

Corp1

*Incorporating the World,
One Company at a Time*

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Good Afternoon. I am Kelly Manchester, President of Corp1, Inc. a Commercial Registered Agent in DE, WY and with a physical office here in Denver. I am a past-president of the only national association of registered agents and corporate formation agents called NPRRA – National Public Records Research Association (although I am not speaking on their behalf today, just to be clear!) I am also a member of the CO Sec of State's Business Advisory Committee and very much appreciate the opportunity to be of service and provide input in that forum as well. On behalf of all CRAs we look forward to the opportunity to work with the CO SOS to bring together a system to protect the public from fraudulent filings while also helping to improve the system as a whole.

I applaud the efforts this working group has made to help protect the integrity of the record for the Colorado Secretary of State's office.

I apologize for the splintered and various comments I'll make but I've been saving them up throughout the meetings.

I was certainly in favor of the proposal made by Mr. Wertsch. One of the key criticisms of it was the "radio talk show host blasting the Secretary for increasing fees by 50%". I just wanted to comment that the recent Know Your Customer regulations and FinCen's pending Corporate Transparency Act regulations would surely provide the Secretary with any needed justification for why it's important for her office to implement these much-needed system improvements!

Another point is the difficulties CRAs operating in Colorado have when their Registered Agent name and/or address is used hundreds of different ways with or without corporate endings, truncated words, at old addresses or incomplete or even bad addresses etc.. etc... Having a "master list" of CRAs where only ONE name and ONE address can be used... and that's the one on record with the Secretary of State, is a very welcomed and needed update.

On another note, other states that immediately notify an agent of an appointment (like Wyoming & Delaware) allows CRAs to work in partner with the SOS's office to help protect against fraudulent filings. Bad guys don't want to pay for services so when we can help weed them out for non-payment that helps the public. We are able to get a resignation of agent on file very quickly. We actually proactively self-police each other and the industry, working together to avoid issues!

DE goes so far as to require all CRAs run all names through an OFAC check BEFORE doing business with them to ensure public safety! Additionally DE requires that we run regular quarterly checks on our entire database!

DE & WY REQUIRE CRAs to collect and provide Communications Contact Forms with either Beneficial Owner info or a key contact for that company which can then be made available to law enforcement upon request. This addresses law enforcement's concern of not being able to find and contact a real owner or key contact of any one company or LLC.

We are required to document in our records that we've done the OFAC check and received the CCF from the client in the event we were ever audited by the state. If we were found not to be in compliance then our ability to serve as a CRA in that state would be in jeopardy. Since it is our bread and butter you can be assured we comply and that only helps to protect the community.

On another note, CRAs HELP the DE SOS police the use of Mail Drops or bad players by reporting them to the SOS whenever discovered. We have helped remove many companies formed for scamming purposes or get bad CRAs off the record who were found to be using a mail drop for an address or sending out fraudulent solicitations. We report these to the SOS and they make a visit to that company or to that address and then remove them from the CRA record. Everyone wins when partnerships are formed with key players all with the same goals in mind.

Thank you very much for the opportunity to provide these comments.

Best regards,

A handwritten signature in blue ink that reads "Kelly A. Manchester". The signature is written in a cursive, flowing style.

Kelly A. Manchester
President/CEO