

**From:** [Signatures USA](#)  
**To:** [SoS Rulemaking](#)  
**Subject:** [EXTERNAL] Rulemaking Hearing: Colorado Department of State Notary Program Rules  
**Date:** Tuesday, December 19, 2023 12:41:24 PM  
**Attachments:** [Outlook-u5qool2q.png](#)

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Good Afternoon,

I just listened to the rulemaking that started at 11am and I did have concerns with this affecting "Loan Signing Agents" and the real estate industry outside of General Notary Work. As fees are easily able to be itemized to general notary work clients (2 notarizations/travel fee) but not so much with Escrow.

My name is Brett and im the owner of a Nationwide Signing Service. I have Escrow and Real Estate Attorney clients all over the country. I subcontract out notaries to conduct loan closings for my escrow clients. I have set fees with my clients as a signing service to service their orders and find them a professional "Notary Loan Signing Agent".

99% of the time when we receive an order, We have no idea how many notarizations there are until we receive documents moments before a signing, sometimes less than 30 minutes before. Some signings have between 15 to 25 notarizations. Which means that our original set fees for \$150 would then turn into \$225 to \$375. Which would not be including any other "service fees". That would then have to be rebalanced, reworked up with the lender and title, and possibly cause a funding delay and a transaction to completely fall apart. As a signing service owner, there are so many moving parts to one order and the fees could actually be astronomical for some clients if there are a lot of notarizations, which in the real estate industry is not uncommon for Reverse mortgages, Refinances, Purchases, and HELOCS.

Most notaries obtain their business from a signing service. So if they're accepting a fee regardless of how little or many notarizations there are, how would they be responsible for breaking down an invoice for the signing client?

Also, who would have to provide this broken-down invoice to the client that is signing? Escrow? The Lender? The Signing Service that Escrow hired? The notary (Who is impartial and subcontracted)?

I have appointments to get too and im sure could break down many other issues with this rulemaking but at least wanted to get in a response.

I appreciate the SOS and everything you all do!

Merry Christmas and Happy New Year!



**Brett Rightler**

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