

Division of

ALCOHOLIC
BEVERAGE
CONTROL

Bulletin

TRW Complex, Bldg. 20, 200 Woolverton Street, CN 087, Trenton, New Jersey 08625-0087

January 29, 1990

BULLETIN 2455

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1. **NEW LEGISLATION REGARDING WINERIES AND AMENDING LICENSING STATUTE (N.J.S.A. 33:1-10) AND WINE SHIPMENT STATUTE - ESTABLISHMENT OF NEW "WINE BLENDING" LICENSE - TEXT OF N.J.S.A. 33:1-10 AND 33:1-28.1 & 28.3 AS AMENDED AND SUPPLEMENTED.**

On December 28, 1989, Governor Kean signed Committee Substitute for S-205 & S-207, which had originally been sponsored by Senators Dumont and Zimmer, as P.L. 1989, c. 209. The legislation substantially amended the sections of N.J.S.A. 33:1-10 which set out the parameters and privileges of the Plenary Winery and Farm Winery Licenses, and also added a new "Wine Blending" License to that section. One of the most substantial changes was the elimination of the cap on the number of plenary winery licenses that could have retail privileges. The effective date of the new legislation was the date of signing (December 28, 1989) for part of the law and January 1, 1990 for the balance of it. Because the new law will eliminate the ability of some current holders of plenary winery licenses to continue holding them, and since those so affected will qualify for the new and less expensive wine blending license, the Licensing Bureau will shortly be contacting such licensees to arrange for the change of license and the subsequent renewals as wine blenders rather than as plenary wineries.

In addition, the legislation also amended the provisions of N.J.S.A. 33:1-28.1 and 28.3, which authorized shipment of wine from a licensed winery by a parcel delivery service, to allow the filling of mail or telephone orders provided the licensee has a signed authorization from the person placing the order, and to require that such shipment be restricted to the residence of the person who placed the order.

The third part of the legislation is an amendment to N.J.S.A. 4:10-76 & 77, which in 1985 had established the New Jersey Wine Promotion Account and the New Jersey Wine Industry Advisory Council, reflecting the new name of the Department of Commerce, Energy and Economic Development (the Commissioner of which is one of the eight members of the New Jersey Wine Industry Advisory Council), and permitting the Council to promulgate rules and regulations regarding employment and duties of persons needed to carry out the duties of the Council. The text of these sections is not printed in this Bulletin as the sections are not part of the Alcoholic Beverage Control Law.

The full text of N.J.S.A. 33:1-10, as amended, is as follows:

33:1-10. Planary brewery license. 1a. The holder of this license shall be entitled, subject to rules and regulations, to brew any malt alcoholic beverages and to sell and distribute his products to wholesalers and retailers licensed in accordance with this chapter, and to sell and distribute without this State to any persons pursuant to the laws of the places of such sale and distribution, and to maintain a warehouse. The fee for this license shall be \$8,500.00.

Limited brewery license. 1b. The holder of this license shall be entitled, subject to rules and regulations, to brew any malt alcoholic beverages in a quantity to be expressed in said license, dependent upon the following fees and not in excess of 300,000 barrels of 31 fluid gallons capacity per year and to sell and distribute his products to wholesalers and retailers licensed in accordance with this chapter, and to sell and distribute without this State to any persons pursuant to the laws of the places of such sale and distribution, and to maintain a warehouse. The fee for this license shall be graduated as follows: to so brew not more than 50,000 barrels of 31 fluid gallons capacity per annum, \$1,000.00; to so brew not more than 100,000 barrels of 31 fluid gallons capacity per annum, \$2,000.00; to so brew not more than 200,000 barrels of 31 fluid gallons capacity per annum, \$4,000.00; to so brew not more than 300,000 barrels of 31 fluid gallons capacity per annum, \$6,000.00.

Planary winery license. 2a. Provided that the holder is engaged in growing and cultivating grapes or fruit used in the production of wine on at least three acres on, or adjacent to, the winery premises, the holder of this license shall be entitled, subject to rules and regulations, to produce any fermented wines, and to blend, fortify and treat wines, and to sell and distribute his products to wholesalers and retailers licensed in accordance with this chapter and to churches for religious purposes, and to sell and distribute without this State to any persons pursuant to the laws of the places of such sale and distribution, and to maintain a warehouse, and to sell his products at retail to consumers on the licensed premises of the winery for consumption on or off the premises and to offer samples for sampling purposes only. The fee for this license shall be \$750.00. The holder of this license shall also have the right to sell such wine at retail in original packages in two salesrooms apart from the winery premises for consumption off the premises and for sampling purposes for consumption on the premises, at a fee of \$200.00 for each salesroom. Additionally, subject to rules and regulations, one salesroom per county may be jointly controlled and operated by at least five planary or farm winery licensees for the sale of the products produced under the licenses of such licensees for consumption off the premises and for consumption on the licensed premises for sampling purposes only, at an additional fee of \$500.00 per county salesroom. Any planary licensee who has heretofore utilized a privilege to sell his products for consumption on the premises at a salesroom other than the licensed premises of the winery may retain that privilege at the existing location. For the purposes of this subsection, "sampling" means the selling at a nominal charge or the gratuitous offering of an open container not exceeding one and one-half ounces of any wine.

Farm winery license. 2b. The holder of this license shall be entitled, subject to rules and regulations, to manufacture any fermented wines and fruit juices in a quantity to be expressed in said license, dependent upon the following fees and not in excess of 50,000 gallons per year and to sell and distribute his products to wholesalers and retailers licensed in accordance with this chapter and to churches for religious purposes and to sell and distribute without this State to any persons pursuant to the laws of the places of such sale and distribution, and to maintain a warehouse and to sell at retail to consumers for consumption on or off the licensed premises and to offer samples for sampling purposes only. The license shall be issued only when the winery at which such fermented wines and fruit juices are manufactured is located and constructed upon a tract of land exclusively under the control of the licensee, provided that the licensee is actively engaged in growing and cultivating an area of not less than three acres on or adjacent to the winery premises and on which are growing grape vines or fruit to be processed into wine or fruit juice; and provided, further, that for the first five years of the operation of the winery such fermented wines and fruit juices shall be manufactured from at least 51% grapes or fruit grown in the State and that thereafter they shall be manufactured from grapes or fruit grown in this State at least to the extent required for labeling as "New Jersey Wine" under the applicable federal laws and regulations. The containers of all wine sold to consumers by such licensee shall have affixed a label stating such information as shall be required by the rules and regulations of the Director or the Division of Alcoholic Beverage Control. The fee for this license shall be graduated as follows: to so manufacture between 30,000 and 50,000 gallons per annum, \$300.00; to so manufacture between 2,500 and 30,000 gallons per annum, \$200.00; to so manufacture between 1,000 and 2,500 gallons per annum, \$100.00; to so manufacture less than 1,000 gallons per annum, \$50.00. No farm winery license shall be held by the holder of a plenary winery license or be situated on a premises licensed as a plenary winery.

The holder of this license shall also have the right to sell his products in original packages at retail to consumers in two salesrooms apart from the winery premises for consumption off the premises, and for sampling purposes for consumption on the premises, at a fee of \$200.00 for each salesroom. Additionally, subject to rules and regulations, one salesroom per county may be jointly controlled and operated by at least five plenary or farm winery licensees for the sale of the products produced under the licenses of such licensees for consumption off the premises and for consumption on the licensed premises for sampling purposes only, at an additional fee of \$500.00 per county salesroom. For the purposes of this subsection, "sampling" means the selling at a nominal charge or the gratuitous offering of an open container not exceeding one and one-half ounces of any wine.

Unless otherwise indicated, for the purposes of this subsection, with respect to farm winery licenses, "manufacture" means the vinification, aging, storage, blending, clarification, stabilization and bottling of wine or juice from New Jersey fruit to the extent required by this subsection.

Wine blending license. 2c. The holder of this license shall be entitled, subject to rules and regulations, to blend, treat, mix, and bottle fermented wines and fruit juices with non-alcoholic beverages, and to sell and distribute his products to wholesalers and retailers licensed in accordance

with this chapter, and to sell and distribute without this State to any persons pursuant to the laws of the places of such sale and distribution, and to maintain a warehouse. The fee for this license shall be \$500.00.

Plenary distillery license. 3a. The holder of this license shall be entitled, subject to rules and regulations, to manufacture any distilled alcoholic beverages and rectify, blend, treat and mix, and to sell and distribute his products to wholesalers and retailers licensed in accordance with this chapter, and to sell and distribute without this State to any persons pursuant to the laws of the places of such sale and distribution, and to maintain a warehouse. The fee for this license shall be \$10,000.00.

Limited distillery license. 3b. The holder of this license shall be entitled, subject to rules and regulations, to manufacture and bottle any alcoholic beverages distilled from fruit juices and rectify, blend, treat, mix, compound with wine and add necessary sweetening and flavor to make cordial or liqueur, and to sell and distribute to wholesalers and retailers licensed in accordance with this chapter, and to sell and distribute without this State to any persons pursuant to the laws of the places of such sale and distribution and to warehouse these products. The fee for this license shall be \$3,000.00.

Supplementary limited distillery license. 3c. The holder of this license shall be entitled, subject to rules and regulations, to bottle and rebottle, in a quantity to be expressed in said license, dependent upon the following fees, alcoholic beverages distilled from fruit juices by such holder pursuant to a prior plenary or limited distillery license, and to sell and distribute his products to wholesalers and retailers licensed in accordance with this chapter, and to sell and distribute without this State to any persons pursuant to the laws of the places of such sale and distribution, and to maintain a warehouse. The fee for this license shall be graduated as follows: to so bottle and rebottle not more than 5,000 wine gallons per annum, \$250.00; to so bottle and rebottle not more than 10,000 wine gallons per annum, \$500.00; to so bottle and rebottle without limit as to amount, \$1,000.00.

Rectifier and blender license. 4. The holder of this license shall be entitled, subject to rules and regulations, to rectify, blend, treat and mix distilled alcoholic beverages, and to fortify, blend, and treat fermented alcoholic beverages, and prepare mixtures of alcoholic beverages, and to sell and distribute his products to wholesalers and retailers licensed in accordance with this chapter, and to sell and distribute without this State to any persons pursuant to the laws of the places of such sale and distribution, and to maintain a warehouse. The fee for this license shall be \$6,000.00.

Bonded warehouse bottling license. 5. The holder of this license shall be entitled, subject to rules and regulations, to bottle alcoholic beverages in bond on behalf of all persons authorized by federal and State law and regulations to withdraw alcoholic beverages from bond. The fee for this license shall be \$500.00. This license shall be issued only to persons holding permits to operate Internal Revenue bonded warehouses pursuant to the laws of the United States.

The full text of N.J.S.A. 33:1-28.1, as amended, is as follows:

33:1-28.1. Any person, other than a person licensed under the provisions of Title 33 of the Revised Statutes, purchasing wine in person on the licensed premises from a licensee holding a plenary winery license with retail privileges or a licensee holding a farm winery license or ordering wine by mail or telephone may authorize shipment of the wine by a parcel delivery service, approved for the purpose by the director, to any point within the State, provided an invoice or similar document is attached to each package stating the licensee's and purchaser's name and address, and the quantity and type of wine, and provided that a copy of the original invoice shall be available for inspection by persons authorized to enforce the alcoholic beverage control laws of this State for a period of one year at licensed premises of the winery.

Wine which is ordered by mail or telephone may be shipped by parcel delivery service only if the licensee has a signed authorization by the person placing the order to ship wine upon his order by mail or telephone. The wine shall be shipped as a restricted delivery and may be delivered only to the residence of the person who placed the order.

The full text of N.J.S.A. 33:1-28.3, as amended, is as follows:

33:1-28.3. Before wine can be shipped by a parcel delivery service from a licensee holding a plenary winery license with retail privileges or a licensee holding a farm winery license in accordance with the provisions of this act, the licensee shall apply to the director for a permit therefor and pay an annual fee to the director of \$150.00 if a plenary winery licensee or \$50.00 if a farm winery licensee.

Implementation:

A. The new legislation prohibits issuance of a farm winery license to the holder of a plenary winery license. Licensees who have previously been issued both types of licenses and currently hold both must relinquish one. A refund of the fee of the surrendered license will be returned to the licensee and be prorated from the date of surrender.

B. The new legislation establishes a new type of license, a "wine blending license". Current holders of plenary winery licenses who more appropriately should hold the new wine blending license (i.e., those who are bottling wine coolers, etc., and do not have three acres of fruit under cultivation) will be invited to apply under this new license type at the beginning of the next license term (July 1, 1990) on applications that will be provided in place of the usual renewal application. A new license number for this category of license will also be promulgated.

C. The new provision that authorizes at least five wineries (whether plenary or farm) to join together to open a retail outlet for off premises sales (with "sampling" allowed on the premises) will be implemented when the first application is filed. Any five or more wineries, regardless of whether plenary or farm, may file the

application, but no more than one such outlet per county will be permitted. A winery licensee must be identified as the lead licensee for the purpose of acting as administrator or agent of the enterprise. The completed application, with appropriate fee (\$500.00), which may be submitted by checks of each winery involved so as to total the \$500.00, or by one check, will be submitted to the Division of Alcoholic Beverage Control along with a formal agreement entered into among the participating winery licensees. Annual renewals for the combination county wine sales outlet will be required.

D. Every winery licensee, whether plenary or farm, is now entitled to apply for two retail outlets in addition to the winery premises itself. Those licensees that already have such outlets may continue to operate them and they may be renewed with new renewal application forms that will be provided in sufficient time for renewal for the next license term commencing July 1, 1990. Although the new legislation does not permit retail sales for on-premises consumption (other than "sampling") in the additional sales outlets, those licensees that have previously operated their outlets with on-premises consumption are grandfathered for that privilege, so long as the outlet is not moved. Applications for authorizing retail sales in these outlets may be secured on request from the Division of Alcoholic Beverage Control's Licensing Bureau. These additional outlets, although previously handled as a license with the issuance of a license certificate, will henceforth be administratively handled as a special permit under the primary license.

E. Winery licensees may request applications to authorize consumer purchases by mail order and telephone and subsequent delivery by licensed parcel delivery services. Those winery licensees that have previously received permits for home delivery of orders may accept mail and telephone orders in conformity with the new legislation until the end of this current license term, at which time appropriate renewal applications will be furnished. It should be noted that for mail and telephone orders, delivery may only be made to the residence of the person placing the order, and only when a written authorization has been simultaneously or previously furnished to the licensee. Thus gifts may only be so delivered to another address if the purchaser personally has visited the winery premises or additional sales outlet. Licensees exercising this privilege are also reminded that records must be maintained on the licensed premises and those records must include invoices showing at least the licensee's name and address, the purchaser's name and address, and the quantity and type of wine ordered and shipped.

F. Henceforth, no plenary or farm winery license will be issued unless the premises includes, or has adjacent to it, at least three acres of fruit under active growth and cultivation, and used in the production of wine by the licensee.

G. Under the new legislation, "sampling" is permitted on the licensed premises and in any additional sales outlets. The new legislation, however, now defines "sampling" so as to allow either

the gratuitous giving of it or the making of a nominal charge. It also limits the sample to no more than one and one-half ounces. Licensees should take care that this size is not exceeded. Where it is, and provided that on-premises consumption is permitted (either on the winery premises or by "grandfathering" at an additional sales outlet), a sufficient charge for the wine must be made so that it at least equals or exceeds the cost of the drink.

Any questions about the implementation of the new winery legislation should be directed to either the Regulatory or Licensing Bureaus of the Division of Alcoholic Beverage Control.

2. NOTICE TO HOTEL AND MOTEL USERS OF PLENARY RETAIL CONSUMPTION LICENSES: PERMISSION GIVEN IN BULLETIN 2451, ITEM 2, FOR CERTAIN "MINI-BARS" AND DEVICES OF A SIMILAR NATURE UTILIZED FOR DISPENSING OF ALCOHOLIC BEVERAGES IN LICENSED HOTEL OR MOTEL ROOMS EXPANDED.

In Bulletin 2451, Item 2 (December 31, 1987), approval was given for the ROBOBARTM System of "mini-bars", as well as the "Bell-Captain" System, which had been approved in Bulletin 2014, Item 1, and any other system provided certain criteria are met. Those criteria were specifically enumerated in Bulletin 2451, Item 2, and continue to be applicable.

Since the publication of the previous Bulletin item, another "mini-bar" system has been presented to the Division. This additional system, known as the ServiCommTM (and presented by ServiSystemsTM America, Inc., of Herndon, Virginia, has the ability to control access to an in-room unit from a central location utilizing the hotel's or motel's existing electrical wiring. This control of access may be on an individual unit basis or for the whole system. The Director is satisfied that the criteria set forth in Bulletin 2451, Item 2, can be satisfied by a user of the ServiCommTM System, provided it is equipped with its "curfew control system", and it is therefore added to the approved systems.

It should also be noted that criterion "d" of the criteria set forth in Bulletin 2451, Item 2 ["(a)n automatic timing or similar device must be utilized to lock out the entire system (i.e., each and every dispensing unit) during the hours when sale of alcoholic beverages for consumption on the premises is prohibited in the particular municipality in which the hotel or motel is located] applies only in those municipalities which have closing hours. In those municipalities which have no hours during which sale of alcoholic beverages are prohibited (there are only two such municipalities at the present time), a "mini-bar" system will not require the central device capable of locking-out the entire system. It will be required, however, that individual units be capable of being locked; but this can be accomplished by a key or equivalent device.

3. NOTICE TO RETAILERS, WHOLESALERS AND SOLICITORS (SALESPERSONS) SERVICING RETAIL ACCOUNTS - IDENTIFICATION OF PROHIBITED PRACTICES OF SALESPERSONS SERVICING COOPERATIVES.

The Division recently has become aware of several instances wherein solicitors (salespersons) may have been providing improper services to certain cooperatives and their member retail licensees. It is, therefore, appropriate that clarification and guidance be provided to the Industry concerning these matters specifically, as well as reiterating some basic principles and other general limitations.

In *Bulletin 2437, Item 6 (December 27, 1984)*, certain policy pronouncements were made which dealt with proper as well as improper pricing practices and servicing activities between solicitors and retailers. The content of that Opinion Letter did not generally deal with the specific relationship among solicitors, cooperatives, and the individual retail members of such cooperatives. This present Notice shall restate the basic applicable regulations and shall clarify and provide guidance to the Industry in this area.

The fundamental authority for requiring a clear and definitive separation between wholesalers and their solicitors and the retail section of the Industry can be found in *N.J.S.A. 33:1-43*, which statutory provision is commonly referred to as the "Tied House Statute". This fundamental concept of separation is further enunciated with respect to retailers by *N.J.A.C. 13:2-23.25*, which states:

"No retail licensee shall employ or have connected with him in any business capacity whatsoever any person interested, directly or indirectly, in the manufacturing or wholesaling of any alcoholic beverage within or without this State, nor shall any retail licensee be employed by or connected in any business capacity whatsoever with any person interested, directly or indirectly, in the manufacturing or wholesaling of any alcoholic beverage within or without this State."

As a correlative with respect to solicitors, the primary regulatory provision requiring the separation of licensed business interests between members of the retail industry and solicitors may be found in *N.J.A.C. 13:2-16.7*, which provides as follows:

"No holder of a solicitor's permit shall be interested, directly or indirectly, in any retail license or any business conducted thereunder, or shall be employed by or connected in any business capacity with any retail licensee."

The Industry is reminded that the Cooperative Purchase Regulation, *N.J.A.C. 13:2-26.1*, prohibits anyone other than a retail licensee who is a member of the cooperative from serving in any management capacity. In essence, therefore, what all these provisions of law and regulation address is a strong recognition of policy prohibiting solicitors from being employed by either a

retailer or the cooperative entity, from engaging in retail activities, and/or from undertaking any management practices concerning a retailer's business or a cooperative.

As it relates to "employment", licensees must be cognizant that persons engaging in activities which are "in furtherance of the licensed business", both directly or indirectly, and whether compensated or not, are considered under A.B.C. law as employees of the licensee. *Kravis v. Hock*, 137 N.J.L. 252, 255 (Sup.Ct. 1948).

Illustrative of such prohibited conduct are examples taken from prior disciplinary determinations rendered by the Division:

1. Determinations have held that even a well-intentioned solicitor finding a retail licensee momentarily overwhelmed by business may not "pitch in" to lend a gratuitous helping hand without being in violation. *Re Wasekanes, Bulletin 1207, Item 9; Re LeWinter, Bulletin 1219, Item 10; Re Homestead Inn, Inc., Bulletin 1699, Item 1.*
2. In addition to being barred from actual employment therein, a solicitor is forbidden to loan money or to arrange for such a loan to a retailer. *Re Schlosser, Bulletin 1550, Item 3; Re Bauman, Bulletin 1550, Item 5.*
3. The mere business assistance of aiding a retailer to pay bills and supporting that aid with a transition cash loan was likewise forbidden. *Re Cohen, Bulletin 1550, Item 6.*

With respect to a solicitor's activities in relationship to a retailer purchasing cooperative, certain specific activities by such solicitors cannot be undertaken because they represent impermissible deviations from the laws, regulations and policy of the A.B.C. discussed above.

Illustrative of such prohibited conduct would be:

1. The actual establishment of the cooperative, which would include but not necessarily be limited to: collecting the required fees, filling out and accumulating necessary signatures on cooperative registration forms to be filed with the Division, and paying bills incurred by the cooperative or its members. Additionally, solicitors may not accept dues or other payments from member retailers and transmit same to the management of the cooperative.
2. The active solicitation by a solicitor of retailers for membership in a cooperative is impermissible. The mere advising of retailers, however, of the perceived benefits of cooperative purchasing or the

identification of cooperatives which have the ability to add new members would not be considered improper conduct by a solicitor.

3. Solicitors may not make determinations on behalf of the cooperative as to which products should be ordered and from which particular wholesale house or houses.
4. Solicitors may accept, but cannot place orders for alcoholic beverages for the cooperative with their own wholesalers. The cooperative manager or other designated retail manager of the cooperative must personally initiate and place all cooperative orders.
5. Solicitors may not accept or place orders for alcoholic beverages to be filled by a licensed wholesaler other than the solicitor's employer. This activity is also specifically prohibited by N.J.A.C. 13:2-16.3, which denotes that the permit issued to a solicitor only authorizes the solicitor to accept alcoholic beverage orders on behalf of his employer. Additionally, N.J.A.C. 13:2-16.5 prohibits solicitors from offering for sale or soliciting orders other than as authorized by their permits.
6. It is impermissible for solicitors to provide order sheets allowing the cooperative to order other than the solicitor's own products.
7. Solicitors may not state that their wholesaler's price is the "best price" or "best deal" that month, unless it is in fact the best price available. Additionally, solicitors may not deceptively state that their wholesaler's price is the "best price" or "best deal" when it in fact is merely one of two or more wholesalers which are offering the same lowest price that month.
8. Solicitors may not deliver all or any part of an order to individual retail members of a cooperative. N.J.A.C. 13:2-24.1. In emergent circumstances, however, solicitors may deliver an entire cooperative order as long as the delivery is made to the one single designated drop off or delivery point.
9. Retail members of a cooperative cannot be forced or pressured to deal only with the solicitor taking the cooperative's orders, but they must be able to freely choose to do business with any solicitor or wholesale house for their own non-cooperative orders.

Contrasted to these prohibited activities, the Division does recognize areas where the solicitor's assistance to their retail accounts, including cooperatives, is consistent with law.

Illustrative of such permissible activities are the following:

1. A solicitor can identify the various best deals his or her wholesaler is offering retailers, including members of a cooperative.
2. Solicitors may also provide blank selection sheets if the retailer so requests. If individual members of a cooperative wish to make selections from the order sheet, they may do so, and such sheets can be collected and transmitted to the president of the cooperative or to the member who has been designated as the ordering agent for the cooperative. That person, and not the solicitor, must thereafter undertake the selection of the appropriate wholesale house for purposes of filling the cooperative order or for advising members that there are insufficient total orders to take advantage of what might be a quantity purchase deal.
3. Solicitors may provide comparative pricing information to their customers, and may relate their prices in comparison to competitors' prices, but such information must be accurate, truthful and not deceptive.

In summary, the active decisional and management duties of the cooperative must be carried out by a designated member retailer and not by a solicitor. The above discussion is merely intended to be illustrative and not all inclusive. Licensees are expected to be familiar with the Division's regulations and they should evaluate and apply same to activities not specifically covered here. Questionable instances should be referred to the Regulatory Bureau of the Division or to the Director for review and response.

4. RESIGNATION OF JOHN F. VASSALLO, JR., AS DIRECTOR.

John F. Vassallo, Jr., who has been Director of the Division of Alcoholic Beverage Control since March 31, 1982, has submitted his resignation to the Governor. The resignation is effective at close of business on January 31, 1990. It is anticipated that an Acting Director will be named until a successor is nominated by Governor Florio and confirmed by the Senate.

5. NOTICE REGARDING A.B.C. BULLETIN SUBSCRIPTIONS.

In *Bulletin 2454*, Item 6 (October 17, 1989), notice was given that in *Bulletin 2451*, Item 5 (December 31, 1987), another notice had been given that subscriptions to *A.B.C. Bulletins* for 1987 were being extended through 1988, and those subscriptions were also extended through 1989. The latest notice also advised that beginning with the first *Bulletin* in 1990 (this one), subscriptions would

require renewal (unless started in 1989) and they will cover ten (10) *Bulletins*. Therefore, to start or renew *Bulletin* subscriptions after 1989, a check or money order for \$25.00, payable to the Division of Alcoholic Beverage Control, should be sent along with the subscriber's name and full mailing address to: Division of Alcoholic Beverage Control (Attention: ABC Bulletin Subscription Service), CN-087, Trenton, NJ 08625-0087.

PUBLICATION OF BULLETIN 2455 IS HEREBY DIRECTED THIS
29TH DAY OF JANUARY, 1990.


JOHN F. VASSALLO, JR.
DIRECTOR