED PENALTY

The allegations of the branch are contained in a Notice of Enforcement Action dated May 7, 2019 (the "NOEA"). The branch alleges that a Minors as Agents ("MAP") inspection was conducted in the North Vancouver region on March 22, 2019. During this type of inspection, the branch utilizes minors aged 16 to 18 years of age to conduct compliance inspections to ensure that licensees did not engage in selling liquor to persons under the age of 19. The MAP program has been utilized by the branch since 2011.

In the NOEA, the branch alleges that a minor person described as Minor Agent #118 was utilized for the inspections that took place on March 22, 2019. It was confirmed that the individual was a minor before the inspections were undertaken. At 1:16 PM on March 22, 2019, two liquor inspectors for the branch entered the premises of the Licensee. Once inside, they were greeted by a female staff member for the Licensee who was standing by the cash register. The liquor inspectors were followed inside by the Minor Agent who entered the premises and proceeded to the beer cooler at the rear of the establishment. There he selected a six pack of beer and then proceeded to the cashier area. The product was scanned, and the Minor Agent paid for it with a \$20 bill. Once he received change, he left the store with the beer. The Minor Agent was not asked for ID by the Licensee's cashier.

After the Minor Agent exited the store, the liquor inspectors advised the cashier that she had just sold liquor to a minor. The cashier provided her name and her Serving It Right certification number. The liquor inspectors obtained a receipt for the beer sale and left the premises. They returned later to deliver a Contravention Notice and were greeted by Mr. Rupani who said he was the owner of the establishment. As well, Mr. MS was present. He advised that he was the Manager of the store. They informed the inspectors that they were aware of the incident and had confirmed it by viewing CCTV footage. They advised that the clerk who had sold beer to the minor had been terminated and sent home. A copy of the Contravention Notice was left with Mr. Rupani.

Given the seriousness of selling liquor to minors as a public safety issue, enforcement action was proposed. In the NOEA, either a 10-day licence suspension or a \$7500 monetary penalty were proposed. The penalty range for this kind of contravention in Schedule 4 of the applicable Regulation is a \$7500-\$10,000 monetary penalty or a 10 to 15-day licence suspension.

The Licensee does not dispute the alleged contravention and instead seeks to advance a defence of due diligence.

RELEVANT STATUTORY PROVISIONS

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 (as in force at the time of the alleged contravention):

Monetary Penalties and Licence Suspensions

Table

Item	Contravention	Period of Suspension (Days)			Monetary Penalty
		First Contravention	Second Contravention	Subsequent Contraventions	
Minors					
3	A breach of section 77 of the Act [supplying liquor to minors]	10 - 15	20 - 30	30 - 60	\$7500 – \$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
- Exhibit 2: Email dated May 7, 2019 re: prior MAP inspection on October 7, 2013
- Exhibit 3: Envelope of pictures from inside licensed facility
- Exhibit 4: Document "Policy on Minors and ID" 2019
- Exhibit 5a: Sting Investigations Report May 7, 2019
- Exhibit 5b: Sting Investigations Report September 9, 2019
- Exhibit 6: Procedure and Training Manual (undated)
- Exhibit 7: Document "Operational Indicators" 2016-2019
- Exhibit 8: Employee Warning Notice January 18, 2019
- Exhibit 9: Employee Payroll Record
- Exhibit 10: Incident Report Documents #646 - #749
- Exhibit 11: Daily Communication Log Entries January 1 – September 19, 2019
- Exhibit 12: Record of Employee Schedules May 2019

EVIDENCE – BRANCH

The branch called two of the liquor inspectors who were involved in the MAP inspection on March 22, 2019. Inspector 1 testified that licensee retail stores in this province are governed by the provisions of the Terms and Conditions Handbook. One of these conditions provides that minors are allowed in a licensee retail store if accompanied by a parent or guardian. Minors may not be employed to work in the store. Further, it is against the law to provide liquor to a minor. The licensee must ensure that minors are not serve liquor. If there is any doubt about the age of a customer, it is to be verified by asking for two pieces of ID. Inspector 1 testified that she entered the premises of the Licensee in the company of another liquor inspector. Minor Agent #118 came in shortly afterwards and proceeded to the cooler to select a six pack of beer. He took this to the cashier and paid for the beer after it was scanned. After this, he left the store. There were no other customers in the store at the time. The Inspector noticed there was a sign at the cash register stating that two pieces of ID were required to establish age. After the incident, Inspector 1 prepared the NOEA dated May 7, 2019. Since there was no history of non-compliance by the Licensee, the minimum penalties in the applicable Schedule were recommended.

In cross-examination, the Inspector acknowledged there had been a prior MAP inspection of the licensed facility in 2013 at which time it was compliant. She recalled that the cashier who was involved in the current MAP incident told her she had thought about checking the ID of the Minor Agent but did not do so.

Inspector 2 testified that prior to the MAP inspections, he confirmed that the Minor Agent was under 19 years of age. He reminded the Minor Agent not to lie about his age. If liquor was sold to him, he was to proceed outside of the store where the sale was made and to meet with the inspectors. Pictures of the Minor Agent were taken before and after the inspection to show that there were no changes in his appearance. Inspector 2 confirmed the previous evidence about the events which occurred inside the store of the Licensee. He identified the Observation Form that was completed by the Minor Agent after the inspection including a description of the events that had taken place inside.

EVIDENCE – LICENSEE

Mr. Rupani was the first of three witnesses to testify on behalf of the Licensee. He stated that the Licensee has been in business since 2004. The business was purchased by Mr. Rupani's group in 2012. He began working in the store as a manager. While there was experienced management already in the store, it was his first experience in a business involving the sale of liquor. The policy of the store at the time it was purchased was to check for ID from any customer that appeared to be under the age of 25.

Mr. Rupani testified that he attended a seminar in 2012 dealing with the issue of selling liquor to minors. Best practices to avoid this occurrence were discussed. Afterwards, he introduced and implemented policies in the store concerning the identification of minors attempting to buy liquor. One of these was to increase the age where identification was to be checked from age 25 to age 30. A procedure and training manual was introduced for the training of employees. An incident log report book was implemented so that store clerks could record sales where ID was refused or where service was refused for reasons such as the intoxication of customers. The incident logs are evaluated by management each week. Staff are also provided with aids for the assessment of the age of customers with different ethnic backgrounds.

Mr. Rupani testified that liquor service has been refused for several reasons over 800 times since the business was acquired in 2012. As well, staff pay is aligned with performing appropriate operational indicators. These include maintaining store cleanliness, checking for ID, and completing the incident report book logs. Several examples of this document were provided in Exhibit 10.

Since the MAP incident, the Licensee has adopted further policies including a secret shopper service which is performed by security company. Mr. Rupani submitted two inspection reports (Exhibits 5a and 5b) by the secret shopper which were both compliant in respect of asking for ID from purchasers who appeared to be youthful. Mr. Rupani testified that a second retail liquor store located in Sapperton was acquired by his group in 2014 and the same policies apply there. No contraventions have been noted in the store since it was purchased.

In cross-examination, Mr. Rupani advised that staff training is performed by the current manager in the store. When Mr. Rupani is in the store, he asks staff about the policies such as asking for ID. As well, he looks at the incident logbook to make sure that staff are making appropriate entries. He uses a document titled "Operational Indicators" to assess various aspects of staff performance including store cleanliness, security, maintenance, and staff appearance. Security includes asking for ID and maintaining an updated service logbook. Any deficiency in the operational indicators results in a minus score. Provided staff are compliant, a bonus is paid to them.

Mr. Rupani reviewed pictures of the several signs inside the store dealing with confirming age in order to purchase liquor. The Point of Sale (POS) equipment also reminds staff to ask for ID when the sale is made. He testified that it is part of the written store policy to ask for ID from anyone who appears to be under the age of 30. The forms of acceptable ID are set out in the Manual. The Manual also addresses refusing service to intoxicated customers, refusing service to bootleggers, and dealing with minors in the store. Staff are informed that if they serve anyone under the age of 19, they may be terminated for cause. He testified that the clerk that was involved in the MAP incident was a good employee who had not previously caused any concern in respect of asking for ID. He was aware, however, that she was experiencing some personal problems at about the time that the MAP incident took place.

JC is the clerk who is working at the time that the MAP incident occurred. She began to work for the Licensee in January 2018. Her services were terminated after the MAP incident and she has not returned to work with the Licensee. She testified that, prior to working in the Lynn Valley store, she had been a customer for several years. She recalled that as a customer, she was asked for ID every time she bought liquor from the store. She began working for the Licensee when she was 26 years old. Her initial training was provided by the store Manager. She was introduced to the Procedure and Training Manual including the section on checking for ID. She knew she could be terminated for failing to check the ID of an underage customer. The Manager showed her how to check ID and how to determine if it was fake. She also reviewed the information about identifying the age of customers with different ethnic backgrounds.

JC reviewed the Incident Reports contained in Exhibit 10 which spanned the time from January 2018 to June 2019. She testified that the practice was to enter incidents into an incident report book first and then into the logbook at the end of the day. She identified 11 reports where she refused service for various reasons including being dissatisfied with foreign identification, failure to provide two pieces of identification, intoxication, failure to provide ID, being uncomfortable with the ID tendered as the customer appeared to be too young, and an incident where a person was attempting to buy liquor for a friend.

JC testified that she had been good at her job. She was entrusted with opening the store in the morning and she had the codes for opening the safe inside the store. The culture of the store is to ID customers. The Manager is aggressive about asking for ID and she was too. At the time of the MAP incident, however, she had been undergoing marital difficulties. On the day in question, she had been distracted by some bad news and so did not look at the Minor Agent when he came into the store or when he came to the cash register. She was not in a proper frame of mind that day but had to work. As the Minor Agent walked out, she looked up and realized that she should have asked him for ID. Further training would not have helped her as she knew how to ID underage customers.

In cross-examination, JC stated that she had been shadowed for a week when she was first hired. Her practice whenever a customer looked to be under 35 years of age was to ask for ID. On some days, 50 customers might be asked to provide ID. She testified that the Manager reviewed the incident logs and spoke to her about them. He spoke to other employees as well. The Manager did not hold formal staff meetings, but he met individually with staff in the store each week. She was aware of the MAP program although not all of its details. She also recalled that the POS system in the store reminded staff to ask for ID at the time of a sale.

MS is the manager of the Licensee's store in Lynn Valley. He has been employed for 14 years at the store and has been the Manager for the past five years. His duties include store upkeep including stock, training of staff, and ensuring there are no maintenance or customer issues. The store employs several young persons. Their employment in the store may often be their first job. They need to come to understand the work world

including not using the phone at work and staying at work for a full day. MS initially reviews the policies of the store as set out in the Procedure and Training Manual. He also instructs new employees on how to stock shelves and to understand day-to-day procedures. All of the employees have a Serving It Right certification, so they are aware of the law with respect to underage service. They are trained on the policy of the store to ask for ID from any customer who appears to be under the age of 30. There are two shifts that focus on this, during which staff are trained on what to look for in respect of age or intoxication issues. They are questioned about information in the Manual as well as about asking for ID. The store has manuals on accepting foreign ID, but employees are told there is no harm in refusing to accept any ID with which they are not familiar. They are informed about what comprises acceptable types of the ID and are taught to be especially observant if a customer claims to be close to 19 years of age. Staff are told that ID with a hologram image such as a government Drivers Licence is a preferable form of ID.

MS testified that he regularly checks on staff in the store. There is also a regular weekly checkup on staff by using the Operational Indicators. Whenever there is a young customer in the store, he watches to ensure that ID is requested. He tells staff that anyone who looks his age or younger should be asked for ID. MS is 33 years of age. Whenever a cashier refuses to accept the ID of a customer, an entry is made in the logbook. It is later entered into the Incident Report logs. Staff bonus pay is tied to performance in areas including making appropriate requests for ID. Employees who consistently fail to follow store policies may be written up. MS testified that he will step in if he sees an issue pertaining to the ID of young customers. In circumstances where a cashier fails to ID a young customer, he or she may be taken off of the till. When this happens, he will speak to the cashier about the need to ID young customers and to think about it for the rest of the shift. Any employee who fails to ID younger customers on a regular basis will be terminated. The store is near a school, so extra diligence is needed.

MS testified that he does not hold regular staff meetings. Many of the employees work part time and so it is not possible to get them together in one meeting. Instead, he speaks to them one on one and makes sure that everyone is included. While his work hours usually cover all of the employees, he may stay later and or come in on the weekend to make sure everyone is spoken with.

MS testified that staff incident reports have been used for several years. He reviewed and testified about some of the reports found in Exhibit 10. There are several entries where staff refused service for various reasons including a customer attempting to buy liquor for younger customers outside the store, for failure to produce ID, for intoxication, for foreign identification that was not accepted, or for identification that was not trusted. As well, service was refused for an incident where a group of customers were not all able to produce acceptable ID, and for refusing to serve a customer who appeared to be under 30 without proper ID. MS identified photographs taken of signage inside the store concerning the identification policy of the store. He said this is more to remind staff than it is to remind customers. As far as the work of JC was concerned, he regarded her as a phenomenal employee. She got on well with everyone and worked hard. She was observed to check ID on a regular basis. Prior to the MAP incident, she had undergone some marital issues and moved to New Westminster. As a result, she had been working in the Sapperton store. She had taken some time off for personal issues and then returned to work at the store in Lynn Valley. MS understood that on the day of the MAP incident she had been given some bad news.

In cross-examination, MS stated that he produced the Procedure and Training Manual used in the store. He trains most of the staff in the store although some training may be done by the Assistant Manager. New staff are given the Manual to read, after which it is reviewed with them and they sign off. In respect of ID, he suggests that cashiers look at the hands of their customers because they are often indicative of age. Neither a beard or grey hair is an indicator of age and staff have to look beyond these. MS testified that he reviews the logbook weekly. If anyone is failing to complete log entries, he speaks with them. His verbal meetings will include ID issues if there are problems. The number of customers inside the store is affected by the season. It is particularly busy in the summer after local schools are out. At this time, the staff in the store need to be especially diligent.

SUBMISSIONS – BRANCH

The branch advocate noted that a contravention is acknowledged, and so a breach of section 77 (1)(a) of the *Act* is made out. As far as due diligence is concerned, the policies of the Licensee are inconsistent. JC had a personal policy of asking for identification from anyone who appeared to be under 35. MS has advised staff to ID anyone who appears to be under his age and he is 33. The policy of the store is to ID anyone under 30. All of this can create inconsistencies. As well, the Licensee could have policies in place to address personal problems experienced by employees.

SUBMISSIONS – LICENSEE

The Licensee submits that it had policies in place to prevent the occurrence of the contravention that occurred on March 22, 2019 and those policies were clearly explained to its employees. In fact, JC personally exercised a higher threshold for checking ID which was more stringent than the one mandated by the Licensee. In this, she was being more diligent. There was no confusion about the age policy used by the Licensee. The Manager trained all staff in the policies as set out in the written Procedure and Training Manual including the policy to ask for ID from customers who appear to be under the age of 30. All employees had Serving It Right certification. Staff were supervised closely and spoken to when necessary. Logs and incident reports are kept. There are signs throughout the store reminding staff about checking for ID. As well, the POS system reminds staff about asking for ID. There is a culture in the store about asking for ID. Further, JC was highly regarded for her diligence in matters such as asking for ID. The Licensee could not know that she was going through personal problems that affected her judgment. The failure to ask for ID in this instance was isolated and unexpected. The policies and procedures of the Licensee met the standard of due diligence on a balance of probabilities.

REASONS AND DECISION

Contravention

The Licensee does not dispute the occurrence of a contravention on March 22, 2019 as alleged in the NOEA. I therefore find that the licensee contravened section 77(1)(a) of the *Act* on that date as a result of selling, giving or otherwise supplying liquor to a minor.

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). The test for the determination of whether a party acted with due diligence is one of reasonableness. The

bar cannot be set too high or it would turn the determination of due diligence into a test of absolute liability: see Goepel, J in *Central City Brewing Company Ltd. v. British Columbia (Liquor Control Licensing Branch)*, 2013 BCSC 2301.

As noted in the cases noted above, the defence of due diligence is to be considered in two stages as follows:

1. First, one must determine 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 in accordance with these criteria. The standard is not one of perfection – that is, that a contravention will never occur. Rather, it is what is adequate training, systems, and monitoring within the context. The circumstances of each case must be considered to determine if the due diligence threshold has been achieved.

In this case, the person made the sale of liquor to the Minor Agent was an employee who did not have ownership in or exercise control of the Licensee. As such, she is not a “directing mind” of the Licensee and so consideration of the defence of due diligence is not precluded. I therefore turned to consider whether the Licensee has met the onus to establish the defence of due diligence on the balance of probabilities.

a. Adequate training and systems to prevent the contravention

As noted above, the first question in the determination of whether the Licensee acted with due diligence is whether it had systems in place to prevent the occurrence of the contravention. In making this determination, I have considered the oral testimony of the witnesses for the branch and the Licensee. As well, I have reviewed and considered the extensive documentary evidence provided by the parties. All of the witnesses give their testimony in a forthright and credible manner.

The evidence establishes that the Licensee has been in business at its current location since 2012. Since the outset of business, the licensee has taken certain steps to meet its responsibilities in respect of the sale of liquor. The evidence concerning training and systems to prevent the contravention include:

- All employees have a Serving It Right (SIR) certification;
- The Licensee utilizes a manual for the initial training of employees on the various aspects of their employment. It includes the requirement to ID anyone who appears to be under the age of 30. The employees are advised that failing to ask for ID from anyone under the age of 19 may result in termination for cause.
- Most of the new employees in the store are trained by MS, the store Manager, although some may be trained by the Assistant Manager. New staff are trained on the Licensee's Procedure and Training Manual. First, they review the Manual, then they are questioned about its contents and about ID issues. MS explains what to look for with respect to age or intoxication.
- The Manager explains what to look for with respect to ID. There are manuals as well which helps to identify the age of customers from different cultures. Staff are encouraged to refuse to accept ID with which they are not familiar.
- New employees shadow existing employees for a week.
- With respect to working at the cash register, there are two training shifts during which the Manager explains what to look for in respect of age or intoxication.
- There are several signs around the store reminding staff about asking for ID. The POS system asks cashiers if they have asked for ID on each sale.
- There is a culture of asking for ID within the store. JC testified that she was a customer for several years before becoming an employee at age 26 and each time she was asked for ID.

b. Effective Operation of the Licensee's Systems:

The evidence of the systems utilized by the Licensee on an ongoing basis include:

- The Manager conducts regular meetings with staff. Because there are many part-time employees the meetings are conducted one-on-one basis. He will discuss ID issues if there is a perceived problem with an employee.
- The Manager closely monitors the conduct of employees with respect to issues such as asking for ID. He will speak to staff for failing to ask for ID from someone who appears to be under the age of 30. Staff may be taken off of the cash register and may be terminated if they continue to fail to ask for ID.
- Staff are required to complete the daily logbook record concerning events such as failure to produce acceptable ID, intoxication, or bootlegging. These entries are reviewed daily by management and any employee who is not keeping records spoken to. JC was able to refer to these records in her testimony.
- Failure to ask for ID from customers appearing to be 30 or younger may result in the verbal warning followed by a written warning followed by termination.
- The Licensee also uses a system of operational indicators which tie staff performance to payment of bonuses. The requirement to ask for ID is a component of this system.
- The Licensee has a CCTV which is reviewed if any incidents occur at the store.
- After the contravention occurred, the Licensee engaged a secret shopper to independently test it staff on whether they are asking for ID.

The cashier who was involved in the MAP incident had a personal system of asking for ID from anyone who appeared to be under the age of 35. The Manager told employees to ID anyone who looks his age or younger. He is 33 years of age. The branch suggested that this might cause confusion among staff. It seems more likely, however, that this simply underscores the message that staff are encouraged to set a high standard when assessing whether to ask a customer for ID. The culture of the Licensee's store is to

enable staff to refuse ID or to refuse to sell to customers in circumstances when which they are not comfortable. It is not a culture of encouraging sales at all costs. It is also apparent that JC was well trained and personally aggressive about asking for ID. At the time of the MAP, she was undergoing personal issues which distracted her from normal performance of her duties. Nevertheless, the Licensee had no direct evidence that she was failing in this manner and could not otherwise be taken to know about her personal issues.

In the result, I am satisfied that the Licensee had established adequate systems and training for the prevention of the contravention and had ensured the effective operation of those systems. As a result, the Licensee has met the onus of establishing that it acted with due diligence at the time of the MAP incident.

CONCLUSION

I find that the contravention of section 77(1)(a) of the *Act* has been proven on the balance of probabilities.

I find further that the Licensee has established a defence of due diligence and thus has a complete defence to the contravention.

Accordingly, I do not need to consider the issue of penalty.

Original signed by

A. Paul Devine
General Manager's Delegate

Date: November 4, 2019

cc: Liquor and Cannabis Regulation Branch, Vancouver Office
Attn: Peter Mior, Regional Manager

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