

From: Michael Reilly
To: [SoS Rulemaking](#)
Subject: Comments - working draft notary rules
Date: Friday, March 2, 2018 4:41:20 PM

Dear Secretary Williams,

I wish to register my strong opposition to the proposed rule changes relating to notary training.

I agree that some training is probably a good idea for new notaries. A test may also be a good idea for new notaries.

I totally oppose the idea of requiring training and testing for renewals. Being a notary is not that complicated, and anyone who has been doing it for a while should be competent.

The way the rule is written, a notary would have to take training and a test - and pay a third party company for both - at every renewal, every five years. It seems absurd to have to sit through the same training and take the same test when a notary is already performing the job with no complaints. Retraining and retesting should only be required if a notary has a record of complaints and violations.

Quite frankly, it appears to me that this entire training and testing requirement is being proposed so that someone connected with the proposal will be able to make a lot of money by providing the testing and training. I see no other reason for this requirement. I see no benefit to the notary, the public, or the State of Colorado. Am I suggesting that there is corruption involved with the proposed changes? Well, it certainly looks like it to me.

The provision that the training materials and curriculum be revised every four years makes me even more suspicious. This seems to be nothing more than a justification for requiring training and testing at every renewal on the grounds that the curriculum has changed - even if the law has not. It would also enable the training and testing agencies to raise their prices because of the short life span of the materials. Yet the changes at each iteration would in most cases be minor. Changes to the notary law can be communicated through your web site without notaries having to waste time and money listening to an instructor.

Finally, if these rules are implemented, I will not renew my notary certification. Or more precisely, I will not pay to take unnecessary training and tests in order to enrich some third party.

Sincerely,

Michael Reilly

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