

ATTACHMENT #1



Department of Business License

VINCENT V. QUEANO
DIRECTOR

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SPECIAL EVENTS

March 20, 2023

**NOTIFICATION OF PROPOSED AMENDMENT TO CLARK COUNTY CODE
BY ADDING TITLE 6, CHAPTER 6.145 – SPECIAL EVENTS AND
REVISING TITLE 6, CHAPTERS 6.12, 6.20, 6.30, 6.36, 6.48, 6.56, 6.65, 6.67;
AND TITLE 8, CHAPTER 8.20**

Dear Licensee and Community Partners:

Please be notified pursuant to NRS 237.080, of proposed amendments to Clark County Code, Title 6 by:

adding a new Chapter 6.145 – Special Events;
and revising Title 6, Chapter 6.12 – Fees and Related Matters;
Chapter 6.20 – Motion Picture and Television Productions;
Chapter 6.30 – Multiple Vendor Arena Shops;
Chapter 6.36 – Auction Sales;
Chapter 6.48 – Traveling Shows;
Chapter 6.56 – Peddlers, Solicitors and Temporary Merchants;
Chapter 6.65 – “Rock” Music Concerts;
Chapter 6.67 – Outdoor Festivals; and
Title 8 Chapter 8.20 – Liquor License Regulations.

The amendments are available for your review online at www.clarkcountynv.gov/depts/businesslicense.

The proposed amendments address the following key areas:

- **Section 1** creates a new chapter (6.145 – Special Events) that:
 - Defines “special event”;
 - Requires a license or permit to provide any special event activities;
 - Requires certain information to be provided for special events that anticipate attendance by more than 5,000 attendees over the course of the entire event;
 - Provides for the authority to inspect the business to ascertain compliance with the County Code;
 - Establishes the duties of the holder of a license or permit for a special event.
- **Section 2** deletes Section 6.12.125 of the Code regarding Arts and Crafts Shows.
- **Section 3** defines “general promoter” and imposes a license fee.

BOARD OF COUNTY COMMISSIONERS
JAMES B. GIBSON, Chair • JUSTIN JONES, Vice Chair
MARILYN KIRKPATRICK • WILLIAM McCURDY II • ROSS MILLER • MICHAEL NAFT • TICK SEGERBLOM
KEVIN SCHILLER, County Manager

- **Section 4** requires a Holiday events permit and limits the permit to a period of not more than 30 continuous days., unless extended.
- **Section 5** amends the definition of “professional promoter” and requires promoters to submit to a background investigation for suitability.
- **Section 6** amends Chapter 6.20 when a film permit is required to include when unmanned aerial vehicles (“drones”) are used and requires an application for a film permit to be submitted 10 days in advance of filming.
- **Section 7** amends Chapter 6.30 to add “farmers’ markets” and “arts and craft shows” to the definition of “multiple vendor arena sales”.
- **Section 8** amends Chapter 6.36 to require auctioneers to conform to the provisions of Chapters 6.36 and 7.20 of the County Code.
- **Section 9** revises the definition of “concession” in Chapter 6.48 to include when the patron makes a monetary donation.
- **Section 10** makes a grammatical correction in Chapter 6.48.
- **Section 11** defines “general promoter” in Chapter 6.56.
- **Sections 12 – 18** renames Chapter 6.65 and certain references to “Music Concerts” and removes certain provisions that are no longer applicable or required.
- **Section 19** revises the definition of “outdoor festival” in Chapter 6.67.
- **Section 20** changes the name of “special event permit” to “off-premises liquor permit” in Chapter 8.20.
- **Section 21** changes the name of “special event permit charitable/nonprofit” to “off-premises liquor permit – charitable/nonprofit” in Chapter 8.20.
- **Section 22** amends Chapter 8.20 to require applications for liquor caterer permits to be submitted to the department at least 10 calendar days in advance or be subject to a penalty of double fees.

In accordance with NRS 237.080, business owners and interested parties may submit data and arguments to the Clark County Board of Commissioners, in care of the Department of Business License as to whether the proposed amendment will:

1. Impose a direct and significant economic burden upon a business; or
2. Directly restrict the formation, operation or expansion of a business.

Please direct your comments, data and arguments in writing to Jordan Sandecki at PublicCommentCCBL@ClarkCountyNV.gov by 5:00 p.m. on April 13, 2023.

Sincerely,

Michael Harwell

Michael Harwell

Manager - Operations

ATTACHMENT #2





10000 W. CHARLESTON BLVD., SUITE 165
LAS VEGAS, NV 89135
PH: (702) 735-4888 FAX: (702) 735-4620

April 13, 2023 - **UPDATED**

The Honorable James B. Gibson, Chairman
The Honorable Justin Jones, Vice Chair
The Honorable Michael Naft
The Honorable Marilyn Kirkpatrick
The Honorable Ross Miller
The Honorable William McCurdy II
The Honorable Tick Segerblom
Board of Clark County Commissioners
Clark County
500 S. Grand Central Pkwy
Las Vegas, NV 89155

RE: Business Impact Statement Industry Comments for Proposed Amendment to Clark County Code by Adding Title 6, Chapter 6.145 – Special Events and Revising Title 6, Chapters 6.12, 6.20, 6.30, 6.36, 6.48, 6.56, 6.65, 6.67; and Title 8, Chapter 8.20

Dear Commissioners:

In accordance with NRS 237.080, I write today on behalf of the members of the Nevada Resort Association operating in unincorporated Clark County. Please accept our comments as part of the business impact statement process for proposed amendments to the Clark County Code Titles 6 and 8 regarding special events.

We appreciate the stakeholder meetings Commissioner Kirkpatrick, Fire Chief John Steinbeck, and Business Licensing Director Vince Queano and his team have held with our members to discuss the proposed ordinance and the county's rationale behind it. The safety of our employees, guests and fellow residents is the resort industry's highest priority and is foundational to all our members do, particularly in hosting special events. We share your devotion to protecting the public and Las Vegas' reputation as a safe destination. We too are committed to ensuring special events are well-planned, organized and executed in the safest, most efficient manner.

In working toward our shared goal of providing the safest environments possible, there are several areas in which we seek clarification in hopes of avoiding duplicative, obsolete or outdated special event licensing and permitting requirements. We also believe clearing up any confusion or ambiguity will mitigate potential issues and reinforce existing commitments to compliance and safety. Thank you for updating portions of the code that are no longer applicable given the technological advances the special

events industry has implemented since the code was originally written. We value these changes as they no longer serve a practical purpose.

Our comments are also intended to provide examples of the direct economic impact and the potential economic ramifications the proposed ordinance will have on our members. We greatly value the county's spirit of collaboration and open communication as it leads to better public policy. As always, we appreciate your consideration of our perspective as you discuss the proposed ordinance.

6.145.030 (page 4)

- 1. Alternative Notification Procedures for Venues with Recurring Events.** As drafted, section 6.145.030 creates a new requirement for industry members to provide notification to Clark County for any of 15 separate activities, newly defined as "special events," where more than 5,000 attendees are present. In practical application, this will mean that certain operators will be required to submit new notifications to Clark County for several hundred events per year, including for recurring performances held at certain resort theaters.

We respectfully ask that you consider amending this section to affirm that for applicable special events held in a permanent building or facility licensed and operated for the purpose of conducting such events as the routine, normal course of business, including recurring shows, an alternative notification process be considered. For example, it could consist of submitting the required information on the first day of each month as a consolidated special event calendar containing the information required in section 6.145.030 (with venue capacities expressed as "expected number of attendees") for events to be held during the next 60 calendar days. This could be a reasonable substitution for the 10-day, advance notification requirement for each special event. For businesses that conduct multiple events a week in such venues, the requirement to provide a separate notification for each applicable special event is a significant economic and administrative burden to industry.

- 2. Conventions.** We also seek clarification in this section as it relates to convention groups. As currently drafted, the notification requirement proposed only applies to "special events" which are defined in proposed Section 6.145.010.010 as events that require the permits or licenses listed therein. In most instances, conventions held at resort properties do not require a permit listed under the proposed definition of special events. We ask that conventions continue to be excluded. Including conventions would create a significant burden on the industry as the meeting and convention business continues to recover. As one example, a standard convention group with 1,500 attendees will stay at a resort hotel for a five-day conference. Cumulatively, this would satisfy the current language of "an event with more than 5,000 attendees over the course of the entire event." However, such an event does require a special event permit, nor does it have more than 5,000 attendees present in a single day that would impact ingress, egress or external traffic conditions. Therefore, we seek clarification that the proposed ordinance will not apply to conventions held inside a hotel ballroom or convention facility.
- 3. Unclear Notification Deadline.** Both "working days" and "calendar days" are used in this section. We would appreciate a clear definition to ensure compliance. Further, since Clark County conducts routine business operations Monday through Thursday, which gives applicants 20 percent fewer working days to submit a proposed notification of event, it would be helpful to

include a consistent definition such that **“working day” is not construed** as “Clark County working day.”

4. **Substantial Changes and Cancellations.** This section of the proposed ordinance requires that a new registration be submitted for “any substantial change to the event or cancellation of the event.” However, this section does not inform the industry as to what constitutes a “substantial change.” It also does not account for the situation when an event is cancelled on the same day it is scheduled to be held or is cancelled during the actual event time. This makes compliance with submitting an updated registration administratively impractical, if not impossible, in certain cases. An amendment to this section providing additional detail as to criteria that constitute a substantial change and stipulating that the registration update provision does not require advance submittal in the case of an event cancelled for extenuating or unforeseen circumstances will provide industry with needed clarity.
5. **Penalties.** The proposed ordinance itself does not include penalty provisions. However, Section 6.04.140 of the existing Code prescribes a criminal penalty for non-compliance with “any of the provisions of Titles 6, 7 or 8.” This seems excessive. Without further clarification on this item, the proposed new notification requirements would seem to be subject to criminal penalties. With the new notification requirements being administrative in nature, it would seem justifiable to exempt the requirements of 6.145.030 from penalties or, if truly necessary, provide a more reasonable administrative penalty.
6. **Confidentiality.** This is a serious concern for the industry. For most operators, information pertaining to ticket sales is considered to be proprietary and disclosure of such information can create reputation management concerns for operators and talent while also creating competitive disadvantages. We ask that this section be amended to clarify that such information submitted pursuant to the new notification requirement is expressly deemed confidential and protected from disclosure.

6.145.40 (page 5)

7. **Credentials Required for Inspection.** Our members share your interest in ensuring that persons presenting as government inspectors are confirmed as government inspectors prior to entry to secured areas. Many locations where special events are held include highly sensitive and secure back-of-house or restricted areas. We hope you will consider an amendment requiring the presentation of “government-issued credentials” upon arrival at the special event location. This would both mitigate the risk of entry by unauthorized persons and decrease the incidence of delays for timely access to secured areas which may result from staff concerns regarding inspector identities.

6.12 & (pages 6-7) 6.56.010 (page 16)

8. **Simplification of Promoter Regulatory Requirements.** To provide greater clarity, it would be helpful to amend the definitions of “Professional Promoter” and “General Promoter” to expressly exclude a licensed “Music Concert Promoter.” This would help mitigate adverse economic impacts to industry. As currently written, there are separate definitions and regulatory requirements for Professional and General Promoters in each of Chapters 6.12 and 6.56, which are further

differentiated from a Music Concert Promoter in Chapter 6.65. In today's operating environment, we have concerns about requiring a business licensed to promote music concerts being required to obtain an additional license to promote non-concert events. Of particular concern is that both require substantial background and suitability review which would increase costs for operators.

Chapter 6.65 (pages 18-26)

9. **Modernize Applicability of Exemptions.** We would like to see more clarity regarding the permissive language and the reference to dated terms for exceptions in 6.65.140. It is creating confusion regarding the applicability of the chapter. We would like to propose an amendment that modernizes the code. Specifically, we would like to see language affirming that a concert permit does not need to be obtained for every concert held on the premises of a permanent establishment or facility that is zoned, licensed, and operated to hold events as the routine, normal course of business – such as showrooms, theaters, arenas, and stadiums (premises licensed to a Music Concert Promoter). By clarifying the language in (i) that the existing exceptions in 6.65.140(1)-(3) are narrowly tailored to the requirement to obtain a concert permit for every concert (not to the requirement to be licensed); and (ii) that 6.65.140(2) applies to hotels and resort hotels or non-restricted gaming licensees and affiliated entities. In proposing this change, our intent is to clarify the requirement to obtain a concert permit for every concert is waived in the case of permanent establishment or facility zoned, licensed, and operated for the purpose of conducting such events as the routine, normal course of business, including recurring shows.
10. **Alternative Option for Occasional Promoter.** Certain event promoters may only promote a single or very few events in Clark County in an entire year. Due to the application requirements and processing times, the requirement for such a business to obtain a privileged Professional Promoter and/or Music Concert Promoter License for a small number of events per year could deter those individuals from holding events in Clark County. An alternative would be to allow a less time intensive provisional Professional Promoter or Music Concert Promoter license for an operator who holds fewer than three events per year. Further, you may wish to consider providing an expedited Music Concert Promoter or Professional Promoter License at a higher fee level as an option.
11. **Clarify Definition of Music Concert Promoter.** Section 6.65.020(b) identifies three elements defining which businesses are subject to the regulations of the chapter. However, there is no “and” or “or” between the elements confirming whether a business that meets all or only one of the elements meets the definition. To provide clarity in 6.65.020, please consider adding the word “and” between elements (2) and (3) and limiting element (3) to “right to receive admission ticket receipts.”

6.67.010 (page 26)

12. **Incidental Outdoor Entertainment.** As currently worded, this section poses the significant burden of duplicating permitting, notification and regulatory requirements for events that occur both indoors and outdoors at the same location and under the control of existing promoter licensees. This creates significant adverse economic impacts for the industry. The proposed language deletes the existing terminology, “permanent building or permanent installation” which broadens the definition of an “Outdoor Festival.” We would like to request the language revert to the prior definition of “Outdoor Festival” such that outdoor entertainment, music, dance, or similar activity

that is an incidental or ancillary component of a primary, larger special event on premises of a permanent building or installation operated by and under the control of a Professional Promoter or Music Concert Promoter licensee is not a separate outdoor music festival for licensing and permitting purposes.

SECTION 25 (page 33)

- 13. Effective Date.** If adopted, this ordinance necessitates numerous operational and administrative adjustments for the industry, particularly for licensees who operate multiple event venues. Respectfully, we ask you to consider adjusting the proposed effective date of the ordinance from July 1, 2023, to a minimum of six months from the date of adoption to give operators the time needed to comply.

In closing, we recognize this is a material list of comments. We offer them to clear up ambiguities and in hopes of providing clear direction to the industry to ensure compliance with the intent of the proposed ordinance. We understand this was a complex undertaking by staff and we thank them for meeting with us throughout the process. Thank you for the opportunity to share our perspective. Should you have any questions or concerns, please contact me at (702) 735-4888.

Sincerely,



Virginia Valentine
President

cc: Kevin Schiller, County Manager
Randall J. Tarr, Assistant County Manager
Vincent Queano, Director of Clark County Business License Department
James Headen, Assistant Director of Clark County Business License Department
Michael Harwell, Manager – Operations of Clark County Business License Department
Jordan Sandecki, Clark County Business License Department

ATTACHMENT #3

From: tballou@mac.com
To: [BL Public Comment](#)
Subject: RE: ordinance to amend Title 6 and Title 8 of the Clark County Code by adding Chapter 6.145 regarding Special Events, also revising Title 6, Chapters 6.12, 6.20, 6.30, 6.36, 6.48, 6.56, 6.65, 6.67; and Title 8, Chapter 8.20
Date: Monday, March 20, 2023 2:54:24 PM

Hello,

The only line item that would impact the film industry negatively, is the 10 days advanced notice. I speak from 24 years of permitting experience. Jurisdictions that require this much advanced notice are usually avoided and in many cases, filmed without a permit. A 10 day advanced notice is seen as a deterrent to filming. A 5 day notice would be better for the industry.

Thanks,

TIM BALLOU,CEO
FILM THIS!

Office Hours: Mon-Fri 9:00am - 6:00pm
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EL SEGUNDO, CA. 90245 CHINO, CA. 91710
tel 213.763.9000 fax 213.559-0818 cell 213.268.3297
tballou@me.com tim@filmthis.net www.filmthis.net
Serving TV+Film Productions with permit services and more

ATTACHMENT #4

From: [Brittney at Blondies](#)
To: [BL Public Comment](#)
Subject: Changes to business license
Date: Monday, March 20, 2023 7:19:21 PM

Hi Jordan,

Replying to your email below. My husband, Craig Von Meyer and I have 5 restaurants all throughout Clark county. We hold quite a few business licenses. Why would Clark county make these changes? More regulations so the county can collect on the permit fees? Our businesses licenses are astronomical as it is. As business owners we are already dealing with inflation, employee shortages, tax increases, rising costs of goods and utilities. What would these excess fees go towards paying? We are for one against these ordinance changes and regulations, we would like to speak out against them.

The County is proposing an ordinance to amend Title 6 and Title 8 of the Clark County Code by adding Chapter 6.145 regarding Special Events, also revising Title 6, Chapters 6.12, 6.20, 6.30, 6.36, 6.48, 6.56, 6.65, 6.67; and Title 8, Chapter 8.20. Attached is the Notification Letter of the Proposed Amendment and a copy of the Proposed Ordinance. Public comments will be received through April 13, 2023 at 5 p.m. Please direct your comments, data and arguments in writing to Jordan Sandecki at PublicCommentCCBL@ClarkCountyNV.gov.

If you have any questions, please let me know.

Respectfully,

Jordan Sandecki, Management Analyst II

Clark County – Department of Business License

[500 S. Grand Central Pky.](#), 3rd Flr

Box 551810

Las Vegas, NV 89155-1810

Phone: 702-455-6186 Fax: 702-678-5278

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Thank you,

Brittney Von Meyer

Blondies Sports Bar & Grill

Miracle Mile Shops @ Planet Hollywood Resort and Casino

(702) 737-0444

www.blondieslasvegas.com

ATTACHMENT #5

From: [Tom Ingram](#)
To: [BL Public Comment](#)
Subject: RE: Proposed Ordinance - Special Events
Date: Wednesday, March 22, 2023 11:56:14 AM

I am emailing you regarding the proposed ordinance. As the organizer of the longest running music festival in Vegas, I have seen a lot of changes with licensing and permits. Staying on top of everything has been a tremendous task and we have often felt that something new is added every year. Here are some of my thoughts:

Multi Vendor Permits. These are a great idea and do make life easier. The one issue is that a lot of vendors are very disorganized and come in at the last minute. Some sort of system for adding late comers would be a good idea.

Background checks. I understand the reasons for this, especially for new promoters. Protecting the public from losing their money because of dodgy promoters is important. But promoters like myself who have been running successful shows for so long, and always getting the correct permits and licenses, as well as dealing with taxes, this is a bit of an insult. If we were not running events properly, the hotel would have dropped us years ago. The police would have files of complaints from customers and we would have a bad reputation. I don't need to worry about a background check because I know I have nothing in my past. In fact, when I first started the event in 1998 at The Gold Coast, they checked up on me and my past. So after 26 years, isn't it a bit like shutting the gate after the horse has bolted.

Finally, promoters bring people to Vegas. People who spend money. With everything that is required by the state and county, it is all getting a bit out of control. It is very rare that we get advised of changes in advance. If the state and the county could somehow work together to provide all the info in one go, life would be easier for all.

TOM INGRAM

From: Jordan Sandecki <Jordan.Sandecki@ClarkCountyNV.gov>
Sent: Monday, March 20, 2023 2:44 PM
To: Jordan Sandecki <Jordan.Sandecki@ClarkCountyNV.gov>
Subject: Proposed Ordinance - Special Events

The County is proposing an ordinance to amend Title 6 and Title 8 of the Clark County Code by adding Chapter 6.145 regarding Special Events, also revising Title 6, Chapters 6.12, 6.20, 6.30, 6.36, 6.48, 6.56, 6.65, 6.67; and Title 8, Chapter 8.20. Attached is the Notification Letter of the Proposed Amendment and a copy of the Proposed Ordinance. Public comments will be received through April 13, 2023 at 5 p.m. Please direct your comments, data and arguments in writing to Jordan Sandecki at PublicCommentCCBL@ClarkCountyNV.gov.

If you have any questions, please let me know.



Respectfully,

Jordan Sandecki, Management Analyst II

Clark County – Department of Business License

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Phone: 702-455-6186 Fax: 702-678-5278

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ATTACHMENT #6

From: [Rosemary Vassiliadis](#)
To: [BL Public Comment](#)
Subject: CCDOA Feedback on Proposed Ordinance - Special Events
Date: Monday, April 10, 2023 4:23:20 PM
Attachments: [EXTERNAL Proposed Ordinance - Special Events.msg](#)
[Chapter 6.145 Special Events Draft 03.01.2023 \(002\) sc.pdf](#)

Hello Jordan,

The Clark County Department of Aviation received your attached email regarding proposing an ordinance to amend Title 6 and Title 8 of the Clark County Code.

We would like to have the below sentence inserted; it's been added to the attached PDF.

Pg. 8 - 6.20.030 – After the section that states, "...or when filming includes unmanned aerial vehicles commonly referred to as drones, pyrotechnics, flame, special effects or laser," please add **"Use of drones, pyrotechnics, flame, special effects, lasers, etc., must comply with CCC 30.48.140."**

Thank you!

Rosemary A. Vassiliadis
Director
Clark County Department of Aviation
Harry Reid International Airport
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rosemaryv@lasairport.com

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