

From: [Jana Reffel](#)
To: [SoS Rulemaking](#)
Subject: [EXTERNAL] Written Comment re: Notary Rulemaking Hearing 12/19/2023
Date: Tuesday, December 26, 2023 10:56:21 AM

December 26, 2023

To the Colorado Department of State Rulemaking Committee:

I am writing to express my concerns about the proposed Notary Rules change, specifically focusing on laws 2.4.1, 2.4.1(a), 2.4.1(b), and 2.4.2. My name is Jana Reffel, and I am a Colorado Notary Public and Loan Signing Agent with just over a year of experience in the field.

As a Signing Agent, I operate within a framework where I receive invitations from various entities such as Signing Services, Title Companies, Lenders, Attorneys, and Real Estate Agents. These invitations outline the details of the closing package, including the offered fee, type of signing, scan back requirements, location, and any additional services required. However, crucially, the invitation does not specify the number of notary certificates I must complete.

It is imperative to emphasize that the fees I am compensated with are determined by a third party and are not contingent on the number of notarizations I perform. Rather, these fees are based on the prevailing rate for mobile notaries and the comprehensive services I provide. My role involves not only presenting and explaining documents to signers but also ensuring accurate and complete document execution, which includes handling notarizations. Regardless of whether a package contains four or ten notarizations, the fee remains constant, reflecting the broader scope of services involved in completing the entire closing package.

I am deeply concerned that the proposed rule changes, in their current form, could have severe repercussions for the notary industry in Colorado and beyond. This extends beyond the impact on in-state Title Companies and Signing Services and other entities involved in real estate transactions, including those with out-of-state components. The implications of these changes may extend beyond mere document notarization, potentially disrupting a broader range of services integral to various transactions.

I respectfully request the Secretary of State to consider the diverse range of services provided by notaries both within Colorado and nationally, as well as those facilitated by Signing Services that extend beyond state borders. It is crucial to recognize the far-reaching effects of these proposed changes on all facets of notarial services and, consequently, consider exemptions to the proposed rules.

I fully support the proposed exemptions outlined by industry experts such as Phil Clark of Fidelity National Title, Larry Stuart of Notary Relief LLC, Penny McKelroy of Land Title Association of Colorado, and the members of Lindy Rich Services LLC, as articulated in their letters posted to the Secretary of State.

I appreciate your time and the opportunity to submit written comments on this matter. I sincerely hope that the Committee will take into account the potential hardships these changes could impose on all stakeholders involved.

Thank you for your time and consideration,

Jana Reffel