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NEVADA COMMISSION FOR
COMMON INTEREST COMMUNITIES
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From: [Todd E. Joslin](#)
To: [NRED Administration](#)
Subject: Re: Public Comment on Proposed Regulation LCB File No. R091-25 – Changes to NAC 116 and NAC 116A
Date: Monday, May 11, 2026 10:47:56 AM



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May 11, 2026

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Shareece Bates, Administration Section Manager
Nevada Real Estate Division
3300 W. Sahara Avenue, Suite 350
Las Vegas, NV 89102

Re: Public Comment on Proposed Regulation LCB File No. R091-25 – Changes to NAC 116 and NAC 116A

Dear Ms. Bates and Members of the Commission:

I am writing as a sitting Director of the Meadows Condominium Unit Owners Association who currently has an active appeal before the Commission (File No. 2025-1100). I respectfully submit these comments regarding the proposed amendments to NAC 116 and NAC 116A.

I strongly support several of the proposed changes, particularly:

- **Section 3**, which requires a person filing an affidavit alleging a breach of fiduciary duty by a board member to specify the statute, regulation, or order violated. This is a necessary improvement to ensure complaints are specific and actionable.
- **Section 13**, which establishes clear requirements for the transfer of all books, records, and other papers upon termination or assignment of a management agreement. In my experience, the lack of such clear rules has contributed to prolonged record denial and obstruction.
- **Section 6**, which eliminates the “baseline funding” option for reserve studies. This is a positive step that will help protect associations from the risk of sudden special assessments caused by inadequate long-term planning.

However, based on my direct experience as a sitting Director who has faced repeated

obstruction, I believe the proposed regulations still require strengthening in the following areas:

1. **Transparency During Investigations (Section 4)** While I support allowing the Division to provide remedial measures during an investigation, the current language does not require any public disclosure of the existence of an investigation or the remedial measures imposed. This lack of transparency allows boards and managers to continue problematic conduct without accountability. I recommend adding language requiring the Division to publicly disclose the fact that an investigation has been opened and the general nature of any remedial measures required, once the matter is resolved.
2. **Definition of “Imminent Threat” (Section 2)** The proposed definition is a good start, but I am concerned it may be too narrow. Conduct such as the deliberate falsification of AVID approval records, secret email votes that exclude a sitting Director, and the systematic denial of a Director’s statutory right to inspect records (NRS 116.31175) can cause substantial harm to the governance and financial integrity of an association, even if they do not immediately endanger physical health or safety. I recommend broadening the definition to include conduct that poses an imminent threat to the **financial integrity or lawful governance** of the common-interest community.
3. **Enforcement and Director Rights** The proposed regulations do not adequately address the recurring problem of boards and managers treating sitting Directors as mere unit owners when they exercise oversight rights. Stronger language should be added requiring associations to recognize and honor a Director’s statutory rights under NRS 116.31175(3) and prohibiting retaliation against Directors who request records or raise legitimate governance concerns.

I appreciate the Commission’s efforts to improve accountability and transparency in common-interest community governance. I am available to provide additional information or testimony at the June 9, 2026 workshop.

Respectfully submitted,

Todd E. Joslin

Director, Meadows Condominium Unit Owners Association
File No. 2025-1100