

1 **BEFORE THE STATE OF NEVADA**
2 **FUNERAL AND CEMETERY SERVICES**

3
4 **IN THE MATTER OF:**

5 **CLARK COUNTY FUNERAL**
6 **SERVICES,**
7 Funeral Establishment Permit
8 No. EST106,

Case No. FB21-17

Respondent.

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11 **CONSENT DECREE**

12 The State of Nevada Board of Funeral and Cemetery Services ("BOARD") having
13 jurisdiction over CLARK COUNTY FUNERAL SERVICES, Funeral Establishment Permit
14 No. EST106 (hereinafter referred to as "CCFS" or "RESPONDENT"), pursuant to NRS
15 642.5175, on December 21, 2021, issued an Order finding that RESPONDENT violated
16 Nevada statutes and regulations controlling funeral establishments. The Parties being
17 mutually desirous of agreeing to revised terms to resolve any outstanding obligations in
18 the Order hereby voluntarily enter into this Consent Decree.

19 **IT IS HEREBY STIPULATED AND AGREED** between the undersigned Parties that
20 Case No. FB21-17 and any outstanding obligations contained in the order issued by the
21 Board in the matter on December 21, 2021, (hereafter the "Order") be settled and resolved
22 upon the following terms:

23 **VOLUNTARY WAIVER OF RIGHTS**

24 **RESPONDENT** is aware of, understands, and has been advised of the effect of this
25 Consent Decree, which it has carefully read and fully acknowledged. **RESPONDENT** has
26 had the opportunity to consult with competent counsel of their choice.
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- 1 3. RESPONDENT entered a payment arrangement on January 21, 2022, in which
2 RESPONDENT agreed to make monthly payments in the amount of \$837.75 on or
3 before the 15th of each month beginning February 15, 2022, until the balance was
4 paid in full. If all monthly payments had been made, the total amount of fees and
5 fine would be paid in full by the conclusion of the 2-year probationary period ending
6 in December 2023.
- 7 4. RESPONDENT made monthly payments in the total amount of \$9,260.00, as
8 follows:
- 9 a. February 22, 2022, in the amount of \$838.00
 - 10 b. March 21, 2022, in the amount of \$840.00
 - 11 c. May 23, 2022, in the amount of \$1,700.00
 - 12 d. July 11, 2022, in the amount of \$840.00
 - 13 e. September 12, 2022, in the amount of \$2,520
 - 14 f. November 28, 2022, in the amount of \$1,682.00
 - 15 g. February 1, 2023, in the amount of \$840.
- 16 5. RESPONDENT has not made a payment since February 1, 2023, and is in default of
17 the payment plan and the Order. The balance of \$10,846.40 remains due, of which
18 \$5,474.30 is the outstanding attorney's fees and \$5,372.10 is the outstanding fine.
- 19 6. On or about August 1, 2023, RESPONDENT ceased conducting business for which a
20 funeral establishment permit is required and has no source of income from the
21 funeral business.
- 22 7. RESPONDENT confirms and agrees that it has performed all funeral service duties
23 for which it had been contracted to perform and that the remains of all decedents in
24 the care of RESPONDENT have been disposed of and death records completed in
25 accordance with those contracts and Nevada law.
- 26 8. RESPONDENT confirms and agrees that, as of August 1, 2023, it has vacated the
27 building located at 2041 West Bonanza Road, Las Vegas, Nevada, the location for
28 which the RESPONDENT was issued Permit Number EST106. RESPONDENT

1 further acknowledges and agrees that the permit issued for that location is no longer
2 valid, as the RESPONDENT no longer meets the requirements of a funeral
3 establishment as defined by NRS 642.016, whereby a funeral establishment means
4 "a place of business conducted at a specific street address or location devoted to the
5 care and preparation for burial, cremation or transportation of dead human bodies,
6 consisting of a preparation room equipped with a sanitary floor, necessary drainage
7 and ventilation, having access to necessary instruments and supplies for the
8 preparation and embalming of dead human bodies for burial or transportation and
9 having a display room containing an inventory of funeral caskets."

10 9. RESPONDENT desires to resolve the outstanding balance of attorney's fees and the
11 fine and any other remaining obligations pursuant to the Order and, therefore,
12 agrees to the immediate and voluntary revocation of Permit No. EST106 pursuant
13 to the Order and this Consent Decree, in lieu of further payment of the outstanding
14 attorney fees, costs, and administrative fine.

15 10. Within ten (10) days of the BOARD's acceptance of this Consent Decree,
16 RESPONDENT agrees to cancel and discontinue any advertising promoting funeral
17 services by RESPONDENT.

18 11. RESPONDENT agrees that it will not reapply for a license for a period of two (2)
19 years from the date the Board accepts this Consent Decree.

20 12. RESPONDENT agrees not to further contest this matter in any administrative or
21 court proceeding.

22 ACCEPTANCE BY THE BOARD

23 This Consent Decree will be presented for acceptance to the BOARD with a
24 recommendation for approval from the Attorney General's Office at its next meeting.
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1 **COMPLETE CONSENT DECREE**

2 This Consent Decree embodies the entire agreement between the BOARD and
3 RESPONDENT. It may not be altered, amended, or modified without the express written
4 consent of the Parties.

5 **NOTICE**

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7 RESPONDENT fully understands and voluntarily waives the notice requirements
8 found under NRS 241.033 and 241.034, including the content requirements of such notices,
9 in relation to any hearing before the BOARD on this settlement agreement that may be
10 held.

11 DATED this 12 day of August, 2023.

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13 By: 
14 Kenshia McKinzie, Managing Member
Clark County Funeral Services, LLC

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16 The foregoing Consent Decree between CLARK COUNTY FUNERAL SERVICES,
17 and the STATE OF NEVADA FUNERAL AND CEMETERY SERVICES BOARD in Case
18 No. FB21-17 is approved as to form and content.

19 DATED this _____ day of _____, 2023.

20
21 AARON D. FORD
Attorney General

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23 By: _____
24 ROSALIE BORDELOVE
25 Chief Deputy Attorney General
26 Nevada Bar No. 12559
27 Attorneys for Petitioner
28 *State of Nevada, Board of
Funeral and Cemetery Services*

