Public copy. Enclosures 2 and 3 are the letters of October 17 and October 27, 2026, published separately on this page with their withheld passages marked. Corrections supported by evidence will be published.

November 13, 2026

Sent by registered mail, with copies by email to kdechant@lgcamb.ca and licence@LGCAmb.ca

Kristianne Dechant
Executive Director and CEO
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Dear Ms. Dechant,

Re: The minimum staffing consultation announced in the LGCA's October 29, 2026 interest-holder notice, and the model Jupiter Cannabis asks the LGCA to adopt

I am Tom Doran, owner of Jupiter Cannabis, operated by Lysithea Inc. under Retailer Agreement 21-4736, a licensed retail cannabis store at Unit C, 580 Academy Road, Winnipeg. I have been a retailer for more than 25 years and have operated this store for more than five and a half years. On October 30 I received the LGCA's interest-holder notice on window coverings and minimum staffing. I welcome what it says: that no staffing change can be made without consultation and supporting regulations, that the LGCA plans to consult industry and interest-holders to ensure a balanced and informed approach, and that a consultation process is being created now. This letter is my formal request to be included in that process as an interest-holder. It sets out the staffing model I am asking the LGCA to recommend, and the questions I ask it to put to others before any regulation is drafted.

I have written to the Premier and the responsible ministers three times on this subject: in June 2026, on October 17, 2026, and on October 28, 2026. The June letter drew a template reply from a deputy minister. The October letters, which set out detailed questions on the consultation record, the Workplace Safety and Health inspection record, inspector capacity, and the structural conflict described below, have received no substantive response. Copies of all three are enclosed so that the LGCA has the full record of what I have asked and what remains unanswered. In every dealing I have had with the LGCA over five and a half years, its staff have been professional, and I have understood the relationship to be about knowledge, compliance, and execution. I am writing in that spirit. I want to be an active participant in building these rules, not a

recipient of them.

1. The model: store-specific criteria, not one rule for 250 stores

A single staffing rule written for every licensed store will be wrong for most of them. Jupiter Cannabis is approximately 850 square feet of retail floor. One trained person can see every corner of it, every customer in it, and the door. In more than five and a half years it has had no robberies and no violent incidents. The Winnipeg Police Service's public crime data records 18 violent incidents in all of 2025 in the Sir John Franklin neighbourhood where the store sits, against roughly 14,500 across the city. This year the store went through the Workplace Safety and Health working-alone process: an improvement order was issued on April 10th, 2026, and the improvement order was closed on April 23rd, 2026, after we formalized the procedures we already had in place, including panic buttons, multiple means of communication, hourly check-ins, a first aid kit, and an independent channel through which staff can raise concerns about me or anyone else here. A store of this size, with that record and that file, can be operated safely by one person, and the province's own inspector closed the file.

A 4,000 square foot store is a different environment. The Joint's own announcement of its Leila Avenue location described it as 4,000 square feet. One person cannot supervise that floor, and I would not ask them to. The criteria for any staffing requirement must therefore be store-specific: retail square footage, documented incident history at the location, the crime profile of the area on police data, hours of operation, and whether the store is owner-operated. The LGCA has described its compliance model as risk-based for years. This is the same model applied to staffing.

2. Hours and thresholds

In June 2026 I proposed to government that cannabis store closing times be moved from midnight to 9 p.m. across the province. The Isabel Street assault of May 5, 2026, the incident publicly linked to Bill 56, happened in the evening. Shorter hours remove the highest-risk part of the day without adding a fixed labour cost to any store. The proposal was never discussed or answered, and I repeat it here for the record. If a minimum staffing requirement is made at all, it should begin no earlier than 9 p.m. It should be mandatory, at all hours, at locations with a documented incident of violence, at locations in areas with elevated violent crime on police data, and at locations above a floor-area threshold. It should not apply to a small, owner-operated store with a clean record and a closed Workplace Safety and Health file.

3. Owner-operators and informed workers

Bill 56 added a power to prescribe the minimum number of staff working at a cannabis store. It does not define staff. The Workplace Safety and Health Act defines a worker and deals separately with self-employed persons, and the deeming provision in the Cannabis Regulation applies by its own words only for the purposes of that regulation. An owner who owns the business, carries the whole financial risk, and controls the operation is not a worker. Any staffing regulation must say in plain words that an owner-operator may work alone in their own store from open to close. I also ask the LGCA to recommend a second provision: that a trained and certified worker may elect in writing to work a solo shift under a working-alone procedure that Workplace Safety and Health has reviewed. A rule that forbids a willing, trained adult from working a quiet afternoon alone in an 850 square foot shop, while a beer vendor employee across the street does exactly that under the same Act, protects no one.

4. What a two-person rule actually costs

One additional position covering about 30 hours a week costs this store roughly $40,000 a year in wages and payroll costs at our wage rates. That is the cost of one extra person. A two-person minimum is not a two-person rule in practice. When one of two staff takes a statutory break, one person is in the store, locked door or not, and the minimum is breached. Continuous two-person coverage therefore requires three people on the floor, and the real cost approaches $80,000 a year. For a store of Jupiter's size that is not a compliance expense. It is the margin. The store would not be viable and would close. I do not say that anyone designed that outcome. I say that it is the foreseeable outcome, that the stores able to absorb it are the chains, that the stores unable to absorb it are the independents who are the majority of the LGCA's licensees, and that the consultation must be designed with that in view.

5. The campaign behind the bill, and what I ask the LGCA to verify

Bill 56 went from first reading on October 5 to third reading on October 15. At the Justice Committee on October 8, the Minister described the input behind it in his own words: "Not working alone was one of the number one concerns that our partners in UFCW and other workers told us about the retail safety campaign." That campaign is UFCW Local 832's Let's Be Blunt. I was never consulted by the union, by the campaign, or by government, and I am not aware of any independent store that was. The union's documented footprint in this industry, by its own posted collective agreements, is The Joint Cannabis Shop, thirteen stores on the LGCA's current list, and Value Buds, three Winnipeg stores: roughly sixteen of roughly 250 licensed stores. Another presenter at the same hearing put it directly: "UFCW only represents a small portion of the cannabis store employees in this province."

The campaign's own materials point at where the problem actually is. Its public page says: "Many workers told us that they are forced to close late at night, mostly while working alone." The workers who told the union that are, by definition, workers at the employers the union organizes, which are the chains. The union's own collective agreements, posted on its website, provide that breaks at Value Buds "must be approved by the Manager to ensure coverage or, if no Manager is available, employees must ensure that breaks are taken at a time where there is no impact on customer service," and that rest periods at The Joint "may be interrupted but not cancelled to meet operational needs." In job interviews at my store, more than one applicant who had worked at a unionized chain store told me that they opened and closed alone, and that locking the door while alone, although their agreement allowed it, was discouraged in practice. I report those accounts as what I was told, not as established fact. They are consistent with the union's own page, and they describe conditions at specific large employers, not at an 850 square foot owner-operated store with a closed safety file.

I therefore ask the LGCA to do three things before any submission from that campaign is treated as the voice of this industry. First, request and verify the underlying materials: the survey instrument, the sample size, the number of respondents, how respondents were confirmed to be cannabis retail workers, and which stores were actually consulted. The campaign had an online component. I saw its posts on platforms including Instagram inviting cannabis workers to fill out a survey, and the campaign hung its signs on the pole outside my store, but no one from the campaign ever came into the store. An open online questionnaire has no way to confirm that a respondent works in a cannabis store, that one person did not complete it several times, or that the same group of people did not submit the same answers until the result matched the message. So I ask the LGCA to put these questions to the campaign specifically: how many people completed the online survey; how each one was verified as a cannabis retail worker, if at all; what percentage of the respondents who reported working alone were unverified online respondents; and what control, if any, prevented one person or one organization from submitting the questionnaire repeatedly to produce the outcome that then appeared in every communication the campaign published. If the campaign cannot answer those questions, its figures cannot carry the weight the Minister has placed on them. The campaign's agency has reported publicly that its canvass produced ninety-eight story submissions, and the widely repeated claim that only eight percent of Manitoba cannabis workers feel safe at work rests on that survey. Second, gather information directly from floor staff at a representative sample of stores, chain and independent, through the LGCA's own inspectors rather than through any campaign. Third, if the conditions described are real at particular employers, direct the remedy at those

employers through Workplace Safety and Health, rather than at every licensee in the province.

6. A structural conflict the LGCA should design around

The president of UFCW Local 832, Jeff Traeger, has also served since December 2023 as Chair of the board of Manitoba Liquor and Lotteries Corporation, the mandatory wholesale supplier to every store this regulation will govern. Both roles are stated on the union's and the corporation's own websites, and the possible conflict was raised on the committee record. Every licensee reports monthly, through the LGCA's portal and the federal compliance report, what it purchased, what it sold, and what it holds in inventory, product by product. In that same monthly reporting, MBLL requires owners to disclose the number of staff working at the store, broken down by role: managers, sales staff, and owners. MBLL therefore knows exactly how many people each store employs and in what capacity. MBLL itself records every purchase, because every product passes through it, and under the Retailer Agreement MBLL may inspect and audit the records a retailer is required to keep, on demand. That is proprietary information about every independent store in the province, including the margins a staffing rule would consume. I allege no misconduct by any individual. I state the structure: the union whose campaign the Minister credits for this law is led by the chair of the corporation that holds the commercial data of the businesses the law regulates. I have applications in preparation under The Freedom of Information and Protection of Privacy Act for the board's conflict-of-interest declarations, recusals, information-barrier policies, and the retailer-level material provided to the Chair. I ask the LGCA to design its consultation so that no reasonable observer could say the outcome was shaped by that structure.

7. Workplace Safety and Health is the starting point, and the LGCA should liaise with it

Before any staffing regulation is considered, every licensed cannabis store in Manitoba should go through the same Workplace Safety and Health working-alone process my store completed, and receive an improvement order where the procedures are missing. My improvement order was issued on April 10th, 2026, and the improvement order was closed on April 23rd, 2026. Twelve days after my file was closed, and less than a month after the order was issued, a lone employee was assaulted at a cannabis store on Isabel Street. I have asked the province whether that store had been inspected before May 5, whether it had working-alone procedures in place, whether it was inspected afterward, and how many of the roughly 250 licensed stores have been inspected at all. I have had no answer. I do not believe all 250 have been. I ask the LGCA to liaise directly with Workplace Safety and Health, to treat a current working-alone procedure at every store as the baseline of any enforcement model, and to tell me in writing

what it learns.

8. Parity, the LGCA's own practice, and capacity

Under the same Act, the LGCA licenses hundreds of private retail liquor outlets, including hotel beer vendors and private wine stores. I have reviewed the licence categories, their terms and conditions, and the liquor regulations: none contains any minimum staffing requirement. If working alone in retail is dangerous enough to legislate, that danger does not check licence categories. The point is not abstract. On Sherbrook Street, Fiddler's Green Cannabis is open until midnight on Fridays and Saturdays. Once a staffing regulation is made, its workers will have a minimum staffing requirement behind them on those nights. Directly across the street, a Subway is open until 4 a.m. on those same nights, and its hospitality workers, and every other retail and hospitality worker in that neighbourhood, have no protection at all under Bill 56. The beer vendor at the St. Vital Hotel, where a customer rings a doorbell to be let in, is regularly operated by one person, under a licence this same Act and this same regulator govern. I ask the LGCA to push back on that scope, and to recommend to government that Bill 56 be amended to cover the independent beer vendors and private liquor retailers it licenses, or that lone-worker safety be placed in workplace safety law for everyone who works alone. The LGCA's own practice points the same way. Its 2022/23 annual report records that the LGCA formalized a working alone procedure for its own employees under its Safe Work Program. When the LGCA faced lone-worker risk among its own staff, including inspectors who enter licensed premises, its answer was a procedure under the workplace safety framework, which is precisely the path my store followed. I ask the LGCA to answer in writing what its working-alone procedure for inspectors requires, why a procedure-based approach is suitable for the regulator's employees but would not be suitable for licensees with documented safe operating records, and how it proposes to enforce a staffing requirement across roughly 250 stores, including the number of cannabis store inspections it has conducted in each year since 2018 and its current inspector complement. I am preparing applications under The Freedom of Information and Protection of Privacy Act for these records, and a direct answer would be faster for both of us.

9. Controlled entry: the measure that actually lowers risk

The measure that would lower risk at every store, at a fraction of the cost of a second staffer, is controlled entry. I am prepared to alter my own store to prove it: a glazed vestibule at the entrance, a camera at the door, and identification presented and validated before the inner door opens, with every entrant recorded. I ask the LGCA to consider this as a province-wide standard, with the identification scanner connected to a shared flagging database of the kind already used by licensed nightclubs in Winnipeg, and of the kind MBLL itself

installed at its Tyndall Market Liquor Mart in 2019, where photo identification is scanned before entry. The union's own campaign page lists "ID scanning before entry" as one of the entry controls workers want. A person who knows their identification has been recorded before the door opens behaves differently. Every store should have the camera and the scanner. I do not understand why this has not been done, and it is the kind of measure a store-by-store consultation would have surfaced in June.

10. Consultation design: count independents store by store, and visit

When the LGCA consults "industry," it should do so knowing that The Joint, Delta 9, Garden Variety, Fire & Flower and one of the AAAAA Supercraft locations answer to one company, FIKA Cannabis, which also owns Open Fields Distribution, the distributor housing nearly half of the products on MBLL's own current list. The only stores with a documented union presence in Manitoba are chain stores. Independent owner-operated stores, roughly two thirds of all licences by our estimate, are the majority of licensees and the stores a staffing mandate can actually close. Most of them, in my experience, will not write to you: they lack the time, or the resources, or they are wary of the consequences. They must be counted store by store, not given one seat at a table where a single company's banners occupy many. That requires store visits, and I invite the first one. Separately, and under separate cover, I will be placing before the LGCA documented concerns about the fulfilment of licensed retailers' orders through a distributor affiliated with competing retailers, including delivery timing, order cancellations, and the allocation of limited inventory. I raise it here only to note that those questions fall within the LGCA's compliance mandate, and that the concentration that affects this consultation also affects the supply chain.

11. Certification

The certification required for cannabis store staff costs 25 dollars, is completed entirely online, is valid for five years, and involves no identity verification. A staffing mandate built on certified workers requires a regulator that knows who its certificate holders are. Does the LGCA maintain a register of active certificate holders, and can it verify that a certificate belongs to the person presenting it? If not, identity-verified certification and a register, with a documented conduct process, must precede any staffing minimum.

12. What I ask, and what follows

I ask for a written response within 30 days; confirmation that Jupiter Cannabis is registered as an interest-holder in the consultation process now being created; the opportunity to participate in that process directly; and the LGCA's written answers to the questions in parts 5, 7, 8 and 11. I am available to meet at your

office or at my store, and I would welcome the LGCA seeing first-hand what an 850 square foot owner-operated store looks like during a shift. I will also say plainly what follows if the process falls short of the LGCA's own published standard. If a one-size-fits-all staffing regulation is made without genuine consultation of the licensees it binds, we will respectfully apply to the Court of King's Bench for judicial review of that regulation, and we will pursue every other remedy available to us, and the LGCA's October 29 notice will be the measure of what was promised. I would much rather build the model with you. This letter and any response to it will form part of the record of how this regulation is developed.

Thank you.

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Enclosures:
1. Letter to the Minister of Labour and Immigration, the Minister of Justice, the Minister responsible for Manitoba Liquor and Lotteries, and the Premier, June 2026
2. Letter to Premier Kinew and Ministers on Bill 56, sent October 17, 2026
3. Letter to the Ministers responsible for Manitoba Liquor and Lotteries, Justice, Workplace Safety and Health, and the LGCA on Bill 56 and the distribution structure, October 28, 2026

ENCLOSURE 1

Enclosure 1 is the June 2026 letter, published above as Letter A.

ENCLOSURES 2 AND 3

Enclosures 2 and 3 reproduce the letters of October 17 and October 27, 2026, published above as Letters B and C.