

Antes, Christopher

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Sent: Wednesday, March 18, 2026 3:44 PM
To: ATC-Rules
Subject: Support rule 32.1 as a currently written

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March 11, 2026

Alcohol & Tobacco Commission
State of Indiana

Subject: Opposition to Changes to Rule 32.1 – Support for Reenactment as Currently Written

Dear Members of the Indiana Alcohol & Tobacco Commission,

On behalf of GDG Liquor Inc. doing business as Speedway Liquors I would like to respectfully express our opposition to any changes to Rule 32.1 and strongly encourage the Commission to reenact Rule 32.1 as it is currently written

First, I would like to thank the Commission for enacting Rule 32.1. The rule has provided clarity and practicality for retailers participating in cooperative purchasing arrangements. It has allowed co-ops to accept deliveries in the parking lot of a permitted premises, reflecting a long-standing industry practice that has proven both efficient and safe.

Co-ops have existed since at least **1996 in Indiana without any major incidents or violations of the law. Even before the adoption of Rule 32.1, it was common practice for co-ops to accept deliveries in parking lots. The adoption of Rule 32.1 wisely recognized this reality and brought the practice within clear regulatory guidance.**

Today, staging deliveries in parking lots is a **common industry practice** used by many wholesalers delivering to individual stores, including deliveries that are not associated with co-ops. In the case of co-ops, deliveries are typically made when **10 to 15 members are present**, which actually provides additional security. There is safety in numbers, and to our knowledge there have been **no hijackings or major theft incidents** associated with co-op deliveries. Available evidence suggests that most alcohol-related theft or crime occurs in other environments, not at cooperative parking-lot deliveries.

Co-ops were originally formed out of necessity so that **small, independent retailers could organize and compete in a highly competitive and regulated marketplace**. Since their formation, the alcohol retail marketplace has continued to consolidate and become even more competitive. As a result, **the need for co-ops has never been greater than it is today**.

Unfortunately, many smaller retailers have already exited the market. Those that remain have often built their businesses around the efficiencies made possible through cooperative purchasing. Participation in a co-op already involves significant costs for members. Additional regulatory burdens would introduce **new costs and operational inefficiencies** for hundreds of independently owned retailers across Indiana.

This concern is particularly relevant in light of the Governor's intent to **reduce unnecessary regulation**. It would be counterproductive to impose additional burdens when the existing rule has functioned effectively **for the past seven years without incident**.

Furthermore, many practical factors influence the structure and operation of co-ops, including deal levels, the size of the community where a store operates, the distance products must be transported, and the need for members to coordinate around shared objectives. Co-ops operate within these logistical realities every day. Simply put, ****if it isn't broken, it should not be fixed****.

For small businesses like mine, the ability to participate in cooperative purchasing under Rule 32.1 is not merely convenient—it is essential. ****Reenacting Rule 32.1 as currently written is vitally important for the survival of my Indiana small business and for many other independent, family-owned retailers throughout the state.****

Thank you for your time, your consideration, and for your continued work serving Indiana's regulated alcohol marketplace.

Respectfully

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