

Cannabis Retail Store
Floor Plan
2121 Springfield Road
Kelowna, BC V1Y 7X1

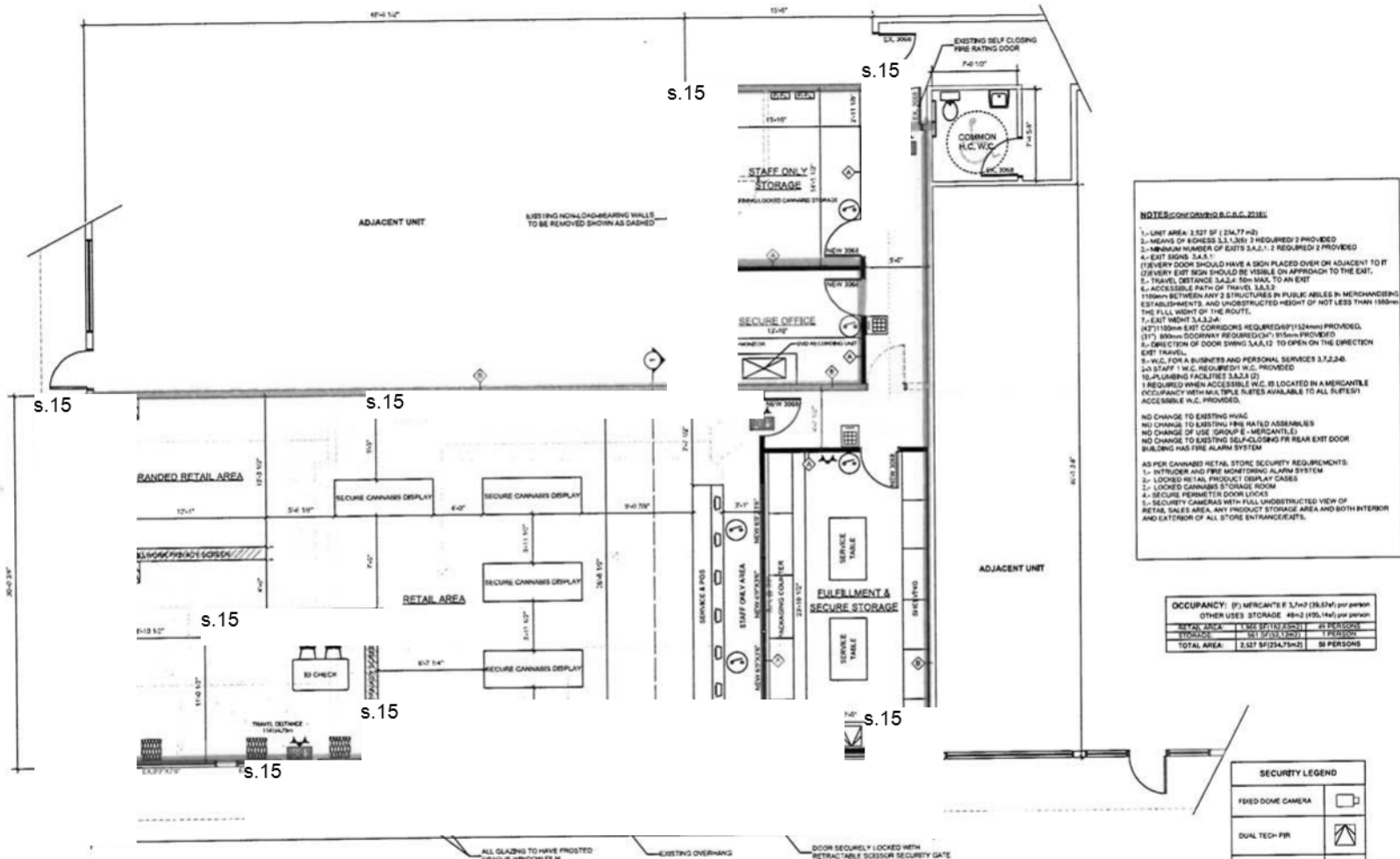
DARCH GROUP
2019, 2020, 2021

Darch Group Architects Inc.
Suite 415, 115 St. James Street
Vancouver, BC V6B 1G5
604.774.2611 darchgroup.com

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Job Number:
19035

Project:
UNIT 4 - 2121
SPRINGFIELD RD
KELOWNA, BC.



NOTES ON DRAWING (S.B.C. 2018)

1. UNIT AREA: 2,527 SF (244.77 m²)
2. MEANS OF EGRESS 3.3.1.3(5) 3 REQUIRED 2 PROVIDED
3. MINIMUM NUMBER OF EXITS 3.3.2.1. 2 REQUIRED 2 PROVIDED
4. EXIT SIGNS 3.3.3.1 (1) EVERY DOOR SHOULD HAVE A SIGN PLACED OVER OR ADJACENT TO IT (2) EVERY EXIT SIGN SHOULD BE VISIBLE ON APPROACH TO THE EXIT
5. TRAVEL DISTANCE 3.3.2.4 10m MAX. TO AN EXIT
6. ACCESSIBLE PATH OF TRAVEL 3.3.3.2 1800mm BETWEEN ANY 2 STRUCTURES IN PUBLIC AREAS IN MERCHANDISING ESTABLISHMENTS AND UNOCCUPIED HEIGHT OF NOT LESS THAN 1800mm THE FULL WIDTH OF THE ROUTE
7. EXIT WIDTH 3.3.3.2.4 (1) 1100mm EXIT CORRIDORS REQUIRED (1524mm) PROVIDED (3) 880mm DOWNWAY REQUIRED (3) 815mm PROVIDED
8. DIRECTION OF DOOR SWING 3.3.3.1.2 TO OPEN ON THE DIRECTION OF EXIT TRAVEL
9. W.C. FOR A BUSINESS AND PERSONAL SERVICES 3.3.2.3.4 (1) REQUIRED WHEN ACCESSIBLE W.C. IS LOCATED IN A MERCANTILE OCCUPANCY WITH MULTIPLE RATES AVAILABLE TO ALL CUSTOMERS ACCESSIBLE W.C. PROVIDED
10. PLUMBING FACILITIES 3.3.2.3.2 (1) REQUIRED WHEN ACCESSIBLE W.C. IS LOCATED IN A MERCANTILE OCCUPANCY WITH MULTIPLE RATES AVAILABLE TO ALL CUSTOMERS ACCESSIBLE W.C. PROVIDED

NO CHANGE TO EXISTING HINGE
NO CHANGE TO EXISTING HINGE RATED ASSEMBLIES
NO CHANGE OF USE (GROUP I - MERCANTILE)
NO CHANGE TO EXISTING SELF-CLOSING FIRE RATED EXIST DOOR
BUILDING HAS FIRE ALARM SYSTEM

AS PER CANNABIS RETAIL STORE SECURITY REQUIREMENTS:

1. INTRODUCT AND FIRE MONITORING ALARM SYSTEM
2. LOCKED RETAIL PRODUCT DISPLAY CASES
3. LOCKED CANNABIS STORAGE ROOM
4. SECURE PERIMETER DOOR LOCKS
5. SECURITY CAMERAS WITH FULL UNOBSTRUCTED VIEW OF RETAIL SALES AREA, ANY PRODUCT STORAGE AREA AND BOTH INTERIOR AND EXTERIOR OF ALL STORE ENTRANCES/EXITS.

OCCUPANCY:	(1) MERCANTILE 3.3.1.3(5) 3 REQUIRED 2 PROVIDED
OTHER USES:	STORAGE 48-2 (195.14) per person
STORAGE:	1000000 1000000 1000000
TOTAL AREA:	2,527 SF (244.77 m ²) 55 PERSONS

SECURITY LEGEND	
FIXED DOME CAMERA	
DUAL TECH-FIR	
RETRACTABLE SCISSOR SECURITY GATE OR INTERIOR OF GLAZING	
PANIC ALARM	
KEYPAD / CARD READER	
VIDEO INTERCOM UNIT	
EMERGENCY LIGHT	
ELECTRICAL PANEL	

WALL ASSEMBLIES	
	NEW/EXISTING PARTITION FULL HEIGHT
	10" OVR. PARTITION 2X4 WOOD STUD @ 16" O.C. BATT INSULATION 1/2" GIBB. PARTITION
	EXISTING SUITE W/FR. FR. SEPARATION TO REMAIN

**LIQUOR AND CANNABIS REGULATION BRANCH
APPROVAL IN PRINCIPLE**

Subject to the terms and/or conditions specified in the approval in principle letter(s) dated: June 12, 2019

Job #: 201585 Max Person Capacity: 44

Authority: [Signature]

LCRB OFFICIAL PLAN
MUST BE KEPT WITH CANNABIS RETAIL STORE LICENCE
AND AVAILABLE FOR INSPECTION AT ALL TIMES

Date Issued: July 19, 2019

Licence # 450045 General Manager

LCLB:EX

From: LCRB Cannabis Licensing LCLB:EX
Sent: Friday, November 16, 2018 3:03 PM
To: 'jd@donnellygroup.ca'
Subject: New Non-Medical Cannabis Retail Store Application - Lightbox Enterprises Ltd - job 001595

Attention: Jeffrey Donnelly

Good afternoon,

Your application for a Non-Medical Cannabis Retail Store has been received. Applications are initially screened to determine whether all documentation and information is available in order to deem the application complete and processing to begin.

Upon review of your application, the following documents was determined to be missing. **Please submit the missing information and documents within 10 days of this email.** All required forms are to be submitted in high quality PDFs to cannabis.licensing@gov.bc.ca

Applicant Legal Entity Information: Please provide the following information / documents

Donnelly Holdings Ltd:

- List of key personnel

Please provide the above information as pdf attachments to a reply email and ensure the subject line of your email contains the Applicant Name and the Application Job Number (as above). Note that all correspondence will be completed through email to cannabis.licensing@gov.bc.ca

If you have any questions, please contact the Cannabis Helpdesk at 1-866-209-2111, select option 2 – for Cannabis inquires, then option 2 for Client Support Team.

Thank you,

Application Intake/db

Liquor and Cannabis Regulation Branch

From: LCRB Cannabis Licensing LCLB:EX
Sent: Thursday, November 22, 2018 8:52 AM
To: 'jd@donnellygroup.ca'
Subject: RE: New Non-Medical Cannabis Retail Store Application - Lightbox Enterprises Ltd - job 001595

Attention: Jeffrey Donnelly

Good morning,

Upon review of your application, please see below for an updated list of the documents that have been determined to be missing. **Please submit the missing information and documents within 10 days of this email.** All required forms are to be submitted in high quality PDFs to cannabis.licensing@gov.bc.ca

Applicant Legal Entity Information: Please provide the following information / documents

Donnelly Holdings Ltd:

- List of key personnel

Business Financial Integrity:

- Projected financial statements
 - Balance Sheet
 - Profit and loss Statement
 - Cash Flows
- Assumptions used for projections

Please provide the above information as pdf attachments to a reply email and ensure the subject line of your email contains the Applicant Name and the Application Job Number (as above). Note that all correspondence will be completed through email to cannabis.licensing@gov.bc.ca

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Thank you,

Application Intake/db

Liquor and Cannabis Regulation Branch

From: LCRB Cannabis Licensing LCLB:EX
Sent: Friday, November 16, 2018 3:03 PM
To: 'jd@donnellygroup.ca'
Subject: New Non-Medical Cannabis Retail Store Application - Lightbox Enterprises Ltd - job 001595

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Donnelly Holdings Ltd:

- List of key personnel

Please provide the above information as pdf attachments to a reply email and ensure the subject line of your email contains the Applicant Name and the Application Job Number (as above). Note that all correspondence will be completed through email to cannabis.licensing@gov.bc.ca

If you have any questions, please contact the Cannabis Helpdesk at 1-866-209-2111, select option 2 – for Cannabis inquires, then option 2 for Client Support Team.

Thank you,

Application Intake/db

Liquor and Cannabis Regulation Branch

INSTRUCTIONS

Complete this application form and assemble all required documents. Upload the application package at: <https://justice.gov.bc.ca/cannabislicensing/>. After the application package has been submitted, the Liquor and Cannabis Regulation Branch (LCRB) may contact the applicant for additional information or documents.

BEFORE STARTING THE APPLICATION

Before starting the application, ensure that:

- The corporation has a registered business number issued by the Canada Revenue Agency
- The corporation is not a federally licensed producer of cannabis
- The person filling out and submitting the application is at least 19 years old

The Province is not placing a cap on the number of non-medical cannabis stores that can operate in B.C. However, a licensee can only hold or have an interest in a maximum of eight cannabis retail store licences. For the purposes of the retail store licence cap, generally a franchisor cannot have more than 8 franchisees. This limit will be reviewed on January 1, 2021.

DOCUMENT CHECKLIST

An applicant for a cannabis retail store licence who is applying as a corporation must provide the LCRB with the following completed documents. Failing to include them will delay the application process.

All documents must be clear and legible. Unless otherwise indicated, all documents must be submitted in high-quality PDF format.

Application Form

- ☒ A completed "Cannabis Retail Store Licence Application: Corporation" form (this application form)

Documents Related to the Proposed Store

- ☒ A copy of the offer to purchase, lease, or sub-lease the proposed store location. This document is required unless the applicant currently owns or leases the store location.
- OR**
- ☐ A copy of the lease, sub-lease, or proof of ownership of the proposed store location (if available at the time the application is submitted)
- *This documentation is not required to be submitted as part of the application package. However, it will be required before the licence is issued*
 - *Leases or other arrangements must not expire for at least 12 months from the date the licence is issued*
- ☒ Photos or renderings of the store's exterior (.jpg, .gif, .png)
- *Must show that cannabis is not visible from outside the store*
 - *If submitting photos, the photos must be taken specifically for the purpose of the application (not general/stock images) and must be no more than six months old*
 - *If submitting renderings, renderings may be either printed or hand-drawn (as long as they are legible)*
- ☒ Photos or renderings of the store's signage (.jpg, .gif, .png)
- *The signage submitted must show the name of the store and all words, images and symbols used in the signage*
 - *Signage must not contain any pictures, images or symbols that imply the sale of medical cannabis (e.g. a green cross)*
 - *Signage must not imply an association with another business (other than another non-medical cannabis retail store)*
 - *If submitting renderings, renderings may be either printed or hand-drawn (as long as they are legible)*
- ☒ Floor Plan(s)
- A **floor plan** is a document, showing a view from above, of the dimensions and relationships between rooms, spaces and other physical features on each floor of a structure. The document must measure at least 8.5" x 11" (standard letter size). A floor plan for each level of the establishment must be submitted if the proposed establishment has more than one level. Either a hand-drawn or computer-generated plan is acceptable, as long as the plan is drawn to scale and is clear and legible. A floor plan must not be submitted on graph paper or paper with gridlines.*

Floor plan(s) - Continued

The floor plan must be submitted at the time of application and it must identify the proposed non-medical cannabis retail area(s) plus the following interior features of the establishment:

- Each room or area labeled with its intended use and dimensions;
- Washrooms, stairs and elevators;
- Entrances and exits (including those used by staff only);
- Cannabis storage areas;
- Sales counter and cash register locations;
- Furniture and fixture layout (e.g. shelves, display cases); and
- Identify the security system and other physical security features that secure the store.



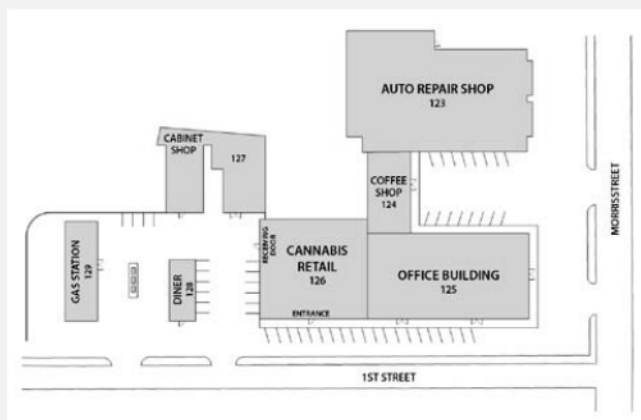
Example of floor plan

☒ Site Plan(s)

A **site plan** is a document showing any existing and proposed building footprints, pathways of travel, parking, and landscaping elements, and the surrounding area. The document must measure at least 8.5" x 11" (standard letter size). Either a hand-drawn or computer-generated plan is acceptable, as long as the plan is drawn to scale and is clear and legible. A site plan must not be submitted on graph paper or paper with gridlines.

The site plan must include the proposed store footprint and a representation of any interior or exterior spaces surrounding the store, including:

- The location of any other buildings/businesses on the same site, each building footprint, type of businesses (e.g. gas station, office building) and building names, and their entrances and exits;
- A description of the type of separation proposed (for any adjoining businesses);
- Road access and exits, including any relevant street names; and
- Parking lots.



Example of site plan

If the proposed store is located inside a building with other businesses (e.g. a mall), submit **two** site plans:

- One site plan showing location of any other buildings/businesses on the same site, including:
 - Each building footprint, building name and a list of businesses operating inside the building
 - Road access and exits, including any relevant street names, and
 - Parking lots
- A second site plan showing the location of the proposed store inside the building's footprint
 - All entrances and exits for the building
 - The location, name and type of businesses operating inside the building
 - The store footprint with all entrances and exits for the store, and
 - A description of the type of separation proposed for any business adjoining the proposed store

Full height walls are required for separation and no connecting doors between the cannabis retail store and the neighbouring business are permitted.

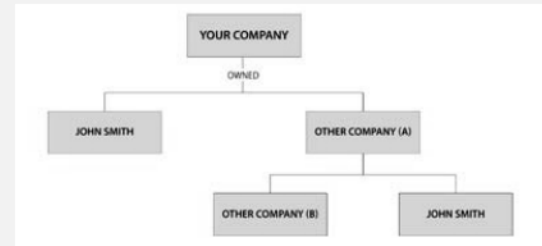
The cannabis retail store may share a vestibule with another type of business (e.g. a liquor store or grocery store) provided each business has its own controlled entrance within the vestibule. The cannabis retail store cannot share a vestibule with a business that would be contrary to public interest (i.e. business aimed at minors or a liquor consumption business).

Documents Related to the Corporation Applying for the Licence

- ☒ Notice of Articles
- ☒ Central Securities Register document. (Note: This is **NOT** required for public corporations)
- ☒ List of key personnel of the corporation
 - Key personnel are those people having authority and responsibility for planning, directing, and controlling the activities of the corporation, either directly or indirectly
 - Key personnel typically include: chief executive officer, chief operating officer, chief financial officer, vice presidents, senior managers

- ☒ Document of organization structure showing the corporation's business relationships:

- Must include all parent companies, holding companies, subsidiaries and partnerships
- For each company, include:
 - Company name
 - Relationship to the corporation applying for the licence (e.g. subsidiary)
 - Percentage of ownership in the corporation applying for the licence



Example of organization structure (applicable to Private Corporation only)

Financial Documents (if the corporation has operated for more than one year)

- ☐ Completed *Business Financial Integrity* form

- ☐ Annual financial statements for the past 3 years including:

- Balance sheet
- Profit and loss statement
- Cash flows

- ☐ Tax filing for the past 3 years in all jurisdictions filed in

- ☐ Notice of Assessment (or equivalent) for past 3 years in all jurisdictions filed in

- ☐ Documentation of funding sources and amounts

- ☐ Documentation about any debts owed

- ☐ Documentation about any loans given

Financial Documents (if the corporation has operated for less than one year)

- ☒ Completed *Business Financial Integrity* form

- ☒ Projected financial statements, including:


- Balance sheet
- Profit and loss statement
- Cash flows
- Assumptions used for projections

Privacy Collection Notice

The information requested on this form is collected by the Liquor and Cannabis Regulation Branch under Sections 26 (a) and (c) of the Freedom of Information and Protection of Privacy Act for the purpose of cannabis licensing, compliance and enforcement matters in accordance with the Cannabis Control and Licensing Act. Should you have any questions about the collection, use, or disclosure of personal information, please contact the Freedom of Information Officer at PO Box 9292 STN PROV GVT, Victoria, BC, V8W 9J8 or by phone toll free at 1-866-209-2111.

PART 1: CORPORATION DETAILS

Complete all fields. Fields that are incomplete or incorrect will cause delays.

Incorporation Number BC1178316	Date of Incorporation September 5, 2018 	Business Number <small>9 digit number from the Canada Revenue Agency</small> 737053488
Business Contact <small>The name and contact information of the person LCRB should contact for ongoing communication.</small>		
Contact Person Jeffrey Donnelly	Phone 604-880-5038	Email jd@donnellygroup.ca
Mailing Address <small>The address for snail mail, including where licence renewal notifications will be sent.</small>		
Corporation Name Lightbox Enterprises Ltd.	Address 1800-510 West Georgia Street,	
City Vancouver	Country Canada	Province/State BC
Postal Code/ZIP Code V6B 0M3		

PART 2: DIRECTORS & OFFICERS

Enter the following information for all directors and officers. If more space is required, please use a separate piece of paper and upload it as a PDF along with supporting documents. Please title the additional page as "Directors, Officers."

First Name	Last Name	Email	Position	Date of Appointment
Jeffrey	Donnelly	jd@donnellygroup.ca	Director	s.22

☐ Check this box if the application includes additional pages.

PART 3: SHAREHOLDERS

If the applicant is a **private corporation**, enter the following information for ALL voting shareholders. Complete:

- Shareholder Type
- Name
- Email
- Number of Voting Shares
- Plus, voting shareholders (individuals) holding less than 10% interest must provide their full legal name and date of birth on a separate sheet of paper.

If the applicant is a **public corporation**, complete all the fields below for ALL shareholders with a 20% or greater interest.

If more space is required, please use a separate piece of paper and upload it as a PDF along with supporting documents. Please title the additional page as "Shareholders."

Shareholder Type	Name <small>individual or organization</small>	Email	Number of Voting Shares	Percentage of Shares
Private Corporation	Donnelly Hospitality Mana	jd@donnellygroup.ca	s.22	100
Total Number of Shares in the Corporation:			s.22	100%

☐ Check this box if the application includes additional pages.

If the applicant is a private corporation, has the corporation's Central Securities Register been included?

☒ Yes

PART 4: CONNECTIONS TO FEDERAL PRODUCERS OF CANNABIS

Does the corporation have any association, connection or financial interest in a federally licensed producer of cannabis?

☐ Yes ☒ No

i This includes, but is not limited to:

- Directly holding voting shares in a federal producer.
- Indirectly holding voting shares in a federal producer. For example, through a subsidiary or holding voting shares in a company that holds voting shares in a federal producer.
- Having a beneficial interest in a federal producer. For example, through a trust.
- A contractual business arrangement of any sort.

If Yes - Provide the name of the federal producer and details of the connection (e.g. percentage and type of shares held).

For Private Corporations only:

Does a federally licensed producer of cannabis have any association, connection or financial interest in the corporation?

☐ Yes ☒ No

i This includes, but is not limited to:

- Directly holding voting shares in the corporation.
- Indirectly holding voting shares in the corporation. For example, through a subsidiary or holding voting shares in a company that holds voting shares in the corporation.
- Having a beneficial interest in the corporation. For example, through a trust.
- A contractual business arrangement of any sort.

If Yes - Provide the name of the federal producer and details of the connection (e.g. percentage and type of shares held).

For Public Corporations only:

Does any shareholder with 20% or more voting shares have any association, connection or financial interest in a federally licensed producer of cannabis?

☐ Yes ☐ No

i This includes, but is not limited to:

- Directly holding voting shares in a federal producer.
- Indirectly holding voting shares in a federal producer. For example, through a subsidiary or holding voting shares in a company that holds voting shares in a federal producer.
- Having a beneficial interest in a federal producer. For example, through a trust.
- A contractual business arrangement of any sort.

If Yes - Provide the name of the federal producer and details of the connection (e.g. percentage and type of shares held).

Does any shareholder with 20% or more of voting shares have any immediate family members with any connection to a federally licensed producer of cannabis?

☐ Yes ☐ No

i This includes, but is not limited to:

- Directly holding voting shares in a federal producer.
- Indirectly holding voting shares in a federal producer. For example, through a subsidiary or holding voting shares in a company that holds voting shares in a federal producer.
- Having a beneficial interest in a federal producer. For example, through a trust.
- A contractual business arrangement of any sort.

Immediate family members include spouses, parents, siblings, children, sons-in-law and daughters-in-law

If Yes - Provide the name of the federal producer and details of the connection (e.g. percentage and type of shares held).

PART 5: APPLICATION CONTACT DETAILS

The contact the LCRB should communicate with regarding the application

First Name Jeffrey	Last Name Donnelly	Title <i>What role do they have in your business?</i> Director
Email jd@donnellygroup.ca	Phone 604-880-5038	

PART 6: PROPERTY DETAILS

Physical Address of Proposed Store

Proposed Store Name

As part of the application process we will review the proposed store's name. The name cannot imply sales of medicinal cannabis.

Hobo

i Words related to medicinal products or similar sounding words will not be approved such as:

- Pharmacy / Farmacy
- Dispensary / Dispensary
- Clinic / Klinik
- Apothecary / Apothekary

Address

2121 Springfield Road

City

Kelowna

Province

British Columbia

Postal Code

V1Y 7X1

Parcel Identifier (PID)

002-865-637

i The property's PID may be found on:

- The title to the property
- Through the B.C. Land Title and Survey Authority
- The tax assessment notice from BC Assessment
- BC Assessment's e-valueBC website
- The municipal tax notice
- The property lease

Does the corporation currently have an offer to lease, sub-lease or purchase the location?

☒ Yes ☐ No

If YES, please confirm the following: ☒ A copy of the offer to lease, sub-lease, or purchase the location is included with this application.

OR

Does the corporation currently own, lease, or sub-lease the location for a period of more than 12 months?

☐ Yes ☐ No

If YES, please confirm the following: ☐ A copy of the proof of ownership, lease or sub-lease is included with this application.

If NO, applicants must purchase or lease the property before receiving conditional approval. A licence cannot be issued unless the applicant provides evidence of the purchase or lease. Leases or other arrangements must not expire for at least 12 months from the date a licence is issued.

PART 7: DECLARATIONS

This application should be submitted by an individual with the authority to bind the applicant. The Branch relies on the applicant to ensure that the individual who submits this application is authorized to do so. Typically, an appropriate individual in a corporation will be a duly authorized signatory who will usually be an officer or, in some cases, a director.

Note: An agent, lawyer, licensee representative or third party operator may **NOT** submit this application on behalf of the applicant.

☒ **I understand and affirm that I am authorized to submit the application**

Section 22(2) of the Cannabis Control and Licensing Act states: "A person must not submit to the general manager an application, or information or a record included as part of the application, that contains false or misleading information, or fails to disclose a material fact".

☒ **I understand and affirm that all of the information provided for this application is true and complete**

Name of Authorized Individual (Please Type)

Jeffrey Donnelly



Job # 001595

December 1, 2018

City of Kelowna
Ryan Smith
Community Planning Department Manager
City of Kelowna
Via email: rsmith@kelowna.ca

Dear Ryan Smith:

Re: Application for a Non-Medical Cannabis Retail Store Licence
Applicant: Lightbox Enterprises Ltd.
Proposed Establishment Name: Hobo
Proposed Establishment Location: 2121 Springfield Road

The Applicant, Lightbox Enterprises Ltd., has applied to the Liquor and Cannabis Regulation Branch (LCRB) for a Non-Medical Cannabis Retail Store (CRS) licence proposed to be located at the above-noted address. The applicant is requesting operating hours from 9:00am to 11:00pm, seven days a week. The applicant contact is Jeffrey Donnelly/604-880-5038/jd@donnellygroup.ca

Local governments and Indigenous nations are a crucial part of the licensing process. Section 33(1) of the *Cannabis Control and Licensing Act* prevents the LCRB from issuing a CRS licence without a positive recommendation regarding the CRS licence application from the local government or Indigenous nation.

The LCRB is requesting the City of Surrey consider the application and provide the LCRB with a written recommendation with respect to the application. To assist with your assessment of the application, a site map of the proposed cannabis retail store is attached. The following link opens a document which provides specific and important information and instructions on your role in the CRS licensing process, including requirements for gathering the views of residents.

Local Governments' Role in Licensing Non-Medical Cannabis Retail Stores
OR
Indigenous Nations' Role in Licensing Non-Medical Cannabis Retail Stores

The LCRB will initiate an applicant suitability assessment regarding this CRS application, also known as a "fit and proper" assessment, which is comprised of financial integrity checks and security screenings of the applicant and persons associated with the applicant. Once the

**Liquor and Cannabis
Regulation Branch**

Mailing Address:
PO Box 9292 Stn Prov Govt
Victoria BC V8W 9J8

Location:
645 Tyee Road
Victoria BC V9A 6X5
Phone: 250 952-5787
Facsimile: 250 952-7066

Website:
www.gov.bc.ca/cannabisregulationandlicensing

assessment is complete, you will be notified of the LCRB's determination. You may choose to withhold your recommendation until the LCRB has made a final decision regarding the applicant's suitability.

If you choose not to make any recommendation regarding this application, please contact the LCRB at the earliest convenience. Please note that a Cannabis Retail Store Licence cannot be issued unless the LCRB receives a positive recommendation from the local government or Indigenous nation. Similarly, if a local government or Indigenous nation decides not to make any recommendation, the LCRB will not consider the application any further.

If you have any questions regarding this application please contact me at s.15; s.19 or
s.15; s.19 @gov.bc.ca.

Sincerely,

s.15; s.19

s.15; s.19

Senior Licensing Analyst

Attachment

copy: LCRB Inspector

Applicant: jd@donnellygroup.ca

From: s.15; s.19 LCRB:EX
Sent: January 25, 2019 11:19 AM
To: s.15; s.19 LCRB:EX
Subject: FW: Store Layout Inquiry for Cannabis Retail
Attachments: MainSt-Sightlines-3 LCRB Job 1797.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

FYI. Can you upload this email chain and picture to the file?

Thanks,

s.15; s.19 | A/Team Lead Licensing Operations
Liquor & Cannabis Regulation Branch
Phone: s.15; s.19

From: s.15; s.19 LCLB:EX
Sent: January 24, 2019 4:03 PM
To: 'sara@risingtideconsultants.ca'
Subject: FW: Store Layout Inquiry for Cannabis Retail

Hello Sara,

Thank you for your email. In section 5(1)(p) of the Cannabis Regulations it states "(p) the retail store must be located in a permanent building or structure and be enclosed by floor-to-ceiling walls that are not transparent" as the mock up appears to have windows that are transparent with wooden slat blinds behind it. This wouldn't be acceptable as is; the window glass itself needs to be opaque.

Going forward, inquiries can be directed to Cannabis.Licensing@gov.bc.ca with the job number in the subject line. If the application is far enough in the process that it has been assigned to a SLA, your inquiry or supporting documents will be forwarded to them to review and add to the file.

Warm Regards,

s.15; s.19 | A/Team Lead Licensing Operations
Liquor & Cannabis Regulation Branch
Phone: s.15; s.19

From: Sara Mohsin [<mailto:sara@risingtideconsultants.ca>]
Sent: January 24, 2019 10:45 AM
To: s.15; s.19 LCLB:EX
Cc: Bert Hick; Stephanie McKenna
Subject: RE: Store Layout Inquiry for Cannabis Retail

Good morning s.15:

Further to the below email I have now received a mock up (attached) from the client. It pertains to LCRB Cannabis Retail Job #1797.

When an email is received from the LCRB there is generally not a specific contact to reply to other than responding to the email with the assigned job# . I raise the point as my question is who I may ask to review the attached mock up for any issues so that our client can comply with the LCRB and move forward with their retail plan?

Thank you for any advice on this matter!

Best,
Sara

Sara Mohsin
Client Relations Officer



P 604.669.2928
F 604.669.2920
E sara@risingtideconsultants.ca
W www.risingtideconsultants.ca
1620 - 1130 W. Pender St., Vancouver, BC V6E 4A4

From: Sara Mohsin

Sent: Wednesday, January 23, 2019 3:54 PM

To: s.15; s.19 LCLB:EX' s.15; s.19 @gov.bc.ca>

Subject: Store Layout Inquiry for Cannabis Retail

Good afternoon, s.15:

My name is Sara and I work with Edna Lizotte and Bert Hick at Rising Tide. We had a few questions about store layout pertaining to the recent regulations update this month; the LCRB was asked via email the below questions, and I have also included the response when follow up by phone. The intent in asking these questions is that we want to make sure the client is complies with the regulations while making the best use of resources for their store.

I appreciate any insight or feedback that you are able to provide.

Questions to the LCRB

- Can each store have a 36" stage in the front window and behind it secondary glazing that will have wood slats and between the slat there will be non-transparent slats that will allow light through, but will not allow sight lines or visual into the store itself?
- Can the window glazing have a film applid that is a mural or artwork print that is non-cannabis, non-cannabis promotional and not-appealing to the youth?

LCRB Answer :

- As long as it's {window} opaque that shouldn't be a problem. LCRB said the best thing to do would be to create a mock up so that they can review, so that there isn't any issues further down the line.

Please note that a mock up will be included, although we want to make sure that the LCRB is receiving the detailed information that is needed.

Kind regards,

Sara

Sara Mohsin
Client Relations Officer



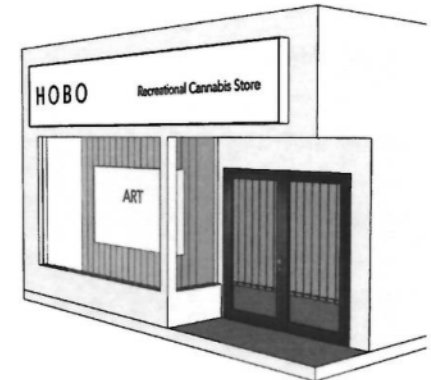
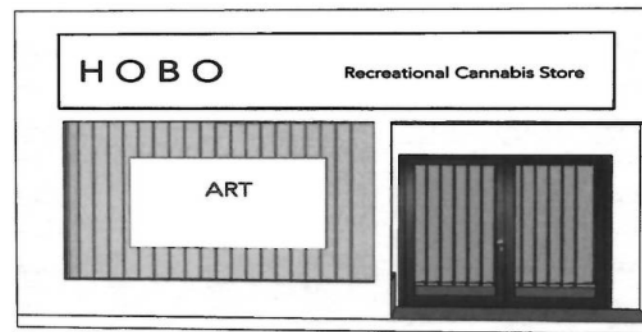
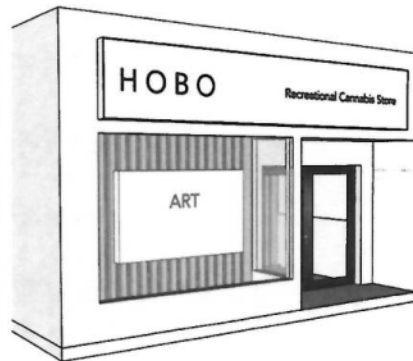
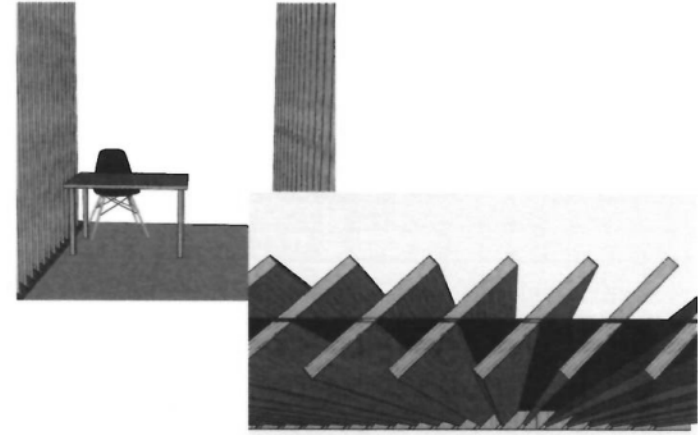
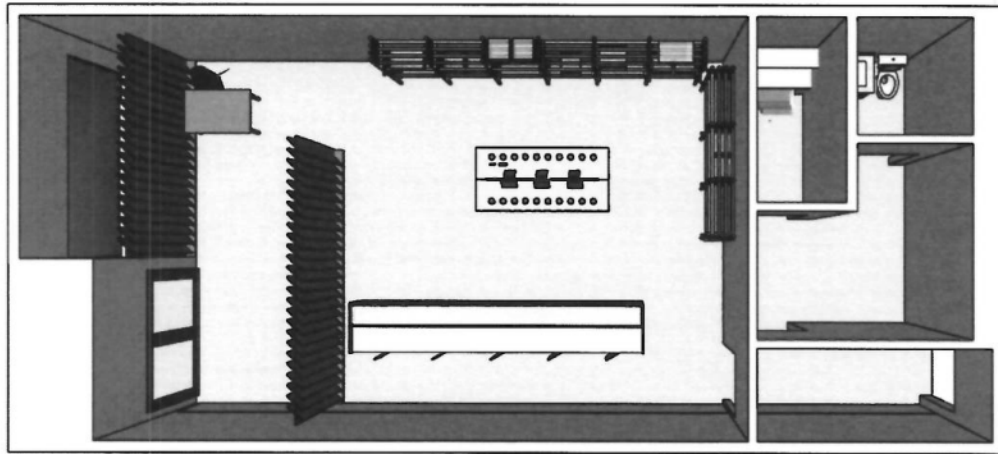
P 604.669.2928

F 604.669.2920

E sara@risingtideconsultants.ca

W www.risingtideconsultants.ca

1620 - 1130 W. Pender St., Vancouver, BC V6E 4A4





Job #001595

March 21, 2019

Via email: rsmith@kelowna.ca

Ryan Smith
Community Planning Department Manager
City of Kelowna

Re: Application for a Non-Medical Cannabis Retail Store Licence
Applicant: Lightbox Enterprises Ltd.
Proposed Establishment Name: Hobo
Proposed Establishment Location: 2121 Springfield Road

The Liquor and Cannabis Regulation Branch (LCRB) has completed the required financial integrity checks and security screenings for Lightbox Enterprises Ltd., and persons associated with Lightbox Enterprises Ltd.

One of the requirements that must be met before the issuance of a Non-Medical Cannabis Retail Store Licence (CRS) under the *Cannabis Control and Licensing Act* is a positive recommendation from the local government and/or Indigenous nation of the area in which the proposed retail store is located. The General Manager must take the recommendation into account in deciding whether to issue the CRS to the applicant.

If the local government or Indigenous nation chooses not to make a recommendation regarding this application, please contact the LCRB at the earliest convenience.

For more information on the local government and Indigenous nation role please see the following links:

https://www2.gov.bc.ca/assets/gov/employment-business-and-economic-development/business-management/liquor-regulation-licensing/documents/local_government_role_in_licensing_cannabis_retail_stores.pdf

OR

https://www2.gov.bc.ca/assets/gov/employment-business-and-economic-development/business-management/liquor-regulation-licensing/documents/indigenous_nation_role_in_licensing_cannabis_retail_stores.pdf

If you have any questions please feel free to contact me at s.15; s.19 rgov.bc.ca.

Sincerely,
s.15; s.19

s.15; s.19

Senior Licensing Analyst

copy: Applicant
s.15; s.19 Provincial Director Compliance

**Liquor and Cannabis
Regulation Branch**

Mailing Address:
PO Box 9292 Sta Prov Govt
Victoria BC V8W 9J8

Location:
645 Tyee Road
Victoria BC V9A 6X5
Phone: 250 952-5787
Facsimile: 250 952-7066

Website:
www.gov.bc.ca/cannabisregulationandlicensing

LCRB:EX

From: Ryan Smith <rsmith@kelowna.ca>
Sent: March 22, 2019 7:45 AM
To: s.15; s.19 LCRB:EX
Subject: RE: Fit & Proper complete - Non-Medical Cannabis Retail Store application - Lightbox Enterprises Ltd. - Hobo - Job 001595

Follow Up Flag: Follow up
Flag Status: Completed

Thanks for the heads up s.15;

Ryan

Ryan Smith
 Department Manager, Community Planning | City of Kelowna
 250-469-8426 | rsmith@kelowna.ca
 Connect with the City | kelowna.ca

From: s.15; s.19 LCRB:EX [mailto:s.15; s.19 LCRB:EX@gov.bc.ca]
Sent: Thursday, March 21, 2019 8:37 AM
To: Ryan Smith <rsmith@kelowna.ca>
Cc: s.15; s.19 LCRB:EX s.15; s.19 LCRB:EX@gov.bc.ca; 'jd@donnellygroup.ca' <jd@donnellygroup.ca>
Subject: Fit & Proper complete - Non-Medical Cannabis Retail Store application - Lightbox Enterprises Ltd. - Hobo - Job 001595

Good morning Ryan,

The Liquor and Cannabis Regulation Branch (LCRB) has completed the required financial integrity checks and security screenings for Lightbox Enterprises Ltd., and persons associated with Lightbox Enterprises Ltd. Please see the attached letter.

I await the city's recommendation to proceed.

If you have any questions please feel free to contact me.

Kind regards,

s.15; s.19 | Senior Licensing Analyst
 Liquor & Cannabis Regulation Branch | Ministry of Attorney General
 PO Box 9292 Stn Prov Govt | Victoria BC | V8W 9J8
 Direct: s.15; s.19 or Branch: 1-866-209-2111

LCRB: www.gov.bc.ca/liquorregulationandlicensing



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From: Stephanie McKenna <stephanie@risingtideconsultants.ca>
Sent: March 22, 2019 1:30 PM
To: s.15; s.19 LCRB:EX
Cc: Jeff Donnelly; Sara Mohsin
Subject: Franchise agreement - Lightbox Enterprises Ltd. - Hobo - Job 001595

Good afternoon s.15;

This does not apply to the applicant or Job 001595.

Kind regards,
Stephanie

Stephanie McKenna
Licensing Specialist



P 604.669.2928
F 604.669.2920
E stephanie@risingtideconsultants.ca
W www.risingtideconsultants.ca
1620 – 1130 W. Pender St., Vancouver, BC V6E 4A4

From: 's.15; s.19 LCRB:EX' <s.15; s.19 @gov.bc.ca>
Date: March 21, 2019 at 8:54:58 AM PDT
To: "'jd@donnellygroup.ca'" <jd@donnellygroup.ca>
Subject: Franchise agreement - Lightbox Enterprises Ltd. - Hobo - Job 001595


Good morning Mr. Donnelly,

Would you please forward a copy of your franchise agreement and advise if it is the same for all stores. If not, one will be required for each store application.

Thank you,

s.15; s.19 | Senior Licensing Analyst
Liquor & Cannabis Regulation Branch | Ministry of Attorney General
PO Box 9292 Stn Prov Govt | Victoria BC | V8W 9J8
Direct: s.15; s.19 or Branch: 1-866-209-2111

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LCRB:EX

From: Chad Cole <chadc@donnellygroup.ca>
Sent: May 28, 2019 4:07 PM
To: s.15; s.19 LCRB:EX
Cc: Jeff Donnelly
Subject: Re: Common hallway ~ Lightbox Enterprises Ltd. - Hobo - Job 001595
Attachments: Kelowna Hobo PROV .pdf; ATT00001.htm

Follow Up Flag: Follow up
Flag Status: Completed

Hi s.15;

Thank you for your email. Please find attached the updated floorpan for Kelowna. Please let me know if this satisfies the requirements and if there is anything else needed, do not hesitate to contact me.

Kind Regards,

From: s.15; s.19 LCRB:EX
Sent: May 28, 2019 5:13 PM
To: s.15; s.19 LCRB:EX
Subject: HOBO

Hey s.15;

I see the AIP job for HOBO in Kelowna is in my box now but I haven't seen an AIP yet. Can you let me know if one has been issued, as I don't want to contact them if it hasn't yet been sent out.

Cheers

s.1

s.15; s.19

Regional Inspector Interior / Northern District
Special Provincial Constable
Liquor & Cannabis Regulation Branch - Compliance and Enforcement Division
207-478 Bernard Ave. Kelowna, B.C. V1Y 6N7

s.15; s.19

www.gov.bc.ca/liquorregulationandlicensing

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Job # 001595

June 12, 2019

via email:jd@donnellygroup.ca

Jeffrey Donnelly
1800 - 510 West Georgia Street
Vancouver BC V6B0M3

Dear Jeffrey Donnelly:

**Re: Application for a Non-Medical Cannabis Retail Store Licence
Approval in Principle – Pending Final Inspection
Applicant: LIGHTBOX ENTERPRISES LTD.
Proposed Establishment Name: Hobo
Proposed Establishment Location: 2121 Springfield Road, Kelowna
Expiry Date of AIP: June 12, 2020**

The Applicant, LIGHTBOX ENTERPRISES LTD., has applied to the Liquor and Cannabis Regulation Branch (LCRB) for a Non-Medical Cannabis Retail Store (CRS) licence proposed to be located at the above-noted address. The Applicant has met the eligibility and suitability requirements of the *Cannabis Control and Licensing Act* (the Act) and is now ready to be issued Approval in Principle.

Section 33(1) of the Act prevents the LCRB from issuing a CRS licence without a positive recommendation to the LCRB from the local government or Indigenous nation regarding the CRS licence application. The City of Kelowna has provided a positive recommendation for the consideration of the LCRB.

Approval in Principle (AIP)

This approval is subject to the all of the general terms and conditions as set out in the Cannabis Retail Store Terms and Conditions Handbook and the following conditions:

- Hours of operation are:
 - 9:00 am to 11:00pm Monday to Sunday
- The LCRB has reviewed and approved a sample of the proposed signage denoting the name “Hobo”. Should you wish to alter the name or signage in any way, prior approval from the LCRB is required.

**Liquor and Cannabis
Regulation Branch**

Mailing Address:
PO Box 9292 Stn Prov Govt
Victoria BC V8W 9J8

Location:
645 Tyee Road
Victoria BC V9A 6X5
Phone: 250 952-5787
Facsimile: 250 952-7066

Website:
www.gov.bc.ca/cannabisregulationandlicensing

- The door leading to the common exit hallway & staff washroom is to be for staff use only and is to remain locked at all times.
- Your business must comply with all applicable federal, provincial, and local government/Indigenous nation laws, including but not limited to the federal rules regarding the promotion of cannabis found in the Cannabis Act and the Cannabis Regulations.

Please ensure you review the Cannabis Retail Store Terms and Conditions Handbook prior to scheduling a final inspection as it will also be an opportunity to discuss any questions you may have regarding the operation of the CRS establishment in accordance with the Act and Regulation. *The handbook is updated periodically; it is your responsibility to keep apprised of any changes that may occur.*

Enclosed is a copy of the floor plan which has been stamped "Approved in Principle". The proposed licensed area has been highlighted in blue and will be confirmed by the LCRB Inspector during the final inspection. Once confirmed, the approved floor plan will become an official component of the CRS Licence.

This AIP allows you to proceed with any construction/renovation detailed in the approved floor plan, but does not constitute final approval.

Final Inspection Requirements

When construction/renovation of the establishment is complete and you are ready to open for cannabis sales, please contact LCRB Inspector s.15; s.19 by telephone at or via email to arrange for a final inspection.

It is recommended that an authorized signatory attend the final inspection. Please ensure that the person attending the final inspection can make a decision or answer questions with respect to any compliance concerns on behalf of the licensee(s). The current contact on file for this application is Jeffrey Donnelly at 604-880-5038 and/or jd@donnellygroup.ca.

At the final inspection:

- You will need to have a copy of this letter and the attached AIP floor plan available for the LCRB Inspector's review and confirmation.
- The Inspector will verify that the establishment matches the AIP floor plans.
- The Inspector will take photographs of the establishment.
- The Inspector will verify the required physical security requirements are in place.
- The Inspector will verify that product displays are installed and secure.
- The Inspector must be satisfied that the product will not be visible from outside the store.

Please Note:

- **This AIP will expire on: June 12, 2020.** A written request for extension to this approval will only be considered if received no later than 30 days prior to the expiry of the AIP. If

Liquor and Cannabis
Regulation Branch

Mailing Address:
P.O. Box 9292 Stn Prov Govt
Victoria BC V8W 9J8

Location:
645 Tyee Road
Victoria BC V9A 6X5
Phone: 250 952-5787
Facsimile: 250 952-7066

Website:
www.gov.bc.ca/cannabisregulationandlicensing

you fail to request an extension within the permitted time frame, this application may be terminated.

- Prior to final approval, the \$1,500.00 first year licensing fee will be required. Once the final inspection is completed, payment can be submitted online at <https://justice.gov.bc.ca/cannabislicensing/dashboard-lite>.
- The BC Liquor Distribution Branch (LDB)
The LDB is the wholesale supplier of non-medical cannabis in B.C. The LDB Cannabis Operations Customer Care Centre is open to serve retailers. For updates and information visit www.bcldbcannabisupdates.com.
- Provincial Sales Tax
If your application for a cannabis retail store licence is approved, you will need to register to collect provincial sales tax. Go to www.gov.bc.ca/pst for more information.
- Cannabis Worker Qualification Requirement
Cannabis retail store licensees in BC must not allow someone to work in their retail store unless the worker has received security verification. Information about the worker qualification is available at: <https://justice.gov.bc.ca/cannabislicensing/policy-document/worker-qualification-training>.

If you have any questions, please feel free to contact me at s.15; s.19
s.15; s.19 @gov.bc.ca

Sincerely,
s.15; s.19

s.15; s.19
Senior Licensing Analyst

Attachment – Floor Plan

copy: Jocelyn Black, City of Kelowna
s.15; s.19 LCRB Inspector
s.15; s.19 Provincial Director Compliance

**Liquor and Cannabis
Regulation Branch**

Mailing Address:
PO Box 9292 Stn Prov Govt
Victoria BC V8W 9J8

Location:
645 Tyeo Road
Victoria BC V9A 6X5
Phone: 250 952-5787
Facsimile 250 952-7066

Website:
www.gov.bc.ca/cannabisregulationandlicensing

From: s.15; s.19 PSSG:EX
Sent: July 9, 2019 8:37 AM
To: s.15; s.19 LCRB:EX
Cc: s.15; s.19 PSSG:EX
Subject: RE: Priority workers - Hobo

Thanks s.15; I have noted these rush requests.

Tracy

From: s.15; s.19 LCRB:EX
Sent: Tuesday, July 9, 2019 7:23 AM
To: s.15; s.19 PSSG:EX <s.15; s.19 @gov.bc.ca>
Cc: s.15; s.19 PSSG:EX <s.15; s.19 @gov.bc.ca>; s.15; s.19 PSSG:EX <s.15; s.19 @gov.bc.ca>
Subject: Priority workers - Hobo

Hi,

See attached list of priority workers for Hobo, 2121 Springfield Rd, Kelowna.

Thank you,

s.15; s.19 | Senior Licensing Analyst
 Liquor & Cannabis Regulation Branch | Ministry of Attorney General
 PO Box 9292 Stn Prov Govt | Victoria BC | V8W 9J8
 Direct: s.15; s.19 or Branch: 1-866-209-2111

LCRB: www.gov.bc.ca/liquorregulationandlicensing



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From: Chad Cole <chadc@donnellygroup.ca>
Sent: July 8, 2019 12:37 PM
To: s.15; s.19 LCRB:EX <s.15; s.19 @gov.bc.ca>
Subject: Re: Approval in Principle CRS Job 001595 – Hobo

Good afternoon s.15;

Please find attached our current staff list for our Hobo store in Kelowna.

Kind regards,

Chad Cole
Operating Partner/Business Development
C: 604.418.9477
www.donnellygroup.ca

On Wed, Jun 12, 2019 at 3:06 PM s.15; s.19 LCRB:EX <s.15; s.19@gov.bc.ca> wrote:

Good afternoon Mr. Donnelly,

The attached documents confirm that your application for a cannabis retail store in Kelowna has been granted Approval In Principle (AIP). The AIP letter outlines what must be completed and provides instructions for scheduling a final inspection. Please print the attached floor plan in colour and have it available for review by the cannabis inspector during the final inspection.

Licensees must ensure that workers in retail stores obtain a security verification from the province. This includes any adult (including the licensee) performing work-related activities in a retail store as an employee, independent contractor or volunteer on a full-time or part-time basis. Instructions for applying are at <https://justice.gov.bc.ca/cannabislicensing/policy-document/worker-qualification-training>. **Please reply to this email with a list of the full names and dates of birth for all people who will work in the store.**

If you have any questions concerning the attached correspondence or licensing processing, please do not hesitate to contact me.

Thank you,

s.15; s.19

| Senior Licensing Analyst

Liquor & Cannabis Regulation Branch | Ministry of Attorney General

PO Box 9292 Stn Prov Govt | Victoria BC | V8W 9J8

Direct: s.15; s.19 or Branch: 1-866-209-2111

LCRB: www.gov.bc.ca/liquorregulationandlicensing



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SERVICE ACCOUNTABILITY

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LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: July 17, 2019 11:42 AM
To: Chad Cole
Subject: Re: New Cannabis Store

Hey Chad

Yes that is fine how about 10:30?

Cheers

s.15:

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

Sent from my iPhone

On Jul 17, 2019, at 11:00 AM, Chad Cole <chadc@donnellygroup.ca> wrote:

Hey s.15:

Is it possible to switch our inspection to Friday, as early in the day as possible? We just have a bit of a power issue that needs addressing. If we can't I will keep it tomorrow and make the guys work through the night. Please let me know.

Thank you

On Mon, Jul 15, 2019 at 1:31 PM ^{s.15; s.19} LCRB:EX ^{s.15; s.19} <@gov.bc.ca> wrote:

Sounds good see you then.

s.15; s.19

Regional Inspector Interior / Northern District

Special Provincial Constable

Liquor & Cannabis Regulation Branch - Compliance and Enforcement Division

207-478 Bernard Ave. Kelowna, B.C. V1Y 6N7

s.15; s.19

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From: Chad Cole <chadc@donnellygroup.ca>

Sent: July 15, 2019 1:31 PM

To: s.15; s.19 LCRB:EX <s.15; s.19 |[@gov.bc.ca](mailto:)>

Subject: Re: New Cannabis Store

Hi s.15;

We can do Thursday at 11am.

Thanks for letting me know.

Regards,

Chad

On Mon, Jul 15, 2019 at 1:28 PM s.15; s.19 LCRB:EX <s.15; s.19 |[@gov.bc.ca](mailto:)> wrote:

Hey Chad,

I have had something come up, and wondering if we could change our inspection time. I could do any of the following:

Wednesday evening

Thursday morning 11am

Friday morning before noon

Let me know what works for you.

Cheers

s.15:

s.15; s.19

Regional Inspector Interior / Northern District

Special Provincial Constable

Liquor & Cannabis Regulation Branch - Compliance and Enforcement Division

207-478 Bernard Ave. Kelowna, B.C. V1Y 6N7

s.15; s.19

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From: Chad Cole <chadc@donnellygroup.ca>
Sent: July 3, 2019 2:45 PM
To: s.15; s.19 LCRB:EX <s.15; s.19@gov.bc.ca>
Subject: Re: New Cannabis Store

Hey s.15:

7pm on the 18th works great. We shall see you then.

Regards,

On Wed, Jul 3, 2019 at 2:44 PM s.15; s.19 LCRB:EX <s.15; s.19@gov.bc.ca> wrote:

Hey Chad,

I am not available during the day on the 18th, but I could do the inspection at 7pm on the 18th. Let me know if that works.

Cheers

s.15;
s.19

s.15; s.19

Regional Inspector Interior / Northern District

Special Provincial Constable

Liquor & Cannabis Regulation Branch - Compliance and Enforcement Division

207-478 Bernard Ave. Kelowna, B.C. V1Y 6N7

s.15; s.19

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From: Chad Cole [mailto:chadc@donnellygroup.ca]

Sent: Wednesday, July 3, 2019 12:55 PM

To: s.15; s.19 LCRB:EX

Subject: Re: New Cannabis Store

hi s.15:

I hope you are well. I wanted to schedule our final walk through at our Kelowna store. We will be ready for our final inspection on July 18th, I wanted to schedule asap before your schedule filled up. Please let me know what time on the 18th works.

Thanks so much,

Chad Cole

Operating Partner/Business Development

C: 604.418.9477

www.donnellygroup.ca

On Wed, Jun 12, 2019 at 4:34 PM s.15; s.19 LCRB:EX s.15; s.19 [@gov.bc.ca](mailto:s.15; s.19@gov.bc.ca)> wrote:

Sounds good thanks Chad

s.15; s.19

Regional Inspector Interior / Northern District

Special Provincial Constable

Liquor & Cannabis Regulation Branch - Compliance and Enforcement Division

207-478 Bernard Ave. Kelowna, B.C. V1Y 6N7

s.15; s.19

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From: Chad Cole [mailto:chadc@donnellygroup.ca]
Sent: Wednesday, June 12, 2019 4:34 PM
To: Jeff Donnelly
Cc: s.15; s.19 LCRB:EX; Reid Ogdon
Subject: Re: New Cannabis Store

Hi s.15;

Nice to meet you. We are underway with construction and are looking to do our final inspection early July. I will keep you posted on our build times.

Thank you,

Chad

On Wed, Jun 12, 2019 at 4:06 PM Jeff Donnelly <jd@donnellygroup.ca> wrote:

Hi s.15;

Thanks for the note. My operations director Chad Cole will be contacting as we get closer to opening, he's in Kelowna now. Look forward to meeting you.

JD

iPhone sent

On Jun 12, 2019, at 4:30 PM, ^{s.15; s.19} LCRB:EX ^{s.15; s.19} [@gov.bc.ca](mailto:jd@gov.bc.ca) wrote:

Hi Jeffrey,

You should have received your AIP letter for your store in Kelowna.

Please let me know when you think you will be ready for your final inspection, so we can schedule appropriately.

For the final, everything must be in place including all security measures, storage; displays, signage, window coverings, and if smell jars are to be used - tethered secure jars.

Look forward to hearing from you

Good luck with the new store

Cheers

s.15

s.15; s.19

Regional Inspector Interior / Northern District

Special Provincial Constable

Liquor & Cannabis Regulation Branch - Compliance and Enforcement Division

207-478 Bernard Ave. Kelowna, B.C. V1Y 6N7

s.15 s.19

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--

Chad Cole
Operating Partner / Business Development
604.418.9477
www.donnellygroup.ca
www.hobo.ca

--

Chad Cole
Operating Partner / Business Development
604.418.9477
www.donnellygroup.ca
www.hobo.ca

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Operating Partner / Business Development
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www.hobo.ca

From: s.15; s.19 LCRB:EX
Sent: July 19, 2019 12:13 PM
To: s.15; s.19 LCRB:EX
Subject: Hobo

Hey s.15;

I have completed the inspection for Hobo in Kelowna. All is good.

Cheers

s.1

s.15; s.19

Regional Inspector Interior / Northern District
Special Provincial Constable
Liquor & Cannabis Regulation Branch - Compliance and Enforcement Division
207-478 Bernard Ave. Kelowna, B.C. V1Y 6N7

s.15; s.19

www.gov.bc.ca/liquorregulationandlicensing

Due to security concerns, Liquor Control and Licensing Branch will not accept electronically transmitted applications containing credit card information.

CONFIDENTIALITY NOTICE:

This e-mail message (including attachments) is confidential and may also be privileged, and all rights to privilege are expressly claimed and not waived. Any use, dissemination, distribution, copying, or disclosure, of this message and any attachments, in whole or in part, by anyone other than the intended recipient is strictly prohibited. If you received this message in error, please destroy it and notify the sender immediately. Thank you.

From: Chad Cole <chadc@donnellygroup.ca>
Sent: July 19, 2019 2:29 PM
To: s.15; s.19 LCRB:EX; Jeff Donnelly
Subject: Kelowna Payment
Attachments: Kelowna Licence.pdf; Liquor and Cannabis Regulation Branch Licence Fee Receipt for Springfield Drive.pdf

Hi s.15;

Please find attached our payment for the 2121 Springfield store in Kelowna. I have also attached the licence which I was able to download after payment.

Kind regards,

Chad Cole
Operating Partner/Business Development
C: 604.418.9477
www.donnellygroup.ca

s.15; s.19

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: July 19, 2019 3:21 PM
To: LCRB Licensing Operations LCRB:EX
Subject: RE: Final Approval CRS Licence #450045 – Hobo

Shoot, sorry, my bad.

s.15;

From: LCRB Licensing Operations LCRB:EX
Sent: July 19, 2019 3:06 PM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Subject: FW: Final Approval CRS Licence #450045 – Hobo

Hi s.15;

Just a reminder that the lic ops email should be a bcc, my apologies if I forgot to mention this before!

Thanks,

s.15; s.19
I have a question about the license application process.
s.15; s.19

From: Jeffrey Donnelly <jd@donnellygroup.ca>
Sent: July 19, 2019 2:49 PM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Cc: Chad Cole <chadc@donnellygroup.ca>; s.15; s.19 FIN:EX s.15; s.19 @gov.bc.ca>; LDB Cannabis Customer Experience LDB:EX <cannabis.customerexperience@bcldb.com>; LCRB Licensing Operations LCRB:EX <LCRB.LicensingOperations@gov.bc.ca>; JBlack@kelowna.ca; RCMP@12504706348
Subject: Re: Final Approval CRS Licence #450045 – Hobo

Thanks s.15;

From: 's.15; s.19 LCRB:EX' s.15; s.19 @gov.bc.ca>
Date: Friday, July 19, 2019 at 2:43 PM
To: Jeff Donnelly <jd@donnellygroup.ca>
Cc: Chad Cole <chadc@donnellygroup.ca>; "s.15; s.19 FIN:EX" s.15; s.19 @gov.bc.ca>, "LDB Cannabis Customer Experience LDB:EX" <cannabis.customerexperience@bcldb.com>, "LCRB Licensing Operations LCRB:EX" <LCRB.LicensingOperations@gov.bc.ca>, "JBlack@kelowna.ca" <JBlack@kelowna.ca>, "RCMP@12504706348" <IMCEAFAX-RCMP+4012504706348@Victoria1.gov.bc.ca>
Subject: Final Approval CRS Licence #450045 – Hobo

Good afternoon,

Please find attached your final approval letter and floor plan for your new Cannabis Retail Store (CRS) licence. I have also attached a copy of your CRS licence, which is available for you to download at <https://justice.gov.bc.ca/cannabislicensing/dashboard-lite>.

The approved floor plan must be printed in colour; please advise if you cannot print a colour floor plan and one will be mailed.

Should you have any questions, please do not hesitate to contact me.

Congratulations on your new Cannabis Retail Store licence.

Regards,

s.15; s.19 | Senior Licensing Analyst
Liquor & Cannabis Regulation Branch | Ministry of Attorney General
PO Box 9292 Stn Prov Govt | Victoria BC | V8W 9J8
Direct: s.15; s.19 or Branch: 1-866-209-2111

LCRB: www.gov.bc.ca/liquorregulationandlicensing



Please consider the environment before printing this email.

SERVICE ACCOUNTABILITY

CURIOSITY PASSION COURAGE ALWAYS WITH INTEGRITY

This communication (both the message and any attachments) may be confidential and protected by privilege. It is intended only for the use of the person or persons to whom it is addressed. Any distribution, copying, or other use by anyone else is strictly prohibited. If you have received this communication in error, please destroy the email message and any attachments immediately and notify me by telephone or by email.



July 19, 2019

Job # 001595

LIGHTBOX ENTERPRISES LTD.
Jeffrey Donnelly
1800 - 510 West Georgia Street
Vancouver BC V6B0M3

Dear Jeffrey Donnelly:

**Re: Final Approval - Non-Medical Cannabis Retail Store Licence
Cannabis Retail Store Licence #450045
Licencee: LIGHTBOX ENTERPRISES LTD.
Establishment Name: Hobo
Establishment Location: 2121 Springfield Road Kelowna
Licence Expiry Date: June 30, 2020**

Cannabis Retail Store (CRS) licence #450045 has been issued to LIGHTBOX ENTERPRISES LTD. pursuant to the *Cannabis Control and Licensing Act* and is effective July 19, 2019. The CRS licence is valid for a 12 month period, due to expire on June 30, 2020.

Terms and conditions for the operation of your establishment are set out in the Cannabis Retail Store Terms and Conditions Handbook which is available on the Liquor and Cannabis Regulation Branch (LCRB) website. The handbook is updated periodically; it is your responsibility to keep apprised of any changes that may occur.

Licensees are also responsible for knowing and complying with applicable local government and/or indigenous nation bylaws and/or requirements.

Your CRS licence must be posted in a prominent location within your establishment. The attached approved floor plan, along with this letter and the Approval in Principle (AIP) letter, must be kept readily available in the establishment for inspection by LCRB inspectors or police.

A renewal notice will be sent to you approximately two months prior to the expiry date of your new licence; please ensure your mailing address is kept up to date with the LCRB.

Provincial Sales Tax

You must register to collect and remit provincial sales tax by going to www.gov.bc.ca/pst. To register, you will need to provide a copy of your licence.

**Liquor and Cannabis
Regulation Branch**

Mailing Address:
PO Box 9292 Stn Prov Govt
Victoria BC V8W 9J8

Location:
645 Tye Road
Victoria BC V9A 6X5
Phone: 250 952-5787
Facsimile: 250 952-7066

Website:
www.gov.bc.ca/cannabisregulationandlicensing

Liquor Distribution Branch

The BC Liquor Distribution Branch (LDB) is the wholesale distributor of non-medical cannabis in BC. As soon as you have a CRS number and PST number, please email the LDB Cannabis Operations Customer Care Centre at businesscustomercarecentre@bcldb.com or call 1-833-420-2227 to register for your first cannabis order.

Cannabis Worker Qualification Requirement

Cannabis retail store licensees in BC must not allow someone to work in their retail store unless the worker has received security verification. You must keep a copy of all worker qualification letters available for inspection. Information about worker qualification is available at: justice.gov.bc.ca/cannabislicensing/policy-document/worker-qualification-training.

Display of Social Responsibility Material

In the future, social responsibility materials will be developed by the LCRB. These materials will be mailed to you and must be displayed in a prominent location in your establishment. Updated materials will be provided to you, free of charge, at regular intervals. Additional copies will be available from your local inspector or on the LCRB website.

Changes to Your Licence

You are required to report any changes to your establishment or licensee ownership (e.g. transfers of ownership, share transfer, change of name) as they occur. Any structural changes to your establishment must be approved prior to the change taking place; this includes the location of displays and sales counters.

If you have any questions, please feel free to contact me at s.15; s.19
s.15; s.19 @gov.bc.ca

Sincerely,

s.15; s.19

s.15; s.19
Senior Licensing Analyst

Attachment – Floor Plan

copy: s.15; s.19 LCRB Inspector
LIGHTBOX ENTERPRISES LTD.
City of Kelowna
LDB
PST
RCMP Kelowna

Liquor and Cannabis
Regulation Branch

Mailing Address:
PO Box 9292 Stn Prov Govt
Victoria BC V8W 9J8

Location:
645 Tyee Road
Victoria BC V9A 6X5
Phone: 250 952-5787
Facsimile: 250 952-7066

Website:
www.gov.bc.ca/cannabisregulationandlicensing

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 2:32 PM
To: s.15; s.19 LCRB:EX
Subject: RE: Hobo - 450045 - 450022 - 450023

The way I see it, clothing is not an cannabis accessory so no they can't sell it in store or online.

s.15;

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 2:21 PM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Subject: FW: Hobo - 450045 - 450022 - 450023

Am I correct in thinking that they are not allowed to sell anything that is not cannabis related, in-store or online?

From: s.15; LCRB:EX
Sent: July 29, 2019 1:09 PM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Cc: s.15; LCRB:EX s.15; @gov.bc.ca>; s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Subject: FW: Hobo - 450045 - 450022 - 450023

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Email from s.15: about Hobo selling t-shirt online. I checked their website We can speak to them about it when we are there tomorrow.

s.15: (SLA) from Victoria said that she already spoke to Jeff(licensee) about it and he says that he had lawyer look into and was told that he couldn't sell them in store but ok if online; however, the T&C says:

"Online sales of cannabis accessories and gift cards are permitted if the website has an age verification tool that restricts website entry to adults only"

And we follow the Fed's definition on "accessories", so it tshirts and hats (they also sell hats) shouldn't be allowed .

Let me know your thoughts pls,

Regards,

s.15; s.19

Liquor and Cannabis Inspector
 Ministry of Attorney General
 Liquor and Cannabis Regulation Branch
 300 – 1770 Burrard Street, Vancouver, BC V6J 3G7
 Phone: s.15; s.19

Mobile: s.15; s.19

Licensing Help Desk Phone: 1 866 209 2111 - Website: www.gov.bc.ca/liquorregulationandlicensing
SEP Help Desk Phone: 1 855 999 7656 - SEP site: www.specialevents.bcldb.com

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From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 11:14 AM
To: s.15; s.19 LCRB:EX s.15; s.19 [@gov.bc.ca](mailto:s.15; s.19@gov.bc.ca)>
Cc: s.15; LCRB:EX s.15; [@gov.bc.ca](mailto:s.15;@gov.bc.ca)>
Subject: RE: Hobo - 450045 - 450022 - 450023

On page 15 and 16 of the terms and conditions handbook it talks about what they are and aren't allowed to sell. Clothing doesn't fit the definition of a cannabis accessory. The SLA's have been informing applicants that they are not allowed to sell clothing throughout the application process. I'm not sure if these guys were informed or missed.

Cannabis Accessories

A licensee may sell cannabis accessories as defined by the federal Cannabis Act, such as rolling papers or wraps, holders, pipes, water pipes, bongs and vaporizers. The sale of e-juice, e-liquid, or e-substance is prohibited.

A licensee is not authorized to sell snacks, tobacco (or products containing nicotine), or other items that are not related to cannabis.

s.15; s.19 | Project Administrator
Liquor & Cannabis Regulation Branch
Ministry of Attorney General

From: s.15; s.19 LCRB:EX
Sent: Monday, July 29, 2019 11:07 AM
To: s.15; s.19 LCRB:EX
Cc: s.15; LCRB:EX
Subject: Re: Hobo - 450045 - 450022 - 450023

Ok is it against the regs if it is only on a website and not from the store?

Cheers

s.15;

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

Sent from my iPhone

On Jul 29, 2019, at 9:55 AM, s.15; s.19 LCRB:EX s.15; s.19 [@gov.bc.ca](mailto:s.15; s.19@gov.bc.ca)> wrote:

Just an FYI, I was on Hobo's website and they are selling apparel despite it being against the regs.

Thank you.
<image001.png>

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 2:36 PM
To: s.15; s.19 LCRB:EX
Subject: FW: Hobo - 450045 - 450022 - 450023

So here is one more situation that has been brought to our attention. We understand that this is not permitted and apparently the licensee said that they got legal advice to say they could sell it online and not in the store. However apparel is not a cannabis accessory so they can't sell it in store or online. Wanted to bring this forward as the licensee may feel they have done their due diligence with the legal opinion and may be reluctant to take it down from the website.

s.15;

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 2:21 PM
To: s.15; s.19 LCRB:EX s.15; s.19
Subject: FW: Hobo - 450045 - 450022 - 450023

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Cc: s.15; LCRB:EX s.15; @gov.bc.ca>; s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Subject: FW: Hobo - 450045 - 450022 - 450023

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Let me know your thoughts pls,

Regards,

s.15; s.19

Liquor and Cannabis Inspector

Ministry of Attorney General
Liquor and Cannabis Regulation Branch
300 – 1770 Burrard Street, Vancouver, BC V6J 3G7
Phone: s.15; s.19
Mobile

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Liquor & Cannabis Regulation Branch
Ministry of Attorney General

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Subject: Re: Hobo - 450045 - 450022 - 450023

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s.15;

s.15; s.19
Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
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s.15; s.19
Sent from my iPhone

On Jul 29, 2019, at 9:55 AM, ^{s.15; s.19}

LCRB:EX ^{s.15; s.19}

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<image001.png>

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 3:25 PM
To: s.15; s.19 LCRB:EX
Subject: Fwd: Hobo - 450045 - 450022 - 450023

FYI

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

Sent from my iPhone

Begin forwarded message:

From: s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>
Date: July 29, 2019 at 2:41:49 PM PDT
To: s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>
Cc: 's.15; s.19 LCRB:EX" s.15; @gov.bc.ca>, s.15; s.19 LCRB:EX"
s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>, s.15; s.19
s.15; LCRB:EX" s.15; s.19 @gov.bc.ca>
Subject: Re: Hobo - 450045 - 450022 - 450023

Hey Everyone,

Thanks s.15: for bringing this forward.

I just attended and they had shirts and sweaters in store. I advised them they could not have them in store and could not sell online either.

s.15; s.19 had also advised them that they needed to remove recreational from any of their signs. They still had it on the door, two sandwich boards and a portable sign.

They are going to remove it right away.

s.15; and s.15; they stated that the signage is the same in Vancouver as well as the clothing. Wanted to make you aware as I believe you are going to the store tomorrow.

Cheers

s.15;

s.15; s.19

Regional Inspector - Interior and Northern Region
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Thank you.

<image001.png>

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Sent: July 29, 2019 3:28 PM
To: s.15; s.19 LCRB:EX
Cc: s.15; LCRB:EX; s.15; LCRB:EX; s.15; s.19 LCRB:EX; s.15; s.19 LCRB:EX
Subject: Re: Hobo - 450045 - 450022 - 450023

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s.15;

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Hello all,

Thanks s.15; for bringing this to my attention

I have included my response below but just to further clarify, when I go onto the HOBO website, and I enter my province, I don't get an option to purchase any apparel. Hobo is a chain and has stores in other provinces. There is chance that they can legally sell online in other provinces etc as per the legal advice they got. I would love for someone else to also go online and confirm if they have the option to purchase apparel if they enter their location as BC.

Finally s.15; I think your question got answered in the email chain but let me know if not.

Thanks

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Cc: s.15; s.19 LCRB:EX; s.15; LCRB:EX; s.15; s.19 LCRB:EX
Subject: Re: Hobo - 450045 - 450022 - 450023

While I was in hobo today they advised me apparel was available for purchase online. There was no restrictions on it.

Cheers

s.15; s.19

Regional Inspector - Interior and Northern Region
 Liquor and Cannabis Regulation Branch
 Special Provincial Constable

s.15; s.19

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From: s.15; LCRB:EX
Sent: July 29, 2019 1:09 PM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Cc: s.15; LCRB:EX s.15; @gov.bc.ca>s.15; s.19 LCRB:EX
<s.15; s.19 @gov.bc.ca>
Subject: FW: Hobo - 450045 - 450022 - 450023

Guys,

Email from s.15: about Hobo selling t-shirt online. I checked their website We can speak to them about it when we are there tomorrow.

s.15: (SLA) from Victoria said that she already spoke to Jeff(licensee) about it and he says that he had lawyer look into and was told that he couldn't sell them in store but ok if online; however, the T&C says:

"Online sales of cannabis accessories and gift cards are permitted if the website has an age verification tool that restricts website entry to adults only"

And we follow the Fed's definition on "accessories", so it tshirts and hats (they also sell hats) shouldn't be allowed .

Let me know your thoughts pls,

Regards,

s.15; s.19
Liquor and Cannabis Inspector
Ministry of Attorney General
Liquor and Cannabis Regulation Branch
300 – 1770 Burrard Street, Vancouver, BC V6J 3G7
Phone: s.15; s.19
Mobile:

Licensing Help Desk Phone: 1 866 209 2111

- Website: www.gov.bc.ca/liquorregulationandlicensing

SEP Help Desk Phone: 1 855 999 7656 - SEP site: www.specialevents.bcladb.com

Due to security concerns, Liquor and Cannabis Regulation Branch will not accept electronically transmitted applications containing credit card information. This message is for the intended recipient(s) only.

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 11:14 AM
To: s.15; s.19 LCRB:EX <s.15; s.19 @gov.bc.ca>
Cc: s.15; LCRB:EX s.15; @gov.bc.ca>
Subject: RE: Hobo - 450045 - 450022 - 450023

On page 15 and 16 of the terms and conditions handbook it talks about what they are and aren't allowed to sell. Clothing doesn't fit the definition of a cannabis accessory. The SLA's have been informing applicants that they are not allowed to sell clothing throughout the application process. I'm not sure if these guys were informed or missed.

Cannabis Accessories

A licensee may sell cannabis accessories as defined by the federal Cannabis Act, such as rolling papers or wraps, holders, pipes, water pipes, bongs and vaporizers. The sale of e-juice, e-liquid, or e-substance is prohibited.

A licensee is not authorized to sell snacks, tobacco (or products containing nicotine), or other items that are not related to cannabis.

s.15; s.19 | Project Administrator
Liquor & Cannabis Regulation Branch
Ministry of Attorney General

From: s.15; s.19 LCRB:EX
Sent: Monday, July 29, 2019 11:07 AM
To: s.15; s.19 LCRB:EX
Cc: s.15; LCRB:EX
Subject: Re: Hobo - 450045 - 450022 - 450023

Ok is it against the regs if it is only on a website and not from the store?

Cheers

s.15:

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

Sent from my iPhone

On Jul 29, 2019, at 9:55 AM, s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca> wrote:

Just an FYI, I was on Hobo's website and they are selling apparel
despite it being against the regs.
Thank you.
<image001.png>

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 3:42 PM
To: s.15; s.19 LCRB:EX; s.15; s.19 LCRB:EX; s.15; s.19 LCRB:EX
Subject: RE: Hobo - 450045 - 450022 - 450023

Thanks s.15;

What was their response to being told that they had to remove the clothing from the store and website (also just to confirm, they had the apparel for sale in the store right?)
 Additionally, where did you leave things at with your inspection?

Thanks

s.15;

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 3:25 PM
To: s.15; s.19 LCRB:EX s.15; s.19
Subject: Fwd: Hobo - 450045 - 450022 - 450023

FYI

s.15; s.19

Regional Inspector - Interior and Northern Region
 Liquor and Cannabis Regulation Branch
 Special Provincial Constable

s.15; s.19

Sent from my iPhone

Begin forwarded message:

From: s.15; s.19 LCRB:EX" <s.15; s.19 @gov.bc.ca>
Date: July 29, 2019 at 2:41:49 PM PDT
To: s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>
Cc: s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>
Subject: Re: Hobo - 450045 - 450022 - 450023

Hey Everyone,

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They are going to remove it right away.

s.15 and s.15; they stated that the signage is the same in Vancouver as well as the clothing. Wanted to make you aware as I believe you are going to the store tomorrow.

Cheers

s.15;

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

Sent from my iPhone

On Jul 29, 2019, at 9:55 AM, ^{s.15; s.19} L.CRB:EX <^{s.15; s.19} [@gov.bc.ca](mailto:)> wrote:

Just an FYI, I was on Hobo's website and they are selling apparel despite it being against the regs.

Thank you.

<image001.png>

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 3:44 PM
To: s.15; s.19 LCRB:EX
Subject: FW: Hobo - 450045 - 450022 - 450023

Further update,

One of our inspectors tested the website on their cell phone, They were able to purchase (did not go through with it) the website accepted the BC address.

Also one of our inspectors in the interior went to the store there and the clothing is available for sale in the store and they said it was for sale online as well.

Thanks

s.15;

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 3:25 PM
To: s.15; s.19 LCRB:EX s.15; s.19
Subject: Fwd: Hobo - 450045 - 450022 - 450023

FYI

s.15; s.19

Regional Inspector - Interior and Northern Region
 Liquor and Cannabis Regulation Branch
 Special Provincial Constable

s.15; s.19

Sent from my iPhone

Begin forwarded message:

From: s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>
Date: July 29, 2019 at 2:41:49 PM PDT
To: s.15; s.19 LCRB:EX" <s.15; s.19 @gov.bc.ca>
Cc: s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>
Subject: Re: Hobo - 450045 - 450022 - 450023

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s.15;

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Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

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Thank you.

<image001.png>

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 3:57 PM
To: s.15; s.19 LCRB:EX
Cc: s.15; s.19 LCRB:EX; s.15; LCRB:EX
Subject: Re: Hobo - 450045 - 450022 - 450023

Hey s.15;

They stated that the items in store were not for sale, however that it was happening at other stores. I gave them 48 hours to remove the recreational from their signage and the clothing was suppose to be removed immediately. The items online they stated, they would advise their head office.

The one manager was from Vancouver and I advised him it would be the same rules there, however with s.15; going tomorrow I will leave it with him and s.15; to follow up.

I will return to Hobo here on Thursday morning to follow up.

Cheers

s.15;

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

Sent from my iPhone

On Jul 29, 2019, at 3:41 PM, s.15; s.19 LCRB:EX s.15; s.19 <s.15; s.19@gov.bc.ca> wrote:

Thanks s.15;

What was their response to being told that they had to remove the clothing from the store and website (also just to confirm, they had the apparel for sale in the store right?)
Additionally, where did you leave things at with your inspection?

Thanks

s.15;

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 3:25 PM
To: s.15; s.19 LCRB:EX s.15; s.19
Subject: Fwd: Hobo - 450045 - 450022 - 450023

FYI

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable
s.15; s.19
Sent from my iPhone

Begin forwarded message:

From: s.15; s.19 LCRB:EX" <s.15; s.19 @gov.bc.ca>
Date: July 29, 2019 at 2:41:49 PM PDT
To: s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>
Cc: s.15; s.19 LCRB:EX" s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX"
s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX"
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Subject: Re: Hobo - 450045 - 450022 - 450023

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Cheers

s.15:

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable
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<image001.png>

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 3:59 PM
To: s.15; s.19 LCRB:EX
Cc: s.15; s.19 LCRB:EX; s.15; s.19 LCRB:EX
Subject: RE: Hobo - 450045 - 450022 - 450023

Ok great, thanks for that information. I am sure we will all need to touch base later this week on this issue.

Thanks

s.15;

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 3:57 PM
To: s.15; s.19 LCRB:EX s.15; s.19
Cc: s.15; s.19 LCRB:EX <s.15; s.19 @gov.bc.ca> s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Subject: Re: Hobo - 450045 - 450022 - 450023

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Cheers

s.15;

s.15; s.19

Regional Inspector - Interior and Northern Region
 Liquor and Cannabis Regulation Branch
 Special Provincial Constable

s.15; s.19

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From: s.15; s.19 LCRB:EX

Sent: July 29, 2019 3:25 PM

To: s.15; s.19 LCRB:EX <s.15; s.19 @gov.bc.ca>

Subject: Fwd: Hobo - 450045 - 450022 - 450023

FYI

s.15; s.19

Regional Inspector - Interior and Northern Region

Liquor and Cannabis Regulation Branch

Special Provincial Constable

s.15; s.19

Sent from my iPhone

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To: s.15; s.19 LCRB:EX" <s.15; s.19 @gov.bc.ca>
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s.15;

s.15; s.19

Regional Inspector - Interior and Northern Region

Liquor and Cannabis Regulation Branch

Special Provincial Constable

s.15; s.19

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Thank you.

<image001.png>

s.15; s.19

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: July 30, 2019 3:19 PM
To: s.15; s.19 LCRB:EX
Cc: s.15; s.19 LCRB:EX; s.15; s.19 LCRB:EX
Subject: RE: Hobo - 450045 - 450022 - 450023

Hi s.15:

Just following up from the inspection that was conducted today at the HOB0 on Main street Vancouver.

In the email chain below, you indicated that there was an issue with the use of the word "recreational " and that you had received some direction from s.15; s.19 on this issue. I was not aware of any issue with use of that word. I know that they can't make reference to the medical aspect. Anyway wanted to see if there was something I was missing or if I need to loop back to licensing in case they are aware of something that we are not.

Thanks

s.15;

From: s.15; s.19 LCRB:EX
Sent: July 29, 2019 3:57 PM
To: s.15; s.19 LCRB:EX s.15; s.19
Cc: s.15; s.19 LCRB:EX <s.15; s.19 @gov.bc.ca>; s.15; s.19 LCRB:EX <s.15; s.19 @gov.bc.ca>
Subject: Re: Hobo - 450045 - 450022 - 450023

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s.15;

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

Sent from my iPhone

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s.15;

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Sent: July 29, 2019 3:25 PM
To: s.15; s.19 LCRB:EX s.15; s.19
Subject: Fwd: Hobo - 450045 - 450022 - 450023

FYI

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

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To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Cc: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX"
<s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX"
<s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX"
<s.15; s.19 @gov.bc.ca>
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s.15;

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

Sent from my iPhone

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Thank you.

<image001.png>

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: August 1, 2019 11:34 AM
To: ss.15; s.19 LCRB:EX
Subject: FW: Lightbox Enterprises Licenses

Good morning s.15; as discussed, please see e-mail below from Sophia Mas, acting as a representative for Lightbox Enterprises.

Cheers

s.15;

From: s.15; s.19 LCRB:EX
Sent: August 1, 2019 8:14 AM
To: Sophie Mas <sophie@somasconsulting.ca>
Cc: s.15; s.19 LCRB:EX <s.15; s.19 @gov.bc.ca>; Jeffrey Donnelly <jd@donnellygroup.ca>
Subject: Re: Lightbox Enterprises Licenses

Good morning Sophie,

I am free this afternoon around 3:00 pm. I will contact you at that time.

Regards,

s.15;

s.15; s.19

Regional Inspector
Liquor and Cannabis Regulation Branch

s.15; s.19

s.15; s.19 [@gov.bc.ca](mailto:s.15; s.19@gov.bc.ca)

On Aug 1, 2019, at 7:18 AM, Sophie Mas <sophie@somasconsulting.ca> wrote:

Hello s.15; and s.15;

My name is Sophie Mas. Lightbox Enterprises has asked me to act as their representative and contact with respect to issues related to their cannabis retail licenses. I am a consultant who used to work with the Ministry of Public Safety and Solicitor General for over 20 years. Until last April 2018, I was the Director of the BC Cannabis Legislation and Regulation Secretariat and was involved in the development of the regulatory framework. Because of my understanding of the provincial and federal cannabis legislation and regulations Lightbox Enterprises has asked me to help them navigate the cannabis regulatory environment and assist them in addressing some of the outstanding issues that currently exist with the Hobo licenses.

The following issues were recently brought up to their attention with respect to their licenses in Vancouver (3 locations) and Kelowna (1 location):

- The use of the word "Recreational" in the store signage
- The sale of clothing apparel on Hobo website
- The display of clothing apparel in Hobo stores; and
- The in store display of cannabis products outside of their original packaging

I would like to follow up with you on these 4 issues in order to assist Lightbox Enterprises with license compliance. Would it be possible to set up a call with you at your convenience in order to discuss the outstanding issues mentioned above?

I look forward to hearing back from you.

Kind regards,

Sophie

Sophie Mas, MPA, PMP
Founder & CEO
SoMas Consulting Inc.
Tel: +1 604 375 3600
www.somasconsulting.ca
<image001.png>

s.15; s.19

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: August 21, 2019 9:10 AM
To: s.15; s.19 LCRB:EX
Subject: RE: Hobo - Job 001595

Thanks s.15;

No worries ☺

s.15;

From: s.15; s.19 LCRB:EX
Sent: August 21, 2019 9:09 AM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Subject: FW: Hobo - Job 001595

Hi,

As promised yesterday, here's the info I have on hobo recreational. Sorry it took me a day to get it to you.

Best,

s.15;

From: s.15; s.19 LCRB:EX
Sent: July 19, 2019 1:51 PM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Subject: RE: Hobo - Job 001595

Hi s.15;

Thanks for sending me the heads up! I reviewed your final photos and found the exterior signage and a sandwich board show recreational cannabis store but the proposal does not include this. I called Jeff to advise they cannot use the word recreational in signage/advertising because of the Fed Reg17(1)(e). He's going to remove the word from sign, and send me a photo then follow up with a phone call. I'll advise him at time of call that sandwich board must be removed until recreational removed from the sandwich board as well. Once I receive his photo that the word has been removed and the 1st year licence fee is paid, I will issue the licence.

Here's the Fed Reg for your reference:

Promotion:

17(1) Unless authorized under this Act, it is prohibited to promote cannabis or a cannabis accessory or any service related to cannabis, including

- a. By communicating information about its price or distribution;

- b. By doing so in a manner that there are reasonable grounds to believe could be appealing to young persons;
- c. By means of a testimonial or endorsement, however displayed or communicated;
- d. By means of the depiction of a person, character or animal, whether real or fictional; or
- e. By presenting it or any or any of its brand elements in a manner that associates it or the brand element with, or evokes a positive or negative emotion about or image of, a way of life such as one that includes glamour, **recreation**, excitement, vitality, risk or daring

Thank you,

s.15; s.19

From: s.15; s.19 LCRB:EX
Sent: July 19, 2019 12:13 PM
To: s.15; s.19 LCRB:EX s.15; s.19 [@gov.bc.ca>](mailto:)
Subject: Hobo

Hey s.15;

I have completed the inspection for Hobo in Kelowna. All is good.

Cheers

s.1

s.15; s.19
 Regional Inspector Interior / Northern District
 Special Provincial Constable
 Liquor & Cannabis Regulation Branch - Compliance and Enforcement Division
 207-478 Bernard Ave. Kelowna, B.C. V1Y 6N7
 s.15; s.19
www.gov.bc.ca/liquorregulationandlicensing

Due to security concerns, Liquor Control and Licensing Branch will not accept electronically transmitted applications containing credit card information.

CONFIDENTIALITY NOTICE:

This e-mail message (including attachments) is confidential and may also be privileged, and all rights to privilege are expressly claimed and not waived. Any use, dissemination, distribution, copying, or disclosure, of this message and any attachments, in whole or in part, by anyone other than the intended recipient is strictly prohibited. If you received this message in error, please destroy it and notify the sender immediately. Thank you.

From: s.15; s.19 LCRB:EX
Sent: August 23, 2019 1:56 PM
To: ss.15; s.19 LCRB:EX
Subject: RE: Hobo License name

Hi s.15;

The Main St location did have "Recreational" in one of their images. However this licence did go out prior to the decision of not allowing recreational.

I noticed there's a new Hobo app sitting in the que which includes a picture of their signage with recreational present, however in the same image they show their Kelowna location where it appears the term has already been removed.

Reface current awning with new white material with the addition of CNC lettering to be installed on awning face.



Current Awning and CNC lettering at our Kelowna Store

Lettering Return .25



Thanks,

s.15; s.19 Senior Licensing Analyst
 Liquor and Cannabis Regulation Branch
 645 Tyee Road | Victoria BC
 P: s.15; s.19 | www.gov.bc.ca/liquorregulationandlicensing

Due to security concerns, Liquor Control and Licensing Branch will not accept electronically transmitted applications containing credit card information.

From: s.15; s.19 LCRB:EX
Sent: August 22, 2019 12:49 PM
To: s.15; s.19 LCRB:EX ; LCRB Licensing Operations LCRB:EX s.15; s.19 LCRB:EX
Subject: RE: Hobo License name

Hi guys,

s.15 informed me that there are renderings of the name with recreational in the Main st application. Can we please ensure renderings are also analyzed against the naming conventions going forward.

I'm sure Hobo will argue that we approved them based on this.
Attached is what I sent.

Thanks
s.15

From: s.15; s.19 LCRB:EX
Sent: August 22, 2019 9:01 AM
To: s.15; s.19 LCRB:EX <s.15; s.19 @gov.bc.ca>
Subject: RE: Hobo License name

Hi s.15;

The files that have been licenced made no mention to the term recreational, aside from the final inspection pictures which do show the term. They have requested recreational in the newer applications that have not yet moved forward for AIP.

I can re-word the response to better reflect this.

Thanks,

s.15; s.19 | Senior Licensing Analyst
Liquor and Cannabis Regulation Branch
645 Tye Road | Victoria BC
P: s.15; s.19 | www.gov.bc.ca/liquorregulationandlicensing

Due to security concerns, Liquor Control and Licensing Branch will not accept electronically transmitted applications containing credit card information.

From: s.15; s.19 LCRB:EX
Sent: August 22, 2019 8:53 AM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Subject: RE: Hobo License name

Hey s.15;

So to be clear out of all the hobo apps – they never submitted recreational in their name? They just added it later without authorization? That's how the below reads to me.

Thx
s.15

From: s.15; s.19 LCRB:EX
Sent: August 21, 2019 3:11 PM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Subject: FW: Hobo License name
Importance: High

Hi s.15;

As per below, I have drafted a response to the “recreational” naming issue with Hobo (Donelley Group).

Hello,

It has come to the attention of the branch that the term “Recreational” has been used in signage for your currently licenced stores, as well as active applications. The proposed signage that was submitted with the application and was subsequently given approval at the point of approval in principle (AIP) did not reflect the term “Recreational”. Although the term “recreational” was present during the time of an inspection prior to the licence being issued, it is not what was submitted or approved, and does not meet federal regulations as outlined below. The word in question must be removed from the existing, and any future, signage.

Promotion:

17(1) Unless authorized under this Act, it is prohibited to promote cannabis or a cannabis accessory or any service related to cannabis, including

- a. By communicating information about its price or distribution;
- b. By doing so in a manner that there are reasonable grounds to believe could be appealing to young persons;
- c. By means of a testimonial or endorsement, however displayed or communicated;
- d. By means of the depiction of a person, character or animal, whether real or fictional; or
- e. By presenting it or any of its brand elements in a manner that associates it or the brand element with, or evokes a positive or negative emotion about or image of, a way of life such as one that includes glamour, **recreation**, excitement, vitality, risk or daring

Please notify the branch when this has been completed. If you have any further questions you can contact the branch at Cannabis.Licensing@gov.bc.ca.

s.15; s.19 [Sig Block]

Please let me know if you need any further information.

Thanks,

s.15; s.19 | Senior Licensing Analyst
Liquor and Cannabis Regulation Branch
645 Tyee Road | Victoria BC
P.s.15; s.19 | www.gov.bc.ca/liquorregulationandlicensing

Due to security concerns, Liquor Control and Licensing Branch will not accept electronically transmitted applications containing credit card information.

From: s.15; s.19 LCRB:EX
Sent: August 19, 2019 2:21 AM
To: LCRB Licensing Operations LCRB:EX <LCRB.LicensingOperations@gov.bc.ca>, s.15; s.19 LCRB:EX
s.15; s.19 @gov.bc.ca>
Cc: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>, s.15; s.19 LCRB:EX
s.15; s.19
Subject: FW: Hobo License name

Hi s.15; and/or s.15;

Can you please draft a response to the below correspondence? This is a follow up on the "recreational" issue where we landed of course that no, it is not an acceptable term. This should go out under s.15; signature.

Thank you,

s.

From: Sophie Mas [<mailto:sophie@somasconsulting.ca>]
Sent: Tuesday, August 13, 2019 3:29 PM
To: s.15; s.19 LCRB:EX
Cc: Jeffrey Donnelly; 'Adam DiCasmirro'
Subject: Fw: Hobo License name

Hi s.15;

I am reaching out to you in s.15; absence in the hope you will be able to assist me. I am forwarding my initial message to s.15; to give you some context about my inquiry.

I am writing to you in relation to the Hobo license name and the outstanding issue associated with the use of word "Recreational" in the name. Hobo license applications (2 in Vancouver and 1 in Kelowna) were approved with the word "Recreational" earlier this year. On July 19th, an inspector in Kelowna asked Hobo to remove "Recreational" from their name (and all signage, banners, displays, sandwich boards, etc).

As outlined in my email below, Lightbox has been waiting for a decision on the name and has removed all their signage to be compliant with LCRB. This has had a financial impact on their business as they are unable to put up any signage until a decision is reached by LCRB.

I also want to add that the reason provided by the inspector for the removal of the word "Recreational" was that the word "Recreational" refers to an outdoor sporting activity. However, the word "Recreational" in this instance was used as per the Oxford dictionary definition as meaning:

1. relating to or denoting activity done for enjoyment when one is not working.

"recreational facilities"

o relating to or denoting drugs taken on an occasional basis for enjoyment, especially when socializing.

"recreational drug use"

I hope that this provides you with enough information and am happy to discuss further with you by phone.

I look forward to your response and thank you in advance for your prompt attention to this matter.

Kind regards,

Sophie

Sophie Mas, MPA, PMP

Founder & CEO

SoMas Consulting Inc.

Tel: +1 604 375 3600

www.somasconsulting.ca



From: Sophie Mas

Sent: August 13, 2019 12:49 PM

To: s.15; s.19 <@gov.bc.ca> s.15; s.19 <@gov.bc.ca>

Cc: Jeffrey Donnelly <jd@donnellygroup.ca>; 'Adam DiCasmirro' <ad@donnellygroup.ca>

Subject: Hobo License name

Hi s.15;

My name is Sophie Mas. Lightbox Enterprises has asked me to act as their representative and contact with respect to issues related to their cannabis retail licenses. As a brief introduction, I am a consultant who used to work with the Ministry of Public Safety and Solicitor General. Until last April 2018, I was the Director of the BC Cannabis Legislation and Regulation Secretariat and was involved in the development of the regulatory framework. Lightbox Enterprises has asked me to help them navigate the cannabis regulatory environment and assist them in addressing some of the outstanding issues that currently exist with the Hobo licenses.

I am reaching out to you because I understand that the Lightbox team held a conference call with you a few weeks ago and that you were able to assist them with some other matter. The reason why I am writing is because there is an outstanding issue with the license name that I am hoping you can help us resolve.

Hobo's license applications for 2 Vancouver locations, Main Street and Granville Street were approved by LCRB with the name "recreational" (Hobo Recreational Cannabis Store). Hobo's Kelowna license application was submitted at the same time as the other 2 and also approved. Hobo's license application to Ontario has also been approved with the term "Recreational". On July 19th, an Inspector asked the Kelowna store manager to remove "Recreational" from all signage and advertising material stating that it contravenes the promotion and advertising provisions of the *Cannabis Act*. Although we understand that the Inspector is doing due diligence and enforcing their interpretation of the *Cannabis Act*, this has a significant impact on Hobo businesses as all promotional and advertising materials (signage, posters, sandwich board, door decals, pylon signs, banners, roadside displays to name a few) were all printed for all Hobo locations with the name "Recreational". They have now all been removed to comply with the inspector's request.

We have been communicating with Regional Inspector ^{s.15; s.19} who has been a tremendous help. He has informed us on several occasions that the matter is with LCRB Licensing for resolution hence my email to you.

Could you please help us get this issue resolved expediently? Until this is resolved, Hobo is in a state of limbo waiting to hear the outcome of the licensing decision. This is having a financial impact on their business that will only be compounded if asked to change the signage initially approved several months ago.

I am happy to discuss further by phone and give you additional information as needed.

Thank you in advance for your attention to this matter.

Kind regards,

Sophie

Sophie Mas, MPA, PMP

Founder & CEO

SoMas Consulting Inc.

Tel: +1 604 375 3600



From: Julie Hutchinson <Julie.Hutchinson@mcmillan.ca>
Sent: August 28, 2019 3:14 PM
To: s.15; s.19 LCRB:EX
Cc: Camille Chisholm; Christian Petersen
Subject: Hobo Recreational Cannabis - License Name
Attachments: 2019 08 28 LT LCRB re_ Licence Branding Requirements.pdf

Good afternoon, please see attached letter from Camille Chisholm.

Regards,



Julie Hutchinson
Legal Administrative Assistant
d 778.328.1492 | f +1.604.685.7084
Julie.Hutchinson@mcmillan.ca

Assistant to: Christian Petersen | 604.691.7456 | christian.petersen@mcmillan.ca
Assistant to: Vicki Tickle | 236.826.3022 | vicki.tickle@mcmillan.ca
Assistant to: Natalie Cuthill | 236.826.3260 | natalie.cuthill@mcmillan.ca
Assistant to: Camille Chisholm | 236.826.3066 | camille.chisholm@mcmillan.ca

McMillan LLP
Lawyers | Patent & Trademark Agents
Royal Centre, 1055 W. Georgia Street, Suite 1500
PO Box 11117
Vancouver, BC V6E 4N7
mcmillan.ca

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McMillan s'engage à vous envoyer des communications électroniques appropriées pour vous et votre entreprise. Pour vous abonner et recevoir des communications électroniques de notre part, ou pour vous désabonner et ne plus recevoir de telles communications, veuillez visiter le [centre d'abonnement en ligne de McMillan](#).

Reply to the Attention of: Camille Chisholm
Direct Line: 236.826.3066
Email Address: camille.chisholm@mcmillan.ca
Our File No.: 263049
Date: August 28, 2019

EMAIL

Liquor and Cannabis Regulation Branch
Ministry of Attorney General
PO Box 9292 Stn Prov Govt
Victoria, B.C. V8W 9J8

Attention: s.15; s.19 **A/Director,**
Licensing Division

Dear Sir,

Re: Hobo Recreational Cannabis – Licence Name

We are counsel for Lightbox Enterprises Ltd., the owner and operator of Hobo Recreational Cannabis Store. We write further to your correspondence with Sophie Mas regarding issues related to our client's cannabis retail licenses and pending applications.

We have reviewed your correspondence and considered it in light of the federal and provincial requirements that apply to our client as set out in the *Cannabis Act* and the *Cannabis Control and Licensing Act* and applicable regulations. In our view, our client's use of the word "recreational" does not offend the federal or provincial requirements and we write to ask that you reconsider your contrary conclusion.

The *Cannabis Act* prohibits the promotion of cannabis by:

presenting it or any of its brand elements in a manner that associates it or the brand element with, or evokes a positive or negative emotion about or image of, a way of life such as one that includes glamour, recreation, excitement, vitality, risk or daring.

Although the word "recreation" appears in the statute, the mere use of the word is not prohibited (and it was certainly open to Parliament to create such a prohibition if that was intended). Instead, the *Cannabis Act* is clearly focused on preventing the promotion of cannabis in a manner that evokes emotion through an association with certain ways of life. On its own, the word "recreational" as a descriptor of the type of cannabis sales available in the store does not create any such association with or evoke any emotion about a way of life.

Perhaps most importantly, our client's use of the word "recreational" is entirely consistent with both the spirit of the *Cannabis Act* and the express requirements of the provincial licensing scheme. As you are aware, the *Cannabis Control and Licensing Act* and terms and conditions imposed pursuant to it prohibit retailers from promoting cannabis in a manner, or using a name that would lead people to believe the retailer is a provider of medical cannabis. The Legislature clearly wanted to ensure that consumers are not misled about the nature of non-medical retail cannabis stores and created rules to establish a clear distinction between medical and other sales of cannabis. The use of the word "recreational" fits squarely with this legislative intent by distinguishing our client's brand and stores from those retailers selling medical cannabis.

In addition, we note that this interpretation is consistent with previous approvals received after final inspections by the Branch's licensing officials. Our client has reasonably relied on those approvals when incurring significant expense to develop and market under the Hobo Recreational Cannabis Store name.

In light of the foregoing, we ask that you reconsider the Branch's position as expressed in your email to Ms. Mas dated August 22, 2019. We look forward to confirmation that the Branch will permit the continued use of the Hobo Recreational Cannabis Store name and will not withhold approval of any future or pending license applications on the basis of that name.

Yours truly,



Camille Chisholm

From: Sophie Mas <sophie@somasconsulting.ca>
Sent: August 29, 2019 10:34 AM
To: s.15; s.19 LCRB:EX
Cc: Jeffrey Donnelly; 'Adam DiCasmirro'; LCRB Licensing Operations LCRB:EX^{s.15; s.19}
 LCRB:EX^{s.15; s.19} LCRB:EX
Subject: RE: Hobo License name
Attachments: 4296MainSignage (002).jpg

Hi s.15;

I apologize for the late reply. Thank you for your e-mail response and for the phone conversation last week.

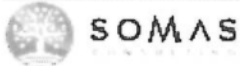
As a follow up to our conversation, I have attached a copy of the signage that was submitted to LCRB on May 7th. The signage includes the word "Recreational". It's not until July 19th that case manager s.15; s.19 advised Kelowna Hobo store manager that "Recreational" is not compliant and asked them to take down all signage. Prior to July 19th, the Donnelly Group didn't receive any communication from LCRB advising them that the word "Recreational" was non-compliant, nor did any of the inspections conducted on the Vancouver stores flag any potential issues with the name. As a result, the Donnelly Group developed all their promotion materials based on the assumption that the store name was approved. As discussed, I will provide you with an estimate of the costs incurred shortly for your review and further discussion.

Also, I can confirm that I will be your point of contact for matters related to the Hobo licenses.

Kind regards,

Sophie

Sophie Mas, MPA, PMP
 Founder & CEO
 SoMas Consulting Inc.
 Tel: +1 604 375 3600
www.somasconsulting.ca



From: s.15; s.19 LCRB:EX^{s.15; s.19} @gov.bc.ca>
Sent: Thursday, August 22, 2019 12:00 PM

To: Sophie Mas <sophie@somasconsulting.ca>

Cc: Jeffrey Donnelly <jd@donnellygroup.ca>; 'Adam DiCasmirro' <ad@donnellygroup.ca>; LCRB Licensing Operations LCRB:EX <LCRB.LicensingOperations@gov.bc.ca>; s.15; s.19 LCRB:EX s.15; s.19 ss.15; s.19 LCRB:EX

Subject: RE: Hobo License name

Hi Sophie,

Thank you for your note, apologies for the delay^{s.22}

The branch has determined that the term "recreational" does not meet the federal requirements outlined in the *Cannabis Act*. This has been consistently enforced by licensing across all applications for all applicants. As a general process, licensing reviews the names of establishments and approves (or not) based on the submission from the applicant. The approved name is on the approval in principle letter, the final approval letter, and on the face of the licence. Notifying the branch of any change to the business name is a requirement and failure to do so is a contravention of the Cannabis Retail Store Licence Terms and Conditions. All exterior signage must also be pre-approved by branch.

I've been told that the names submitted for Hobo's licensed stores were not approved by licensing with the term "recreational". The subsequent applications indicating this term will need to be adjusted before reaching approval in principle and inspection. The Senior Licensing Analyst assigned to the file will be reaching out to discuss this with the applicant in due course.

I apologise for any misunderstanding that may have occurred during the process and am available to discuss further, alternatively you may reach out to^{s.15; s.19} _____, Manager of Licensing at^{s.15; s.19} _____.

Thanks,
s.15

s.15; s.19 | A/Director | Licensing Division |
Liquor and Cannabis Regulation Branch | Ministry of Attorney General |
Ph:s.15; s.19 | **e:**s.15; s.19 [@gov.bc.ca](mailto:s.15; s.19@gov.bc.ca)

From: Sophie Mas <sophie@somasconsulting.ca>

Sent: August 13, 2019 12:49 PM

To:ss.15; s.19 LCRB:EX s.15; s.19 [@gov.bc.ca](mailto:s.15; s.19@gov.bc.ca)

Cc: Jeffrey Donnelly <jd@donnellygroup.ca>; 'Adam DiCasmirro' <ad@donnellygroup.ca>

Subject: Hobo License name

Hi s.15;

My name is Sophie Mas. Lightbox Enterprises has asked me to act as their representative and contact with respect to issues related to their cannabis retail licenses. As a brief introduction, I am a consultant who used to work with the Ministry of Public Safety and Solicitor General. Until last April 2018, I was the Director of the BC Cannabis Legislation and Regulation Secretariat and was involved in the development of the regulatory framework. Lightbox Enterprises has asked me to help them

navigate the cannabis regulatory environment and assist them in addressing some of the outstanding issues that currently exist with the Hobo licenses.

I am reaching out to you because I understand that the Lightbox team held a conference call with you a few weeks ago and that you were able to assist them with some other matter. The reason why I am writing is because there is an outstanding issue with the license name that I am hoping you can help us resolve.

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We have been communicating with Regional Inspector ^{s.15; s.19} who has been a tremendous help. He has informed us on several occasions that the matter is with LCRB Licensing for resolution hence my email to you.

Could you please help us get this issue resolved expediently? Until this is resolved, Hobo is in a state of limbo waiting to hear the outcome of the licensing decision. This is having a financial impact on their business that will only be compounded if asked to change the signage initially approved several months ago.

I am happy to discuss further by phone and give you additional information as needed.

Thank you in advance for your attention to this matter.

Kind regards,

Sophie

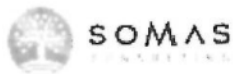
Sophie Mas, MPA, PMP

Founder & CEO

SoMas Consulting Inc.

Tel: +1 604 375 3600

www.somasconsulting.ca



LCRB:EX

From: Krista Lusted <krista.l@hobo.ca>
Sent: August 30, 2019 11:00 AM
To: s.15; s.19 LCRB:EX
Subject: Re: Worker qualification

Good morning,

I followed up with s.22 this morning to ask. s.22
s.22

Rest assured that either way we will be pulling her shifts until I have an approval letter in hand. We have calibrated our schedule to ensure that anyone in store has their proper documentation and approval to be working here.

Thanks for your patience, and I'll update you asap.

On Fri, Aug 30, 2019 at 10:50 AM s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca> wrote:
Hey Krista,

Did s.22 provide you with her receipt?

Cheers

s.15:

s.15; s.19

Regional Inspector - Interior and Northern Region
Liquor and Cannabis Regulation Branch
Special Provincial Constable

s.15; s.19

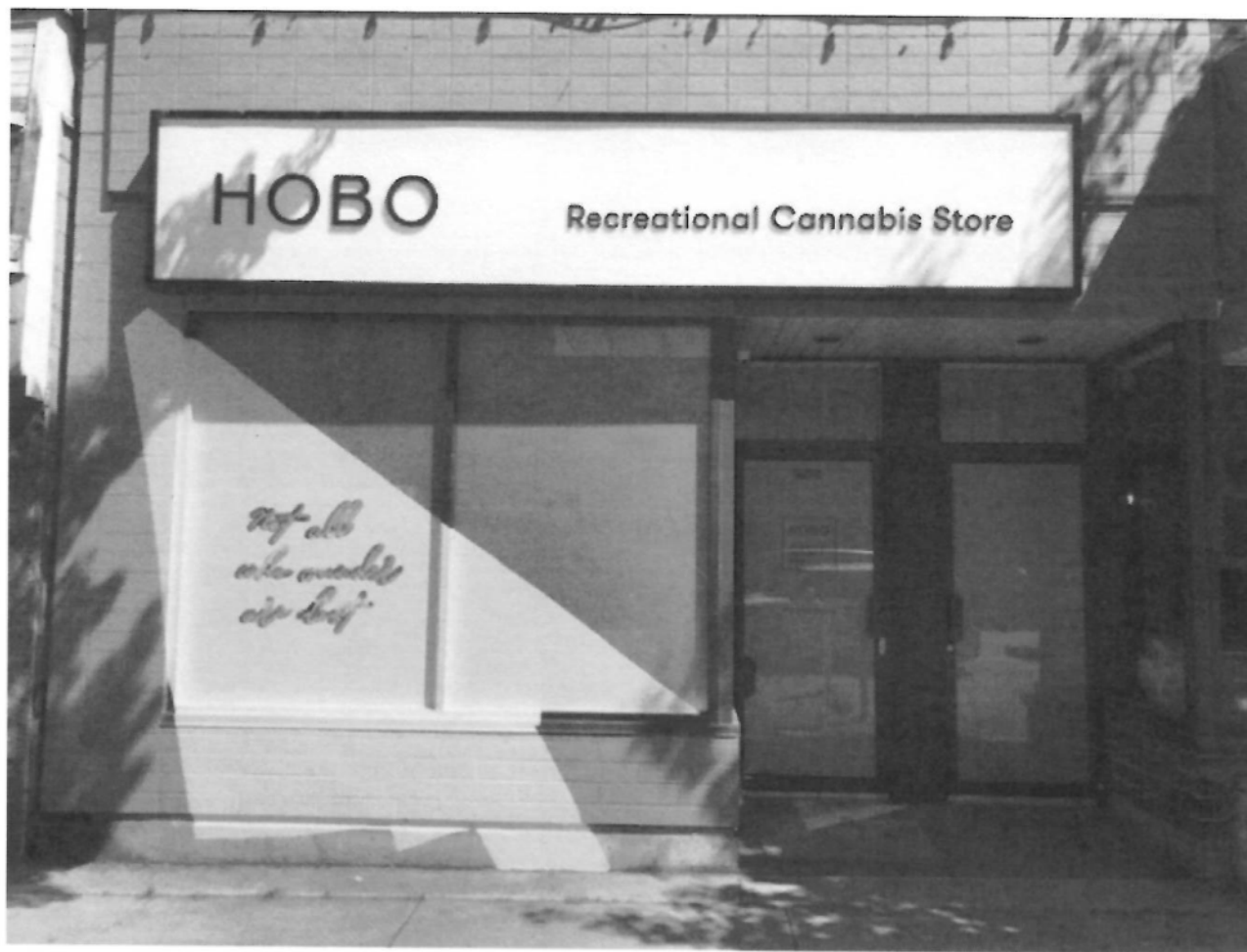
Sent from my iPhone

--

hobo.

Krista Lusted Manager
s.22 Mobile

Hobo Cannabis Vancouver — Toronto



From: s.15; s.19 LCRB:EX
Sent: September 3, 2019 9:59 AM
To: s.15; s.19 LCRB:EX
Cc: s.15; s.19 LCRB:EX
Subject: RE: Hobo License name

Thanks s.15;
Please work with LSB.

s.15;

From: s.15; s.19 LCRB:EX
Sent: Tuesday, September 3, 2019 9:50 AM
To: s.15; s.19 LCRB:EX <s.15; s.19 @gov.bc.ca>
Cc: s.15; s.19 LCRB:EX s.15; s.19
Subject: RE: Hobo License name

Hi s.15;

Follow-up on this – we have received correspondence from their lawyers requesting us to reconsider.
I will get LSB involved and review next steps with you.

s.15;

From: s.15; s.19 LCRB:EX
Sent: August 22, 2019 1:58 PM
To: s.15; s.19 LCRB:EX <s.15; s.19 @gov.bc.ca>
Cc: s.15; s.19 LCRB:EX s.15; s.19
Subject: RE: Hobo License name

Thanks s.15;

From: s.15; s.19 LCRB:EX
Sent: Thursday, August 22, 2019 12:58 PM
To: s.15; s.19 LCRB:EX
Cc: s.15; s.19 LCRB:EX
Subject: FW: Hobo License name

Hi s.1

Raising this issue in case you hear about it from other channels.
This is from the Donnelly Group who state they are out some money due miscommunication and possibly an error on our part.

Coles notes:

- Donnelly group own the cannabis franchise "Hobo"
- They were approved with the establishment name "hobo"

- On one of the applications a rendering was submitted with the exterior signage using the word “recreational” – this is a term we do not accept
- This application was approved and the licence was issued under the name of “hobo”
- The applicant put up signage with “recreational” in the name stating this was based on the renderings not on the final approval of the name

Bottom line

We will require Hobo to remove the term “recreational” as we have made other businesses remove theirs. I’ll connect with s.15 and the team leads to ensure we do a better job looking at renderings of signage in the future. Additionally, I will work with s.15 to see if we can develop a better procedure for checking names at final inspection (ie based on the approval letter)

Please let me know if you need and further information.

Thanks,

s.15:

From: s.15; s.19 LCRB:EX
Sent: August 22, 2019 12:00 PM
To: 'Sophie Mas' <sophie@somasconsulting.ca>
Cc: Jeffrey Donnelly <jd@donnellygroup.ca>; 'Adam DiCasmirro' <ad@donnellygroup.ca>; LCRB Licensing Operations LCRB:EX <LCRB.LicensingOperations@gov.bc.ca>; s.15; s.19 LCRB:EX <s.15; s.19@gov.bc.ca>; s.15; s.19 LCRB:EX <s.15; s.19@gov.bc.ca>
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I’ve been told that the names submitted for Hobo’s licensed stores were not approved by licensing with the term “recreational”. The subsequent applications indicating this term will need to be adjusted before reaching approval in principle and inspection. The Senior Licensing Analyst assigned to the file will be reaching out to discuss this with the applicant in due course.

I apologise for any misunderstanding that may have occurred during the process and am available to discuss further, alternatively you may reach out to s.15; s.19 Manager of Licensing at s.15; s.19 [@gov.bc.ca](mailto:s.15; s.19@gov.bc.ca).

Thanks,

s.15

s.15; s.19 | A/Director | Licensing Division |
 Liquor and Cannabis Regulation Branch | Ministry of Attorney General |
Ph: s.15; s.19 | **e:** s.15; s.19 | [@gov.bc.ca](mailto:s.15; s.19@gov.bc.ca)

From: Sophie Mas <sophie@somasconsulting.ca>
Sent: August 13, 2019 12:49 PM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Cc: Jeffrey Donnelly <jd@donnellygroup.ca>; 'Adam DiCasmirro' <ad@donnellygroup.ca>
Subject: Hobo License name

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Kind regards,

Sophie

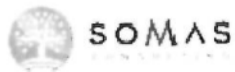
Sophie Mas, MPA, PMP

Founder & CEO

SoMas Consulting Inc.

Tel: +1 604 375 3600

www.somasconsulting.ca



LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: September 3, 2019 9:50 AM
To: s.15; s.19 LCRB:EX
Cc: s.15; s.19 LCRB:EX
Subject: RE: Hobo License name
Attachments: Hobo Recreational Cannabis - License Name

Hi s.15;

Follow-up on this – we have received correspondence from their lawyers requesting us to reconsider. I will get LSB involved and review next steps with you.

s.15

From: s.15; s.19 LCRB:EX
Sent: August 22, 2019 1:58 PM
To: s.15; s.19 LCRB:EX <s.15; s.19@gov.bc.ca>
Cc: s.15; s.19 LCRB:EX s.15; s.19
Subject: RE: Hobo License name

Thanks s.15

From: s.15; s.19 LCRB:EX
Sent: Thursday, August 22, 2019 12:58 PM
To: s.15; s.19 LCRB:EX
Cc: s.15; s.19 LCRB:EX
Subject: FW: Hobo License name

Hi s.1

Raising this issue in case you hear about it from other channels.

This is from the Donnelly Group who state they are out some money due miscommunication and possibly an error on our part.

Coles notes:

- Donnelly group own the cannabis franchise "Hobo"
- They were approved with the establishment name "hobo"
- On one of the applications a rendering was submitted with the exterior signage using the word "recreational" – this is a term we do not accept
- This application was approved and the licence was issued under the name of "hobo"
- The applicant put up signage with "recreational" in the name stating this was based on the renderings not on the final approval of the name

Bottom line

We will require Hobo to remove the term "recreational" as we have made other businesses remove theirs. I'll connect with s.15 and the team leads to ensure we do a better job looking at renderings of signage in the future. Additionally, I will work with s.15 to see if we can develop a better procedure for checking names at final inspection (ie based on the approval letter)

Please let me know if you need and further information.

Thanks,
s.15

From: s.15; s.19 LCRB:EX
Sent: August 22, 2019 12:00 PM
To: 'Sophie Mas' <sophie@somasconsulting.ca>
Cc: Jeffrey Donnelly <jd@donnellygroup.ca>; 'Adam DiCasmirro' <ad@donnellygroup.ca>; LCRB Licensing Operations LCRB:EX <LCRB.LicensingOperations@gov.bc.ca>; s.15; s.19 LCRB:EX <s.15; s.19@gov.bc.ca>; s.15; s.19 LCRB:EX <s.15; s.19@gov.bc.ca>
Subject: RE: Hobo License name

Hi Sophie,

Thank you for your note, apologies for the delay^{s.22}

The branch has determined that the term "recreational" does not meet the federal requirements outlined in the *Cannabis Act*. This has been consistently enforced by licensing across all applications for all applicants. As a general process, licensing reviews the names of establishments and approves (or not) based on the submission from the applicant. The approved name is on the approval in principle letter, the final approval letter, and on the face of the licence. Notifying the branch of any change to the business name is a requirement and failure to do so is a contravention of the Cannabis Retail Store Licence Terms and Conditions. All exterior signage must also be pre-approved by branch.

I've been told that the names submitted for Hobo's licensed stores were not approved by licensing with the term "recreational". The subsequent applications indicating this term will need to be adjusted before reaching approval in principle and inspection. The Senior Licensing Analyst assigned to the file will be reaching out to discuss this with the applicant in due course.

I apologise for any misunderstanding that may have occurred during the process and am available to discuss further, alternatively you may reach out to s.15; s.19 Manager of Licensing at s.15; s.19 s.15; s.19@gov.bc.ca.

Thanks,
s.15

s.15; s.19 | A/Director | Licensing Division |
Liquor and Cannabis Regulation Branch | Ministry of Attorney General |
Ph: s.15; s.19 | **e:** joshua.huska@gov.bc.ca

From: Sophie Mas <sophie@somasconsulting.ca>
Sent: August 13, 2019 12:49 PM
To: s.15; s.19 LCRB:EX <s.15; s.19@gov.bc.ca>
Cc: Jeffrey Donnelly <jd@donnellygroup.ca>; 'Adam DiCasmirro' <ad@donnellygroup.ca>
Subject: Hobo License name

Hi Josh,

My name is Sophie Mas. Lightbox Enterprises has asked me to act as their representative and contact with respect to issues related to their cannabis retail licenses. As a brief introduction, I am a consultant who used to work with the Ministry of Public Safety and Solicitor General. Until last April 2018, I was the Director of the BC Cannabis Legislation and Regulation Secretariat and was involved in the development of the regulatory framework. Lightbox Enterprises has asked me to help them navigate the cannabis regulatory environment and assist them in addressing some of the outstanding issues that currently exist with the Hobo licenses.

I am reaching out to you because I understand that the Lightbox team held a conference call with you a few weeks ago and that you were able to assist them with some other matter. The reason why I am writing is because there is an outstanding issue with the license name that I am hoping you can help us resolve.

Hobo's license applications for 2 Vancouver locations, Main Street and Granville Street were approved by LCRB with the name "recreational" (Hobo Recreational Cannabis Store). Hobo's Kelowna license application was submitted at the same time as the other 2 and also approved. Hobo's license application to Ontario has also been approved with the term "Recreational". On July 19th, an Inspector asked the Kelowna store manager to remove "Recreational" from all signage and advertising material stating that it contravenes the promotion and advertising provisions of the *Cannabis Act*. Although we understand that the Inspector is doing due diligence and enforcing their interpretation of the *Cannabis Act*, this has a significant impact on Hobo businesses as all promotional and advertising materials (signage, posters, sandwich board, door decals, pylon signs, banners, roadside displays to name a few) were all printed for all Hobo locations with the name "Recreational". They have now all been removed to comply with the inspector's request.

We have been communicating with Regional Inspector^{s.15; s.19} who has been a tremendous help. He has informed us on several occasions that the matter is with LCRB Licensing for resolution hence my email to you.

Could you please help us get this issue resolved expediently? Until this is resolved, Hobo is in a state of limbo waiting to hear the outcome of the licensing decision. This is having a financial impact on their business that will only be compounded if asked to change the signage initially approved several months ago.

I am happy to discuss further by phone and give you additional information as needed.

Thank you in advance for your attention to this matter.

Kind regards,

Sophie

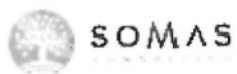
Sophie Mas, MPA, PMP

Founder & CEO

SoMas Consulting Inc.

Tel: +1 604 375 3600

www.somasconsulting.ca



Page 086 of 121

Withheld pursuant to/removed as

s.14; s.15; s.19

From: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
Sent: Thursday, August 22, 2019 12:00 PM
To: Sophie Mas <sophie@somasconsulting.ca>
Cc: Jeffrey Donnelly <jd@donnellygroup.ca>; 'Adam DiCasmirro' <ad@donnellygroup.ca>; LCRB Licensing Operations LCRB:EX <LCRB.LicensingOperations@gov.bc.ca>; s.15; s.19 LCRB:EX <s.22 @gov.bc.ca>; s.15; s.19 LCRB:EX s.22 @gov.bc.ca>
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Thanks,

s.22

s.15; s.19 | A/Director | Licensing Division |
Liquor and Cannabis Regulation Branch | Ministry of Attorney General |
Ph: s.15; s.19 e,s.15; s.19 @gov.bc.ca

From: Sophie Mas <sophie@somasconsulting.ca>
Sent: August 13, 2019 12:49 PM
To: s.15; s.19 LCRB:EX s.15; s.19 @gov.bc.ca>
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Kind regards,

Sophie

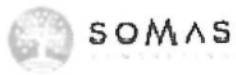
Sophie Mas, MPA, PMP

Founder & CEO

SoMas Consulting Inc.

Tel: +1 604 375 3600

www.somasconsulting.ca



Page 090 of 121 to/à Page 096 of 121

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s.14; s.15; s.19

Page 097 of 121

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s.14; s.15; s.19; s.22

Page 098 of 121

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s.14; s.15; s.19

Page 099 of 121

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Page 100 of 121

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s.15; s.19; s.14

Page 101 of 121

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s.14; s.15; s.19

Page 102 of 121

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s.14

Page 103 of 121

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s.14; s.15; s.19

Page 104 of 121 to/à Page 105 of 121

Withheld pursuant to/removed as

s.14

Page 106 of 121 to/à Page 109 of 121

Withheld pursuant to/removed as

s.14; s.15; s.19

Thank you in advance for your attention to this matter.

Kind regards,

Sophie

Sophie Mas, MPA, PMP

Founder & CEO

SoMas Consulting Inc.

Tel: +1 604 375 3600

www.somasconsulting.ca



Page 111 of 121

Withheld pursuant to/removed as

s.14; s.15; s.19



September 24, 2019

Camille Chisholm:
camille.chisholm@mcmillan.ca

Dear Camille Chisholm:

I write to you on behalf of the Liquor and Cannabis Regulation Branch (LCRB) in response to your letter dated August 28, 2019. My apologies for the brief delay in responding to your letter.

While I appreciated receiving your submission that the prohibition on the promotion of cannabis in the federal *Cannabis Act* does not extend to use of the word “recreational”, LCRB’s position on the use of the word “recreational” on retail store signage is a reasonable interpretation of the nature and scope of that prohibition.

The word “recreational” suggests, among other meanings, a leisurely, fun pastime or activity and as such readily comes within the scope of the prohibition, which refers to a brand that “evokes a positive... emotion or image of a way of life that includes... recreation....” The fact that the word “recreational” could serve to distinguish retail store cannabis from medical cannabis does not change the primary connotation of the word, or the fact that in our view it comes *prima facie* within the scope of the federal prohibition.

As I am sure you are aware, the policy manifest in the prohibition has been established by the federal government and can only be changed or modified by the federal government. It may be that further discussions and policy developments lead to a change in federal policy, but until then the prohibition must be enforced as worded.

I would further note the LCRB has not approved cannabis retail store licences that proposed the use of the word recreational in their business name or signage and indeed several applications have had that request denied. Fairness dictates that the same result prevails in this context.

Finally, I note that the Approvals in Principle provided by the LCRB to your client both approved specific wording of proposed signage, in which the word “recreational” did not appear. The Approvals in Principle also advised that any alteration or modification, of the name or signage in any way, required prior approval from the LCRB. No proposed alteration to the approved signage was ever submitted to LCRB for approval. Having failed to do so, the responsibility for having nevertheless made the alterations lies with your client.

It is unfortunate that your client has incurred costs with respect to their signage, but the LCRB is not in position to accommodate your request and will require all store signage to refrain from containing the word “recreational”.

**Liquor and Cannabis
Regulation Branch**

Mailing Address:
PO Box 9292 Stn Prov Govt
Victoria BC V8W 9J8

Location:
4th floor 645 Tyee Road
Victoria BC V9A 6X5
Phone: 250 952-5787
Facsimile: 250 952-7066

Website:
www.gov.bc.ca/liquorregulationandlicensing

Sincerely,
s.15; s.19

Deputy General Manager, Licensing
Liquor and Cannabis Regulation Branch

Naming Principles Association and Name Review Checklist

Proposed Establishment Name

Applicant

Job #

Hobo

LIGHTBOX ENTERPRISES LTD. 001595

1. Using the Naming Principles (federal)

- ☐ Logo/brand no visual depiction of a person, character or animal
- ☐ Not appealing to minors
- ☐ No testimonials/endorsements
- ☐ Name/logo does not evoke a positive or negative emotion about a way of life

2. Aligning with provincial rules:

- ☐ Name does not imply selling medical cannabis (dispensary, pharmacy)
- ☐ Similar to a public store (BC Cannabis Store)
- ☐ Suggest an association with the government (BC in the name)

Principles **three through six** are intended to be considered collectively. It is possible that one principle (independent from others) may indicate non-approval or that a combination of these will result in non-approval. Further, a factor identified under a principle may be irrelevant without being considered in conjunction to another. These principles have been placed in a specific order for consideration.

3. Name – Words or Phrases used in the proposed name or domain name

- ☒ Proposed name or part of name appears in one or more of other businesses
- ☐ Generic Terms versus Specific
- ☐ Appearance that the store sell medical cannabis

Hobo, ON: <https://hobo.ca/>

4. Signage, font, colours, logos, design

One or a combination of these factors is the same

- ☐ Similarity to a public store (BC Cannabis Store)
- ☐ Logos: Generic vs specific
- ☐ Appearance of association with another business
- ☐ Appearance of association with selling medical cannabis

5. Proximity of businesses to each other

The closer together the greater the likelihood of appearance of association; the further apart, the lower the likelihood of appearance.

- ☐ In BC
- ☐ Outside the town/city but in BC
- ☐ Same town/city

6. Associations (actual or appearance) with other business(es)

The actual association among businesses may make any appearance of associations stranger. Lack of an actual association can make the appearance of an association less important.

- ☐ Financial
- ☐ Familial
- ☐ Corporate relationships
- ☐ Actual association

Notes / Attachments / Appendixes

Hobo - Play on Armor Games

<https://armorgames.com/play/2529/hobo>

Hobo, a free online Arcade game brought to you by Armor Games.

Hobo - New Season Shop Now <https://www.Lyst.com/Hobo>

Backlash because name is insensitive:

<https://ca.finance.yahoo.com/news/hobo-recreational-cannabis-store-sparks-twitter-backlash-name-144002355.html>

Decision/Recommendation

Approved: No issues - associated to other Hobo retail chain in Canada.

Naming Principles Association and Name Review Checklist

Proposed Establishment Name

Applicant

Job #

HOBO

Lightbox Enterprises Ltd.

001797/001752

1. Using the Naming Principles (federal)

- ☒ Logo/brand no visual depiction of a person, character or animal
- ☒ Not appealing to minors
- ☒ No testimonials/endorsements
- ☒ Name/logo does not evoke a positive or negative emotion about a way of life

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3. Name – Words or Phrases used in the proposed name or domain name

- ☐ Proposed name or part of name appears in one or more of other businesses
- ☒ Generic Terms versus Specific
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4. Signage, font, colours, logos, design

One or a combination of these factors is the same

- ☒ Similarity to a public store (BC Cannabis Store)
- ☐ Logos: Generic vs specific
- ☐ Appearance of association with another business
- ☒ Appearance of association with selling medical cannabis

association with other retail cannabis stores across Canada. Name appears to be a franchise

5. Proximity of businesses to each other

The closer together the greater the likelihood of appearance of association; the further apart, the lower the likelihood of appearance.

- ☒ In BC
- ☐ Outside the town/city but in BC
- ☒ Same town/city

outside of BC but within Canada

6. Associations (actual or appearance) with other business(es)

The actual association among businesses may make any appearance of associations stronger. Lack of an actual association can make the appearance of an association less important.

- ☐ Financial
- ☐ Familial
- ☐ Corporate relationships
- ☐ Actual association

Notes / Attachments / Appendixes

Decision/Recommendation

Recommend approval - meets requirements

Cannabis Retail Store
Floor Plan
2121 Springfield Road
Kelowna, BC V1Y 7X1

DARCHGROUP
2121 Springfield Road
Kelowna, BC V1Y 7X1

Darch Group Architects Inc.
Suite 410 - 115 St. Patrick Street
Vancouver, BC V6B 1G3
604-774-2281 info@darchgroup.com

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Job Number:
19035

Project:
UNIT 4 - 2121
SPRINGFIELD RD
KELOWNA, BC.

NOTES: (SEE DRAWING B.B.C. 2019)

1. UNIT AREA: 2,527 SF (234.77 m²)
2. MEANS OF EGRESS 3.3.1.3(1) 2 REQUIRED 2 PROVIDED
3. MINIMUM NUMBER OF EXITS 3.3.2.1. 2 REQUIRED 2 PROVIDED
4. EXIT SINGS 3.3.2.1
- (1) EVERY DOOR SHOULD HAVE A SIGN PLACED OVER OR ADJACENT TO IT
- (2) EVERY EXIT SIGN SHOULD BE VISIBLE ON APPROACH TO THE EXIT.
5. TRAVEL DISTANCE 3.3.2.4: 50m MAX. TO AN EXIT
6. ACCESSIBLE PATH OF TRAVEL 3.3.2.3
- 1500mm BETWEEN ANY 2 STRUCTURES IN PUBLIC AREAS IN MERCHANDISING ESTABLISHMENTS AND UNOBSTRUCTED HEIGHT OF NOT LESS THAN 1950mm THE FULL WIDTH OF THE ROUTE.
7. EXIT WIDTH 3.3.2.2
- (1) 1100mm EXIT CORRIDORS REQUIRED (1152mm) PROVIDED.
- (3) 800mm DOORWAY REQUIRED (813mm) PROVIDED
8. DIRECTION OF DOOR SWING 3.3.1.2 TO OPEN ON THE OUTSIDE
9. EXIT TRAVEL
10. V.C. FOR A BUSINESS AND PERSONAL SERVICES 3.3.2.3.4
11. STAFF 1 V.C. REQUIRED (1) V.C. PROVIDED
12. PLUMBING FACILITIES 3.3.2.3.2
13. REQUIRED WHEN ACCESSIBLE V.C. IS LOCATED IN A MERCANTILE OCCUPANCY WITH MULTIPLE ROUTES AVAILABLE TO ALL SUITES 1 ACCESSIBLE V.C. PROVIDED.

NO CHANGE TO EXISTING HVAC
NO CHANGE TO EXISTING FIRE RATED ASSEMBLIES
NO CHANGE TO EXISTING (GROUP E - MERCANTILE)
NO CHANGE TO EXISTING SELF-CLOSING FIRE RATED EXIT DOOR
BUILDING HAS FIRE ALARM SYSTEM

AS PER CANNABIS RETAIL STORE SECURITY REQUIREMENTS:
1- INTERIOR AND FIRE MONITORING ALARM SYSTEM
2- LOCKED RETAIL PRODUCT DISPLAY CASES
3- LOCKED CANNABIS STORAGE ROOM
4- SECURE PERIMETER DOOR LOCKS
5- SECURITY CAMERAS WITH FULL UNOBSTRUCTED VIEW OF RETAIL SALES AREA, ANY PRODUCT STORAGE AREA AND BOTH INTERIOR AND EXTERIOR OF ALL STORE ENTRANCE/EXITS.

OCCUPANCY: (F) MERCANTS 3.3.1.3(1) 3(15.57m ²) per person			
RETAIL AREA	STAFF OFFICE	STORAGE	OTHER USES
15.57m ²	15.57m ²	15.57m ²	15.57m ²
1 PERSON	1 PERSON	1 PERSON	1 PERSON
TOTAL AREA: 2,527 SF (234.77m ²) 25 PERSONS			

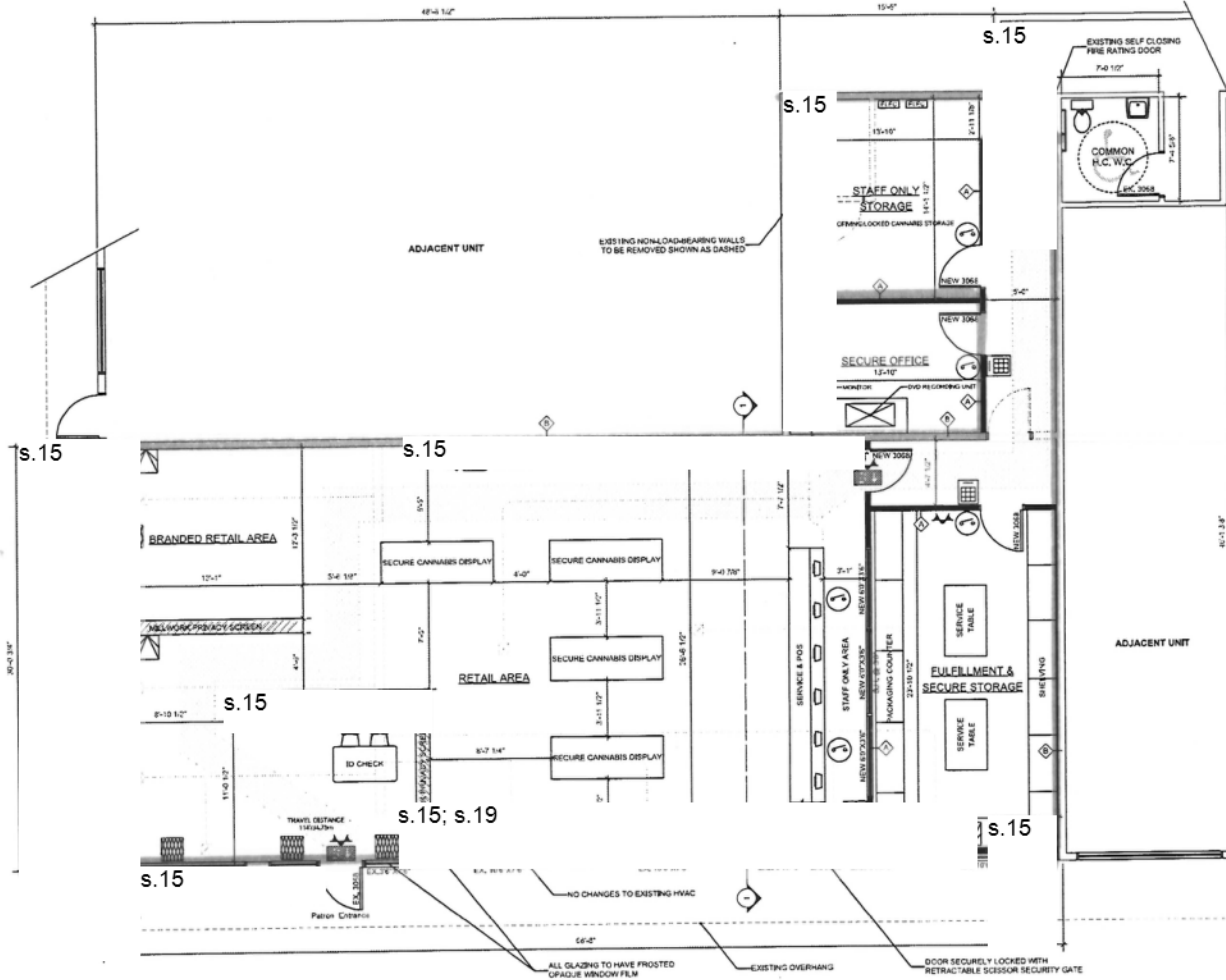
BE USED FOR BUILDING PERMITS
217340-03

Submittals

Draw: JV
Checked: CM
Date: AS NOTED
Project: C-19

FLOOR PLAN

A-202



LIQUOR AND CANNABIS REGULATION BRANCH
APPROVAL IN PRINCIPLE

Subject to the terms and/or conditions specified in the
approval in principle letter(s) dated: _____

Job #: 201585 Max Person Capacity: 25

Authority: [Signature]

PROPOSED FLOOR PLAN
Scale: 1/4" = 1'-0"

WALL ASSEMBLIES	
NEW INTERIOR PARTITION FULL HEIGHT	1" GYP + PARTED 2X4 WOOD STUD @ 16" O.C. BATT INSULATION 1/2" GYP + PARTED
EXISTING SUITE FIRE SEPARATION TO REMAIN	

SECURITY LEGEND	
FIXED DOME CAMERA	[Icon]
DUAL TECH-PTR	[Icon]
RETRACTABLE SCISSOR SECURITY GATE ON INTERIOR OF GLAZING	[Icon]
PANIC ALARM	[Icon]
KEYPAD / CARD READER	[Icon]
VIDEO INTERCOM UNIT	[Icon]

EMERGENCY LIGHT
ELECTRICAL PANEL

Job Number (Regarding) (Applica	Title	Description	Created By	Modified By	Modified On
001595	Incomplete 1	missing key personnel for Donnelly Holdings and projections	s.15; s.19		2018-11-22 8:53
001595	docs received	received list of key personnel for Donnelly Holdings and projects for Lightbox Enterprises			2018-11-26 15:37
001595	Hours of operation	Sent email to confirm proposed store hours of operation. Email uploaded.			2018-11-29 12:46
001595	Hours of operation	11/29/2018 - Received reply confirming standard hours of operation requested. Email uploaded.			2018-12-01 10:09
001595	Referral to LG	Sent referral email to Ryan Smith. LG w/applicant cc'd. Email uploaded.			2018-12-01 10:19
001595	LG Response to referral	Received email from LG re the city will not be providing a resolution at this time because the property is not yet properly zoned. If the City has received a rezoning application for this property, a resolution would be provided only after the property was successful in a rezoning process. Email uploaded.			2018-12-03 13:39
001595	Re-zoning app submitted to LG	Received email from Chad Cole (chad@donnellygroup.ca) re further to voicemail left, rezoning app submitted to LG. Info forwarded to ensure that provincial app stays active. Replied re: thank you for info, noted on file, advised written permission to correspond w/third party required. Email uploaded.			2018-12-03 13:49
001595	Third party permission	12/03/2018 - Received email from Jeff Donnelly re providing written permission for Chad Cole to correspond re this application. Email uploaded.			2018-12-04 7:41
001595		SPD information sent.			2018-12-07 13:44
001595	Rezoning application accepted as complete	12/07/2018 - Received email from Chad Cole re City of Kelowna confirms acceptance of rezoning application. Email uploaded.			2018-12-11 9:56
001595	Dec 21 Incomplete email to applicant	12/21/2018 - Sent incomplete email to applicant w/Chad cc'd re: OTL requires landlords signature and what is being store in the soft and open non cannabis retail displays. Email uploaded.			2018-12-21 14:01
001595	Response to incomplete email Jan 2, 2019	2019-01-03 - Replied to applicant w/Chad Cole cc'd re thank you for the signed lease and updated floor plan. Are cannabis accessory displays secure? Email and attachments uploaded.			2019-01-03 12:55
001595	Response to incomplete email Jan 3, 2019	2018-Jan-03 - Received reply from Chad Cole re as per T&C handbook, cannabis accessories will be secured the same way as cannabis products. Can have team update floor plan if needed. Replied re yes, please update floor plan to reflect this. Received reply with updated floor plan - uploaded.			2019-01-04 12:47
001595		2018-Jan-04 - Replied with floor plan approved & status - LG, FI & SPD required. Email uploaded.			2019-01-25 11:48
001595	SPD approved	2019-Mar-20 - Rec'd SPD approval email. Uploaded to SLA corr and updated chevron to yes. Sent f & p complete letter to LG. Uploaded to LG corr. 2019-Mar-22 rec'd email from LG acknowledging receipt of letter.			2019-03-22 8:18
001595	Franchise agreement	2019-Mar-21 - Sent email to applicant requesting a copy of franchise agreement and confirm is same for all stores, if not, one will be req'd for each store app. Email uploaded to SLA corr. 2019-Mar-22 rec'd email does not apply. See SLA corr for email.			2019-05-16 8:21
001595	Updated floor plan	2019-Apr-18 Rec'd email with updated floor plan attached. See SLA corr for email and estab docs for floor plan.			2019-05-16 8:35
001595		Associate Organization Assessment Form for Butcher - Bullock Enterprises Ltd is uploaded but pdf is not opening properly.....see same document uploaded on other Hobo location Job #1846			2019-05-28 13:01
001595	AIP	2019-Jun-12 Called applicant to advise re AIP, no answer, left message to advise email sent & i'm available if any questions, email sent, see SLA corr.			2019-07-09 7:24
001595	FINAL	2019-Jul-08 Rec'd list of priority workers. 2019-Jul-09 forwarded to PSSG, see AIP folder.			
001595		2019-Jul-19 Rev'd final photos, exterior signage and a sandwich board now shows recreational cannabis store, proposal does not include this. Called applicant to advise cannot us the work recreational in signage/advertising and advised re fed reg17(1)(e). Advised would remove word from sign, and send me a photo then follow up with a phone call. Will advise at end of call that sandwich board must be removed until recreational removed from the sandwich board. Confirmed both removed, payment rec'd, email sent, see FINAL folder.			2019-07-19 15:09
001595	AIP TL Review	2019-May-22 sent email to TL's for AIP review. See AIP folder. Sent email to applicant re common hallway. Rec'd reply re door to hallway solid and receiving through the front of store, not the hallway. See SLA corr.			
001595		2019-May-28 Rec'd request to clarify secondary door and updated naming checklist w/rationale, email sent, see SLA corr for email and AIP folder for naming doc. Rec'd updated floor plan with blue lines showing secondary door locked.			
001595		2019-May-29 Replied requesting floor plan in black and white.			
001595		2019-Jun-03 Printed rec'd floor plan in black and white, secondary door securely lock with retractable scissor security gate and patron entrance clearly labelled. Updated naming principles docs and uploaded to AIP folder. Email sent to TL for approval.			
001595		AIP letter updated and added to AIP-TLR folder.			2020-02-04 8:46
001595	Bylaw/Recommendation	2019-May-15 Rec'd email from LG with bylaw attached and inquiry if will receive f&p letter for all files.			
001595		2019-May-16 replied re more info required, provided link to LG role doc and listed recommendation requirements, advised can add note to file if want to receive a notification for all files. See LG corr.			
001595		2019-May-16 rec'd council report.			
001595		2019-May-17 replied requesting copy of council meeting minutes referenced in report. See LG corr.			
001595		2019-May-21 Rec'd email with link to the Council meeting minutes. See LG corr.			2020-02-04 8:48

LCRB:EX

From: s.15; s.19 LCRB:EX
Sent: January 16, 2020 3:13 PM
To: s.15; s.19 LCRB:EX
Subject: FW: Hobo licence name
Attachments: 564795 Camille Chisholm.pdf; Hobo

FYI

From: s.15; s.19 LCRB:EX
Sent: September 24, 2019 2:38 PM
To: Julie Hutchinson ; Camille Chisholm
Cc: s.15; s.19 LCRB:EX ; s.15; s.19 LCRB:EX ; s.15; s.19 LCRB:EX
Subject: Hobo licence name

Dear Camille Chisholm:

Thank you for your August 28, 2019 email, to the Liquor and Cannabis Regulation Branch, regarding Hobo and their licence name.

Please find attached a response sent on behalf of s.15; s.19 Deputy General Manager for the branch's Licensing Division.

Kind regards,

s.15; s.19

Administrative Assistant, Licensing Division
Liquor and Cannabis Regulation Branch
Ministry of Attorney General
phone: s.15; s.19
email: s.15; s.19 [@gov.bc.ca](mailto:s.15; s.19@gov.bc.ca)

From: Julie Hutchinson <Julie.Hutchinson@mcmillan.ca>
Sent: August 28, 2019 3:14 PM
To: s.15; s.19 LCRB:EX <s.15; s.19@gov.bc.ca>
Cc: Camille Chisholm <Camille.Chisholm@mcmillan.ca>; Christian Petersen <Christian.Petersen@mcmillan.ca>
Subject: Hobo Recreational Cannabis - License Name

Good afternoon, please see attached letter from Camille Chisholm.

Regards,



Julie Hutchinson
Legal Administrative Assistant

d 778.328.1492 | f +1.604.685.7084

Julie.Hutchinson@mcmillan.ca

Assistant to: Christian Petersen | 604.691.7456 | christian.petersen@mcmillan.ca

Assistant to: Vicki Tickle | 236.826.3022 | vicki.tickle@mcmillan.ca

Assistant to: Natalie Cuthill | 236.826.3260 | natalie.cuthill@mcmillan.ca

Assistant to: Camille Chisholm | 236.826.3066 | camille.chisholm@mcmillan.ca

McMillan LLP

Lawyers | Patent & Trademark Agents

Royal Centre, 1055 W. Georgia Street, Suite 1500

PO Box 11117

Vancouver, BC V6E 4N7

mcmillan.ca

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