

12/22/2023

To the Colorado Department of State Rulemaking Committee,

I am Sandi Rhynard, representing SR Loan Signing Services and a licensed CO notary public. I sincerely appreciate the opportunity to share my concerns regarding the recently proposed laws: 2.4.1, 2.4.1(a), 2.4.1(b), and 2.4.2.

As Loan Signers, our fees are based on industry standards, not the number of notarizations in a given package. We are given a flat fee that includes notarizations as a service and is not the complete job. It is a minimal part of our actual job as loan signers.

I support Option 1 - 2.4.3 from the Land Title of Colorado's document, ***LTAC Comments to SOS Proposed Rule 2.4 to 8 CCR 1505-11" dated December 18, 2023 by Penny McKelroy, CTIS, CESS President***, exempting services related to title insurance and settlement services from Rule 2.4. Specifically I support the following addition to the proposed law as taken from the above referenced document:

**2.4.3 RULE 2.4 SHALL NOT APPLY TO SERVICES PROVIDED IN CONJUNCTION WITH THE BUSINESS OF TITLE INSURANCE, AS DEFINED IN C.R.S. 10-11-102(3), TO CLOSING AND SETTLEMENT SERVICES, AS DEFINED UNDER C.R.S. 10-11-102(3.5), OR TO SETTLEMENT SERVICES, AS DEFINED UNDER C.R.S. 10-11-102(6.7).**

Implementing the proposed changes without this exemption would compromise our ability to maintain high standards and impact consumers, loan signers, and clients.

I sincerely appreciate your time in considering this matter and trust that you understand the potential challenges this proposal poses to all parties involved.

Thank you for your attention and understanding.

Best regards,



Sandi Rhynard

SR Loan Signing Services