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NEVADA COMMISSION FOR
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From: [Paul De La Cruz](#)
To: [NRED Administration](#)
Subject: R091-25 Public Comment
Date: Tuesday, May 12, 2026 8:00:24 AM

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Hello,

Please accept the following comments regarding the proposed regulation R091-25.

The draft includes several meaningful improvements—particularly the strengthened record-transfer requirements, reserve-funding corrections, and clearer definitions around imminent threats. These changes will help reduce ambiguity and improve procedural consistency.

My concern is whether enforcement practices will keep pace with the updated language. Clearer rules are valuable, but their effectiveness depends on consistent, timely, and predictable application. Without that, the practical impact of these revisions may be limited.

I appreciate the work that went into this proposal and hope the Division pairs these regulatory updates with strengthened enforcement processes so that both owners and boards can rely on consistent outcomes.

Thank you for the opportunity to comment.

Best regards, Paul Delacruz