



May 20, 2016

Deonne Contine
Executive Director
Nevada Department of Taxation
1550 College Parkway, Suite 115
Carson City, Nevada 89706

Re: LCB File No. R137-15

Dear Director Contine,

Thank you for giving us the opportunity to testify this morning regarding draft regulation LCB File No. R137-15. We make the following as a suggestion in amending the draft.

Section 5(2) and Section 5 (3)

It is our suggestion that Section 5, subsections 2 and 3 be deleted from the draft regulation.

Nowhere in AB380 does the Bill require a retailer to disclose the prior gross receipts of the entity as a condition of registration. The Bill uses the Gross Receipts from the past 4 quarters as a qualifier for an entity to recognize the need to register with the Department or to rebut the requirement to register with the Department.

Nevada is a voluntary compliance state. No other tax registration requires as a condition of registration the disclosure of past gross receipts. The very fact that an entity is registering with the Department is an acknowledgement that the entity has triggered the qualifier.

If an entity fails to timely register with the Department, those receipts are subject to audit. If an entity registers in a timely manner, those receipts are not subject to audit and should not be a condition for registration.

Sincerely,

Barbara Smith Campbell
Principal