

**From:** [Krista Gabel](#)  
**To:** [SoS Rulemaking](#)  
**Subject:** [EXTERNAL] New Law Proposed  
**Date:** Tuesday, December 26, 2023 12:40:11 PM

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To the Colorado Department of State Rulemaking Committee 12/26/23

My name is Krista R Gabel and I am a Colorado Notary Public. I am concerned

about the newly proposed laws: 2.4.1, 2.4.1(a), 2.4.1(b),and 2.4.2. I have listened to the

recordings and also read the letters that have been submitted to the S.O.S. regarding

this law. I agree with the other notaries, title companies and signing services.

I am in agreement with OPTION 1 of the document from Land Title of Colorado which

we are referring to as - "Exhibit A - *LTAC Comments to SOS Proposed Rule 2.4 to 8*

*CCR 1505- 1" dated December 18, 2023 by Penny McKelroy, CTIS, CESS President.*

The ability to complete our job and do a good job for the consumers and protect

their real estate transactions would be SEVERELY hampered by the law without

the addition of Option 1 - 2.4.3 as seen below.

**2.4.3 RULE 2.4 SHALL NOT APPLY TO SERVICES PROVIDED IN CONJUNCTION WITH THE BUSINESS OF TITLE INSURANCE, AS DEFINED IN C.R.S. 10-11-102(3),**

**TO CLOSING AND SETTLEMENT SERVICES, AS DEFINED UNDER C.R.S.**

**10-11-102(3.5), OR TO SETTLEMENT SERVICES, AS DEFINED UNDER C.R.S.**

10-11-102(6.7).

I also agree with Lindy Rich Services on 2.4.4 RULE 2.4 SHALL NOT APPLY IN INSTANCES WHERE THE NOTARY IS ENGAGED IN A FLAT-RATE ARRANGEMENT. THESE CIRCUMSTANCES PERTAIN TO SITUATIONS WHEREIN THE NOTARY IS NOT DIRECTLY ENGAGED BY A CONSUMER. IN SUCH CASES, THE NOTARY PROVIDES SERVICES ENCOMPASSING NOTARIAL CERTIFICATES, WHERE THE FEE REMAINS CONSTANT AND IS NOT CONTINGENT UPON THE NUMBER OF NOTARIAL CERTIFICATES BUT RATHER IS INCLUSIVE WITHIN THE PREDETERMINED FEE STRUCTURE.

I appreciate your time. I hope that your office understands and recognizes the amount

of undue hardship this would place on the consumer, the loan signer and the client.

Thank you so much,

Krista R Gabel

Loan Signing Agent, CO Notary.