

From: [Jeff Moser](#)
To: [SoS Rulemaking](#)
Subject: [EXTERNAL] Comments on Proposed Amendments to the Colorado Department of State Notary Program Rules (8 CCR 1505-11).1
Date: Wednesday, August 17, 2022 4:42:33 PM

TO: Colorado Department of State
FR: Jeffery Moser
RE: Preliminary Draft of Proposed Rules

As a former notary, I am writing to express my opposition to the preliminary draft of proposed rules that would amend the current 8 CCR 1505-11 in Rule 2.3, and which are intended, apparently, to clarify the exception that authorizes the use of an interpreter for deaf, hard of hearing, and deafblind individuals during notarial acts.

While I have no doubt that good intentions are behind these proposed rule changes to serve those who are visually and hearing impaired, the proposed new language will make it more difficult and less likely for such persons to be served by a notary. The proposed rules, while giving greater clarity to the exception when interpreters may be used, unfortunately, would put in place roadblocks for certain disabled individuals who seek and need notary services, especially by preventing them from using an interpreter whom they know and trust. Also, the proposed rules add a plethora of expectations and qualifications for interpreters, many of whom would be unfamiliar with the notary process unless they themselves are notaries. Finally, the rules add more requirements that could deter notaries from assisting the disabled.

Therefore, I encourage the Office of the Secretary of State to consider the above concerns of this matter and rewrite and revise the wording in the proposed rules, which could be reviewed again, and then subsequently amended and approved.

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Prefer to be contacted by email