

DISTRICT OF COLUMBIA
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ALCOHOLIC BEVERAGE CONTROL BOARD
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MEETING

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IN THE MATTER OF:

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Trader Joe's East, Inc.	:	
t/a Trader Joe's #662	:	Fact Finding
1914 14th Street, NW	:	Hearing
Retailer B, ANC 2B	:	
License No. 93455	:	
	:	
New Retailer Class B Full-	:	
Service Grocery Store	:	
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Wednesday,
November 20, 2013

The Alcoholic Beverage Control

Board met in the Alcoholic Beverage Control
Hearing Room, 2000 14th Street, N.W., Suite
400S, Washington, D.C. 20009, Chairperson
Ruthanne Miller, presiding.

PRESENT:

- RUTHANNE MILLER, Chairperson
- NICK ALBERTI, Member
- DONALD BROOKS, Member
- MIKE SILVERSTEIN, Member
- HERMAN JONES, Member

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P R O C E E D I N G S

1:45 p.m.

CHAIRPERSON MILLER: Our next matter is scheduled for 2 o'clock. That's Trader Joe's. I don't know if anyone is here on that yet. Not seeing anyone here on that, the Board will recess and return at 2.

(Off the record.)

CHAIRPERSON MILLER: Okay, we're back on the record for a Fact-Finding Hearing with respect to Trader Joe's East, Inc. trading as Trader Joe's No. 662 located at 1914 14th Street, N.W., License No. 93455 in ANC 2B. We're here to determine -- Trader Joe's is a grocery store. So why don't you introduce yourselves for the record?

MR. FONSECA: Michael Fonseca on behalf of the Applicant.

MR. MOLLOY: Brian Molloy on behalf of the Applicant.

CHAIRPERSON MILLER: Okay. And

1 Mr. Jones is a Board member who is most
2 experienced in looking at these plans, so
3 we're all going to be following along and may
4 have questions and stuff, so he's most
5 familiar with what has gone on with your
6 filing plans and supplementing them, so I'm
7 going to turn this over right now to Mr. Jones
8 to take it forward.

9 MEMBER JONES: Cool. Thank you,
10 Madam Chair. So you two gentleman -- well, I
11 know Mr. Molloy has been here before and I
12 know there's been some dialogue that's taken
13 place between you and a director as well as
14 I'm sure Mr. Fonseca, you're familiar with, if
15 not being here specifically for this case that
16 you were familiar with the process. So I
17 won't dive into the details of how we do our
18 calculations because I think you are well
19 versed in that. But if I am mistaken, please
20 correct me and I'll be happy to jump into
21 that.

22 MR. FONSECA: Absolutely. If I

1 may, I beg your pardon to intrude, but I am
2 going to turn it over principally for the
3 presentation and we may both respond to your
4 inquiries and that of the Board, but just so
5 you know I think we initially are going to
6 offer qualification under the 50 percent rule
7 as a full-service grocery store.

8 MEMBER JONES: Understood, okay.
9 Fair enough. So the primary reason that
10 there's interest in having you here before us
11 is related to the calculation of the total
12 food selling area. And specifically, as you
13 know, the total food selling area, as we
14 determine it, is calculated by subtracting the
15 nonfood selling area from the selling area.
16 And you provided us a document. I don't know
17 of the exact date of when this document was
18 provided, but I'm just going to hold it up and
19 let you know that this is the version that I
20 last saw and reviewed. And I don't have any
21 specific revision number or designator on here
22 to know if it's anything that is old, new, or

1 somewhere in between. But this is where we
2 are.

3 And to help hopefully better
4 identify this, what I have here on this sheet
5 is for test 1 as was indicated by Mr. Fonseca,
6 there's a calculation in which it was
7 determined based on the numbers provided that
8 the establishment had a food selling area of
9 50.016 percent. Is this the last or latest
10 revision that we should have or is there
11 something --

12 MR. MOLLOY: Today we brought with
13 us a slightly revised version of what you
14 have.

15 MEMBER JONES: Okay.

16 MR. MOLLOY: And that would be --
17 the main way you can tell them apart and I
18 believe DeeDee put a copy up there for you in
19 that similar size, is that we've added several
20 gray areas marked with an NF for nonfood.

21 MEMBER ALBERTI: Can I give this
22 to Mr. Jones?

1 CHAIRPERSON MILLER: Doesn't he
2 have one?

3 MR. MOLLOY: He doesn't have this
4 version. He has the older version.

5 CHAIRPERSON MILLER: You don't
6 have any smaller ones for us to follow along?
7 Thank you. We can share this.

8 MR. MOLLOY: And a number of these
9 were revised just slightly, but -- so where
10 they're still passing.

11 Do you mind if I walk you through
12 every step on down to get that 50 percent
13 rather than jumping right to the 50 percent?

14 MEMBER JONES: Do I mind or do you
15 mind if you --

16 MR. MOLLOY: Do you mind if I just
17 start from the whole story --

18 MEMBER JONES: Not at all, feel
19 free.

20 MR. MOLLOY: So if you're looking
21 at the latest version of the plans, we have
22 the whole story area which is defined by the

1 red line. Everything else that has these red
2 dashes is surrounding building space and you
3 know the development is right across the
4 street, but has absolutely nothing to do with
5 Trader Joe's. There's no Trader Joe's
6 employee access or Trader Joe's patron access.
7 So it's the red line that defines what Trader
8 Joe's is and the inside -- that's the total
9 store area which is a little over 15,000
10 square feet.

11 And then the next step is defining
12 the nonfood area. So inside that pink line or
13 red line, you'll see a thicker black line.
14 Anything that's not inside that thicker black
15 line is nonselling area. So that would be all
16 back of the house stuff which is mainly this
17 section over here, so there's a lot of
18 storage, a storage room, a storage cooler, and
19 other storage space and then there's actually
20 some employee-only space over here. It's a
21 sales support room. And then the restrooms
22 which the statute says don't have to be

1 counted either, even though a patron could get
2 to them.

3 And so everything inside the black
4 line is then the -- oh, I jumped over that,
5 but the total nonselling area is a little over
6 4,000 square feet. And then that leaves
7 everything inside that thicker black line as
8 the total selling area which is 10,668.790
9 square feet. So that's anywhere inside Trader
10 Joe's where a patron could walk.

11 MEMBER JONES: Understood.

12 MR. MOLLOY: And then once we
13 define the total selling area, then the next
14 thing I have is broken out that area into
15 three separate spaces. So there's the not
16 total, non-food selling area which is anywhere
17 that's in a product that doesn't fit into one
18 of the seven categories. So over here the
19 store that is alcoholic beverages and over
20 here in Trader Joe's it's their floral
21 products. Trader Joe's, unlike a lot of other
22 grocery stores, doesn't sell any paper

1 products or trash bags or anything like that.
2 So they have a much smaller non-food selling
3 area.

4 And then the rest of the space is
5 what I called in this chart as non-dedicated
6 selling area. So it's all the white space.
7 Anything on that chart that isn't one of these
8 seven categories or isn't non-food. If you
9 can remember back and this is a while ago now,
10 but when we did Little Red Fox which was a 50
11 percent test grocery store as well, that's how
12 we did it and I actually brought that chart if
13 anyone would like their memory refreshed. But
14 we basically just -- here, I can bring it up.

15
16 As we see inside the selling area,
17 it's just the seven categories and then
18 everything else is like white. We didn't even
19 actually specifically mark off non-food
20 selling area because at least when we approved
21 that test for a 50 percent store, the key was
22 just defining the selling area and then where

1 the seven categories were and then using that
2 to get to those are the seven category selling
3 area after 50 percent of the total store.

4 So when you subtract -- not when
5 you subtract, but just when you go from the
6 selling area to find what's non-food and
7 what's non-dedicated, that leaves the seven
8 categories which are A through G and each is
9 assigned its own different color. And when we
10 add up all the portions of the selling area
11 that are dedicated to one of those seven
12 categories plus the three-foot extension and
13 the diagonals and we've had to explain that
14 with Little Red Fox, that's how we get to the
15 5,342.930 square feet which is about 50
16 percent of the store. And we take that number
17 which is our selling area for the seven
18 categories and use that as the denominator for
19 test 2 which is the 5 percent test and that's
20 what the top of the chart is over here and
21 that's where we take each individual product
22 and divide it by the total to get its

1 percentage and that's where we meet 6 out of
2 the 7 to be 5 percent or more. Going through
3 it as I've just described, we pass in all
4 seven other categories.

5 MEMBER ALBERTI: Just real quick
6 because I think you lost me. The denominator
7 again was what?

8 MR. MOLLOY: The total food
9 selling area.

10 MEMBER ALBERTI: And that was
11 computed how? By the area dedicated --
12 categories A through G?

13 MR. MOLLOY: Yes. You can get to
14 it two ways. And we've done it both ways.
15 It's either the total categories A through G
16 or it's taking the selling area, the total
17 selling area, subtracting the non-food selling
18 area and the non-dedicated selling area from
19 that.

20 MEMBER ALBERTI: Okay, now I
21 understand. Thank you.

22 MR. MOLLOY: And so the big

1 distinction using the Little Red Fox method
2 which is what I used here and then what we
3 tried to do for Giant and some of the other
4 stores where it's a 6,000 plus square foot
5 store, is that the equation for Giant, we take
6 the selling area and just subtract non-food
7 selling area from it and then we use that
8 number as the food selling area.

9 When we do a 50 percent test,
10 based on the past model of Little Red Fox, we
11 take the selling area and subtract those two
12 things, the non-food selling area and the non-
13 dedicated selling area.

14 So that's the biggest difference
15 which is what I think draws the most confusion
16 when trying to analyze it, at least sometimes
17 on our part.

18 MEMBER JONES: Okay, so I think
19 there's good and bad in what it is I'm hearing
20 based on my understanding. So I am painfully
21 and intimately familiar with the Little Red
22 Fox application or process by which it was

1 approved. So the question I have for you
2 based on your understanding of what you just
3 communicated, in the Little Red Fox
4 application and Little Red Fox and Little Red
5 Fox floor plan, would you consider this space
6 here, this hallway space here -- can you see
7 what I'm referring to?

8 MR. MOLLOY: I can.

9 MEMBER JONES: This hallway space
10 here, what category of space would you define
11 that to be based on either non-food selling
12 area or non-dedicated selling area?

13 MR. MOLLOY: It would be non-
14 dedicated selling area.

15 MEMBER JONES: Okay. And that's
16 where I think the confusion where -- I don't
17 know that we had a chance to circle back on
18 how Little Red Fox came to be in compliance
19 with the regulations, but how we make the
20 calculation is we take the selling area in its
21 entirety. We subtract from that the square
22 footage dedicated to non-food selling items

1 and that's it. And that ends up being what
2 your food-selling area is. And that is the
3 same construct that was used in calculating
4 what Little Red Fox and how it came to be
5 determined to be passing.

6 So these numbers that are here
7 listed on this document that you're referring
8 to as being passed, the calculations that were
9 determined did not match these numbers that
10 were submitted in this document. We came up
11 and we provided or calculated this independent
12 of these calculations and made the
13 determination that you were successful in
14 passing, but using these numbers as a baseline
15 guide and reference, as you submitted them, is
16 probably where the disconnect is in the
17 communication. So I apologize for that from
18 that standpoint.

19 But that being said, we're going
20 to put Little Red Fox away. We're going to
21 focus back on Trader Joe's. Yes, sir?

22 MR. MOLLOY: Can I get that copy

1 back?

2 MEMBER JONES: Yes, sir. No
3 problem. So circling back to Trader Joe's,
4 the disconnect that we are having in how you
5 came to the test 2 values is going to be
6 centered around the number that you're using
7 as your denominator which is your food selling
8 area.

9 MR. MOLLOY: Yes.

10 MEMBER JONES: The way in which we
11 would be doing the calculations and I will
12 submit to you that I haven't had an
13 opportunity to run these numbers based on the
14 fact that we just got this document today with
15 the -- where the NF or the non-food items were
16 discretely identified and one of the holes
17 that I referenced in terms of what I needed in
18 order for us to facilitate reviewing this is
19 a description and/or a definition of what the
20 non-food selling areas where so we could
21 subtract that from the overall selling area to
22 come up with the denominator and then use that

1 number to then roll into the determination of
2 whether or not you met test 2.

3 So I do not have a concern, i.e.,
4 I will concede to you that I believe based on
5 my cursory review of this information as of
6 right now, that test 1 is not a problem. I am
7 concerned that based on that new denominator
8 number because without the subtraction of the
9 4707, your number is going to be a lot higher
10 for your denominator and then that denominator
11 is going to subsequently and appropriately
12 decrease the percentage categories as they
13 apply. And I haven't done the math. So I
14 can't say that I am correct or I can't speak
15 definitively from that, but that's where it is
16 a disconnect in what I think how we approach
17 this.

18 MR. MOLLOY: Your suspicions are
19 correct. We -- time to move on?

20 MR. FONSECA: We'll concede. If
21 that's going to be the case, because -- and to
22 some extent each time we're doing one of

1 these, and I hear now, Member Jones, and now
2 I'm absolutely crystal clear on it. To us, it
3 kind of seems as though there was always a
4 moving target. But there really wasn't. So
5 now that we realize and we've got Plan B, so
6 if we have to, we'll present now the 6,000-
7 foot proposition.

8 MEMBER JONES: Yes, sir.

9 MR. FONSECA: Which is -- we'll
10 meet it that way, too.

11 MEMBER JONES: Okay.

12 MR. FONSECA: Because if we're
13 only for the 50 percent going to subtract out
14 of the selling area the non-food area which
15 here was only some 618 square feet, it changes
16 everything. There's no reason to try to go
17 through all those numbers.

18 MEMBER JONES: That's fine. So
19 there's no need to go down that path.

20 MR. FONSECA: We won't have the
21 six of seven. You may be lucky we have the
22 five of seven. There's no reason to go

1 forward.

2 MEMBER JONES: Understood.

3 MR. FONSECA: So we will proceed -
4 -

5 MR. MOLLOY: If you just give me -
6 - I'm committed to switch on this one and give
7 you the new plan.

8 MEMBER JONES: A minute is yours.

9 CHAIRPERSON MILLER: Mr. Jones, I
10 just want to ask you so that I understand what
11 was wrong with their approach? It wasn't the
12 same as your approach, but why isn't their
13 approach a viable one under our regulations?

14 MEMBER JONES: It's not consistent
15 with what we've done with the previous
16 applications and it's not consistent with what
17 our interpretation as the Board of what the
18 regulations call for.

19 CHAIRPERSON MILLER: I hear what
20 you're saying which is conclusory. I don't
21 see it right now like why it's inconsistent.

22 MEMBER JONES: So if you'd like to

1 take the time to do that now, we can pull up
2 every case that we had regarding that and we
3 can demonstrate to you that we had a
4 consistent pattern and approach in the past
5 that we've used to --

6 CHAIRPERSON MILLER: Okay, no, I
7 don't mean that. I just mean I thought that
8 when we look at the plans, and you look at
9 them more carefully than anyone, but we look
10 to see whether the measurements fit within the
11 words of the regulation.

12 MEMBER JONES: Correct, so I can
13 walk through why it doesn't, but as I just
14 noted, I will concede that I haven't performed
15 these calculations because I just got the
16 package today as I was standing here.

17 MEMBER ALBERTI: Mr. Jones,
18 correct me if I'm wrong, but I think
19 explaining it a different way, what they
20 referred to as the non-dedicated area, really
21 in effect, according to the way we've been
22 treating everyone else, really should be

1 included in the food selling area. The bottom
2 line is that that is the result, the way we
3 have treated things.

4 CHAIRPERSON MILLER: Okay, that
5 makes sense to me.

6 MEMBER ALBERTI: They were
7 deducting that out from the food selling area,
8 making the denominator smaller and it needs to
9 be included which makes the denominator
10 larger, reducing their percentages for their
11 categories. Is that clear?

12 CHAIRPERSON MILLER: Yes, that
13 makes sense. Thank you.

14 MEMBER JONES: Thank you, Mr.
15 Alberti.

16 MEMBER ALBERTI: While we're doing
17 this, can I ask a question? I'm just going to
18 label this as number two, all right? Can I
19 ask a question just out of curiosity,
20 gentlemen, you have a center aisle here
21 between the two green polygons there?

22 MR. MOLLOY: Yes.

1 MEMBER ALBERTI: According to what
2 I -- my impression from just -- sort of a
3 guesstimate based on your dimensions, it looks
4 like that's about an aisle of 15-feet wide, is
5 that correct? You've already taken up three
6 feet on either side, so I'm using --
7 guesstimating based on relative size that we
8 have another nine feet in the middle there.

9 MR. MOLLOY: Yes. It is a very
10 long aisle and while I wasn't privy to
11 deciding how to use the space at Trader Joe's,
12 I was told that one of the issues they have
13 had at their other location in D.C. on L and
14 25th is that they do have some very narrow
15 aisles and they got a lot of negative customer
16 feedback, so their goal in this one was to
17 provide a much smoother, less congested
18 shopping environment. And so they wanted to
19 take advantage of the extra space they have
20 here and not cram in more aisles, just so that
21 the patrons could move around better.

22 MEMBER ALBERTI: Thank you for the

1 explanation.

2 MR. FONSECA: In the middle of
3 those aisles, those three items there, those
4 are columns.

5 MEMBER ALBERTI: Support columns.

6 MR. FONSECA: Those are columns
7 running through the building.

8 MEMBER ALBERTI: Will there be any
9 displays in those?

10 MR. MOLLOY: As of right now,
11 they're just constructed as support columns.
12 There might be advertisements on them, but not
13 product.

14 MEMBER ALBERTI: Thank you.

15 MR. MOLLOY: All right, so in this
16 second version which I think is going to meet
17 a lot of the concerns we just talked about,
18 the big difference here is that in test one,
19 we are now passing as a more than 6,000 square
20 feet of food selling area. So we're doing the
21 second half or the different half of test 1.

22 So as you can see, a lot of things

1 stayed the same. Anything in red is not
2 Trader Joe's, just surrounding building. The
3 big difference here now is the selling area as
4 defined by the thick black line and this is
5 easiest to see on large version that Board
6 Member Jones has, but tougher on the smaller
7 one that you have. If we trunk it down like
8 the Giant model which I know some of you have
9 recently seen for Giant #2381, so we've
10 defined a selling area footprint of the store.

11
12 So the areas of the store that
13 while they're inside the store and accessible
14 to patrons on a selling area, they're an area
15 that's dedicated for patrons to get their
16 carts. They're the entry vestibule. They're
17 the staircase that brings patrons up from the
18 parking garage, the elevators, the exit areas
19 behind the registers and then the registers.
20 So the thick black line is much smaller here
21 and defines a selling area that is total
22 selling area 7,924.388 square feet which is

1 more than the 6,000 square feet to past test
2 1.

3 And to make sure that we got
4 there, the way that we just talked about, we
5 took the total selling area as defined by --
6 the total selling area as defined by the black
7 line and we subtracted all the NF areas which
8 are the same as -- for the same reason we just
9 talked about. So this is where the alcoholic
10 beverages are sold and this is where floral is
11 sold and those are the only areas subtracted
12 out of the total selling area. And then we
13 take that food selling area that we just got
14 to by subtracting the non-food selling area
15 and we used that as the denominator for the
16 seven food categories and it is a much larger
17 number, but it is a number that's still
18 qualifies us for six out of the seven as test
19 2 requires, but all the percentages do drop as
20 you can see because it's a larger denominator.
21 So six out of seven is the test, so we still
22 make it on our calculations.

1 MEMBER JONES: Fair enough and the
2 approach that you've taken, of course, with
3 our understanding and how we would proceed to
4 perform same calculations, so I agree with
5 your method and your methodology and it is
6 clear to me based on the second submission of
7 the drawing that we got today that there's
8 enough information there for us to
9 independently verify the numbers that you've
10 submitted and provided. And I think we have,
11 at least I have a good understanding of how
12 you're using the space within the newly
13 defined food selling area and therefore would
14 be able to comfortably, independently verify
15 and therefore I can say we probably do not
16 need any additional information from you to
17 proceed.

18 MR. MOLLOY: Excellent.

19 MEMBER JONES: Now based on
20 numbers that you've submitted, obviously, you
21 recognize that you passed test 1 based on the
22 6,000 square foot rule or the portion of test

1 1. And it would appear as if you are in a
2 position to pass test 2 based on the numbers
3 that you've submitted. However, you will
4 independently verify to confirm that we are in
5 agreement. You passed six of seven food
6 categories based on the numbers you submitted.
7 So from there I think I'm comfortable and I
8 don't have any other questions regarding the
9 layout and/or the approach.

10 So I turn it back over to you,
11 Madam Chair.

12 MEMBER ALBERTI: I have a question
13 and maybe more out of curiosity, we'll see.
14 Okay, in your first drawing you had this area
15 just underneath my finger here.

16 MR. MOLLOY: The NF area around
17 the cash registers.

18 MEMBER ALBERTI: Right. What was
19 being sold there in the first one that's not
20 being sold in the second one?

21 MR. MOLLOY: To make our numbers
22 in the first plan, they really beefed up what

1 products were going to be available as you
2 waited in the queue to get to the registers
3 and then by the registers, so there was a
4 large number of baked goods to make it qualify
5 as a dry good area. And in the second
6 version, they no longer have to have the F
7 area to help them with the numbers, so they're
8 reducing it down to candy like you'll see at
9 a lot of other registers, but not to the point
10 where we thought it was a dedicated selling
11 space. It's just last minute candy items that
12 you'll see at other grocery stores.

13 MEMBER ALBERTI: Okay. Thank you.

14 MEMBER JONES: But just to be
15 clear, that area, notwithstanding, you are
16 still as you have defined what your selling
17 area is and your subsequently your food
18 selling area are still over 6,000 square feet.

19 MR. MOLLOY: Yes.

20 MEMBER JONES: So Board Member
21 Alberti, that lends itself to the distinction
22 in why it would or would not matter

1 specifically what's taking place in that area.

2 MEMBER ALBERTI: I understand. I
3 understand. I just -- it's new territory for
4 us. This is the first time we've had this
5 issue before us and I want to digest it a
6 little bit.

7 MR. FONSECA: This version is
8 comparable to a large extent with the H
9 Street, N.E. Giant that's -- is that #2381?

10 MEMBER JONES: Understood. And I
11 appreciate the nuance and appreciate your
12 clarification and appreciate your preparedness
13 to come forward today with an alternative.
14 Thank you.

15 MR. FONSECA: Next week being a
16 non-board date, we thought it would be best
17 for all of us.

18 (Laughter.)

19 MEMBER JONES: Thank you, Madam
20 Chair.

21 CHAIRPERSON MILLER: You're
22 welcome. If you could just indulge and

1 explain again that -- the black line, what
2 that represents?

3 MR. MOLLOY: Okay, so the black
4 line defines our selling area and based on our
5 experience with Giant and Walmart, we realized
6 that while the store is a larger space, a good
7 percentage of the store is not selling area.
8 It's just literally where you can come and get
9 out of the cold and find your car, or where
10 it's just where you're buying products or
11 you're walking your products back out to the
12 car.

13 And so the black line in this
14 version simply defines the area of the store
15 where we're selling the products whether
16 they're 7 category products or non-food
17 products like alcohol and plants.

18 MR. FONSECA: Consider it your
19 show case area for now. Our shelves are
20 there, loaded, whether they're food items or
21 non-food items, then you can separate out
22 certain things to make the second part of your

1 test, but where you then get your 6,000 feet
2 or greater, quote unquote selling area.

3 CHAIRPERSON MILLER: Okay.

4 MEMBER ALBERTI: And then 6,000
5 feet is comprised somewhat up to the
6 discretion, within reason, somewhat discretion
7 of the licensee.

8 MR. FONSECA: Yes, and frankly
9 with the Board's good graces, how we came with
10 the straightest line with the last fact-
11 finding or post-fact finding submission on the
12 Giant is why we found a certain space above
13 the line of reaching the cashier or assuming
14 there was no other food behind that lien which
15 would cause a bit of a fit and dive where we
16 did the straight line. So this, as I said, is
17 very consistent with the last one what we're
18 dealing with is the Giant H Street, N.E.
19 store.

20 CHAIRPERSON MILLER: My last
21 question is and I know Trader Joe's has
22 several stores and they probably had a model

1 as to how they laid them out and I'm just
2 curious whether if they had an issue with
3 changing their model to meet our regs. I'm
4 just interested since it's a new reg.

5 MR. MOLLOY: They -- it wasn't
6 their initial plans, were slightly different
7 than this and once they -- because their first
8 store got licensed before all the regulations
9 came about so there was some tweaking, but not
10 to the point where it was a drastic change
11 where they were going back to the drawing
12 board and frustrated. It was more like okay,
13 work to fix it, so I would say moderate level
14 of surprise and change, but it wasn't hard to
15 do.

16 CHAIRPERSON MILLER: Okay, good.
17 All right. Any other questions? Thank you
18 very much. That was very helpful. We'll get
19 on it.

20 (Whereupon, at 2:40 p.m., the Fact
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