



August 16, 2023

Liquor Advisory Group
c/o Colorado Department of Revenue 1707
Cole Blvd; Suite 350
Lakewood, CO 80401

Re: Proposal - Changes to Colorado Liquor Code and Colorado Liquor Rules

Dear Advisory Committee:

I am writing to follow up on a discussion that the LAG Regulations of Retail Operations subgroup had on July 20th 2023 concerning the prohibition of Retail Liquor Stores licenses (off premise) and on premise licenses from having common ownership/financial interest.

As an RLS owner there is simply no reason that a person could/should not have financial interest in both licenses. So, long as the regulations of obtaining the licenses and policies are followed for each tier. The licenses would be separate and distinct. Each having separate and distinct business licenses, separate and distinct licensed premises, separate and distinct tax accounts, separate and distinct licensed wholesaler accounts, etc. The businesses would operate independent of each other and have to obtain product individually. The RLS licensed premise and on-premise licensed premise would obtain product independently from wholesalers. The regulations that govern the amount of stores for RLS would apply in the respective tiers. The individual policy/regulations for the on-premise license would apply for that tier. The removal of the prohibition should not have an affect on policy/regulations in either tier.

As an RLS operator and a person that has been in the hospitality industry my entire life. The fact that I can not have a financial interest in a restaurant simply because I own/operate an RLS license in the state of Colorado is ridiculous. As an example, owning an RLS store should not impede a person's ability to invest in and or own a pizza shop that serves beer for on premise consumption. I simply to not see how the removal of this prohibition would create a catastrophic event or be another knife in the retailers coffin. Rather it would give RLS operators the ability and opportunity to expand into other areas of commerce.

I would like the subgroup to further discuss how eliminating this prohibition would negatively affect RLS operators.

Regards,

A handwritten signature in black ink, appearing to read "Dustin Chiappetta". The signature is stylized with a large loop and a long horizontal stroke extending to the right.

Dustin Chiappetta - Owner/Operator Pearl Wine Company