



Shorts Brewing Company

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July 30, 2018

Michigan Liquor Control Commission
PO Box 30005
Lansing, MI 48909

Re: Request for Declaratory Ruling

MLCC

Short's Brewing Company is requesting a declaratory ruling on the matter below. We believe that a previously enacted commission rule is being enacted too broadly and is an issue that only the commission can consider and should not be considered at the investigation level.

Specifically we ask the commission to find:

- 1) Rule 49, also known as R 436.1049, applies only to the transfer of license and corporate stock. It does not apply to a new license or modifying an existing license such as adding space or changing permits.
- 2) Rule 49, also known as R 436.1049, does not require or allow investigation to halt, delay, or suspend an investigation into any matter. Consideration of whether this rule is applicable lies solely with the commission itself.
- 3) Rule 49, also known as R 436.1049, does not apply when a complaint is merely being considered. In order to apply a complaint should have formally been issued to the licensee.

Yours Truly

Scott Newman-Bale
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MLCC LICENSING

"Life is Short's, drink it while you're here"
www.shortsbrewing.com