



## **CR 101 Memorandum**

### **Regarding private club membership drives.**

Date: March 29, 2023  
Presented by: Jeff Kildahl, Policy and Rules Coordinator

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### **Background**

On July 28, 2022, Keith Laurent, on behalf of the Vancouver Elks #823, submitted a petition for adoption, amendment, or repeal of a state administrative rule to the Washington State Liquor and Cannabis Board (Board). The petition requested that the Board amend WAC 314-40-040(6) to allow private clubs to add one additional membership drive per calendar quarter (for a total of eight per year) and host a membership drive on two consecutive days during one quarter per calendar year.

On September 14, 2022, the Board accepted the petition. Consistent with RCW 34.05.330(1)(b), the Board agreed to initiate the rulemaking process and begin collaboratively engaging with stakeholders and any interested members of the public to explore the possibility of allowing private clubs to add additional membership drives and/or host consecutive membership drives.

### **Reasons Why Rulemaking Is Needed**

Amending WAC 314-40-040, and amending, repealing, and creating other rules in Title 314 WAC, may be necessary to allow private clubs licensed under RCW 66.24.450 or 66.24.452 to add additional membership drives and/or host consecutive membership drives.

### **Process**

The rulemaking process begins by announcing the Board's intent to consider changes to existing rules, add new rule sections, or both by filing a pre-proposal statement of inquiry (CR 101) form with the Office of the Code Reviser. This allows staff, stakeholders, industry partners, and all members of the authorizing environment to begin discussing possible rule changes.

At the CR 101 stage of the rulemaking process, no proposed language is offered. Any interested person may comment on the subject of this possible rulemaking during the designated comment period. Notice will be sent to all who have

indicated that they want to receive notice of rule activity related to this pre-proposal statement of inquiry. The notice will identify the public comment period and where comments can be sent.