

From: McIntosh, Peggy S
To: [SoS Rulemaking](#)
Subject: Proposed amendments to Colorado's Notary Program Rules (8 CCR 1505-11)
Date: Friday, March 9, 2018 3:40:06 PM
Attachments: [image001.png](#)

Honorable Secretary Williams,

I am opposed to proposed rule **2.1.3**. Current notaries in good standing should not be required to retake training and to pass an exam prior to renewal. As already noted by respondent Susan Ortiz from the City of Greenwood Village: "Requiring every current notary to study for, pay for, and retake an examination to renew punishes those who have faithfully fulfilled their duties under the law and will only discourage renewals." This proposed rule is onerous and would benefit no one but the vendors who provide the training and administer the tests.

There are many notaries who do not charge for their services. I am one of these people and would have to think twice before paying more than I currently do to renew my commission and order a new notary stamp every four years to remain compliant.

Rule 4

I do not think a notary should ever be able to pass their responsibility for securing the notary journal to their employer, especially in a healthcare situation where notarizations are almost certainly subject to HIPAA rules. If an employee leaves an organization, they do not also automatically give up their notary status, so why would they leave their journal behind. The status of a notary is not dependent on or tied to an employer. The notary is still the person ultimately responsible for what was notarized and should be required to either retain possession of the journal, or return it to the State for safekeeping.

Thank you,

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