

From: Peter Saba <[REDACTED]>

Sent: Tuesday, October 7, 2025 10:09 AM

To: Tina Padovano <[REDACTED]>; Peter Saba <[REDACTED]>

Subject: Public Comment – Clarification on Brew Pubs & AB375 Participation

WARNING - This email originated from outside the State of Nevada. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good afternoon,

My name is Peter Saba and I am the Senior Government Affairs Manager of the Nevada Restaurant Association.

I'd like to briefly clarify a key point regarding today's comments about covered food establishments that also manufacture alcohol on-site, such as brew pubs or restaurants with small-batch production licenses.

Under AB375, these businesses should absolutely be eligible to participate in alcohol-to-go and delivery. These are fully licensed, on-premises establishments that operate under retail privileges. When they sell or deliver alcohol to-go, it is drawn directly from their on-site inventory, the same barrels or kegs served to customers in-house, not from a separate production or distribution facility. By law, these brew pubs are limited to producing no more than 15,000 barrels per year on-site, and that's exactly the product being used for these deliveries, the same tightly regulated, small-batch production already approved under their retail license.

This distinction is critical:

- It does not create a loophole in the three-tier system.
- It does not permit direct-to-retail sales or self-distribution beyond their licensed premises.
- And it does not impact wholesalers in any way, since these deliveries come exclusively from on-site barrels that were never part of wholesale distribution in the first place.
- It fully aligns with Nevada's long-standing regulatory framework for brew pubs, which allows on-site production for on-site retail consumption.

Excluding these businesses would unintentionally penalize small, local operators — many of which are community brew pubs, distilleries, and restaurants — who are already among the most compliant, inspected, and regulated licensees in the state.

Allowing them to deliver within the same parameters as any other restaurant under AB375 simply extends their existing retail privilege in a controlled, transparent, and responsible manner.

Thank you for the opportunity to clarify.

Best,

Peter Saba

Senior Manager of Government Affairs and Communications
Nevada Restaurant Association

2320 Paseo Del Prado Ste 103

Las Vegas, NV 89102

