

From: [Desilets, LeeAnn \(DBR\)](#)
To: [Paravisini, Diane \(DBR\)](#)
Cc: [Stewart, Amy \(DBR\)](#)
Subject: FW: [EXTERNAL] : Re: New liquor regulation 230-RICR-30-10-2
Date: Tuesday, January 25, 2022 10:49:07 AM
Attachments: [image001.png](#)

Good Morning,

Comment #2.

From: Jeremy Duffy <jeremy@islebrewers.com>
Sent: Tuesday, January 25, 2022 9:43 AM
To: Desilets, LeeAnn (DBR) <LeeAnn.Desilets@dbr.ri.gov>
Subject: [EXTERNAL] : Re: New liquor regulation 230-RICR-30-10-2

Hi LeeAnn,

Thank you for sending! If I am reading this right, there doesnt seem to be any significant changes (on beer) just adding distilled spirits to the mix. Let us know if there are any action items.

All the best,

Jeremy

On Mon, Jan 24, 2022 at 10:52 AM Desilets, LeeAnn (DBR) <LeeAnn.Desilets@dbr.ri.gov> wrote:

Please be advised that the Department of Business Regulation has proposed a new liquor regulation for “Alternating Proprietorships and Contract Production,” [230-RICR-30-10-2](#). Written comments should be submitted no later than February 23, 2022, by email to diane.paravisini@dbr.ri.gov or submitted on the Secretary of State’s Rulemaking [Website](#) under the “Comments” tab. The proposed new regulation and summary of changes to the status quo can be accessed by the links in this email.

Thank you,



Lee-Ann Desilets
Asst. Admin. Officer
Department of Business Regulation
Commercial Licensing Liquor Division
1511 Pontiac Ave. 69-1

Cranston, RI 02920
Phone: 401-462-9544
Department Website: www.dbr.ri.gov
Email: leeann.desilets@dbr.ri.gov

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Jeremy Duffy
Co-Founder/
Managing Partner
401.263.4435
IsleBrewers.com [islebrewers.com]

From: [Desilets, LeeAnn \(DBR\)](#)
To: [Paravisini, Diane \(DBR\)](#)
Cc: [Stewart, Amy \(DBR\)](#)
Subject: FW: [EXTERNAL] : Re: New liquor regulation 230-RICR-30-10-2
Date: Monday, January 24, 2022 2:35:05 PM
Attachments: [image001.png](#)

Comment #1. I don't believe this has anything to do with what he is mentioning.

From: RICK DYER <rickdyer1@verizon.net>
Sent: Monday, January 24, 2022 12:53 PM
To: Desilets, LeeAnn (DBR) <LeeAnn.Desilets@dbr.ri.gov>
Subject: [EXTERNAL] : Re: New liquor regulation 230-RICR-30-10-2

Good Afternoon LeeAnn,

Under federal guidelines these changes do not apply to wine turned over to vinegar production, and I confirmed the same with your office that this was true in RI as well. Would the state changes change that standing?

Rick Dyer
WinterHawk Vinyards llc.
401 474 7810

On Monday, January 24, 2022, 10:52:22 AM EST, Desilets, LeeAnn (DBR) <leeann.desilets@dbr.ri.gov> wrote:

Please be advised that the Department of Business Regulation has proposed a new liquor regulation for "Alternating Proprietorships and Contract Production," [230-RICR-30-10-2](#). Written comments should be submitted no later than February 23, 2022, by email to diane.paravisini@dbr.ri.gov or submitted on the Secretary of State's Rulemaking [Website](#) under the "Comments" tab. The proposed new regulation and summary of changes to the status quo can be accessed by the links in this email.

Thank you,

Lee-Ann Desilets

Lee-Ann Desilets
Asst. Admin. Officer

Department of Business Regulation
Commercial Licensing Liquor Division
1511 Pontiac Ave. 69-1
Cranston, RI 02920
Phone: 401-462-9544
Department Website: www.dbr.ri.gov
Email: leeann.desilets@dbr.ri.gov

From: [Desilets, LeeAnn \(DBR\)](#)
To: [Paravisini, Diane \(DBR\)](#)
Cc: [Stewart, Amy \(DBR\)](#)
Subject: FW: [EXTERNAL] : 230-RICR-30-10-2
Date: Tuesday, January 25, 2022 12:04:59 PM

Comment #3

From: Gary A. Richardson <gary@ribrewersguild.org>
Sent: Tuesday, January 25, 2022 11:37 AM
To: Desilets, LeeAnn (DBR) <LeeAnn.Desilets@dbr.ri.gov>
Subject: [EXTERNAL] : 230-RICR-30-10-2

LeeAnn, would it be possible for DBR to include the RI Brewers Guild on emails like the one you sent yesterday?

We have two email addresses, one is generic, while the other is just me - but both of them would be received by me unless there is a change in leadership of the RIBG.

One of our brewers who is not an Alternating Proprietorship or a Contract brewer sent me a copy of your email, asking how that might affect them.

At first glance, my only question would be regarding the Alt Prop ownership regulations. It appears that the expectation is for both breweries (host and tenant) to show ownership of the brewing equipment, as well as manufacturing materials (yeast, grains, hops, etc). I think the reason most Alt Prop breweries enter into that type of arrangement is because they do not have ownership of equipment or a facility. To my knowledge, we have only 2 Alt Prop breweries in Rhode Island.

The regs for Contract brewing is more straightforward - it does make sense that a Contract brewer would own all the equipment, and in effect, rent it out to breweries who do not have room for more equipment at their home brewery. I think there is only one contract brewer in Rhode Island, although some of the breweries do use a contract arrangement, just not always in Rhode Island.

Are there other aspects of either regulation that we should pay attention to?

The email addresses for RI Brewers Guild are info@ribrewersguild.org or gary@ribrewersguild.org

Thank you very much

Gary Richardson
Executive Director
RI Brewers Guild
401-465-8809

From: [Desilets, LeeAnn \(DBR\)](#)
To: [Paravisini, Diane \(DBR\)](#)
Cc: [Stewart, Amy \(DBR\)](#)
Subject: FW: [EXTERNAL] : Re: New liquor regulation 230-RICR-30-10-2
Date: Friday, January 28, 2022 9:29:30 AM
Attachments: [image001.png](#)

Another Comment. Happy Friday!

From: David Wright <mbv@mulberryvineyards.com>
Sent: Friday, January 28, 2022 9:23 AM
To: Desilets, LeeAnn (DBR) <LeeAnn.Desilets@dbr.ri.gov>
Subject: [EXTERNAL] : Re: New liquor regulation 230-RICR-30-10-2

Hi LeeAnn,

What is the change? And how will this affect the business?

Thank you,

David Wright
Mulberry Vineyards

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From: Desilets, LeeAnn (DBR) <LeeAnn.Desilets@dbr.ri.gov>
Sent: Monday, January 24, 2022 10:52:01 AM
Subject: New liquor regulation 230-RICR-30-10-2

Please be advised that the Department of Business Regulation has proposed a new liquor regulation for “Alternating Proprietorships and Contract Production,” [230-RICR-30-10-2](#). Written comments should be submitted no later than February 23, 2022, by email to diane.paravisini@dbr.ri.gov or submitted on the Secretary of State’s Rulemaking [Website](#) under the “Comments” tab. The proposed new regulation and summary of changes to the status quo can be accessed by the links in this email.

Thank you,



Lee-Ann Desilets
Asst. Admin. Officer
Department of Business Regulation
Commercial Licensing Liquor Division
1511 Pontiac Ave. 69-1
Cranston, RI 02920

Phone: 401-462-9544

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Email: leeann.desilets@dbr.ri.gov