

Regulatory Analysis Form

(Completed by Promulgating Agency)

INDEPENDENT REGULATORY
REVIEW COMMISSION

(All Comments submitted on this regulation will appear on IRRRC's website)

2015 OCT 29 PM 3:04

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IRRC

(1) Agency: Pennsylvania Liquor Control Board

(2) Agency Number: 54

Identification Number: 86

IRRC Number: 3123

(3) PA Code Cite: 40 Pa. Code §§ 3.141, 3.143

(4) Short Title: Management Contracts

(5) Agency Contacts (List Telephone Number and Email Address):

Primary Contact: Rodrigo J. Diaz (717) 783-9454
Pennsylvania Liquor Control Board
401 Northwest Office Building
Harrisburg, Pennsylvania 17124
FAX: (717) 787-8820
Email: ra-lblegal@pa.gov

Secondary Contact: Justin E. Blake (717) 783-9454
(Same Contact Information)

(6) Type of Rulemaking (check applicable box):

- Proposed Regulation
- Final Regulation
- Final Omitted Regulation

- Emergency Certification Regulation;
 - Certification by the Governor
 - Certification by the Attorney General

(7) Briefly explain the regulation in clear and nontechnical language. (100 words or less)

The Liquor Code authorizes management companies to operate and manage all or part of a licensed business. Nonetheless, the Board's regulations require that all indicia of ownership remain with the licensee. The regulatory requirement that all indicia of ownership remain with the licensee has proven to be inconsistent with the statutory provision that allows a management company to operate all or part of the licensed business. Therefore, the regulations are being changed to be consistent with the statutory scheme.

(8) State the statutory authority for the regulation. Include specific statutory citation.

The Board has the authority to make regulations pursuant to section 207(i) of the Liquor Code (47 P.S. § 2-207(i)).

(9) Is the regulation mandated by any federal or state law or court order, or federal regulation? Are there any relevant state or federal court decisions? If yes, cite the specific law, case or regulation as well as,

any deadlines for action.

No, this regulation is not mandated by any federal or state law or court order, or federal regulation. There are no relevant state or federal court decisions pertaining to this regulatory change.

(10) State why the regulation is needed. Explain the compelling public interest that justifies the regulation. Describe who will benefit from the regulation. Quantify the benefits as completely as possible and approximate the number of people who will benefit.

In recent years, the Board has encountered a growing number of management contracts, i.e. agreements between a licensee and a management company to operate, manage, or supervise all or part of the operation of the licensed premises. These agreements, which can involve multi-layered business organizations with fees and profits being exchanged among the constituent parts of the licensee and management company, are expressly permitted by the Board's regulations (40 Pa. Code § 3.141(a)) and the Liquor Code (47 P.S. §§ 1-102, 4-477(g)). In fact, the Liquor Code defines a management company as an entity that operates, manages or supervises all or part of a licensed business on behalf of a licensee. However, the regulations currently preclude a management company from having a pecuniary interest in the licensed business, despite the fact that management companies are held to the same standards as any person involved in the license. (40 Pa. Code § 3.143(b)(2)). In response to comments from the regulated community, the Board therefore believes a regulatory change is needed to recognize the reality of the modern business environment in which licensees enter into negotiated management agreements that, while not structured as a formal partnership or joint venture, may involve the sharing of profits and control. The Board further believes that the amended regulations will be more consistent with the definition of a management company, as set forth in the Liquor Code, than the existing regulations.

The proposed regulatory change amends the Board's regulations to eliminate the blanket prohibition of a pecuniary interest being held by a management company in subsection 3.141(d) (40 Pa. Code § 3.141(d)) as well as a similar reference in subsection 3.143(b)(1). In view of the statutory definition of a management company, it removes the requirement that a management contract reserve to the licensee the capability to direct its own business by deleting subsection 3.141(b).

Sections 404 and 436 of the Liquor Code (47 P.S. §§ 4-404, 4-436) provide that only the applicant for, in the case of section 404, the issuance, transfer or extension of a hotel, restaurant or club liquor license, or, in the case of section 436, the issuance or transfer of a distributors', importing distributors' or retail dispensers' license, may have a pecuniary interest in the license. However, the Board believes this provision was not meant to prevent a management company from having control and receiving a share of the profits of the licensed business when the management company is on the license application, particularly given the fact that such management companies are required to meet the same eligibility criteria as the applicant under subsection 470(a.1) of the Liquor Code (47 P.S. § 4-470(a.1)), i.e. reputation, criminal history, and current or prior involvement in other licenses, and particularly since a management company is defined in the Liquor Code as an entity that manages or operates a licensed business on behalf of a licensee. This change will therefore prevent placing an undue burden on the formation and reporting of management contracts by the regulated community, while remaining consistent with the Liquor Code by having the management company listed on the application, investigated by the Board's Bureau of Licensing, and subject to refusal by the Board if the management company would not qualify for the license in its own name.

The Board has received approximately one hundred fifty-five (155) applications for use of a management company since January 1, 2013. Therefore, the Board estimates that approximately fifty (50) to sixty (60) licensees each year will be impacted by the regulatory change, in addition to any other licensees that decide to make changes to an existing management contract after the change takes effect.

(11) Are there any provisions that are more stringent than federal standards? If yes, identify the specific provisions and the compelling Pennsylvania interest that demands stronger regulations.

The proposed regulation is not more stringent than any federal standards since federal regulations do not address this matter.

(12) How does this regulation compare with those of the other states? How will this affect Pennsylvania's ability to compete with other states?

A comparison of the proposed regulation with the laws of other states would not be appropriate since alcoholic beverage licensing is controlled by neighboring states in accordance with their unique and individual regulatory systems. Nonetheless, if anything the proposed changes will have a positive effect on Pennsylvania's ability to compete with other states in that it will lessen the regulatory burden on national hotel and resort chains that choose to locate in the Commonwealth, since such entities typically operate under management contracts.

(13) Will the regulation affect any other regulations of the promulgating agency or other state agencies? If yes, explain and provide specific citations.

The regulation will not affect any other existing or proposed regulations of the Board, nor is the Board aware of any regulations of another state agency that would be affected.

(14) Describe the communications with and solicitation of input from the public, any advisory council/group, small businesses and groups representing small businesses in the development and drafting of the regulation. List the specific persons and/or groups who were involved. ("Small business" is defined in Section 3 of the Regulatory Review Act, Act 76 of 2012.)

The Board did not formally solicit input from the public in the development of the regulatory change, although during the course of reviewing management contracts Licensing has received general comments from attorneys who represent licensees. Recently, attorneys from the law firm of Flaherty & O'Hara suggested that allowing hotel operators the ability to have an interest in the licensed business would make Pennsylvania more attractive to such companies without any resulting public harm. The firm further identified the specific regulatory provisions which are inconsistent with the statutory definition of a management company. As a result of this and other suggestions, the Board believes the proposed amendments are in the public interest.

(15) Identify the types and number of persons, businesses, small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012) and organizations which will be affected by the regulation. How are they affected?

As of August 14, 2015, there are sixteen thousand three hundred seventy (16,370) active retail licenses

(including clubs) that could be potentially affected by the proposed regulation. Out of this group, approximately one thousand one hundred ninety-one (1,191) hold hotel licenses. Under federal law (relating to small business size standards) “small” businesses in the Full Service Restaurant and Drinking Places (Alcoholic Beverages) industries are those with annual receipts of seven and a half million dollars (\$7,500,000) or less. (13 C.F.R. § 121.201). Hotels are considered small businesses if they have annual receipts of thirty-two and a half million dollars (\$32,500,000) or less. Thus, the majority of businesses licensed by the Board would likely be considered small businesses. The proposed regulation would make it easier for these licensees to use management companies.

(16) List the persons, groups or entities, including small businesses, which will be required to comply with the regulation. Approximate the number that will be required to comply.

There are no persons, groups, or entities that will be required to comply with the proposed regulation. The proposed regulation simply expands the options available to licensees and management companies in entering into a management agreement. All management agreements must be reported to Licensing.

(17) Identify the financial, economic and social impact of the regulation on individuals, small businesses, businesses and labor communities and other public and private organizations. Evaluate the benefits expected as a result of the regulation.

The proposed regulatory changes will benefit all current and future licensees financially by expanding the options for entering into management contracts. Regarding any social impacts, the Board believes the existing regulatory requirements for the eligibility of a management company will ensure that only qualified entities will be approved to operate a licensed business.

(18) Explain how the benefits of the regulation outweigh any cost and adverse effects.

The proposed regulation will benefit the regulated community by reducing the burden of compliance with respect to the formation of management contracts. By allowing a management company identified on the license application, and on other forms supplied by Licensing, to have a greater interest in the licensed business, licensees and management companies may negotiate and structure their agreements in line with the reality of the modern business environment and the definition of management company in the Liquor Code.

The Board does not anticipate any adverse effects because management companies are required by regulation to meet the same criteria for eligibility as any person involved in a licensed business. Licensing reviews all license applications and investigates a proposed management company as it would a proposed licensee. Thus, the Board is satisfied that the regulatory change will not negatively affect the public welfare.

(19) Provide a specific estimate of the costs and/or savings to the **regulated community** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

The proposed regulatory changes will allow the regulated community more freedom in negotiating and structuring management contracts for the operation of the licensed business. Therefore, industry members will likely realize cost savings associated with legal, accounting, and consulting procedures,

although the magnitude of such savings is unknown to the Board. There are no anticipated costs to the regulated community associated with compliance.

(20) Provide a specific estimate of the costs and/or savings to the **local governments** associated with compliance, including any legal, accounting or consulting procedures which may be required. Explain how the dollar estimates were derived.

The regulation is not expected to result in any costs or savings for local governments; it is not anticipated that any legal, accounting, or consulting services would be required.

(21) Provide a specific estimate of the costs and/or savings to the **state government** associated with the implementation of the regulation, including any legal, accounting, or consulting procedures which may be required. Explain how the dollar estimates were derived.

The regulation is not expected to result in any costs or savings for the state government; it is not anticipated that any legal, accounting, or consulting services would be required.

(22) For each of the groups and entities identified in items (19)-(21) above, submit a statement of legal, accounting or consulting procedures and additional reporting, recordkeeping or other paperwork, including copies of forms or reports, which will be required for implementation of the regulation and an explanation of measures which have been taken to minimize these requirements.

Because the regulated community, local governments, and the state government are not required to take any new action as a result of this regulatory change, it is not expected to affect legal, accounting or consulting procedures and should not require any additional reporting, recordkeeping or other paperwork.

(23) In the table below, provide an estimate of the fiscal savings and costs associated with implementation and compliance for the regulated community, local government, and state government for the current year and five subsequent years.

	Current FY Year	FY +1 Year	FY +2 Year	FY +3 Year	FY +4 Year	FY +5 Year
SAVINGS:						
Regulated Community	\$0	\$0	\$0	\$0	\$0	\$0
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
Total Savings	\$0	\$0	\$0	\$0	\$0	\$0
COSTS:						
Regulated Community	\$0	\$0	\$0	\$0	\$0	\$0
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0

Total Costs	\$0	\$0	\$0	\$0	\$0	\$0
REVENUE LOSSES:						
Regulated Community	\$0	\$0	\$0	\$0	\$0	\$0
Local Government	\$0	\$0	\$0	\$0	\$0	\$0
State Government	\$0	\$0	\$0	\$0	\$0	\$0
Total Revenue Losses	\$0	\$0	\$0	\$0	\$0	\$0

(23a) Provide the past three year expenditure history for programs affected by the regulation.

Program	FY -3 2011-2012	FY -2 2012-2013	FY -1 2013-2014	Current FY 2014-2015
N/A	N/A	N/A	N/A	N/A

(24) For any regulation that may have an adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), provide an economic impact statement that includes the following:

(a) An identification and estimate of the number of small businesses subject to the regulation.

As of August 14, 2015, there are sixteen thousand three hundred seventy (16,370) active retail licenses (including clubs) that could be potentially affected by the proposed regulation. Out of this group, approximately one thousand one hundred ninety-one (1,191) hold hotel licenses. Under federal law (relating to small business size standards) "small" businesses in the Full Service Restaurant and Drinking Places (Alcoholic Beverages) industries are those with annual receipts of seven and a half million dollars (\$7,500,000) or less. (13 C.F.R. § 121.201). Hotels are considered small businesses if they have annual receipts of thirty-two and a half million dollars (\$32,500,000) or less. Thus, the majority of businesses licensed by the Board would likely be considered small businesses.

(b) The projected reporting, recordkeeping and other administrative costs required for compliance with the proposed regulation, including the type of professional skills necessary for preparation of the report or record.

There will be no new administrative costs above what is already required under the current regulations.

(c) A statement of probable effect on impacted small businesses.

Small businesses will have more options in how they structure their business relationships, in the event they contract with a management company.

(d) A description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation.

The prohibition on management companies having a pecuniary interest in a license is set forth by regulation. Therefore, removing the prohibition must be accomplished by regulation.

(25) List any special provisions which have been developed to meet the particular needs of affected

groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

No special provisions have been developed to meet the particular needs of affected groups or persons including, but not limited to, minorities, the elderly, small businesses, and farmers.

(26) Include a description of any alternative regulatory provisions which have been considered and rejected and a statement that the least burdensome acceptable alternative has been selected.

Non-regulatory alternatives were not considered because the benefit for the regulated community requires the amendment of the current regulations.

(27) In conducting a regulatory flexibility analysis, explain whether regulatory methods were considered that will minimize any adverse impact on small businesses (as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012), including:

- a) The establishment of less stringent compliance or reporting requirements for small businesses;
- b) The establishment of less stringent schedules or deadlines for compliance or reporting requirements for small businesses;
- c) The consolidation or simplification of compliance or reporting requirements for small businesses;
- d) The establishment of performing standards for small businesses to replace design or operational standards required in the regulation; and
- e) The exemption of small businesses from all or any part of the requirements contained in the regulation.

Non-regulatory alternatives were not considered because the benefit for the regulated community requires the amendment of the current regulations.

(28) If data is the basis for this regulation, please provide a description of the data, explain in detail how the data was obtained, and how it meets the acceptability standard for empirical, replicable and testable data that is supported by documentation, statistics, reports, studies or research. Please submit data or supporting materials with the regulatory package. If the material exceeds 50 pages, please provide it in a searchable electronic format or provide a list of citations and internet links that, where possible, can be accessed in a searchable format in lieu of the actual material. If other data was considered but not used, please explain why that data was determined not to be acceptable.

No data was used for the basis of the proposed regulation.

(29) Include a schedule for review of the regulation including:

- A. The date by which the agency must receive public comments: November 2015
- B. The date or dates on which public meetings or hearings will be held: December 2015
- C. The expected date of promulgation of the proposed regulation as a final-form regulation: January 2016

D. The expected effective date of the final-form regulation: February 2016

E. The date by which compliance with the final-form regulation will be required: February 2016

F. The date by which required permits, licenses or other approvals must be obtained: N/A

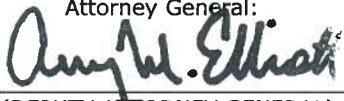
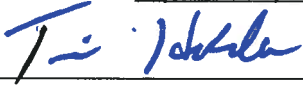
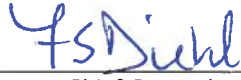
(30) Describe the plan developed for evaluating the continuing effectiveness of the regulations after its implementation.

Review of the regulations is ongoing and any changes will be through the rulemaking process.

2015 OCT 29 PM 3: 04

FACE SHEET
FOR FILING DOCUMENTS
WITH THE LEGISLATIVE REFERENCE BUREAU
(Pursuant to Commonwealth Documents Law)

DO NOT WRITE IN THIS SPACE

<p>Copy below is hereby approved as to form and legality.</p> <p>Attorney General:  BY: _____ (DEPUTY ATTORNEY GENERAL)</p> <p><u>OCT 26 2015</u> DATE OF APPROVAL</p> <p><input type="checkbox"/> Check if applicable Copy not approved. Objections attached.</p>	<p>Copy below is hereby certified to be a true and correct copy of a document issued, prescribed or promulgated by:</p> <p><u>Pennsylvania Liquor Control Board</u> (AGENCY)</p> <p>DOCUMENT/FISCAL NOTE NO. 54-86</p> <p>DATE OF ADOPTION: <u>September 2, 2015</u></p> <p>BY:  _____</p> <p>TITLE: <u>Chairman</u> (Executive Officer, Chairman or Secretary)</p>	<p>Copy below is hereby approved as to form and legality. Executive or Independent Agencies:</p> <p>BY:  _____ Chief Counsel</p> <p><u>September 2, 2015</u> DATE OF APPROVAL</p> <p><input type="checkbox"/> Check if applicable. No Attorney General approval or objection within 30 days after submission.</p>
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TITLE 40—LIQUOR
PART I. LIQUOR CONTROL BOARD
CHAPTER 3. LICENSE APPLICATIONS
SUBCHAPTER M. MANAGEMENT CONTRACTS

The following sections are proposed to be amended:

- 3.141 Management contracts.
- 3.143 Board approval and licensee responsibility.

PROPOSED RULEMAKING

LIQUOR CONTROL BOARD

40 PA. CODE CHAPTER 3

Subchapter M. Management Contracts

The Liquor Control Board ("Board"), under the authority of section 207(i) of the Liquor Code (47 P.S. § 2-207(i)), proposes to amend Chapter 3.

Summary

In recent years, the Board has encountered a growing number of management contracts, i.e. agreements between a licensee and a management company to operate, manage, or supervise all or part of the operation of the licensed premises. These agreements, which can involve multi-layered business organizations with fees and profits being exchanged among the constituent parts of the licensee and management company, are expressly permitted by the Board's regulations (40 Pa. Code § 3.141(a)) and the Liquor Code (47 P.S. §§ 1-102, 4-477(g)). In fact, the Liquor Code defines a management company as an entity that operates, manages or supervises all or part of a licensed business on behalf of a licensee. However, the regulations currently preclude a management company from having a pecuniary interest in the licensed business, despite the fact that management companies are held to the same standards as any person involved in the license. (40 Pa. Code § 3.143(b)(2)). In response to comments from the regulated community, the Board therefore believes a regulatory change is needed to recognize the reality of the modern business environment in which licensees enter into negotiated management agreements that, while not structured as a formal partnership or joint venture, may involve the sharing of profits and control. The Board further believes that the amended regulations will be more consistent with the statutory definition of a management company, as set forth in the Liquor Code, than the existing regulations.

The proposed regulatory change amends the Board's regulations to eliminate the blanket prohibition of a pecuniary interest being held by a management company in subsection 3.141(d) (40 Pa. Code § 3.141(d)) as well as a similar reference in subsection 3.143(b)(1). In view of the statutory definition of a management company, it removes the requirement that a management contract reserve to the licensee the capability to direct its own business by deleting subsection 3.141(b).

Sections 404 and 436 of the Liquor Code (47 P.S. §§ 4-404, 4-436) provide that only the applicant for, in the case of section 404, the issuance, transfer or extension of a hotel, restaurant or club liquor license, or, in the case of section 436, the issuance or transfer of a distributors', importing distributors' or retail dispensers' license, may have a pecuniary interest in the license. However, the Board believes this provision was not meant to prevent a management company from having control and receiving a share of the profits of the licensed business when the management company is on the license application, particularly given the fact that such management companies are required to meet the same eligibility criteria as the applicant under

subsection 470(a.1) of the Liquor Code (47 P.S. § 4-470(a.1)), i.e. reputation, criminal history, and current or prior involvement in other licenses, and particularly since a management company is defined in the Liquor Code as an entity that manages or operates a licensed business on behalf of a licensee. This change will therefore prevent placing an undue burden on the formation and reporting of management contracts by the regulated community, while remaining consistent with the Liquor Code by having the management company listed on the application, investigated by the Board's Bureau of Licensing, and subject to refusal by the Board if the management company would not qualify for the license in its own name.

Affected Parties

The affected parties include all present and future licensees that contract with a management company to operate the licensed business.

Paperwork Requirements

The proposed regulation would not require any additional paperwork to be filed. License applicants are already required to identify management companies on the license application, and current licensees are required to notify the Board in the event they enter into a management contract. (40 Pa. Code § 3.142).

Fiscal Impact

There is no anticipated adverse fiscal impact from the proposed regulation. The amendment is meant to ease the burdens of compliance for the regulated community. Therefore, by making its regulations more accommodating to businesses, the Board anticipates the change will have a positive fiscal impact on licensees as well as the Commonwealth.

Effective Date

These regulatory changes will become effective upon publication in final form in the *Pennsylvania Bulletin*.

Public Comments

Interested persons are invited to submit written comments about the proposed rulemaking to Rodrigo Diaz, Executive Deputy Chief Counsel, or Justin Blake, Assistant Counsel, Office of Chief Counsel, Pennsylvania Liquor Control Board, Room 401, Northwest Office Building, Harrisburg, PA 17124-0001, within thirty (30) days after publication of the proposed regulation in the *Pennsylvania Bulletin*. Comments submitted by facsimile will not be accepted.

Please note that all public comments will be posted on the Independent Regulatory Review Commission's website. No personal information will be redacted from the public comments received.

Regulatory Review

Under section 5(a) of the Regulatory Review Act (71 P.S. § 745.5(a)), on _____, 2015, the Board submitted a copy of these proposed amendments to the Independent Regulatory Review Commission (IRRC) and to the Chairpersons of the House Liquor Control Committee and Senate Committee on Law and Justice. A copy of this material is available to the public upon request.

Under Section 5(g) of the Regulatory Review Act, IRRC may convey any comments, recommendations or objections to the proposed regulations within thirty (30) days of the close of the public comment period. The comments, recommendations or objections shall specify the regulatory review criteria that have not been met. The Regulatory Review Act specifies detailed procedures for review, prior to final publication of the regulation, by the agency, the General Assembly and the Governor of comments, recommendations or objections raised.

Tim Holden
Chairman

ANNEX A

TITLE 40. LIQUOR

PART I. LIQUOR CONTROL BOARD

CHAPTER 3. LICENSE APPLICATIONS

Subchapter M. MANAGEMENT CONTRACTS

§ 3.141. Management contracts.

- (a) A licensee may contract with another person to manage its licensed premises.
- (b) [A management contract must reserve to the licensee the capability to direct its own business.] [Reserved.]
- (c) A management contract must be in writing, and a copy shall be maintained on the licensed premises where it shall be available for inspection by the Board.
- (d) [A management contract may not give a pecuniary interest to a management company.] [Reserved.]

* * *

§ 3.143. Board approval and licensee responsibility.

- (a) The Board will notify the current licensee or applicant, in writing, of the Board's decision to either approve or refuse the involvement of a person providing services as a management company.
- (b) The Board may refuse the involvement of a person providing services as a management company. The Board's refusal may be based upon the following:
 - (1) [The creation by the management contract of a pecuniary interest in the license.] [Reserved.]
 - (2) Facts upon which the Board could refuse a person's involvement in the license which may include reasons specified in section 4-470(a.1) of the Liquor Code (47 P. S. § 4-470(a.1)) such as reputation, criminal history, and current or prior involvement in other licenses.
- (c) The licensee's use of a management company will not affect the licensee's responsibility for violations of the Liquor Code or this title.

Commonwealth of Pennsylvania
Pennsylvania Liquor Control Board
October 29, 2015

SUBJECT: Proposed Regulation Package 54-86
Management Contracts

TO: DAVID SUMNER, EXECUTIVE DIRECTOR
INDEPENDENT REGULATORY REVIEW COMMISSION

FROM: RODRIGO J. DIAZ *RTD*
EXECUTIVE DEPUTY CHIEF COUNSEL
PENNSYLVANIA LIQUOR CONTROL BOARD

By Hand Delivery

The Pennsylvania Liquor Control Board ("PLCB") is submitting proposed amendments to chapter 3 of its regulations. Enclosed please find a copy of the regulatory analysis form, signed CDL-1 face sheet, preamble and Annex A (regulatory text).

These amendments are being delivered today to the legislative oversight committees and to the Legislative Reference Bureau. They have been approved by the Office of Attorney General as to form and legality only.

If you have any questions and comments about this regulatory submission, feel free to contact this office at (717) 783-9454. If I am not available, you can discuss this matter with Justin Blake, Assistant Counsel.

cc with enclosures:

Honorable Charles McIlhinney, Majority Chairman, Senate Law and Justice Committee
Honorable James Brewster, Minority Chairman, Senate Law and Justice Committee
Honorable Chris Ross, Majority Chairman, House Liquor Control Committee
Honorable Paul Costa, Minority Chairman, House Liquor Control Committee
Gail Reinard, Executive Director, Senate Law and Justice Committee
Victor Wills, Executive Director, Senate Law and Justice Committee
Shauna Boscaccy, Executive Director, House Liquor Control Committee
Lynn Benka-Davies, Executive Director, House Liquor Control Committee

**TRANSMITTAL SHEET FOR REGULATIONS SUBJECT
TO THE
REGULATORY REVIEW ACT**

I.D. NUMBER: 54-86
SUBJECT: Management Contracts
AGENCY: Liquor Control Board





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IRRC

TYPE OF REGULATION

- Proposed Regulation
- Final Regulation
- Final Regulation with Notice of Proposed Rulemaking Omitted
- 120-day Emergency Certification of the Attorney General
- 120-day Emergency Certification of the Governor

FILING OF REGULATION

<u>DATE</u>	<u>SIGNATURE</u>	<u>DESIGNATION</u>
10/29/15	 (1)	SENATE LAW & JUSTICE COMMITTEE (Majority)
10/29/15	 (2)	SENATE LAW & JUSTICE COMMITTEE (Minority)
10/29/15	 (3)	HOUSE LIQUOR CONTROL COMMITTEE (Majority)
10/29/15	 (4)	HOUSE LIQUOR CONTROL COMMITTEE (Minority)
10/29/15	 (5)	LEGISLATIVE REFERENCE BUREAU
10/29/15	 (6)	INDEPENDENT REGULATORY REVIEW COMMISSION