

From: Julie Spear
To: [SoS Rulemaking](#)
Subject: Comments - working draft charity rules
Date: Tuesday, July 17, 2018 10:41:36 AM

As a third-party filer who has one umbrella account covering nearly 200 charities, my biggest pieces of feedback are the following:

1. Due to the relatively new requirement of a third-party filer having to manage one umbrella account, we have incredibly slow speeds on your website, regardless of browser used or Mac or PC being used. It is a huge waste of our time to not be able to simply log in and either submit or make payments on behalf of a registered charity in a timely fashion.

I would like your charity website to be able to handle the requirements your agency has imposed on third-party filers.

2. Multiple online states, such as NM, OH, and NJ, all allow a third-party filer to submit the filings on behalf of the charity without requiring an officer to create an account and go online every year to sign, as well as have to engage with the SoS office if the authorizing officer has changed.

Affinity has a power of attorney signed and notarized by these charities that should allow us to file these registrations on their behalf. It places an unnecessary burden on these charities to go through these hoops of online signing and having to correspond with the office if any changes to the online signer are needed, as they have already authorized and paid us to submit these filings on their behalf.

I would like there to be a more streamlined and less burdensome process in place for the charity filings to be electronically submitted by a paid preparer.



Warm Regards,

Julie Spear
Registration Manager

Affinity Fundraising Registration
www.FundraisingRegistration.com

877-320-2299, ext. 102 Toll-free
Juls@FundraisingRegistration.com

P.O. Box 12129
Denver, CO 80212

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