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From: VonSpreckelsen, Elaine <elaine.vonspreckelsen@squirepb.com>
Sent: Tuesday, August 26, 2014 2:04 PM
To: SoS Rulemaking
Subject: Written comments re 9/16/14 Notary Program Rules Hearing

Thank you very much for providing the draft for review. In reviewing the draft as if it were a clean copy, I noted a few errors that, I believe, should be corrected before the final rule goes to the printer.

Page 10, Article 3.2.1 – Item (C) should not have the word “and” at the end of the paragraph because Item (D) is not the final item in the article. Item (D) should have a semicolon after “Rule 3.5.4” and the word “and” inserted after the semicolon.

Page 14, Article 3.7 – I believe the article would be more clear and particular if it read “Notification of changes. Approved vendors and course providers must notify the Secretary of State using vendors’ and course providers’ letterhead with 30 days of:”. As it reads now, it appears a vendor or course provider could use anyone’s letterhead, including the Secretary of State’s letterhead.

Page 15, Article 3.9.2 – I believe the article should include more restrictive language. Even though it is implied, I believe the following should be added to the article’s last phrase: “to observe, monitor, audit, and investigate said approved vendor, course provider, and course of instruction.”

Page 16, Article 3.9.5(A) – As currently worded, the article makes no sense. I believe it should read “... termination will be effective 30 days after the ~~termination~~ mailing date of the termination notice.”

Thank you for your consideration.



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