"Exhibit A"

SMALL BUSINESS IMPACT STATEMENT FOR PROPOSED REGULATIONS BY THE FINANCIAL INSTITUTIONS DIVISION (Division)
Chapters 604A and 675 Lenders
September 18, 2025

1. Small Business Impact Statement pursuant to NRS 233B.0609:

(a) A description of the manner in which comment was solicited from affected small businesses, a summary of their responses, and an explanation of the manner in which other interested persons may obtain a copy of the summary.

(I) <u>Solicitation of affected small businesses.</u>

The Division sought public comments in accordance with NRS 233B.0608 to evaluate whether the proposed regulations may impose a direct and significant economic burden on small businesses (defined as those with fewer than 150 employees), or whether the regulations may directly restrict the formation, operation, or expansion of small businesses seeking to engage in or who desire to engage in lending activities under NRS chapters 604A and 675. This evaluation is intended to ensure the establishment of an adequate, efficient and competitive service that is accessible to the general public within this state.

The Division composed the solicitation list from current licensees under NRS chapter 604A and chapter 675 and all known interested parties, including those individuals on the Division's list for noticing of administrative regulations. The Division then emailed to all persons on the solicitation list a notice and questionnaire. The Division sent out 167 small business questionnaires to all known interested persons. Additionally, a copy of the full text of the proposed regulations was emailed and posted to the Division's website. The solicited comments were used to formulate this Small Business Impact Statement.

(II) <u>Summary of responses.</u>

The Division received a total of seven (7) responses to the solicitation. Three (3) responses provided no comment because the responders were over the small business threshold of 150 employees. Of the remaining four (4) responses, two (2) small businesses provided comment and the other two (2) responded with N/A or no impact. See the attached spreadsheet.

(III) <u>Obtain a copy of the summary.</u>

This Small Business Impact Statement was posted on the Division's website on September 25, 2025, along with a Notice of Workshop for October 14, 2025. Interested persons may also obtain a copy of the Small Business Impact Statement by contacting the:

Office of the Commissioner
Financial Institutions Division
3300 W. Sahara Avenue, Suite 250
Las Vegas, NV 89102
Email: FIDMaster@fid.state.nv.us
Telephone: (702) 486-4120
Website: http://fid.nv.gov

(b) The total number of small businesses likely to be affected by the proposed regulation.

The proposed regulations are not likely to impose a direct and significant economic burden on any small business or directly restrict the formation, operation or expansion of any small business.

(c) A list of the chambers of commerce and trade associations notified of the proposed regulation pursuant to NRS 233B.0608.

As amended during the 83rd Regular Session of the Nevada Legislature by Assembly Bill 444, NRS 233B.0608 requires notification to certain chambers of commerce and trade associations only if the Division determines a proposed regulation is likely to impose a direct and significant economic burden on a small business or directly restrict the formation, operation or expansion of a small business. As stated above, the proposed regulations are not likely to affect small businesses. Additionally, the provisions of A.B. 444 do not become effective until October 1, 2025.

The Division has provided the following chambers of commerce and trade associations with notice of the time and place set for the workshop:

Chambers of Commerce:

- African Chamber of Commerce and Tourism
- America Asia Economic Alliance
- Armed Forces Chamber of Commerce
- Asian American & Pacific Islander Chamber of Commerce
- Austin Nevada Chamber of Commerce
- Battle Mountain Chamber of Commerce
- Beatty Chamber of Commerce
- Boulder City Chamber of Commerce
- Caliente Chamber of Commerce
- Carson City Chamber of Commerce
- Carson Valley Chamber of Commerce
- Clark County Chamber of Commerce
- Colombian Chamber of Commerce
- Dayton Area Chamber of Commerce
- Elko Area Chamber of Commerce
- Ely Chamber of Commerce
- Eureka Chamber of Commerce
- Fallon Chamber of Commerce
- Fernley Chamber of Commerce
- Filipino American Chamber of Commerce of Greater Nevada
- Gay & Lesbian Chamber of Commerce Nevada
- Goldfield Chamber of Commerce
- Greater Las Vegas Black Chamber of Commerce
- Henderson Black Chamber of Commerce
- Henderson Chamber of Commerce
- Humboldt County Chamber of Commerce
- Incline Village Chamber of Commerce (North Lake Tahoe Chamber of Commerce)
- Indian Chamber of Commerce
- International Chamber of Commerce of Nevada
- Japanese Chamber of Commerce of Nevada
- Korean American Chamber of Commerce Las Vegas
- Lake Tahoe South Shore Chamber of Commerce
- Lambda: The LGBTQ Chamber of Commerce of Southern Nevada

- Las Vegas Asian Chamber of Commerce
- Las Vegas Global Economic Alliance (LVGEA)
- Las Vegas India Chamber of Commerce
- Las Vegas Latin Chamber of Commerce
- Las Vegas Metro Chamber of Commerce
- Las Vegas Urban Chamber of Commerce
- Las Vegas Ward 5 Chamber of Commerce
- Latin Chamber of Commerce Nevada
- Laughlin Chamber of Commerce
- Lovelock/Pershing County Chamber of Commerce
- Mason Valley Chamber of Commerce
- Mesquite Area Chamber of Commerce
- Mineral County Chamber of Commerce
- Moapa Valley Chamber of Commerce
- Native American Chamber of Commerce of Nevada
- Nevada Association of Employers
- Nevada Black Chamber of Commerce
- Nevada Business Opportunity Fund
- Nevada Cannabis Chamber of Commerce
- Nevada Economic Development Association (NEDA)
- Nevada Filipino American Chamber of Commerce
- Nevada Hispanic Business Group
- Nevada Indian Territory (Tourism & Tribal Business Org)
- Nevada LGBTQ+ Chamber of Commerce
- Nevada Main Street (Governor's Office of Economic Development)
- Nevada Small Business Council
- Nevada State Development Corporation
- Nevada Veterans Chamber of Commerce
- Nevada Women's Business Center
- North Las Vegas Chamber of Commerce
- Pahrump Valley Chamber of Commerce
- Peruvian Chamber of Commerce
- Philippine-American Chamber of Commerce of Southern Nevada
- Pioche Chamber of Commerce
- Reno + Sparks Chamber of Commerce
- Russian American Chamber of Commerce
- Silver Springs Area Chamber of Commerce
- Sin City Chamber of Commerce
- South Vegas Chamber of Commerce
- Southern Nevada Veterans Chamber of Commerce
- Sparks Chamber of Commerce
- Tahoe Chamber
- Tonopah Chamber of Commerce
- Tonopah Main Street
- Truckee Donner Chamber of Commerce
- Urban Chamber of Commerce
- Virginia City Chamber of Commerce
- Water Street District Business Association
- Wells Chamber of Commerce
- Western Nevada Development District (WNDD)
- White Pine Chamber of Commerce
- Winnemucca Chamber of Commerce

- Women's Chamber of Commerce of Nevada
- Yerington Chamber of Commerce

Trade Associations:

- American Financial Services Association (AFSA)
- Community Financial Services Association of America (CFSA)
- Online Lenders Alliance (OLA)

(d) The manner in which the analysis was conducted.

Pursuant to NRS 233B.0608(1), the Division made a concerted effort to determine whether the proposed regulations are likely to impose a direct and significant economic burden upon a small business or directly restrict the formation, operation or expansion of a small business. For this effort, the Division sent a copy of the draft regulations and a Small Business Impact Questionnaire to all known interested persons for review and invited written comment regarding the impact of the proposed regulations, after which the Division took all comments submitted into consideration.

Following review and analysis of written comments from the industry, the Division has determined that the proposed regulation is unlikely to impose a direct and significant economic burden upon any small business; result in any direct or indirect adverse effects on small business; or directly restrict the formation, operation, or expansion of a small business.

(e) The estimated economic effect of the proposed regulation on the small businesses which it is to regulate including, without limitation:

(1) Both Adverse and Beneficial effects:

(I) ADVERSE EFFECTS:

The Division received two comments concerning the requirement to post the fees and rates. One commenter asserted that the requirement is impractical and therefore burdensome. However, this requirement already exists under current NRS and NAC Chapter 604A, and the Division is merely extending it to Chapter 675. Licensees may post a range of fees and rates, provided they disclose the Annual Percentage Rate (APR) will not exceed 40% for loans under chapter 675.

Another commenter believes the posting of fees and rates will confuse in-office borrowers from their purchased retail installment contract borrowers since the auto dealers determine the APR. This should not impact indirect lending business, as the borrower is not originating the loan in-person at the licensed location; therefore, no confusion would exist. For direct/in-office lending, a range of the rates will suffice, disclosing the max APR of 40% for NRS 675 loans.

The Division does not consider this provision to impose an adverse economic effect on small businesses.

(II) BENEFICIAL EFFECTS:

The Division received one general comment. The commenter stated "All the proposed regulations may have a direct or indirect impact both adverse and beneficial effects. The less regulations the better. We're still recovering from the database regulation and business has dropped significantly. Small businesses really feel regulations either timewise or customer-wise/financially."

The response was directed at all regulations and not to one specific section of the proposed regulations. Therefore, the Division cannot provide a clear response.

(2) Both Direct and Indirect effects:

(I) DIRECT EFFECTS:

The Division received two comments concerning the requirement to post the fees and rates. One commenter asserted that the requirement is impractical and therefore burdensome. However, this requirement already exists under current NRS and NAC chapter 604A, and the Division is merely extending it to NAC chapter 675. Licensees may post a range of fees and rates, provided they disclose the Annual Percentage Rate (APR) will not exceed 40% for loans under chapter 675.

The Division does not consider this provision to impose an adverse economic effect on small businesses, direct or indirect.

The Division received one general comment. The commenter stated "All the proposed regulations may have a direct or indirect impact both adverse and beneficial effects. The less regulations the better. We're still recovering from the database regulation and business has dropped significantly. Small businesses really feel regulations either timewise or customer-wise/financially."

The response was directed at all regulations and not to one specific section of the proposed regulation. Therefore, the Division cannot provide a clear response.

(II) INDIRECT EFFECTS:

Another commenter believes the posting of fees and rates will confuse in-office borrowers from their purchased retail installment contract borrowers since the auto dealers determine the APR. This should not impact indirect lending business, as the borrower is not originating the loan in-person at the licensed location, therefore no confusion would exist. For direct/in-office lending, a range of the rates will suffice, disclosing the max APR of 40% for NRS 675 loans.

The Division does not consider this provision to impose an adverse economic effect on small businesses, direct or indirect.

The Division received one general comment. The commenter stated "All the proposed regulations may have a direct or indirect impact both adverse and beneficial effects. The less regulations the better. We're still recovering from the database regulation and business has dropped significantly. Small businesses really feel regulations either timewise or customer-wise/financially."

The response was directed at all regulations and not to one specific section of the proposed regulation. Therefore, NFID cannot provide a direct answer.

(f) A description of the methods that the agency considered to reduce the impact of the proposed regulation on small businesses and a statement regarding whether the agency actually used any of those methods.

The Division sent out 167 small business questionnaires to all known interested persons. It received a total of seven (7) responses to the solicitation. Two (2) small businesses provided comment, two (2) responded with N/A or no impact, and three (3) responded with no comment because they were over the small business threshold of 150 employees. The Division has considered and analyzed all submitted comments and addressed those comments in the attached spreadsheet.

(g) The estimated cost to the agency for enforcement of the proposed regulation.

The Division does not foresee any additional costs or fees associated with the proposed regulations.

(h) If the proposed regulation provides a new fee or increases an existing fee, the total annual amount the agency expects to collect, and the manner in which the money will be used.

The proposed regulations do not provide for a new fee or increase to an existing fee.

(i) If the proposed regulation includes provisions which duplicate or are more stringent than federal, state, or local standards regulating the same activity, an explanation of why such duplicative or more stringent provisions are necessary.

To the Division's knowledge, the proposed regulations do not duplicate and are not more stringent than any existing federal, state, or local standards regulating the same activity.

(j) The reasons for the conclusions of the agency regarding the impact of the regulation on small businesses.

The proposed regulation introduces minimal additional requirements and does not impose any additional costs. As such, it does not create an economic burden to small business.

To the best of my knowledge or belief, a concerted effort was made to determine the impact of the proposed regulation on small businesses and that the information contained in this Small Business Impact Statement was prepared properly and accurate.

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Sandy O'Laughlin
Commissioner
Financial Institutions Division
State of Nevada, Department of Business and Industry

NRS 675/604A- Dual Licensure	**Number/ and %**	**Direct or Indirect**	**Adverse or Beneficial**	**NFID Answer/Mitigation**
Section 2, subsection 5-fees and rates posting. Rates are determined by credit and ability to pay. Unless a licensee may post a range of rates (e.g._% to _%APR), this requirement is impractical and therefore burdensome.	1 (22.2%)	Direct	Adverse	A range of the rates will suffice, disclosing the max APR of 40% for NRS 675 loans.
Section 2, subsection 5-fees and rates posting. The posting of rates for Chapter 675 loans will confuse in-office borrowers from our purchased retail installment contracts since it is the dealers who determine the APR of the retail installment contract.	1 (11.1%)	Indirect	Adverse	This should not impact indirect lending business, as the borrower is not originating the loan in-person at the licensed location, therefore no confusion would exist. For direct/in-office lending, a range of the rates will suffice, disclosing the max APR of 40% for NRS 675 loans.
All the proposed regulations may have a direct or indirect impact both adverse and beneficial effects. Comment provided: The less regulations the better. We're still recovering from the database regulation and business has dropped significantly. Small businesses really feel regulations either timewise or customer-wise/financially.	1 (22.2%)	Direct	Beneficial	The response was directed to all regulations and not to one specific section of the proposed regulation. Therefore, NFID cannot provide an answer.
All the proposed regulations may have a direct or indirect impact both adverse and beneficial effects. Comment provided: The less regulations the better. We're still recovering from the database regulation and business has dropped significantly. Small businesses really feel regulations either timewise or customer-wise/financially.	1 (11.1%)	Direct	Adverse	The response was directed to all regulations and not to one specific section of the proposed regulation. Therefore, NFID cannot provide an answer.
All the proposed regulations may have a direct or indirect impact both adverse and beneficial effects. Comment provided: The less regulations the better. We're still recovering from the database regulation and business has dropped significantly. Small businesses really feel regulations either timewise or customer-wise/financially.	1 (33.3%)	Indirect	Beneficial	The response was directed to all regulations and not to one specific section of the proposed regulation. Therefore, NFID cannot provide an answer.

All the proposed regulations may have a direct or indirect impact both adverse and beneficial effects. Comment provided: The less regulations the better. We're still recovering from the database regulation and business has dropped significantly. Small businesses really feel regulations either timewise or customer-wise/financially.	1 (11.1%)	Indirect	Adverse	The response was directed to all regulations and not to one specific section of the proposed regulation. Therefore, NFID cannot provide an answer.
<u>SBI Response Summary:</u> Total Known Interested Parties Solicited: 167 Total Responded with Comments: 2 Total Responded with N/A: 2 Total Responded with over 150 Employees (outside the small business threshold): 3 Total Comments Impacting the SBI % (Total Known Interested Parties Solicited - N/A - over 150 Employees=): 162 % Responded/Total Solicited (7/167): 4.2% % Responded with Comments/Total Comments Impacting SBI (2/162): 1.2%				