



# **PURPLE PEAK SOLUTIONS**

## **24-7 MOBILE NOTARY SERVICE**

TO: Colorado Secretary of State - Rule Making Division  
FROM: Jenny Amsden, Purple Peak Solutions  
DATE: 12/26/2023

Hello,

I am writing today concerning the new proposed rule 2.4 to 8 CCR 1505-11. I represent myself as a Colorado Notary Public, along with my team of notaries at Purple Peak Solutions. Purple Peak Solutions has been in business since 2016.

Since day one, our invoices and receipts have been itemized based on the type of work and services that were provided. If it is general notary service, the fees are itemized on every receipt. 99% of our customers receive a receipt, if they choose to receive one, showing a separation of travel fees, office fees, print fees, and other miscellaneous fees that are required to complete the service. Our service charges the same itemized fees for Estate Planning documents. It is more the consumers that may have a gripe or issue about fees charged for their notary services. Those types of services are warranting this rule to be implemented since it is best to itemize with regular everyday type notary services.

However, when it comes to working with lenders, title companies, and signing services across the country, the fees have always been a flat all-inclusive fee ranging from \$50-200 and sometimes more if traveling further. It is categorized as Signing Agent Fees in our system to differentiate them from the General Notary Fees. As a Signing Agent, we are acting in more than just a notary capacity to complete these transactions. They take additional education and certifications that allow the notary to guide a signer through their real estate documents in such a way without giving legal advice or give the signer incorrect information. The fees that are paid to the notary include a range of tasks; printing the documents (2 sets), communicating with the signer(s), scheduling the appointment, travel to the signer, signing the documents, notarizing certain documents, scanning the documents, and dropping off the documents. There can be anywhere from 1-25 notarizations in a real estate closing depending on the type. There is no telling how many notarizations will be in a particular package as it varies between lenders, title, and escrow companies. On most days, I am completing at least 4-5 closings and they all have varying numbers of notarizations. If I were to itemize the fee for these closings on invoices, it would bring the fee up to likely double or more than what any of these companies are willing to pay. They will switch to RON notaries in Texas or another state in a heartbeat to digitally close to save their bottom line.

Each year, I send a price list to the companies to show type of closing, location by county, and the flat fee. This way, they can put it into the settlement numbers and have no changes. The closing disclosures to the signers must include accurate fees 3 business days prior to closing. This means that the lender or title company would need to send me the documents as early as possible prior to that and get the total fee for all the notarizations, printing, and travel. In a perfect world, that would be great! In my experience, it doesn't happen so smoothly a lot of times. I have had many same day within an hour of printing closings that will not allow the time



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to get the itemized estimate to the company and have them be ok with the fee. Many times this fee is paid for by the consumer in their closing costs. If this rule is being made to protect the consumer, it will hurt the consumer more as it will increase fees they pay to buy or refinance their home overnight.

Another issue our company would have with this is that when we charge for prison and jail visits, we charge a flat fee for those as well. One facility we charge a flat fee and then split that up between each person on the appointment to help save the inmate's family money. This we could work out if the proposed rule passes, but it would mean some changes to our itemization on the invoices for those appointments.

My main concern is how this will affect our work with real estate closings. This is a large part of our business that has already taken some hits with interest rates and notary market saturation over the last couple of years. If this proposed rule goes into effect, I can see many of our Colorado closings being outsourced to digital notaries in other states that don't itemize or charge lesser fees. Not to mention that the title companies will just find a way to complete them in house without an outside notary if necessary.

I propose the rule should be revised to make an exception to services provided in relation to title insurance related real estate closings.

Thank you,

Jenny Lynn Amsden

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