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:	Paul Esposito's Restaurant (Abbotsford) Ltd. dba Liquor for Less.com 1-34252 Marshall Road Abbotsford, BC V2S 1L9
Case #:	EH19-080
For the Licensee:	Paul Esposito
For the Branch:	Andeep Kang
General Manager's Delegate:	Paul Devine
Date of Hearing:	February 25, 2020
Date of Decision:	March 6, 2020

INTRODUCTION

The Licensee Paul Esposito's Restaurant (Abbotsford) Ltd. operates a retail liquor store ("LRS") under Licence No. 195451 at #1 – 34252 Marshal Road in the Municipality of Abbotsford, (the "Licence"). The LRS does business under the name "Liquor for Less.com." The terms of the Licence allow the LRS to sell packaged liquor from 9:00 a.m. to 11:00 p.m., Monday to Sunday.

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

Mr. Paul Esposito is a principal of Paul Esposito's Restaurant (Abbotsford) Ltd. and represented the Licensee in these proceedings.

ALLEGED CONTRAVENTION AND PROPOSED PENALTY

The allegations of the Branch and proposed penalty are set out in a Notice of Enforcement Action letter dated September 25, 2019 (the "NOEA"). The Branch alleges that at 11:23 a.m. on August 23, 2019, an inspection under the Minors as Agents Program ("MAP") was conducted at the premises of the Licensee. Under this program, the Branch utilizes minors aged 16 to 18 years of age to conduct compliance inspections to ensure that licensees do not engage in selling liquor to persons under the age of 19. MAP inspections have 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 in the Abbotsford area on August 23, 2019. It was confirmed that the individual was a minor, 17 years of age, before the MAP inspections were undertaken. At 11:23 a.m., Minor Agent #118 entered the premises of the Licensee and was followed inside by two liquor inspectors. Once inside, the Minor Agent walked to the back of the store and picked up a six pack of Palm Bay vodka beverage. The product was taken to the sales counter where it was rung in by a female salesclerk employed by the Licensee. This individual was later identified as an assistant manager for the Licensee at this location. The Minor Agent

paid for the product and was not asked for ID. After the sales transaction was completed, the Minor Agent left the premises with the Palm Bay beverage. The sales transaction was witnessed by the two liquor inspectors who were inside the store.

The Branch considers that the actions of the employee of the Licensee breached section 77(1)(a) of the *Liquor Control and Licensing Act* (the "*Act*".) Further, the sale of liquor to minors comprises a significant public safety issue because of the effects of alcohol on growing bodies and developing minds, and because of the effects it has on individuals and on society as the result of irresponsible drinking behaviour learned at an early age. Due to a lack of capacity to metabolize alcohol in the same manner as an adult, liquor has a more intoxicating effect on minors, and is a significant factor in crimes committed by youth, including serious driving offenses, assaults, sexual assaults, and theft. By way of enforcement action, the Branch proposed either a 7-day licence suspension or a $7000 monetary penalty. Both of these are within the penalty range set out in item 7 of Schedule 2 of the *Liquor Control and Licensing Regulation* for a first contravention of this type.

The Licensee does not dispute that the contravention occurred as described in the NOEA. It alleges instead that it acted at all times within the bounds 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,

(b) possess liquor for the purposes of selling, giving or otherwise supplying the liquor to a minor, or

(c) allow a minor to consume or possess liquor in or at a place under the person's control.

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

Monetary penalty

Item	Contravention	Monetary Penalty			Period of Suspension (Days)		
	Contravention No.	First	Second	Third	First	Second	Third
Minors							
7	Contravention of section 77 of the Act *[supplying liquor to minors]*	$7000–$11000	$11000–$15000	$15000–$25000	7-11	11-21	21-41

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: Copy of Clerk's SIR Certificate
Exhibit 3: B.C. Gov't Information on SIR program
Exhibit 4: Photo of POS system
Exhibit 5: Photo of "NO MINORS" sign at door to LRS
Exhibit 6: Photo confirming clerk ID No.
Exhibit 7: Daily transactions record
Exhibit 8: DECLARATIONS BY CLERK JUNE 2018 & SEPTEMBER 2019
Exhibit 9: EMAIL SEPTEMBER 25, 2019
Exhibit 10: DISMISSAL NOTICE DECEMBER 2, 2019

EVIDENCE

BRANCH

The Branch called one liquor inspector to provide oral evidence about the alleged contravention. The Liquor Inspector testified that he was one of three inspectors

involved in the MAP inspections that took place in Abbotsford on August 23, 2019. He was also the author of the NOEA described earlier in this Decision. The purpose of the MAP inspections was to ensure compliance by retail store licensees in the Abbotsford area with the prohibition against selling liquor to minors. The Branch utilizes the services of minors in these types of inspections. Further, licensees have been notified that these types of inspections will take place from time to time. The Minor Agent used in this round of inspections was photographed before the inspections were undertaken. His identity was checked to confirm that he was under the age of 19. Further photographs were taken at the end of the inspections to confirm that his appearance had not been changed during the course of the day.

The inspection team had conducted one inspection prior to arriving at the business of the Licensee. The Minor Agent entered the store at about 11:23 a.m. and was followed by the Liquor Inspector and one other inspector. The third inspector in the team remained outside the store in a parked car. The store was not busy as only one other customer was observed. The Minor Agent selected a six pack of Palm Bay, a vodka beverage, and took it to the clerk. He paid for the product and was not asked for ID. Both liquor inspectors had a clear view of the transaction. Once outside, the Minor Agent wrote an observation report while the Liquor Inspector prepared a Contravention Notice. He took the Contravention Notice back inside the store and receipt of it was acknowledged by the clerk who had been involved in the transaction and the on-site manager for the store. The manager had not been present when the transaction took place.

The Liquor Inspector recommended the minimum penalties for a first offence because there was no prior history of non-compliance by the Licensee.

LICENSEE

The Licensee's Representative called three witnesses and also testified himself. Ms. AA testified that she is a District Manager who is responsible for overseeing the five retail liquor stores operated by the Licensee. The Licensee had four retail liquor stores when the contravention took place. AA testified that her work is conducted in concert with ownership and on-site management. The clerk who was involved in the sale to the

Minor Agent was hired by her in the summer of 2018. The clerk was an assistant manager in the store at the time the sale to the Minor Agent took place. Prior to being hired, the clerk provided a current Serving It Right (SIR) certificate which teaches, among other things, about not selling liquor to minors. As well, the clerk was required to review and sign an Employee Declaration concerning the policies of the Licensee pertaining to the issue of not selling liquor to minors. The ID requirements for the Licensee are that anyone that appears to be under the age of 30 must be asked of ID. Primary ID must be issued by a government agency and must include the name, birthdate and picture of the holder. A secondary piece of identification must include the name of the holder and/or a picture. The purpose of the secondary piece of ID is to confirm the identification on the primary ID. AA reviews the Declaration with new employees to ensure they understand that it is crucial not to sell liquor to minors. She was satisfied that the clerk involved in the MAP sale understood this obligation.

In the store itself there is a large sign at the door advising that minors are not to enter unless accompanied by a parent or guardian. Further, two pieces of ID will be required. The Point of Sale (POS) equipment used by the Licensee shows the current birth date required of a customer in order to purchase liquor. It requires that the user indicate on each sale that the customer was over 30 or that ID was checked. It also allows the clerk to scan the ID presented to show a customer is of age and to determine whether the ID presented by a customer is fake. AA reviewed the transaction records of the sales made by the clerk on the day in question, (Exhibit 7). It was apparent that she had checked the ID of other customers on three occasions prior to the MAP inspection.

AA noted there are 25 video cameras in each store. These are used as a tool for overseeing staff. It can be used to investigate thefts in the stores. If there appears to be a sale made to a young person, AA will speak to the clerk involved. It is also used as a tool for training. She speaks to new employees when they are hired and when they will shadow an experienced employee for a time. During this time, AA will look at the video cameras to ensure that the new employee is asking for ID. There is ongoing communication with employees as needed. The managers communicate with staff by emails and by direct discussion. They also speak to on-site store managers about their employees. These discussions take place daily.

After the incident, management met with all of the employees at all of its stores to ensure they were aware of the requirements about asking customers for ID. The clerk who was involved in the MAP sale had been reliable about asking for ID previously and had trained other employees as well.

In cross-examination, AA stated that training new employees takes about two weeks. There are information sheets dealing with customer service issues, how to deal with customers that appear to be intoxicated, and for dealing with ID issues. As an example, when a large group of young people come into a store together, a clerk will need to know how to ensure that they are all of age before selling liquor to any of them. AA spoke to the clerk who sold the liquor to the Minor Agent. The clerk told her she thought that she had served the Minor Agent before and had checked his ID on a previous occasion.

KW is also a District and Operations Manager. She testified that employees are told from their first orientation about the need to ask for ID from anyone who appears to be under the age of 30. It is better to be safe than sorry. She advises staff to look at the clothing worn by a customer and his or her general demeanour. All staff were required to re-sign the declaration concerning service to minors after the MAP incident took place.

KW visited the stores where the clerk worked two or three times a week and never saw anything that gave her concern. New employees receive follow-up memoranda for three to five months after they begin their employment to act as a refresher about issues that might arise in their employment including asking for ID. Management constantly observes new staff to make sure that ID is requested. Communications with new employees are conducted directly or through the on-site manager if there are any issues seen including problems asking for ID. The video records from each store are reviewed on Fridays to see if there are any problems. There were never any occasions for concern about asking customers for ID raised by the clerk who sold to the Minor Agent.

TL is the on-site manager where the clerk was employed. She was in the store at the time of the MAP inspection but was in the warehouse preparing a beer order. Therefore, she did not see what took place inside the store during the MAP inspection. She had never before been concerned about the clerk asking for ID. The clerk had also worked at another store operated by the Licensee and had been promoted to an assistant manager position. Failing to ask for ID from the Minor Agent went against her training. TL did not think that any further training would have prevented the incident.

In cross-examination, she noted that normally there were other staff working on the POS in the store. As Assistant Manager, the clerk who sold liquor to the Minor Agent usually had other duties. The Licensee does not conduct staff meetings with its employees because of their different hours of employment. Instead, it relies on meetings with staff individually and on communications with them by messaging or through social media such as Facebook. TL also reviews the videos taken in the store and will use them to speak to staff about issues such as asking for ID from customers. Sometimes staff will ask her for assistance when there are large groups in the store. Ownership and District managers also attend at the store 3 to 4 days each week.

Paul Esposito testified that his family has been in the liquor business in Abbotsford since 1987. The business includes a pub and several retail liquor stores. During this time, there had been no prior contraventions of the liquor legislation. The Licensee realizes that holding a liquor licence is not a right. It needs to partner with government to ensure the safety of the public including not selling liquor to minors. The Licensee normally gets on well with liquor inspectors from the Branch. As well, the Licensee tends to be proactive in instructing staff not to sell liquor without ID from anyone who appears be under 30, and on instructing staff on the procedure to employ when checking for proper ID. This often results in challenges as some customers will become angry when asked for ID to support a purchase. After discussions with the Branch, the Licensee gave staff some discretion. If a customer is over 26 for example, one piece of ID may be enough to support a sale.

Mr. Esposito testified that after the incident involving the sale to the Minor Agent, he went to the store to speak to the clerk and the on-site Manager. The clerk was frightened. He told her she was not going to be fired but a serious discussion was needed in order to determine that she knew the requirements of her job. He met with her again on September 4 for a further review. The clerk was terminated for cause in December 2019 for reasons unrelated to the MAP incident.

In cross-examination, Mr. Esposito stated that apart from incidents like the one involving the MAP sale, critical policies such as the need to ask for ID or for dealing with fake credit cards are discussed and sent out to staff. District Managers make sure that they are signed off by the staff when they are reviewed. The Licensee also used the services of a retired liquor inspector for about 10 years in order to assist with the development of policies and procedures. The Licensee has not used secret shoppers but instead reviews the footage of its surveillance cameras. If there are issues about questionable transactions such as asking for ID or dealing with intoxicated customers, staff will be spoken to directly. Performance adjustment notices are used and ultimately, staff may be terminated for failure to follow store policies. The Licensee has found that the most effective training takes place when it is dealing with issues in the moment. Speaking to employees in small groups or one-on-one works better than meeting with staff as a group.

SUBMISSIONS - BRANCH

The Branch submits that the contravention is not an issue and due diligence is not established. While the Licensee employs a POS system and engages in training, the clerk who was involved in the incident believed she could sell to the Minor Agent because she thought she had served him before. As well, the Licensee does not use logbooks to record incidents that occurred during each day. The Branch acknowledges that the Licensee has no compliance history.

SUBMISSIONS- LICENSEE

The Licensee submits that its lack of prior history is evidence of the effectiveness of efforts it has made to avoid contraventions of the liquor legislation. Through its policies and procedures, there are adequate systems in place for the avoidance of such matters. If the clerk who sold to the Minor Agent believed she had sold to him before and checked his ID previously, it is hard to identify any kind of training that might have prevented the incident from occurring. The Licensee acknowledged the incident occurred despite its training and points out that it took further steps afterwards to prevent future occurrences. The Licensee also expressed concern that the system does not levy fines against individual employees as a consequence for their breaches of the *Act*. Without such consequences, staff may not be motivated to follow the policies and procedures put in place by the Licensee.

REASONS AND DECISION

Contravention

The Licensee does not dispute that there was a sale of liquor from one of its retail liquor stores to a person under the age of 19 as described in the NOEA. I therefore find that there was a breach of section 77(1)(a) of the *Act* by the Licensee as alleged in the NOEA.

Due Diligence

The onus to establish the defence of due diligence rests on the Licensee. It 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 accordingly.

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, more 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); <u>and,</u>
    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.

The first question when considering the test for due diligence is to determine if the person who made the sale to the minor was a directing mind of the licensee. The evidence establishes that the person who served the Minor Agent was an Assistant Manager of the store where the MAP inspection occurred. There is no evidence that her involvement with the Licensee was other than as an employee. She did not act as a "directing mind" of the Licensee in an ownership or control capacity. She was not, as

described in *Beverly Corners, supra* at paragraph 42, a person who had been delegated governing executive authority of the company in the design and supervision over the implementation of corporate policy. Instead, she merely carried out such policies, and so was not a directing mind of the corporation. The Licensee is therefore not precluded from advancing a defence of due diligence.

As noted by the Licensee in argument, the test for due diligence is not one of perfection. Madam Justice Dillon described the rationale for a test that involves the application of a test involving "reasonable precautionary measures" as follows at paragraph 22 of *Beverly Corners, supra*:

> The scheme of the legislation is that public safety in the distribution of liquor is maintained through the establishment of high standards in the industry for compliance with statutes and regulations. Licensees control policies, practices, and procedures specifically designed to ensure compliance with statutes and regulations, in this case, the sale of liquor to minors. Control by those in charge of business activities that may endanger the public was described in *Sault Ste. Marie* at 1322 as "vital to promote the observance of regulations designed to avoid that danger". Licensees who undertake reasonable precautionary measures against selling liquor to minors are encouraged to seek even higher standards because the amount of care that is taken goes to the defence of due diligence in the event of a contravention of the Act. Conviction will have a deterrent effect only if the licensee is encouraged to have better and stricter standards. If it matters not how high the standards are that are employed, then businesses will not be encouraged to impose the highest standards in order to avoid contravention of the legislation, and public safety in the sale of liquor to minors will suffer generally as a result. As phrased in *Sault St. Marie* at 1311: "If a person is already taking every reasonable precautionary measure, is he likely to take additional measures, knowing that however much care he takes, it will not serve as a defence in the event of a breach?" In this way, pressure is put upon licensees to do their whole duty in the interest of public safety. Good practices in supervision, inspection, and observance promote efficiency and the welfare of the community.

The question of whether the Licensee acted with due diligence does not turn on what steps might have been taken to prevent the occurrence of the contravention, which in this case was the sale of liquor by an employee to a minor. Instead, the determination rests on answer to two questions. First, did the Licensee implement adequate training and other systems to prevent such a contravention? Second, did the Licensee take reasonable steps to ensure the effective application of the training and the operation of these systems?

With respect to the first question, the evidence of the Licensee establishes that all of its prospective employees must have a valid SIR certificate. New employees are taken through an "Employee Declaration" which they must sign following their review of the document. The Declaration deals extensively with the prohibition against selling liquor to minors, the prohibition against minors entering into a liquor store without being accompanied by a parent or guardian, and the refusal of service to groups of young persons where any of them is a minor. As well, the ID policy of the Licensee is to request identification from any customer who appears to be under the age of 30. Acceptable forms of identification are also discussed.

New employees are required to shadow with an experienced employee for a time. Their training takes about two weeks to conclude. The Licensee has an extensive video camera system in its stores. During their training and for a time after hire, new employees are closely supervised to ensure that they are meeting the requirements of their employment including asking for ID where appropriate. Management will speak to any employee who fails to meet the requirements of their employment including requesting ID. As well, new employees receive memoranda for three to five months after hire about issues pertaining to their employment including ID issues.

Each store has extensive signage stating that minors are not to enter the store. The fulsome POS system used in the stores advises employees about the minimum birth date on which liquor can be sold to a customer. It can scan ID to determine if it is fake or real. It requires a salesclerk to confirm on each sale that a customer is over 30. In the event that ID is requested and found to be acceptable, a notation is made on the daily sales transaction record.

Overall, I am satisfied that the policies of the Licensee clearly articulate the prohibition against selling liquor to minors. Further, the Licensee takes reasonable steps to train and supervise employees in the application of these policies when they are first employed.

Next, I turn to consider whether the Licensee took reasonable steps to ensure the effective application of its training and the operation of its systems. It is apparent that the Licensee relies heavily on reviewing the video camera footage taken by cameras

from within its stores. This footage is used as a basis for speaking to employees who seem to be deficient in their obligations. The Licensee also stated that it sends memoranda to its employees from time to time regarding issues pertaining to their job performance, but none of these were entered into evidence except for the warning that was given to the sales clerk after the MAP inspection took place.

I acknowledge that the Licensee took steps to address the deficiencies that occurred when the clerk failed to request ID from the Minor Agent. This shows that the Licensee takes its responsibilities seriously. I am concerned, however, that there is a lack of connection between the store clerks and management over the daily application of the Licensee's policies respecting the sale of liquor to minors and other related matters. I accept that management reviews the video recordings regularly and will speak to employees when considered necessary. I also accept the rationale of the Licensee for not conducting meetings with its employees as a group because of the disparate hours of their employment. There is, however, no vehicle for employees to communicate with management about issues that may occur in the course of their employment. For example, logbooks or incident records are not used in the stores. While the POS system notes when ID is requested and provided, it does not record occasions when ID was not found to be acceptable or where there were problems serving customers. If such logbooks were available, store staff could use them as a tool for discussion with management. Such records would provide a two-way communication with staff and would ensure a better understanding about these matters. As well, while the Licensee maintained that it sends written memoranda to staff about policy issues in addition to direct discussions, it did not provide evidence of such material. There are no formal meetings or similar opportunities for staff to provide input into these issues.

One policy contained in the Declaration deserves further comment. It provides that where a customer fails to provide appropriate ID but where the on-duty Manager knows one thousand percent that the customer is not a minor and will not acquire liquor for a minor, the on-duty Manager in his or her sole discretion can approve the sale. In this case, the clerk was involved in the sale failed to follow and apply this policy as the on-duty Manager was not consulted. Instead, the clerk made the sale on the mistaken belief that the Minor Agent had bought liquor in the store before. There was no evidence about any training or discussion concerning the application of this

policy. Use of a logbook could be used to record instances of the application of this policy and would be beneficial for review by management with its employees when necessary.

In conclusion, while the Licensee has systems in place for the supervision of its employees, I am not satisfied that there is a reasonable mechanism for employees to articulate their understanding of the policies of the Licensee or to raise issues they experience in the application of store policy. There is therefore no mechanism for staff to communicate with management over such matters. There are no staff meetings, and no other mechanism for formal communication with staff about issues relating to their employment. As such, I find that the Licensee has failed in its onus to establish that it acted with due diligence in the continued application of its training and the operation of its systems beyond initial training in order to prevent a contravention under the *Act*.

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 24-month period preceding this incident. In fact, there has been no history of the same contravention dating back to the inception of the business of the Licensee in 1987. This contravention is therefore properly treated as a first contravention for the purposes of the penalties set out in Schedule 2. The Licensee indicated that if there are grounds for a penalty action confirmed in these proceedings, a monetary penalty is preferred in lieu of a licence suspension.

ORDER

Pursuant to section 51(2)(b) of the *Act*, and Schedule 2 Item 7 of the Regulation, I order the Licensee pay a monetary penalty in the amount of $7000.00 to be paid to the General Manager of the Liquor Control and Cannabis Regulation Branch within 30 days of this decision.

Original signed by

A. Paul Devine Date: March 6, 2020
General Manager's Delegate

cc: Liquor and Cannabis Regulation Branch, Surrey Office
Attn: McKenzie Castle, Regional Manager

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