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# Fax

<b>To:</b> Deonne E. Contine	<b>From:</b> Mark Dreschler
<b>Fax:</b> 775-684-2020	<b>Pages:</b> 3
<b>Phone:</b>	<b>Date:</b> April 6, 2016
<b>Re:</b> Commerce Tax Registration Announcement	<b>CC:</b>

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Thank you.

**PREMIER TRUST***"It's a Matter of Trust"™*

Mark Dreschler  
President

April 6, 2016

Nevada Tax Commission  
Ms. Deonne E. Contine, Executive Director  
Department of Taxation  
1550 College Parkway, Suite 115  
Carson City, NV 89706

Re: Commerce Tax Registration Announcement

Dear Commissioner:

We are writing to express our concern regarding the attached Commerce Tax Registration Announcement document posted last week. The document mentions only in a footnote that

*"Exempt entities not registered with the Nevada Secretary of State are not required to register for the Commerce Tax."*

We note that neither the instructions nor the proposed regulations expressly contain the language used in the footnote (cited above).

Premier Trust is an independent Nevada chartered trust company founded in 2001. We administer several thousand trusts that would appear to be exempt from registration pursuant to the footnote. There are many other Nevada trust companies and individual trustees who in aggregate administer thousands of trusts. There would be a significant burden for us and the others acting in the same capacity to register trusts if we were required to do so. The burden would be in terms of time, personnel and overall costs. We believe this is an undue and unfair burden given that these trusts are exempt from the Commerce Tax.

There is a more far reaching issue than simply the registration process for these entities not registered with the Nevada Secretary of State. The trust business is drawn to Nevada because of its favorable trust, corporate, tax and privacy laws. A significant advantage for doing business in Nevada is the fact there is no current requirement for trusts to register here. Mandating registration and the administrative burden it entails on both the trustees and clients would likely deter clients from doing business in Nevada and may result in trust clients withdrawing from the state.

We believe that we should be attracting trust business to the state as it provides significant non-gaming related employment at Nevada's trust companies and the various professionals

who support the industry. The trust business also provides revenues to the state without adding to Nevada's population and the concomitant infrastructure burden as trust clients do not have to move to Nevada to do business here.

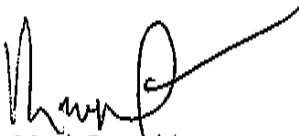
We respectfully request that the Commission review and amend the proposed Regulations and related Instructions to specifically express what your announcement stated in its footnote,

"Exempt entities not registered with the Nevada Secretary of State are not required to register for the Commerce Tax."

Thank you in advance for your understanding and consideration.

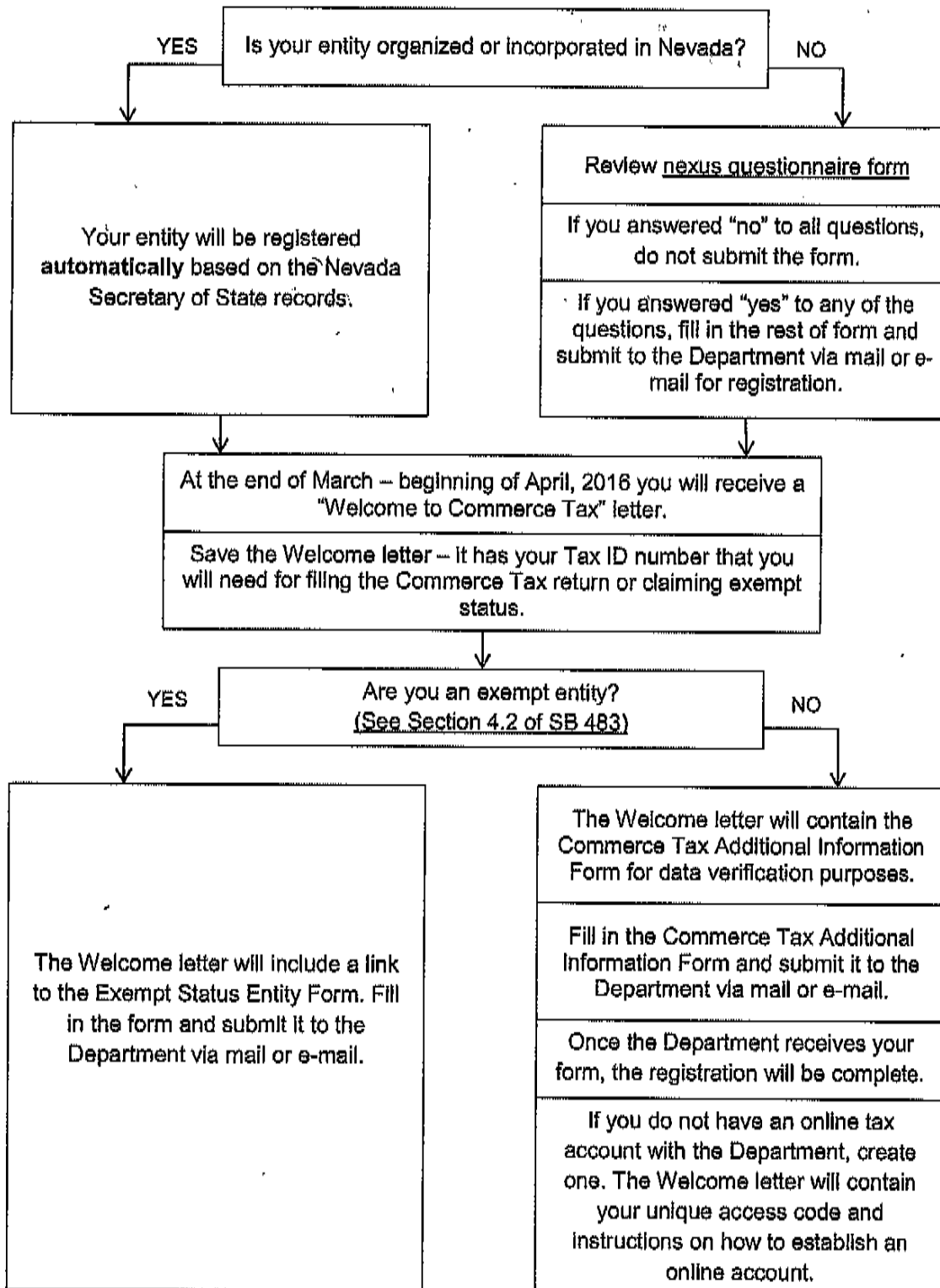
Sincerely yours,

Premier Trust, Inc.



Mark Dreschler

### Commerce Tax Registration Process Informational Chart



Exempt entities not registered with the Nevada Secretary of State are not required to register for the Commerce Tax