

# LAS VEGAS WEDDING BUREAU, LLC

**dba: Vegas Wedding Chapel**

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February 29, 2008

Mr. Jim DiFiore  
Business Services Manager  
Dept. of Finance and Business Services  
400 Stewart Ave., 3<sup>rd</sup> Floor  
Las Vegas, NV 89101

Dear Mr. DiFiore:

Thank you for allowing us to respond to the proposed changes to Las Vegas City Ordinances impacting the wedding industry. We commend the City and their efforts to address these very serious issues, that left unresolved, will continue to erode the marriage business in Las Vegas. An example of this continuing negative national media coverage is enclosed (ABC News, Nightline, February 20, 2008).

Generally we are in favor of the proposed changes, particularly the requirement for wedding chapels to obtain a Privilege License. We believe this is necessary to provide enforcement authority whenever the City encounters 'rogue' business operators who flaunt reasonable and gentle guidance from City personnel. We assume any change of ownership will also trigger the requirement to obtain a Privilege License. In order to avoid any appearance of favoritism to existing chapels, we would volunteer to seek a Privilege License even though it appears that we would be otherwise exempt.

We also support the idea that a solicitor's permit would be required for the distribution of commercial handouts for any wedding chapel. In reality this requirement already exists and is routinely and successfully ignored by solicitors and chapel owners.

The more difficult portion of the ordinance is the implementation of meaningful regulations that will minimize the negative impact of street hustlers preying on the naivety of our out-of-town guests. We believe that this proposed change will not have any meaningful impact on the way business has been conducted for the past several years in and around the Marriage Bureau. Without treading on the very sensitive feelings of the ACLU we believe minor changes to this proposal will accomplish the results you wish to achieve.

- 100' from the "primary public entrance" will only move the current solicitors 21' from the current boundary (the "blue line" designating the property line on 3<sup>rd</sup> Street), which is routinely and successfully ignored. Almost all of the newly created 100' protected area lies within the area that is already controlled by Clark

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County Bailiffs who have been unsuccessful in keeping solicitors at bay. Solicitors would still approach every car that parks on 3<sup>rd</sup> Street and in the County parking lot, just as they currently do. (See attached aerial diagram.)

- A meaningful proposal would be "...within one hundred feet (100') of the Marriage Bureau (and parking lot) property line". In the alternative the outdoor public steps could be defined as the 'primary public entrance'. This clarification would eliminate future arguments about the location of the 'primary' public entrance (for example if the Marriage Bureau were moved to the 3<sup>rd</sup> floor of the RJC) and provide the required precise enforcement criteria. This modification would at least require the current flock of street hustlers to relocate east of 3<sup>rd</sup> Street and north of Lewis. This would also eliminate the gauntlet that wedding couples must endure under the current and proposed boundaries.
- These distance restrictions should apply to everyone, including principals and owners as well as officers, employee, agents and independent contractors. As you may recall chapel owners have been among the most flagrant violators of the current regulations which included multiple assaults on competitors. Allowing principals a free rein will circumvent your best intentions.
- It is our desire that the City of Las Vegas regain its reputation as a 24-hour town where a couple can be married any time day or night. Therefore we believe the new rules and ordinances should be enforced 7 days per week, 24 hours per day, including weekends and holidays.
- The best long term solution to these issues would have been to change the ordinance to "Prohibit the distribution of commercial handouts and commercial solicitation within 100' of the property line of any courthouse, marriage bureau, detention center, police station and city hall (including adjoining parking garages and parking lots)." This wording will provide a permanent solution to the current problems and prevent future circumvention by creative business owners.

These proposed changes will have a positive impact on the wedding business in general and will not restrict the formation, expansion or operation of any wedding chapel. These changes will benefit existing and future wedding chapels by helping to create a comfortable and rewarding experience for wedding couples and encourage positive media coverage. This renewed favorable media coverage will benefit the wedding industry and every wedding chapel. Meaningful changes will be a major step in allowing Las Vegas to once again take pride in its recognition as the 'Wedding Capital of the World'.

Very truly yours,

**CLIFF EVARTS**  
  
**FEB 29 2008**

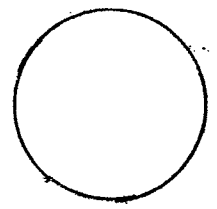
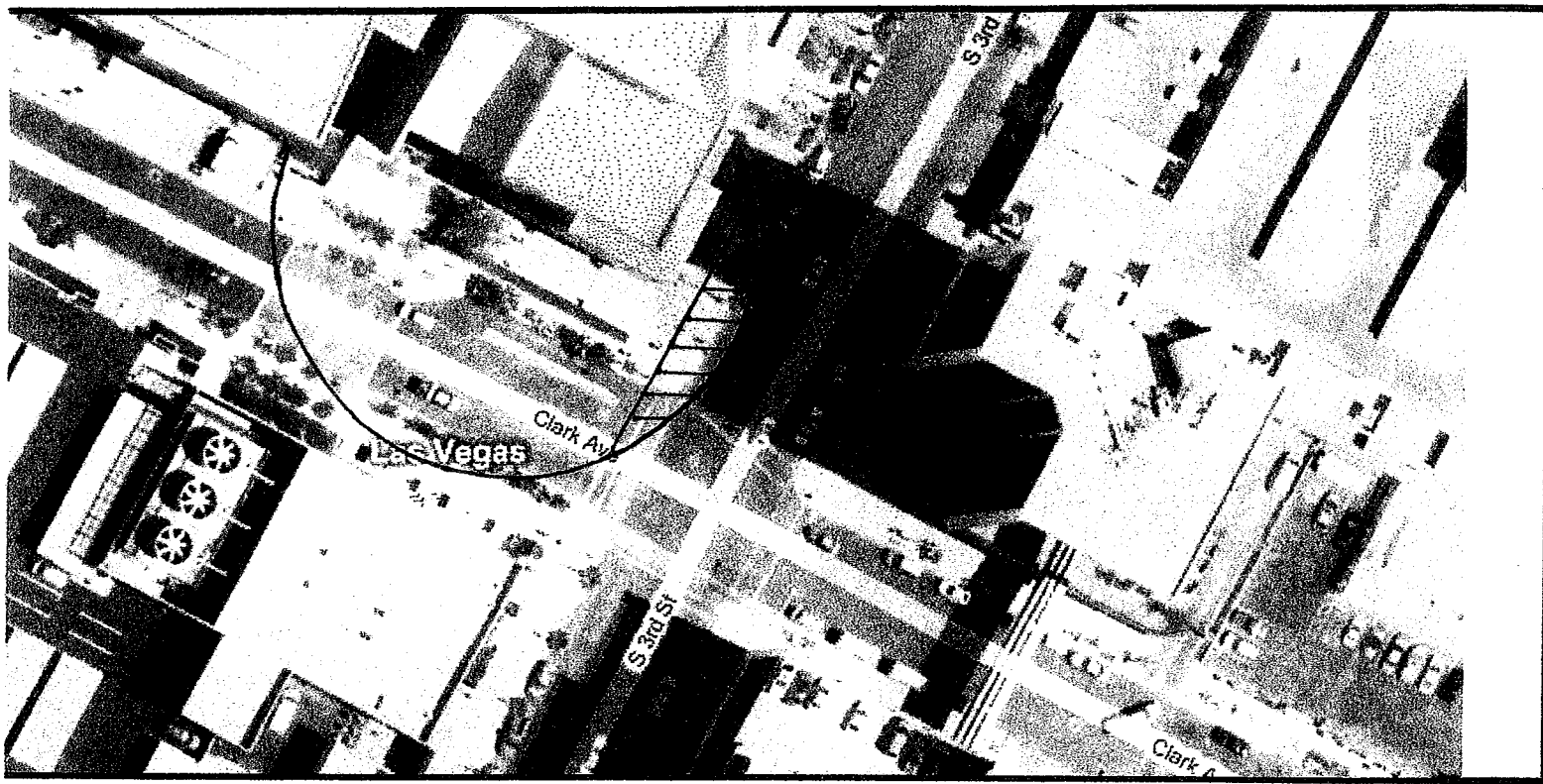
Cliff Evarts  
CEO/Founder

Enclosures

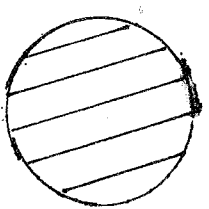
cc: Councilman Gary Reese, Mayor Pro-Tem

For the best possible print results, click the printer icon on the Live Search Maps page.

Welcome



**CURRENT 'PROTECTED AREA'**  
(The area located west of the RJC property line.)



**PROPOSED 'PROTECTED AREA' EXPANSION**