MINUTES OF THE
LEGISLATIVE COMMISSION'S
SUBCOMMITTEE TO REVIEW REGULATIONS

March 8, 2012

The meeting of the Legislative Commission's Subcommittee to Review Regulations was called to order by Senator Mo Denis, Chair, at 3:04 p.m. on March 8, 2012 at the Grant Sawyer State Office Building, Room 4401, 555 East Washington Avenue, Las Vegas, Nevada, and via simultaneous videoconference at the Legislative Building, Room 3137, 401 South Carson Street, Carson City, Nevada. The Agenda is included as Exhibit A and the Attendance Roster is included as Exhibit B. All exhibits are available and on file in the Research Library of the Legislative Counsel Bureau.

COMMITTEE MEMBERS PRESENT (LAS VEGAS):

Senator Mo Denis, Chair, Senate District No. 2
Senator David R. Parks, Senate District No. 7
Senator Michael Roberson, Senate District No. 5
Assemblywomen Marilyn Kirkpatrick, Assembly District No. 1
Assemblyman Lynn Stewart, Assembly District No. 22

COMMITTEE MEMBERS PRESENT (CARSON CITY):

Assemblywoman Debbie Smith, Assembly District No. 30

STAFF MEMBERS PRESENT:

Brenda Erdoes, Legislative Counsel
Risa Lang, Chief Deputy Legislative Counsel
Karen Bondi, Receptionist, Legal Division, Legislative Counsel Bureau
Angela Hartzler, Deputy Administrator, Legal Division, Legislative Counsel Bureau
Olivia Lodato, Interim Secretary, Legal Division, Legislative Counsel Bureau

OTHERS PRESENT:

Matthew Taylor, President, Nevada Registered Agent Association, Inc.
John Wagner, Independent American Party
Andrew Platt
C.T. Wang
Alan Wetter
Larry Gilbertson, Nevada Department of Wildlife, Game Division Chief
Ross Miller, Secretary of State of Nevada

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Juanita Clark, Charleston Neighborhood Preservation

Chair Denis opened the meeting of the Legislative Commission's Subcommittee to Review Regulations at 3:04 p.m. on March 8, 2012. He requested a roll call of members present at the meeting.

Ms. Karen Bondi called the roll. A quorum was present. Assemblywoman Debbie Smith represented Assemblywoman Benitez-Thompson.

Chair Denis said the meeting was appropriately noticed for today in this room. He said there were eight regulations for review by the Subcommittee. There would be public comment under Item II and then approval of the minutes from the previous meeting. He requested people come forward for public comment.

Matthew Taylor, President, Nevada Registered Agent Association, Inc., commented on issues with R080-11. He offered his written proposal in Exhibit C. He said his testimony from the December meeting was on record. He was concerned that the proposed regulation was attempting to change the definition of "person" to "natural person." The current language stated a business did not include a person who operated a business from his or her home and the net earnings from the business were not more than sixty-six and two thirds of the average wages, approximately $27,000.00. He said something that was not a business was a natural person, whose sole business was the rental of dwelling units. The regulation was contrary to statutes as written. He said it was also a change in the computational basis to increase any public revenue in any form. He said the change in the regulation lost the ability to file as a home based business. He said it would raise approximately $10 million in revenue. The concern was it was not submitted to both houses and did not have a two-thirds vote.

Mr. Taylor's third concern was that the requirement for a state business license was based in part on the local business license requirements. He said if someone opened their home to the public, it might put them in a situation where a local business license also required them to have a state business license. The concern was that different counties had different requirements and someone living in one county had to have a business license and someone in a different county did not have to have the license. It was an unequal application of a fee based on where a person resided in the State. Mr. Taylor referenced Exhibit C referring to exemptions and forms for home based business exemptions according to Title 7 entities. He was concerned that it was a change to how the law was written and how the fee was computed. His other issue was that the Secretary of State said his internal audit led to a belief that there was roughly an 87 percent fraud rate on filings done as a home based business. He said it was a limited sampling. Approximately 17 notices were sent out to companies that they had previously researched and had reason to believe were violating the definition of a home based business exemption. He was also concerned that the office had implemented a number of the changes already. He said he believed it was a flawed regulation and it cannot be passed in this format.

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Chair Denis opened discussion in Carson City for public comment.

John Wagner, Independent American Party, was concerned about the home based business fee. He said many of the businesses were run by women to supplement their income. He said A.B. 78 went through both houses of the Senate and Assembly, but never went to the Governor's Office. He said it R080-11 needed to go through the entire Legislature and not have it determined by the Subcommittee.

Andrew Platt was a member of the administrative law and business law sections of the Nevada Bar. He said Nevada had business-friendly laws. R080-11 eroded the reputation for legal certainty in Nevada. The change would be noticed and he said it implied Nevada turned its back on business when times were difficult. He said when the Executive Branch was attacking the business climate over the Legislature, it created problems. There were new substantive provisions in the regulation.

Chair Denis asked if there was further public comment.

C.T. Wang stated he was opposed to the regulation. He said the last legislative session did not consent to imposing taxes and Secretary of State Miller was trying to circumvent the laws.

Alan Wetter, from Henderson, Nevada, agreed with Mr. Wang. It was a way of circumventing the Nevada Constitution. He said it seemed wrong to go after people operating a small at-home business. He said people earning an average salary paid over 50 percent of their earnings in taxes.

Chair Denis closed public comment and requested approval of the minutes.

MS. KIRKPATRICK MOVED TO APPROVE THE MINUTES FROM THE MEETING OF DECEMBER 29, 2011.

SENATOR PARKS SECONDED THE MOTION.

THE MOTION CARRIED.

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Chair Denis opened discussion on Agenda Item IV. He said there were seven regulations submitted for review pursuant to NRS 233B.067 and NRS 233B.0675. He said R080-11 was pursuant to NRS 233B.0675. He listed the regulations and requested the members tell him the ones they wished held for discussion. Mr. Stewart requested R055-11 be held.

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Chair Denis held R110-11 and R080-11 for further discussion. He reviewed the regulations held for discussion and asked for approval of the other five regulations.

MS. KIRKPATRICK MOVED TO APPROVE R038-11, R051-11, R078-11, R091-11, AND R093-11.

SENATOR PARKS SECONDED THE MOTION.

THE MOTION CARRIED.

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Chair Denis opened discussion on R055-11.

Mr. Stewart asked why they deleted the indoctrination course on the big horn sheep and the spotting binoculars. He asked for an explanation of why they were no longer needed.

Larry Gilbertson, Game Division Chief, Nevada Department of Wildlife (NDOW), said the regulations went back a long time. He said the initial provision for binoculars started as a 5 power binocular. The requirement became an unnecessary part of the regulations, as everybody had those types of instruments in the field. The indoctrination also went back to when they were trying to introduce big horn sheep hunting in Nevada. The populations of big horn sheep were low throughout the West. The regulations were carefully crafted and restricted to protect the sheep population. He said the regulations were so strict they had to have indoctrination for all the hunters. He said approximately a decade ago, the regulation was changed to any ram because Nevada had more big horn sheep than any state in the nation. He said Nevada provided big horn sheep for other states to transplant. The regulations no longer required dating the age of the ram or the size of the horn. They would continue to hold the indoctrination because it was an opportunity to provide educational materials in the field but they would no longer be mandatory.

Mr. Stewart said he was also surprised that swans were hunted in Nevada.

Mr. Gilbertson said swans had been hunted for more than 40 years in Nevada.

MR. STEWART MOVED TO APPROVE R055-11.

SENATOR PARKS SECONDED THE MOTION.

THE MOTION CARRIED.

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Chair Denis opened discussion on R110-11.

Ms. Smith said she was pleased to be a substitute to the meeting so she could vote on the regulation. The program was several years in the making. The regulations allowed the promotion of the Dream Tag which allowed the general public to buy raffle tickets for a chance for whatever the allotted big game species was for that hunting season. She said the hunt application process was about to get underway. The chances would be sold and the proceeds designated for conservation and restoration of habitat in Nevada.

MS. SMITH MOVED TO APPROVE R110-11.

MR. STEWART SECONDED THE MOTION.

THE MOTION CARRIED.

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Chair Denis opened discussion on Agenda Item R080-11. He requested a discussion of the regulation with the Secretary of State. He asked Ms. Erdoes to discuss the concerns about the regulation.

Ms. Erdoes said two questions were raised during public comment that were things the Legal Division was required to look at when reviewing the regulations and reporting to the Subcommittee. The items were whether the proposed regulation would conflict with statute, and whether it would conflict with the Constitution. She said the Legal Department did not believe the regulation conflicted with either statute or the Constitution. The statutory provision NRS 76.020 said "person", and "person" was defined by the preliminary chapter to include organizations other than a natural person. She said the provision said "unless the context otherwise requires." The Legal Division did not find any case-law going any other way than as a person who operated a business from his or her home, because businesses do not have homes. It did not conflict with the statute. The other issue was whether the regulation required a two-thirds vote of the Legislature. She pointed out that Section 18 of Article 4 was very clear. It stated that the requirement for an affirmative vote of not fewer than two-thirds of the members applied to passing a bill or a joint resolution. She said once the bill was passed, the agency carried it out with the regulation and there was no requirement for the regulation to be voted on by the subcommittee or anyone else by a two-thirds vote. She said there was a specific provision in the Constitution which allowed for the approval of regulations by this subcommittee during the interim. The regulation as proposed did not conflict with statute or the Constitution.

Senator Roberson asked Ms. Erdoes if she was indicating they could raise taxes at will through regulation.

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Ms. Erdoes replied no, the Legislature had not given statutory authority for agencies to impose taxes on their own. She said agencies had to have specific authority to enforce a section or raise fees.

Senator Roberson asked if agencies could raise fees. He said fees, taxes, or call them what you want.

Ms. Erdoes answered if the Legislature had given the agency the authority to do that. She said the authority of the Legislature required the two-thirds majority vote to pass. She said the two-thirds vote had occurred when the agency was given the authority to collect the tax.

Senator Roberson asked where the Secretary of State's Office had the authority to expand the fee to a new set of people, a new set of businesses. He said NRS 76.020 specifically exempted these folks from the definition of a business.

Ms. Erdoes said the interpretation of her office was that these were all things that were interpretations of the statute which they were allowed to make. In other words, if this was the correct interpretation that the Secretary of State made, it did not matter that they did it differently before. She said there were many examples of that throughout the statutes and regulations where an agency realized there was a problem and corrected the problem. The agency was authorized to interpret the statute and draft a regulation to then be approved by the Subcommittee.

Ms. Kirkpatrick asked about the small businesses such as the Tupperware lady whose house was typically not open to the public and was considered a small business. She said a beauty salon had a lot of traffic through their house and may be required to have a business license. She asked for clarification between the different business entities.

Ross Miller, Secretary of State, said the business license was created by the Legislature, who created certain exemptions for home based businesses. It specifically carved out an exemption that would apply to the Mary Kay or Tupperware saleswoman. The exemptions were in existence from 2003 to 2009. The proposed regulation would have the exact same effect as the one in place in 2003 in that a sole proprietor or general partner, but not an LLC or corporation, could claim an exemption and not have to pay the $200.00 fee. However, for example, a sole proprietor running a barber shop from the home and open to the public would be subjected to the city licensing requirements. He would have to pay the $200.00 fee.

Senator Roberson said there was confusion involved in the regulation. He said someone who sold Tupperware out of their home was still subject to the fee if they sought the limited liability statute protection of the LLC; they were subject to the new fee whether or not their home was open for business.

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Ms. Kirkpatrick said she wanted clarification, did it only apply if they had an LLC.

Ms. Erdoes said, as she understood Senator Roberson, it would still apply to someone running a business out of their home if they filed and created an LLC. She replied that was correct. If the person had not sought that protection and filed for an LLC, the fee would not apply.

Senator Roberson said that was his understanding, and his argument that they were now forcing home based businesses, including people who sell Tupperware or whatever product or service, even though they don't open their home up to the public, now have to make the difficult choice of waiving the legal protection of the LLC statute or facing this tax increase. He said he did not think this was the time in our economy in this State to be increasing taxes and putting the smallest home based businesses in that difficult position.

Chair Denis said he understood the regulation did not create the fee. The fee was created by the Legislature in 2009.

Ms. Kirkpatrick said as she remembered the discussions, they were trying to create a business portal so everybody could streamline the process of getting a business license. She said they looked at many other states. They found that businesses were complaining about the lack of uniformity concerning the licenses. The bill was modeled into a streamlined system. She believed they had the discussion and were trying to have a better process.

Senator Roberson offered a couple of points. He said there was reference made that this fee was created or passed in 2009, not to these home based businesses who were not even classified as a business under NRS 76.020. He said this was entirely new. There was another point he wanted to ask the Secretary of State. He said he listened to the testimony of the Nevada Resident Agent Association's Matthew Taylor, who brought something up. Mr. Taylor indicated that the Secretary of State and his office's received no guidance from the Attorney General's Office on this issue. Yet, he also made reference to correspondence from Mr. Anderson of the Secretary of State's Office with the Attorney General's Office. He quoted, an email that said: "…after careful review of the statute and after discussion with the AGs office, it has been determined that the home based business exemption applies to Title VII entities due to the definition of person in Title VII." He asked Secretary Miller's opinion on the email.

Secretary Miller said as he understood it, shortly after the bill was passed in 2009 transferring the oversight of the state business license from the Department of Taxation to the Secretary of State's Office, they began trying to implement to whom the fees would apply. He said in some of the discussion, the question was asked whether or not LLCs and incorporations had to pay the state business license or whether they could claim an exemption under the home based business requirement. He said he understood Deputy Anderson had a verbal discussion with the Attorney General's Office, who gave

him a verbal opinion or guidance that LLCs and corporations would be able to claim the exemption. He said it had since been determined that it was erroneous legal advice. He asked what difference it made if the Attorney General's Office gave them an opinion. He said it was not the Attorney General's published opinion and it did not have the weight of effect of law. He said after further review and looking at the legislative history, they discovered the Legislature made a mistake. As a result of that, his office brought forward the regulation which clarified the original intent of the Legislature. He said in 2009 he did not have the authority to change the policy of the Legislature. He said he did not have the unilateral authority to reverse the long-standing legislative intent of the State without first going to the Legislature. He said the Attorney General's Office did not have the authority to change intent either.

Senator Roberson said it was the Attorney General's Office and apparently the Secretary of State's Office had sought out an opinion of sorts, whether verbal or written. He said it sounded like the Attorney General's Office said yes, they should be excluded from the fee. He asked the Secretary if he stated that he did not seek guidance, but someone in his office did seek guidance. He said he was trying to determine what the reality was.

Secretary Miller replied that Senator Roberson had asked the question of whether he had gotten the Attorney General's opinion. He said he never had an Attorney General's opinion that had the full weight of the review of the statute, signed by the Attorney General, and published. He said his office received verbal guidance from a Deputy Attorney General that was assigned to his office. He said since that time, his office had more time to look at the regulation in consultation with the AG's Office, and they determined that the legal advice given earlier was inaccurate. He said the Attorney General's office stood behind his opinion and were defending the Secretary of State's Office in the lawsuit. He said they were advised it was fully within their rights to seek clarification on a law and think this is the proper interpretation of the law.

Chair Denis requested discussion be directed through the Chair. He said he was trying to keep the discussion from becoming a court case. They were not trying to see whether he did something or did not do something. They were trying to see if this was the regulation.

Senator Roberson said he understood the Chair was in charge and he respected that. He said it was an important issue to many people in the State and it merited a full discussion.

Chair Denis agreed it was an important issue.

Senator Roberson addressed his question to Secretary Miller. He said the Attorney General told Secretary Miller's office verbally, that Chapter 7, Title VII entities that were home based businesses, under $27,000.00 did not have to pay this fee. He added the Secretary and his office determined they were wrong, and now the Attorney General had come to Secretary Miller's way of thinking on the regulation and had opined that these folks can be taxed. He asked if that was correct.

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Secretary Miller said it was not correct. He said he explained several times earlier and would try to explain it again. The Attorney General never opined on this issue. A Deputy Attorney General assigned to his office gave them verbal advice that LLCs, corporations, and the like could claim a home based business exemption. He said when his office began to review the issue in more depth, looking at the legislative history in consultation with the Attorney General's Office; they came to the collective conclusion, with the Deputy Attorney General, that the initial legal advice was incorrect. He said this process was trying to clarify that area of the law and revert back to the original intent of the Legislature.

Chair Denis said the way he understood Secretary Miller, it was not an official thing requested of the Attorney General. The office worked with the person they normally worked with from the Attorney General's Office who was assigned to their office.

Secretary Miller said they had a Deputy Attorney General assigned to his office at the time. He said there was a different person assigned to them currently. The Deputy Attorney General did not speak for the Attorney General's Office; they were only his office's counsel and represented their interests.

Chair Denis said in this particular instance, there was a request made and a telephone call over and there was a discussion and that was what came out of the discussion.

Secretary Miller said that was memorialized and that was correct.

Senator Roberson said to clarify the issue, it was the Attorney General's advice to his office, not an opinion, but advice to his office.

Chair Denis said he thought Secretary Miller said that there was a Deputy Attorney General they discussed the issue with and it did not come from the Attorney General.

Senator Roberson said he meant the office of the Attorney General.

Ms. Kirkpatrick said they had to be clear that every state agency has a "DAG," a Deputy Attorney General. She said they saw them in the budget all of the time and they fund them. The Deputy Attorney Generals worked throughout the entire regulatory process directly within their agency to help things along. She said it was a function of the Attorney General's Office, but each agency worked with their representative. She said Public Works had a DAG they worked specifically with to make regulations conform to the law. The general public does not understand when someone said the Attorney General's Office, but the DAG was specific to that particular agency. She wanted to clarify the term for the general public.

Chair Denis said the other thing he wanted to ask was when something came officially from the Attorney General's Office, how did it occur? He said the Deputy Attorney

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General would make a recommendation, but they obviously would do something that would go officially through the Attorney General.

Secretary Miller said he believed the process varied. It varied according to the policy established by any Attorney General. He said if an agency wanted an official opinion from the Attorney General, the request had to be made through the Deputy Attorney General, who then elevated the request up the chain of command. It was a very lengthy process and took substantial review from their office. They publish what is termed an Attorney General's opinion. The opinions were cataloged and interpreted the statutes in a way that had persuasive authority. It was definitely not binding authority, but was a much more formal process. Each agency had an assigned Deputy Attorney General. He said it was part of the daily consultation he had with their office.

Senator Roberson asked the Secretary of State if he had a written, official opinion from the Attorney General of the State of Nevada on this issue.

Secretary Miller replied no.

Senator Roberson said maybe they should get an official opinion before they voted on this. He requested they have an official written opinion on this before they vote on the regulation.

Ms. Erdoes said her understanding of the law was that only the client of the Attorney General may ask for an opinion. They do that when they believe they need an opinion. This committee's authority was only to approve or reject a regulation. She said even if it was deferred today, the committee did not have the authority to require such an opinion before they took action.

Ms. Smith said their legal counsel was the Legislative Counsel whom they relied on, and she was comfortable relying on Ms. Erdoes and her staff. She said it was not their job, nor do they have the authority, to request an opinion. The committee relied on their legal counsel, and she was comfortable with the advice.

Senator Roberson said he would determine his own comfort level. He said he had simply asked the Secretary of State to request a written opinion from the Attorney General. He said it seemed to him there was a lot of confusion on what the Attorney General's Office feels about this issue.

Chair Denis asked if there were other items they wanted to review on this item. He wanted to be sure, in layman's terms, about the Mary Kay item. He said if a person did Mary Kay out of their home, they did not have hours posted, and took orders from their client, and she came to the house and picked it up, that would not kick this in unless they were an LLC or whatever.

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Secretary Miller replied he was correct.

Chair Denis said the issue brought up in that respect, not taxing those individuals, but there could be an issue where a county or city would require a business license on their part and that changed that.

Secretary Miller replied he was correct.

Senator Parks asked Secretary Miller for clarification. He asked if his Deputy Attorney General had reviewed the regulation, R080-11, and supported the regulation.

Secretary Miller replied yes.

Senator Parks said the committee had the advice of their legal counsel that it complied with respect to the requirements in statute.

Chair Denis asked if there was further discussion.

Senator Roberson requested a roll call vote.

Chair Denis asked for a motion on R080-11.

SENATOR PARKS MOVED TO ADOPT REGULATION R080-11.

MS. KIRKPATRICK SECONDED THE MOTION.

Chair Denis asked if there was further discussion.

Senator Roberson asked that everyone's vote on this be recorded.

Chair Denis said the votes were recorded, but he was asking for a roll call response.

Ms. Bondi did a roll call vote. Ms. Kirkpatrick voted yes; Mr. Stewart voted no; Ms. Smith voted yes; Senator Parks voted yes; Senator Roberson voted no; Chair Denis voted yes.

THE MOTION PASSED. (MS. KIRKPATRICK, MS. SMITH, SENATOR PARKS, AND CHAIR DENIS VOTED YES. MR. STEWART, AND SENATOR ROBERSON VOTED NO.)

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Ms. Kirkpatrick asked Secretary Miller if she could check with his office to see how the regulation was being enforced.

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Chair Denis asked Secretary Miller for a report to the committee.

Ms. Kirkpatrick said she did not want it to be controversial. She was just interested to know what comes out of the regulation in case they need to adjust it legislatively. She was not willing to have it put on the agenda and make it a drama. There was enough of that already. She said she would share information with anyone who wanted to know.

Chair Denis said he appreciated her request. He said they wanted to help businesses in Nevada and always wanted to do that. He opened the discussion for further public comment.

Juanita Clark, Charleston Neighborhood Preservation, said she had written comment on R080-11. She said the actions taken by the committee affected every Nevadan. She said a business must turn a profit. She asked if the entire Legislature did not approve the regulation.

Ms. Erdoes replied the entire Legislature did approve the bill which gave the Secretary of State the authority to adopt regulations, to interpret the statute, and enforce the tax that was imposed.

Ms. Clark said that was from whence the power came then, to the SOS. She said they had a few little comments about that great concern, Exhibit D. She said review allowed the subcommittee of six members to make the regulation. They were very concerned about two thirds of a subcommittee taking the place of two thirds of an entire Senate and Assembly. She said they each knew their elected duty and they had chosen on occasion to not act as charged by their constituents or the majority of their fellow Legislators. It looked like in this case, indeed they had because there was a two-thirds vote giving the power to the Secretary of State. She respectively requested each member vote no on R080-11. She said she would like to be informed on the future written pieces.

Ms. Kirkpatrick made a firm commitment that every six weeks she would ask the Secretary of State's office for a report. She said Ms. Clark had sent her an email today and she would respond on a regular basis. She also said Ms. Clark's own Legislator could reach out for the information as well. She would get an update every six weeks of how many people were affected and what type of persons they were.

Ms. Clark asked for a copy of the written opinion from the Attorney General's Office.

Ms. Kirkpatrick said she was asking for information for her knowledge, but she did not know about any written opinion from the Attorney General's Office.

Chair Denis said there was not an Attorney General opinion issued on the regulation.

Ms. Clark asked if there was a written opinion coming soon from the office.

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Chair Denis said not necessarily. He said he believed it was mentioned because of the lawsuit coming up in a different matter. He said there will not necessarily be an Attorney General's Office opinion.

Senator Roberson said it was clear today the Secretary of State did not feel he needed the Attorney General's opinion.

Ms. Clark said OK, then she asked Ms. Kirkpatrick if she would name businesses that were affected or not and there was no criteria about how individuals were affected.

Ms. Kirkpatrick said she would ask how many new businesses were affected by the regulation. She said the Legislature passed a bill in 2007 that gave a certain exemption to certain folks. She checked on it and recently only one business had used the exemption in four years. She was interested to see how things played out in the future. She did not have an agenda. She said there might be a need to address it in the next legislative session.

Chair Denis asked if there was any further comment for the committee.

Mr. Wang asked if he understood that the Secretary of State had the authority to do this and under what legislation? He said his information said A.B. 78 was not passed. Where did he get the authority to do this?

Ms. Erdoes said the authority under which the regulation was adopted today was the authority from the bill that was passed which switched the administration of this fee from the Department of Taxation to the Secretary of State's Office. It gave the Secretary of State's Office the duty to interpret and enforce the state business license fee and also gave them the authority to adopt such regulations as the Secretary of State deemed necessary to collect the fee. She said that was the authority. There was a bill during the last session which would have done what the regulation was doing, or similar to it, by bill. It would have put it in statute rather than by regulation. The bill did not go to the Governor, so it had no effect on this regulation.

Mr. Wang asked what the original bill was that gave the authority.

Chair Denis said it was in the previous session, in 2009. He asked if there were any further comments. He said as there were no further items for discussion, the meeting was adjourned at 4:22 p.m.

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RESPECTFULLY SUBMITTED:

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Olivia Lodato, Interim Secretary

APPROVED BY:

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Senator Mo Denis, Chair

DATE:_____

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EXHIBITS

Committee Name: LEGISLATIVE COMMISSION'S SUBCOMMITTEE TO REVIEW REGULATIONS

Date: March 8, 2012 **Time of Meeting: 3:00 p.m.**

Bill	Exhibit	Witness / Agency	Description
	A		Agenda
	B		Attendance Roster
	C	Matthew Taylor	Comments on R080-11
	D	Juanita Clark	Comments on R080-11

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