



Department of Business License

VINCENT V. QUEANO
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State of Nevada
Department of Taxation

October 27, 2022

Yvonne Nevarez-Goodson, Chief Deputy Executive Director
Nevada Tax Commission
1550 E. College Parkway, Suite 115
Carson City, Nevada 89706

Re: Comments to the Proposed Amendments and/or Additions regarding the adoption of the regulation that pertains to LCB File No. R068-21.

Dear Chief Deputy Executive Director Nevarez-Goodson:

Clark County is submitting the following comments regarding the adoption of the proposed regulation that pertains to LCB File No. R068-21 for the State of Nevada following the notice of intent to act upon a regulation posted on September 1, 2022:

ENFORCEMENT REGULATIONS (Proposed Regulation 7)

Sec. 7.

1. The Department may impose the following penalties on a retail liquor store that violates any of the provisions of sections 2 to 6, inclusive, of this regulation within any 24-month period:

(a) For the first violation, a penalty of not more than \$500.

(b) For the second violation, a penalty of not more than \$1,000.

(c) For the third and any subsequent violation, a penalty of not more than \$5,000 or a license suspension, or both such penalty and suspension.

2. A county or city may adopt by ordinance the penalties set forth in this section.

Comment: Please clarify if a county or city must adopt this penalty structure to the exclusion of any other. Clark County Business License has a robust enforcement process in place which does not match this structure in penalty amount. We request the regulation allow for this section to be enforced according to current practices in alignment with all other liquor licensees in order to promote consistency across the industry and to reduce uncertainty in enforcement actions.

Comment: This structure does not allow for violations that have an increased risk to public health and safety to face increased enforcement action. We request to be able to issue enforcement action, including immediate license suspension, based on the severity of the

violation to public health and safety, and not solely based on the number of the times the violation occurred and/or was substantiated.

LOCAL JURISDICTION REGULATIONS (Proposed Regulation 8)


Sec. 8.

Each county and city in this State shall adopt ordinances regulating liquor delivery which are consistent with the provisions of NRS 369.489 and sections 2 to 7, inclusive, of this regulation.

Comment: Please clarify if the local jurisdiction is able to be more restrictive in its ordinance. We request that the local jurisdiction be able to be more restrictive in its ordinance than the language provides, specifically for areas in which liquor is able to be delivered to.

Please do not hesitate to reach out to Clark County should you have any questions on the foregoing comments. You may reach me by email (VincentQ@ClarkCountyNV.gov) or by phone (702) 455-2963. We look forward to continued collaboration with the State as these policies move forward through the regulatory process.

Sincerely,



Vincent V. Queano
Director of Business License

cc: Board of County Commissioners
Yolanda T. King, Clark County Manager
Kevin Schiller, Deputy County Manager
Randall J. Tarr, Deputy County Manager
Joanna Jacob, Government Affairs Manager