

From: [REDACTED]
Sent: Friday, January 7, 2022 12:54 PM
To: Carla Hoke [REDACTED]
Cc: Kathleen Wallace [REDACTED]
Subject: [EXTERNAL] RON and Rulemaking

Good afternoon,

After listening to the testimony yesterday at the public hearing, and reading the comments posted, I would very much like an opportunity to share our experiences.

In April, 2020, under the emergency rule, we formed Colorado Remote Notary, LLC, dba IntegraNotary.

After a succession of engineers, architects and consultants, we were sponsored by AWS to design our platform.

First, I want you all to consider how very complicated it is to provide remote notarization services.

We have been at an impasse for some time now, for just how we are to perform Credential Analysis, according to the Provider Protocols published December, 1, 2020.

Before you consider rules with enforcement powers for noncompliance, I urge you to create more clarity on what you believe is a digital platform that will function to perform a compliant credential analysis.

Because the best AWS consultants (Cloud303) cannot offer a solution, I have to seriously question how you think the approved providers you post as approved, have the ability to actually be in compliance.

CU Law '83; notary public as a petroleum landman, in various states (off and on) including Colorado, since 1978.

Our vision was to create a digital platform for notaries public, starting in Colorado, that would be built to the highest integrity and standards.

The digital world is not a parallel universe, navigated by attorneys on one side, and computer engineers on the other.

Once you step into the Cloud, it's a house of many rooms, with databases turning, and it's easy to get lost.

We saw the future in April, 2020, and still want to offer what we consider the new standard in legal documents, via RON.

Would you have anyone in your office that could converse about this, and what you conceive to be a secure catalog of services, including independent auditing, that can provide what YOU imagine to be possible?

If you think self declared compliance works well, my experience is that does not end well.

We are moving forward to reach out to Google Cloud Platform for our solution, and starting on the front end with website pages, to then seek how they can perform a visual analysis of a driver's license, and report on its conformity to a small database library of examples. We do not anticipate the ability to read the barcodes on the reverse side, or the PDF417 codes. No DMV, except California wants to grant even minimal access to DMV records.

With 30+ years to bring comprehension to the matters that are susceptible to legal analysis, this step into algorithms and AI is quantum level space, and very much in need of more transparency.

Our next task is to research the providers on your short list, to see if we can chart out how they actually perform against the CO Protocols, and their Terms of Use and Privacy Notices.

At that point, we have done about as much as any citizen of Colorado, in good faith, attempting to elevate remote notarization to a standard of integrity at every step, and a resulting document that is surely to the standard you all would desire.

If you would consider a discussion before next Thursday (the deadline for comments), I would like to help with thoughtful observations, and receive your help on what you actually expect to see in the Cloud, when it comes to RON.

Thanks for your consideration.

Chris Sullivan



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