

PHIL WEISER
Attorney General

NATALIE HANLON LEH
Chief Deputy Attorney General

JUNE TAYLOR
Chief Operating Officer

ERIC R. OLSON
Solicitor General



**STATE OF COLORADO
DEPARTMENT OF LAW**

RALPH L. CARR
COLORADO JUDICIAL CENTER
1300 Broadway, 6th Floor
Denver, Colorado 80203
Phone (720) 508-6020

Consumer Protection Section
Consumer Credit Unit

July 1, 2019

Honorable Pete Lee, Chairman (via email)
Senate Judiciary Committee
200 E. Colfax, Room 346
Denver, CO 80203.

Honorable Mike Weissman, Chairman (via email)
House Judiciary Committee
200 E. Colfax, Room 307
Denver, CO 80203

RE: Bi-Annual Report on Colorado Fair Debt Collection Practices Act

Dear Senator Lee and Representative Weissman:

In accordance with SB 17-216, which amended § 5-16-117(5) of the Colorado Fair Debt Collection Practices Act ("CFDCPA"), I am pleased to submit the Administrator's third bi-annual report accounting for the efficient discharge of all responsibilities assigned by law and the general administration of the collection agency licensing program within the Colorado Department of Law.

For the most part, this bi-annual report covers the period of December 31, 2018 through July 1, 2019. This report will follow the order set out in § 5-16-117(5).

Enforcement Actions

1. Lawsuits

- a. *Colorado v. Hopp*, Colorado Court of Appeals Case No. 2016CA1983. This was an enforcement action against foreclosure law firm The Hopp Law Firm, LLC and related individuals and entities. The action asserts claims under the CFDCPA and other Colorado laws, including that the defendants violated C.R.S. §§ 5-16-107(1)(b)(I) and 5-16-108(1)(a) of the CFDCPA when pursuing foreclosure actions against Colorado homeowners. The trial court entered a judgment in favor of

the Administrator on the CFDCPA claims and the Colorado Court of Appeals (2018COA69M) affirmed the judgment on May 17, 2018 (opinion modified and rehearing denied on November 1, 2018). The Court of Appeals Opinion addresses the statute of limitations applicable to the CFDCPA and the award of penalties under the CFDCPA. Hopp filed a Petition for a Writ of Certiorari on December 28, 2018, challenging, among other things, the statute of limitations under the CFDCPA. The Colorado Supreme Court denied the Petition for Writ of Certiorari on June 3, 2019.

- b. *Colorado v. Castle Law Group, et al.*, Colorado Court of Appeals Case No. 2017CA923. This is an enforcement action against foreclosure law firm The Castle Law Group, LLC and related individuals and entities. The action, asserted by both the Administrator and the Colorado Attorney General, asserts claims under the CFDCPA and other Colorado laws. The CFDCPA claims allege that the defendants violated C.R.S. §§ 5-16-107(1)(b)(I) and 5-16-108(1)(a) when pursuing foreclosure actions against Colorado homeowners. After a three-week trial, the trial court entered an order in 2017 dismissing the Administrator's CFDCPA claims, in addition to rulings on other claims in the case. The plaintiffs and defendants both appealed. The Colorado Court of Appeals issued a ruling on April 4, 2019 that did not directly address the Administrator's CFDCPA claims. The plaintiffs filed a Petition for Writ of Certiorari on June 20, 2019.

2. Administrative Enforcement

- a. Stipulations & Final Agency Orders, Assurance of Discontinuance¹
 - i. Law Office of Wyn Taylor-\$36,348 (violations related to collection of returned checks)
 - ii. Revive Debt Collection Corp.-\$20,000 (surety company accepted demand on bond after agency failed to remit payment)
 - m. Waypoint Resources-\$5,000 (credit reporting prior to sending a collection letter to consumers);
 - iv. Wakefield and Associates-\$2,000 (collecting while account was under dispute, and collecting an amount not due);
 - v. Plaza Services-\$3,000 (failing to disclose legal actions taken against them by other jurisdictions);
- b. License Denials
 - i. No licenses were denied during this period.

¹ None of these enforcement actions were appealed or otherwise challenged.

c. License Revocations

- i. No licenses were revoked during this period.

Complaints & Outcomes:

1. Since January 1, 2018, the Consumer Credit Unit has received 304 complaints.
 - a. Of the 304 complaints filed, 202 are against licensed collection agencies, 50 are against unlicensed collection agencies, and 40 complaints are against attorneys.²
2. Outcomes
 - a. 40 complaints have been resolved.
 - b. 7 complaints against non-lawyer collection agencies have been referred to other agencies.
 - c. 150 complaints resulted in No Action, either because of a lack of jurisdiction, no allegation of a violation of the CFDCPA, or similar deficiencies.
 - d. 16 Cease & Desist notices have been issued to unlicensed agencies.
 - e. The remaining complaints are still open and under investigation.

Other Actions:

1. 7 Advisory Letters and 3 (disciplinary), Letters of Admonition were issued.

Statutory Changes to Collection Agency Licensing Program

1. *Debt Buyer Definition:* The CFDCPA adds a new definition of "debt buyer." This section became effective on January 1, 2018.
2. *Legal action requirements:* The CFDCPA created new requirements for legal actions filed by debt collectors or collection agencies on debts owned by debt buyers. This section became effective on January 1, 2018.
3. *Administrator duties:* The Administrator has additional duties, which include reporting requirements, attending meetings of industry groups and advocacy organization, and hosting meetings each year for consumer advocacy organizations and industry groups. The Administrator's duties became effective on January 1, 2018.
4. *Fees, costs, and costs of collection - limitation:* The CFDCPA adds a limitation to fees, costs, and costs of collection for debt due to the state or any political subdivision of the state collected on by a private collection agency or

² All complaints against attorneys were referred to the Office of Attorney Regulation Counsel.

privately retained attorney, except that the limitation does not apply is the state or political subdivision of the state has sold the debt to a third party. This section becomes effective July 1, 2019.

Significant Legal Filings-Amicus Brief

1. *None.*

Summary of New Regulations

1. *None.*

Legal Developments

1. *None.*

Matters to be Addressed at the Request of the Regulated Community or the Public

While there have been no formal requests from the public to the Administrator to address specific issues under the CFDCPA, licensees and other interested parties at prior public meetings raised the following issues:

1. Collection agencies that intentionally sue people that are covered by Medicaid;
2. Licensing of process servers;
3. Converting to licensing through the national multistate licensing system (NMLS);
4. Electronic communications with consumers/debtors;
5. Streamlining the application process, including upon the sale or transfer of a business;
6. Telephone verification of payment;
7. Define/clarify what the "meaningful involvement" of an attorney requires, especially in high volume businesses;
8. The complaint process, including streamlining, guidelines on an information resolution process, and making complaints public;
9. Enhanced communications with the Administrator, including the public meeting process;
10. Updating opinion letters; and
11. Consumer education and outreach.

Meetings

1. **Correction to December 31, 2018 Bi-Annual Report.** In his December 31, 2018 bi-annual report, the Interim Administrator stated the prior Administrator had been invited to a national conference of collection agencies or collection agency trade association. In the January 25, 2019 public meeting, the Interim Administrator was informed that the prior Administrator was invited to a local conference.
2. **Meeting of relevant licensees, industry groups and associations, and other interested persons.** The Administrator convened this meeting, as required by§ 5-2-117(7), on July 30, 2018. The 30-day notice was provided directly (via email) to a list of licensees, industry groups and associations, and other interested parties compiled by the Administrator.
3. **Meeting of licensees, consumer advocacy groups and associations, and other interested parties.** The Administrator convened this meeting, as required by§ 5-2-117(7), on January 25, 2019. The 30-day notice (via e-mail) was provided to all consumer advocacy groups and associations and other interested parties compiled by the Administrator. *See Attachment 1 (Transcript).*
4. **Meeting of relevant licensees, industry groups and associations, and other interested persons.** This meeting is scheduled for July 29, 2019, at 10:00 AM at the Ralph L. Carr Colorado Judicial Center, 1300 Broadway, Denver CO 80203. The direct 30-day notice (via email) was provided to licensees, industry groups and associations, and other interested parties compiled by the Administrator.

Please feel free to contact me if you would like further information.

Respectfully submitted,

FOR THE ATTORNEY GENERAL

MARTHA FULFORD
Administrator, CFDCPA
Martha.Fulford@coag.gov
720-508-6020

Cc: Members of the Senate Judiciary Committee (via email)
Members of House Judiciary Committee (via email)

Bi-Annual Report
July 1, 2019
Page 6

Kurt Morrison, Colorado Department of Law. Deputy Attorney General for
Intergovernmental Affairs (via email)

Attachment

ATTACHMENT 1
Transcript of January 25, 2019, Public Hearing

1 STATE OF COLORADO DEPARTMENT OF LAW

2 COLORADO FAIR DEBT COLLECTION PRACTICES ACT
3 UNIFORM CONSUMER CREDIT CODE

4

5 TRANSCRIPT OF PROCEEDINGS
6 January 25, 2019

7

8 Proceedings had on Friday, January 25,
9 2019, at the Ralph L. Carr Colorado Judicial Center,
10 1300 Broadway, Room 1E, Denver, Colorado 80203,
11 commencing at the hour of 10:06 a.m., before
12 Jan Zavislan, acting or interim administrator of the
13 Uniform Consumer Credit Code.
14
15
16
17
18
19
20
21
22
23
24
25

<p style="text-align: right;">2</p> <p>1 PROCEEDINGS</p> <p>2 MR. ZAVISLAN: So good morning,</p> <p>3 everybody. I'll start off with: My name is</p> <p>4 Jan Zavislan. I am still the acting or interim</p> <p>5 administrator of the Uniform Consumer Credit Code,</p> <p>6 which includes enforcement of Colorado's Fair Debt</p> <p>7 Collection Practices Act. I didn't think I would still</p> <p>8 be here by the time this meeting rolled around. We've</p> <p>9 been trying since May to fill the position formerly</p> <p>10 held by Julie Meade without success so far.</p> <p>11 I've had a recent conversation with our</p> <p>12 new attorney general, Phil Weiser, and he is telling me</p> <p>13 that they're going to be moving forward on a full-time</p> <p>14 administrator replacement in the coming hopefully</p> <p>15 weeks, not coming months.</p> <p>16 This is a public hearing pursuant to</p> <p>17 Section 5-16-117, Subsection 7 of the Fair Debt</p> <p>18 Collection Practices Act.</p> <p>19 And if you recall in 2017 when the</p> <p>20 General Assembly, in House Bill 216, repealed the</p> <p>21 collection agency board, it placed on the administrator</p> <p>22 several additional responsibilities. One was to file</p> <p>23 biannual reports with the Joint Judiciary Committees in</p> <p>24 the Colorado legislature, the oversight committees to</p> <p>25 the Department of Law; and two, was to hold a meeting</p>	<p style="text-align: right;">4</p> <p>1 public hearing. We sent out notice to everybody on our</p> <p>2 interested parties list, which we expanded this time</p> <p>3 around to include I think at least all of the email</p> <p>4 addresses we had for the Colorado Bar Association's</p> <p>5 Consumer Protection Committee, because we had noticed</p> <p>6 that so much of the work of that committee has been on</p> <p>7 debt collection issues. That notice went out I believe</p> <p>8 December 18th or 19th, more than 30 days in advance of</p> <p>9 this meeting as required by Colorado Open Meetings Law.</p> <p>10 This is completely informal, right. I</p> <p>11 am, while an attorney and while the acting</p> <p>12 administrator, it is not my role today to provide legal</p> <p>13 opinions or legal advice; to provide interpretations of</p> <p>14 the Fair Debt Collection Practices Act, or any of the</p> <p>15 rules that the administrator has adopted under that</p> <p>16 Act. So, you know, we can have a discussion about</p> <p>17 issues involving the Act or the rules, but nothing that</p> <p>18 I say today should be construed as an informal or</p> <p>19 formal position statement or opinion of the</p> <p>20 administrator or of the attorney general's office.</p> <p>21 It's going to be mostly a listening</p> <p>22 session. I'm here, in my capacity as acting</p> <p>23 administrator, to hear from you. I want to hear about</p> <p>24 issues that you're seeing, problems that you're facing.</p> <p>25 I am most interested in -- everybody here is well aware</p>
<p style="text-align: right;">3</p> <p>1 every January for the two years of the bill with</p> <p>2 consumer advocacy groups and associations and other</p> <p>3 interested parties; and to hold every July a similar</p> <p>4 meeting, but with collection agencies, attorneys</p> <p>5 representing creditors or collection agencies, and</p> <p>6 other interested persons.</p> <p>7 Julie Meade hosted the first of these</p> <p>8 meetings last January. I hosted the meeting with the</p> <p>9 collection agency representatives and attorneys last</p> <p>10 July. The transcripts I think of both of those</p> <p>11 meetings are available on the attorney general's</p> <p>12 website, COAG.gov. And if you go to the licensing</p> <p>13 section, you should see links both to the written</p> <p>14 annual reports that we filed as well, and those annual</p> <p>15 reports contain or have as attachments the transcripts</p> <p>16 of the first two public hearings that we held.</p> <p>17 So a couple of just basic housekeeping</p> <p>18 things. The restrooms are literally out this door and</p> <p>19 a little bit to your right if anybody needs to do it.</p> <p>20 You know where the Starbucks is probably. If you go</p> <p>21 back towards reception and down that hallway, there's a</p> <p>22 small cafeteria, coffee, et cetera, if you need</p> <p>23 something to drink during this meeting.</p> <p>24 The way I want to conduct these and the</p> <p>25 way I conducted the meeting in July is truly as a</p>	<p style="text-align: right;">5</p> <p>1 of the fact that now it has been a number of years</p> <p>2 since any formal rulemaking was undertaken under the</p> <p>3 Fair Debt Collection Practice Act. And we are aware,</p> <p>4 from meetings last January and July and from our own</p> <p>5 review, that there certainly are areas where the Act</p> <p>6 and the rules need updating; where there may be some</p> <p>7 new issues that aren't currently addressed in rule that</p> <p>8 ought to be addressed.</p> <p>9 And I'll be honest with you, if I had</p> <p>10 known that eight and a half months would go by and I'd</p> <p>11 still be the acting administrator, I think we would</p> <p>12 have tried to do maybe some rulemaking this fall, but I</p> <p>13 really think that that should be the prerogative of the</p> <p>14 new attorney general and a permanent administrator.</p> <p>15 So we will be looking to making some</p> <p>16 formal rulemaking announcements sometime this calendar</p> <p>17 year, and we'll obviously invite members of the</p> <p>18 industry, members of the consumer advocacy and other</p> <p>19 interested parties to participate in that process as</p> <p>20 well.</p> <p>21 So the ground rules are going to be this:</p> <p>22 We have about 90 minutes. We may not take all of that</p> <p>23 time, we'll take it all if we need it.</p> <p>24 I would like to have everybody who is in</p> <p>25 the room, if you haven't done it, on your way out,</p>

<p style="text-align: right;">6</p> <p>1 please, we have a sign-up sheet so that we have a 2 formal record of everybody that was in attendance. And 3 I would ask that you all do that. 4 If you want to make a public statement -- 5 unfortunately this room isn't miked for a handheld 6 wireless. So that the court reporter, who's going to 7 take a transcript of this, can hear you, if you would 8 please come forward to near the front of the room, 9 please state your name and spell your name for her, and 10 then try to speak up as loud as you can so that 11 everybody can hear. Now, I'm also happy to simply 12 relinquish the podium and have you come here if you'd 13 rather to make whatever comments or public statements 14 that you'd like to make, so we'll need your name and 15 the spelling of your name. And then try to hold your 16 comments, please, to about five minutes, okay? It 17 looks like we have about 65 people, I think. The room 18 is set up for 70, almost 80. So give an opportunity 19 for everybody to make a public statement. We certainly 20 will -- I can follow up with you, we can have follow-up 21 questions, we can have follow-up dialogue. 22 But as I said, my goal is to have as 23 open, as public a hearing as we possibly can, and that 24 includes any members of the collection industry or 25 their attorneys who want to make a statement today are</p>	<p style="text-align: right;">8</p> <p>1 MR. ZAVISLAN: So what are we hearing? 2 What's going on out there from those who are 3 representing debtors or who represent consumer advocacy 4 or other groups that you would like to have a 5 conversation about today? This is way too quiet a 6 crowd. Everything's perfect. 7 Yes, ma'am. 8 MS. EVANS: I might need the mike because 9 my voice doesn't carry. I am not an attorney. My name 10 is Eileen Evans, E-I-L-E-E-N E-V-A-N-S. I'm 11 representing myself against Collection Center in an 12 active case, so I'm researching case studies at the 13 library. 14 I have two questions, and they relate to 15 helping debtors like myself address abuses by 16 collection agencies. 17 How do you research an instance where a 18 wage was garnished without an agreement on file? So I 19 don't know if it's all in the Fair Debt Collection 20 Agency Act (sic) or other laws, but that's one case 21 that happened to me. And I had a falsified stipulation 22 agreement filed with the Court, so in essence, how do 23 you look up issues like that in a database or maybe the 24 consumer protection committee with the Bar Association? 25 So I was wondering, is there a group of people that</p>
<p style="text-align: right;">7</p> <p>1 more than welcome to do so as well. My view is public 2 means public. 3 So with that, let's get started. And is 4 anybody willing to step up and be the first to address 5 the group? Tom, why am I not surprised? 6 MR. ROMOLA: What a surprise, huh? What 7 a surprise. Tom Romola, R-O-M-O-L-A. I'm the 8 legislative chairman for the Associated Collection 9 Agencies. 10 On page 5 of your report to the 11 legislature, one more error that you tried to fix at 12 the last meeting that we need to correct again. On 13 line 1, No. 1, Julie was invited to a local conference, 14 not the national -- 15 MR. ZAVISLAN: Okay. I misunderstood you 16 then. I tried to make that correction because of our 17 conversation at the last time, so ... 18 MR. ROMOLA: And it's nitpicky, but it 19 might come into play down the road, so ... 20 MR. ZAVISLAN: Okay. Perfect. 21 MR. ROMOLA: That's all I have for right 22 now. 23 MR. ZAVISLAN: Thank you. And by the 24 way, the Romola rule is you get to talk once. 25 UNIDENTIFIED SPEAKER: I second.</p>	<p style="text-align: right;">9</p> <p>1 have filed these cases? I'm open to any ideas. Thank 2 you. 3 It seems to be in favor of the collection 4 agencies, and very difficult for the claimant to make 5 their case, that's my point. 6 MR. ZAVISLAN: So unfortunately I can't 7 give you legal advice. I can tell you a couple of 8 resources that you might consider. One is the Colorado 9 Law Library, which is in this building. If you go past 10 the elevator banks and keep walking to the other 11 atrium, the courthouse side, is the Colorado state law 12 library. And they have a staff of librarians who are 13 there to assist on all variety of legal research or 14 legal-type questions. So that's one. 15 And I always mention the Colorado Legal 16 Services Corporation. That's somewhat income based, so 17 I don't know what your situation is. But they have a 18 staff of attorneys throughout the state of Colorado 19 that work on legal issues for their clients, including 20 on debt collection matters. So those are the two 21 resources that come to mind. 22 Anybody have any other ideas where we 23 might send Eileen? Yes, ma'am. 24 MS. TAYLOR-HUNT: Hi, Eileen. My name is 25 T.A. Taylor-Hunt. I'm the state chair for the National</p>

<p style="text-align: right;">10</p> <p>1 Association of Consumer Advocates. If you want to 2 connect with me when this is over, we can point you to 3 some potential resources. 4 MS. EVANS: Okay. 5 MR. ZAVISLAN: Thank you, T.A. Yes. 6 MS. STURGES: I'm with the State Court 7 Administrator's office. Judicial has self-help 8 centers. And there are folks in the self-help centers 9 located in the courthouses called Sherlocks. And they 10 can assist -- they can't give legal advice; however, 11 they can help you identify potential forms that might 12 be relevant to your situation. And you can take 13 advantage of that. 14 And if you want to look at the state 15 court judicial website in your particular district 16 where your case is pending, there should be information 17 there. 18 MR. ZAVISLAN: Could I have you state 19 your name? 20 MS. STURGES: Sure. It's Sharon Sturges. 21 I'm actually the director of the Office of Dispute 22 Resolution, not in the trial courts; but certainly 23 we -- we offer mediation services as well. So if you 24 want to come up to me at any point in the meeting, we 25 can step outside and I can direct you to how to get a</p>	<p style="text-align: right;">12</p> <p>1 with an astounding amount of information that's been 2 submitted by the various collection agencies that 3 utilize NMLS for various other states; Idaho, 4 Massachusetts, Indiana are just a few. 5 But it also allows, for those of us who 6 have to have licenses all across the nation that use 7 NMLS, to get on once a year, and the licenses all 8 expire December 31st, and it tightens up the windows 9 and allows me, for instance, to get 84 licenses in a 10 period of two months, and that includes branches and 11 main state licenses as well. 12 But what it also does, it allows to not 13 talk to staff with Massachusetts, Indiana, Idaho, it 14 allows them to refocus. And if their goal is to help 15 consumers, it removes the function and gives you more 16 time to focus in on the consumers as opposed to having 17 to go through what can be some fairly redundant 18 functions involved in getting an entity licensed or 19 renewed. 20 One other issue I'd like to bring up is, 21 we don't have a lot of complaints filed against us. 22 One reason we do -- and I'm sure everyone in here 23 prefers not to have complaints filed and have to 24 respond -- is we have implemented a program that if a 25 debtor calls and if they're heated or if they're hot,</p>
<p style="text-align: right;">11</p> <p>1 referral to mediation as well. 2 MR. ZAVISLAN: So, Sharon, it's Sturges? 3 MS. STURGES: Sturges, yes. I will sign 4 in. 5 MR. ZAVISLAN: Okay. Sturges? 6 MS. STURGES: Just one S at the end. 7 MR. ZAVISLAN: One S. Thank you. So, 8 Eileen, I hope that's helpful. 9 MS. EVANS: Thank you. 10 MR. ZAVISLAN: Next? Who else has an 11 issue they'd like to talk about, an issue they'd like 12 to identify; thoughts or ideas about where the rules 13 are inadequate and need to be updated, need to be 14 amended or changed? Come on up. 15 MR. DEEDS: My name is Michael Deeds, 16 D-E-E-D-S. I'm a partner with Linebarger Goggan Blair 17 & Sampson. I was here in July, and I had requested 18 that the Department of Law consider transitioning over 19 to the National Multistate Licensing Service (sic). 20 And I'm here to re-urge that request. 21 Many of the functions that your office 22 performs can be done in this as, if not a more swift 23 and efficient fashion through NMLS. It doesn't detract 24 or diminish the critical nature of your office; but 25 what it does, number one, it provides you, as a group,</p>	<p style="text-align: right;">13</p> <p>1 and it's not just because they owe a debt and they want 2 to deny it, they're immediately routed to our 3 collection department manager, of which we have 12 4 nationwide, and we try to resolve it so that we don't 5 have to go through the process, for instance, of coming 6 here, filing a formal response. 7 But there are interim steps -- and I was 8 hoping perhaps that Colorado might consider issuing 9 something that gives a collection agency some 10 guidelines by which you might accept some informal 11 resolution process. And it doesn't have to be anything 12 that is mandatory, but it would be helpful to know what 13 some of the regulatory agencies perceive to be, where 14 are you getting your highest rate of complaints? 15 We see a lot of addresses that are 16 incorrect or phone numbers that we dial and they're 17 incorrect. We have very few where it's abuse of 18 collection techniques. I think that's few and far 19 between in the industry these days. We're very 20 sensitive to what you guys are trying to do. Thank you 21 very much. 22 MR. ZAVISLAN: Thank you, Mike. 23 So I can tell you, after the July meeting 24 I had staff start looking at NMLS. I had a staff 25 member actually attend a national conference in which</p>

<p style="text-align: right;">14</p> <p>1 there was a presentation on NMLS, so it is something</p> <p>2 that we're aware of. It would require, my</p> <p>3 understanding, is legislative change. And so with a</p> <p>4 brand-new set of people upstairs, the attorney general</p> <p>5 and his legislative director, et cetera, it wasn't</p> <p>6 possible to do anything this year. We haven't decided</p> <p>7 whether we want to go that route or not even, but we</p> <p>8 are definitely looking at it and following up.</p> <p>9 Anybody else? Yes, T.A.</p> <p>10 MS. TAYLOR-HUNT: Maybe the meeting</p> <p>11 before last we were talking about some problems</p> <p>12 consumers were encountering with process servers.</p> <p>13 MR. ZAVISLAN: Yes.</p> <p>14 MS. TAYLOR-HUNT: And we were raising the</p> <p>15 issue of whether any thought has been given to trying</p> <p>16 to license process servers.</p> <p>17 UNIDENTIFIED SPEAKER: We can't hear her.</p> <p>18 MR. ZAVISLAN: I'll repeat the question.</p> <p>19 The question was: At the meeting a year ago there was</p> <p>20 a discussion about process servers and problems with</p> <p>21 process service. And T.A.'s question was whether or</p> <p>22 not there's any thought given to licensing of process</p> <p>23 servers, right? Do I have that correct? So the quick</p> <p>24 answer is, as far as I know -- I thought that there was</p> <p>25 a sunrise application several years ago .</p>	<p style="text-align: right;">16</p> <p>1 You know, if enough -- if there's enough of an interest</p> <p>2 and there's enough of a need, that would be the process</p> <p>3 that we'd do. It wouldn't be something that our</p> <p>4 office, or that me, as the interim administrator, would</p> <p>5 be able to do. And we can't do it by rule, obviously.</p> <p>6 Yeah, Tom.</p> <p>7 MR. ROMOLA: Jan, can you hear me alright</p> <p>8 if I don't come up?</p> <p>9 MR. ZAVISLAN: I can hear you, yes.</p> <p>10 MR. ROMOLA: The legislature introduced a</p> <p>11 bill similar to that, I believe it was three years ago,</p> <p>12 two years ago maybe. They were wise enough to</p> <p>13 determine that that was going to jack up the prices of</p> <p>14 process servers, which would harm consumers, so they</p> <p>15 voted it down in first committee, if I recall.</p> <p>16 MR. ZAVISLAN: All right. What I was</p> <p>17 thinking was remembering from two or three years ago</p> <p>18 was exactly that. I knew that there was some movement</p> <p>19 or push towards that.</p> <p>20 Now, we've had conversations with some</p> <p>21 debt collectors and law firms doing debt collection</p> <p>22 about complaints that we receive about process service.</p> <p>23 So it's something that we are aware of, it's something</p> <p>24 that we have worked with other collection agencies and</p> <p>25 worked with law firms doing collections work on making</p>
<p style="text-align: right;">15</p> <p>1 Now, for those of you who don't know,</p> <p>2 state law requires, in most instances where there is a</p> <p>3 proposal to license or otherwise regulate a previously</p> <p>4 unlicensed, unregulated profession, that they initiate</p> <p>5 what's called a sunrise application with the Department</p> <p>6 of Regulatory Agencies. And they do an analysis and</p> <p>7 they take a look at risk versus benefits, cost versus</p> <p>8 benefits as to whether or not a bill should be</p> <p>9 introduced in the legislature to, in this instance,</p> <p>10 say, license process servers.</p> <p>11 I thought that there had been -- and</p> <p>12 maybe it's farther back than two or three years ago,</p> <p>13 but I do recall seeing a sunrise report that DORA</p> <p>14 recommended that they not be licensed; that they hadn't</p> <p>15 been shown or there wasn't enough of a need. But</p> <p>16 that's certainly one process.</p> <p>17 And if you're interested in that, I would</p> <p>18 encourage that you communicate with your local state</p> <p>19 representative or state senator, although that's not</p> <p>20 required. Citizens and other groups are fully entitled</p> <p>21 to make an application with DORA for a sunrise review</p> <p>22 and report. And if you just go to their website, and I</p> <p>23 can't remember what -- it's in their policy -- I don't</p> <p>24 remember exactly what it's called, there's information</p> <p>25 on how you make an application for a sunrise review.</p>	<p style="text-align: right;">17</p> <p>1 sure that they're reporting to us when they have a</p> <p>2 belief that a process server that they have been using</p> <p>3 isn't adequately affecting service.</p> <p>4 Other questions or comments? Yes.</p> <p>5 MR. VEDRA: Hi. My name is Dan Vedra.</p> <p>6 I'm an attorney in private practice. And I represent</p> <p>7 individuals like Ms. Evans, who are typically the</p> <p>8 defendants in collection lawsuits.</p> <p>9 And I have two questions and sort of two</p> <p>10 comments and requests. One would be, what, if any,</p> <p>11 outreach does the administrator and the regulators do</p> <p>12 with consumer advocacy groups that deal with</p> <p>13 representing individuals like Ms. Evans?</p> <p>14 Two would be, what precisely is on the</p> <p>15 rulemaking agenda, if there is any agenda? And is</p> <p>16 there the possibility that the administrator would set</p> <p>17 a deadline for a request for rulemaking so that rather</p> <p>18 than sharing ideas for rulemaking in sort of an open</p> <p>19 forum where we're sharing sort of anecdotal</p> <p>20 information, and we can gather up information that we</p> <p>21 feel is important and necessary and should be</p> <p>22 considered in making a rule and making a formal</p> <p>23 rulemaking request?</p> <p>24 My first ask would be, in terms of</p> <p>25 complaints that are received by the administrator, one</p>

<p style="text-align: right;">18</p> <p>1 thing I think has been tremendously successful with the</p> <p>2 CFPV is that there is an available database online</p> <p>3 where you can look up all manner of complaints that are</p> <p>4 made to the CFPV. It's something that's very</p> <p>5 efficient, it's very robust, and it helps you to</p> <p>6 identify issues that are coming up frequently as</p> <p>7 against particular bad actors.</p> <p>8 And so as an advocate for consumers, it's</p> <p>9 helpful for me to be able to look at the issue I'm</p> <p>10 dealing with and determine whether this is a one-off</p> <p>11 problem that may be the result of a mistake, or whether</p> <p>12 this a systematic problem that comes up over and over</p> <p>13 again. And I think everybody has been very happy with</p> <p>14 that database that has had access to it because it</p> <p>15 provides so much information.</p> <p>16 The last -- and I think that there's</p> <p>17 probably a lot of common ground in this room about</p> <p>18 this, is as a consumer lawyer, we encounter a lot of</p> <p>19 just straight-up scams. There's so much information</p> <p>20 out there that people can get and use in a bad way.</p> <p>21 And the thing that I see most frequently is information</p> <p>22 taken in bulk from bankruptcy files. And they'll take</p> <p>23 bulk information from bankruptcy files, find people</p> <p>24 that had old Payday loans, for example, and use the</p> <p>25 information from the bankruptcy file to use that to</p>	<p style="text-align: right;">20</p> <p>1 for whatever reason. I think it's partly because of</p> <p>2 its heavy regulatory versus enforcement roles. But I'd</p> <p>3 certainly support doing a great deal more, and will</p> <p>4 have conversations with the new attorney general and</p> <p>5 whomever he appoints as a permanent administrator, to</p> <p>6 do exactly that. Not only just to consumer advocacy</p> <p>7 groups, but I think in industry as well. And I know</p> <p>8 Tom would love to have us at every one of their</p> <p>9 meetings locally to do that exact kind of outreach.</p> <p>10 In regard to rulemaking, I mean, while</p> <p>11 we're accumulating a lot of different ideas primarily</p> <p>12 out of last January and this July's meetings, we don't</p> <p>13 have a formal rulemaking agenda set.</p> <p>14 What I would propose to the new attorney</p> <p>15 general and to the new administrator is that in advance</p> <p>16 of formal rulemaking under the Administrative Procedure</p> <p>17 Act, that we actually issue a request essentially for</p> <p>18 proposals or requests for information to allow both the</p> <p>19 industry and other interested parties, whether they be</p> <p>20 lawyers or consumer advocacy groups, to suggest areas</p> <p>21 in which they think that we ought to at least consider</p> <p>22 adopting a rule. That would help us then in</p> <p>23 establishing a formal rulemaking agenda, which would</p> <p>24 then go out as part of a notice of proposed rulemaking</p> <p>25 and a public hearing on those rules, rather than get</p>
<p style="text-align: right;">19</p> <p>1 call and harass people and convince them to try to pay</p> <p>2 something that they don't actually pay (sic). This</p> <p>3 isn't good for anyone except for the scam artist. And</p> <p>4 most of these people are out of state and probably part</p> <p>5 of criminal organizations.</p> <p>6 It makes collection agencies' work more</p> <p>7 difficult because these things exist. It makes my work</p> <p>8 more difficult because there's nothing I can do to stop</p> <p>9 somebody who's a criminal actor and is doing this to a</p> <p>10 lot of people. And suing them for a thousand bucks in</p> <p>11 federal court or state court under the FDPCA isn't</p> <p>12 really of tremendous value if there's no possibility of</p> <p>13 collection; and in reality, that person should just be</p> <p>14 in jail somewhere. So those would be my two questions</p> <p>15 and two asks.</p> <p>16 MR. ZAVISLAN: Thanks, Dan. So a couple</p> <p>17 of things. What I've been proposing -- so I've spent</p> <p>18 30 years in consumer protection in this office. And</p> <p>19 I've noticed that while we do a tremendous amount of</p> <p>20 education and outreach on the consumer fraud side, we</p> <p>21 have a stopfraudcolorado.gov website, we speak all</p> <p>22 around the state and partner with other groups and</p> <p>23 organizations who do that.</p> <p>24 I think historically there has not been</p> <p>25 nearly enough education and outreach out of the UCCC</p>	<p style="text-align: right;">21</p> <p>1 all the way to a rulemaking hearing and then start</p> <p>2 hearing all these ideas that we haven't really had an</p> <p>3 opportunity to digest and submit -- and get out to all</p> <p>4 of you for public comment. So that's certainly how I</p> <p>5 plan to proceed with our new attorney general and with</p> <p>6 the new administrator, whenever she or he is appointed.</p> <p>7 You know, the complaint database is an</p> <p>8 interesting one. We've taken the position, as an</p> <p>9 office, for all 30 years that I've been here, is that</p> <p>10 we guard pretty carefully consumer complaint and</p> <p>11 consumer complaint information. The idea that -- we've</p> <p>12 actually been sued by the news media for refusing to</p> <p>13 turn over consumer complaints; unsuccessfully.</p> <p>14 There is some value, though, I</p> <p>15 think in -- so I've spent a fair amount of time in the</p> <p>16 C of PV (phonetic) database as well, and it's all</p> <p>17 deidentifying, right? You can't tell -- I think they</p> <p>18 even -- I don't even think they include full zip codes</p> <p>19 in that database. And so I understand that there is</p> <p>20 value to that. It would be really more of a cost issue</p> <p>21 for us.</p> <p>22 We're in the process right now of redoing</p> <p>23 our entire database, both licensing and complaints,</p> <p>24 because we're dealing with pretty antiquated</p> <p>25 technologies. I certainly think that there may be some</p>


<p style="text-align: right;">22</p> <p>1 value, as we work through that new database process, of 2 having some public-facing information either in an 3 aggregated, but certainly in a deidentified way to 4 accomplish some of that. So I will make sure to raise 5 that to the powers here as well.</p> <p>6 You know, Dan, we're seeing the exact 7 same kind of scams, phantom debt, collection of illegal 8 debt. We usually proceed this way: When we get a 9 complaint, sometimes all we have is a phone number. 10 It's either a capture on a caller ID, which, as most of 11 you know, can be spoofed very easily. To the extent 12 that they're legitimate phone numbers, we send 13 subpoenas out to sometimes three or four or five phone 14 companies, because there's a lot of reselling, 15 especially of long distance phone numbers, to see if we 16 can identify an actual address at the -- that attaches 17 to that phone number. And in most cases there is no 18 actual address. It turns out to be a PO box, it turns 19 out to be a vacant lot, or it turns out to be a 20 completely unassigned phone number.</p> <p>21 Where we do find an address and the 22 address is continental United States, we will send 23 cease and desist letters out. I have to be honest with 24 you, most of them come back not accepted, undelivered. 25 Even if we send them certified mail, we get them back</p>	<p style="text-align: right;">24</p> <p>1 Mr. Baker (phonetic) is aware, I'm sure, 2 that making these complaint databases public is 3 problematic despite the absence of a federal parallel 4 to our beloved C.R.S. 5-16-128, which would criminalize 5 violations of the Colorado Fair Debt Collections Act.</p> <p>6 To my amazement, none of my clients has 7 ever instructed me to seek a waiver of criminal 8 prosecution in exchange for a full cooperative response 9 to an inquiry from the administrator. I'm not sure 10 that that attitude won't change when this database 11 becomes available to the public.</p> <p>12 MR. ZAVISLAN: Thank you. Any other 13 comments? Anybody else have an issue they'd like to 14 address or at least make public at today's meeting? 15 Yes, T.A.?</p> <p>16 MS. TAYLOR-HUNT: One of the areas that 17 we're finding more difficulty with is ambulance 18 overbilling or really rapid debt collection. So far 19 there's only been a few debt collectors who are being 20 overly aggressive with medical debt, but there are 21 supposed to be more stop points before you go to that 22 level. And I'm just wondering if you all are hearing 23 more medical debt complaints, particularly as it 24 relates to ambulance.</p> <p>25 MR. ZAVISLAN: So I have to -- so that's</p>
<p style="text-align: right;">23</p> <p>1 as unaccepted or undelivered. So it's a challenge.</p> <p>2 My office overall, we enforce the 3 Colorado No-Call List Act, same exact issue there. 4 Really, really difficult to find where these companies 5 are. We know that for a while a lot of the phantom 6 debt collection phone calls were emanating out of 7 India. We know they also come out of Eastern European 8 and South American or Central American countries as 9 well. So it's a huge challenge for a pretty small 10 staff given all of the responsibilities that we have to 11 try to track these guys down. It's an area where at 12 least on -- I think we've even done consumer education, 13 consumer alerts about phantom debt.</p> <p>14 We had one where they were actually 15 spoofing the attorney general as the caller; we did an 16 advisory about that. So, you know, it's another area 17 that I would put down in the category of, we can do a 18 much better job of getting information and education 19 out even if we're not able to identify and enforce 20 against some of these companies. So, thank you. Other 21 comments. BBB? No, go ahead.</p> <p>22 MR. GREENBERG: I'm Alan Greenberg, 23 Greenberg & Sada; president of the Colorado Creditors 24 Bar Association, and I serve on ACA's legislative 25 council.</p>	<p style="text-align: right;">25</p> <p>1 T.A. Taylor (sic). We have not gotten a huge number of 2 complaints about this.</p> <p>3 We see complaints regarding medical debts 4 where it's either Medicaid debt that is being collected 5 on inappropriately; so you know that if you're a 6 healthcare provider, your contract with the state 7 Health Care Policy & Financing says, You have to accept 8 our reimbursement to you as a hundred percent of the 9 payment of that client's medical expenses, and you 10 can't balance bill that client or set out for 11 collection.</p> <p>12 Now, for the collection industry, I'm not 13 sure how you would know to begin with whether or not a 14 debtor is a -- the debt you're dealing with is Medicaid 15 medical debt.</p> <p>16 And we've actually had a conversation 17 with legal counsel over at Health Care Policy & Finance 18 about that. And we typically don't look necessarily at 19 the debt collectors unless we can make some sort of 20 informal arrangement or informal resolution. We've 21 been trying to refer some of these back to Health Care 22 Policy & Finance because they have enforcement 23 authority against providers that are improperly balance 24 billing on medicaid debt. We struggle with it 25 internally about how best to handle that.</p>

<p style="text-align: right;">26</p> <p>1 We have issues that we see on medical 2 debt in a -- in an estranged family relationship, 3 divorce, separation, where a child incurs medical debt, 4 and one parent or the other is contacted by a 5 collection agency, and they say, I never authorized 6 services on behalf of this child; she's got full 7 custody, he's got full custody, whatever it may be. I 8 think Colorado law is against them in that situation, 9 it makes both parents responsible for those debts. 10 But again, these issues just come up as 11 they come up, and we try to figure out the best way to 12 try to deal with them. And maybe not successfully in 13 every instance, but I'll tell you, we're not seeing 14 that huge -- this issue came up this summer, when we 15 met with the collection agency groups, about waiting 16 until the insurance claims are fully adjusted and paid 17 before debt is subsequently sent out for collection. 18 And that's something that I think we can look at both 19 legislatively and potentially through rulemaking to 20 see about that. 21 Because we do have complaints from time 22 to time about somebody who's being contacted by a debt 23 collection company or an individual or a lawyer, and 24 they're still in negotiations with their medical 25 healthcare provider -- or insurance company about why</p>	<p style="text-align: right;">28</p> <p>1 because the repeal is in statute. Now, if they want to 2 extend it, then they would probably do a review and a 3 recommendation and a -- it's not really a term, but a 4 mini sunset. I mean, nobody from -- and believe me, 5 DORA policy reaches out to me all the time on a whole 6 variety of issues as they're building these reports, 7 and nobody's reached out to us, that I know of, on this 8 yet. And it would be about now that they would be 9 doing it, right, because it would have to be in the 10 October 2019 sunset report for the 2020 legislature. 11 MR. ROMOLA: You don't think they'll 12 issue a report to -- 13 MR. ZAVISLAN: I don't know. I just 14 don't know the answer. All I know is they have not 15 reached out to us about it, and they almost always do. 16 MR. ROMOLA: Second question, if you 17 don't mind, I'll put you on the spot. How do you think 18 this format's working yourself? And I know you're -- 19 again, you were put in a tough spot, and I appreciate 20 that, but how do you think it's working? 21 MR. ZAVISLAN: So I have to tell you, my 22 personal opinion only, and not that of the attorney 23 general, is that I'm not sure that having two meetings 24 makes a lot of sense, two separate groups; which is why 25 in July and this time around I expanded the</p>
<p style="text-align: right;">27</p> <p>1 did you not cover this, why did you not cover that, 2 et cetera, et cetera. 3 So I think there's something to be looked 4 at there that would achieve a nice, fair balance 5 between creditors, debt collectors, but also between 6 medical patients who are in negotiations with their 7 insurance companies. 8 Other comments, questions, statements? 9 Tom S. 10 MR. ROMOLA: I have a question if you're 11 ready. 12 MR. ZAVISLAN: Sure. 13 MR. ROMOLA: First of all, I want to 14 thank you for the way you're handling these meetings. 15 You were put in a pretty tough position, and you're 16 doing an excellent job. And I think everyone in this 17 room probably appreciates it, so thank you. You can 18 clap if you want. 19 As you know, the -- this portion of the 20 sunset comes up again next year, a year from now. Is 21 it your understanding that DORA will do a complete 22 research again this summer to determine the validity of 23 this format and how this continues; do you know? 24 MR. ZAVISLAN: You know, I don't think 25 they will. I don't think it's scheduled that way</p>	<p style="text-align: right;">29</p> <p>1 notification and the opportunity to speak. I think 2 maybe -- I don't have a problem with twice a year, but 3 the fact that we bifurcate it in the way that we have 4 through legislation, I'm not sure it makes that much 5 sense. 6 We had a good discussion in July with 7 both sides of the aisle, right; we have good 8 representation here and discussion here today with both 9 sides. Unless you're telling me whether it's consumer 10 advocates' lawyers or collection agencies' lawyers, 11 that you somehow feel constrained about what you're 12 willing to say. You know, those are just my thoughts, 13 Tom. 14 You know, I don't think that this is a 15 bad idea at all. I do think it connects the regulator 16 more with her constituents, both the licensed and 17 debtors and debtor counsel. So I don't have any 18 problem with this process personally, I just wonder 19 whether it makes sense to, if we're going to do this 20 twice a year, why not bring everybody together for both 21 meetings instead of having one that's supposed to be 22 this and one that's supposed be that; but that would 23 require legislation. 24 MR. ROMOLA: Yeah, but I believe in the 25 July meeting you made it pretty clear that anyone could</p>

<p style="text-align: right;">30</p> <p>1 talk.</p> <p>2 MR. ZAVISLAN: Absolutely.</p> <p>3 MR. ROMOLA: I don't think there was</p> <p>4 any -- like, the first meeting that Julie did in</p> <p>5 January, that was not effective, but the one you did</p> <p>6 was fine.</p> <p>7 MR. ZAVISLAN: Yeah, I think that --</p> <p>8 again, I've been around for so many years now, I just</p> <p>9 think public hearing means public. And whether you're</p> <p>10 in the industry or whether you're Eileen who has</p> <p>11 questions and issues and concerns and wants an</p> <p>12 opportunity to address the administrator, I think they</p> <p>13 should have an opportunity to do that.</p> <p>14 MR. ROMOLA: You're from way back, and I</p> <p>15 know you're familiar with the old collection agency</p> <p>16 board.</p> <p>17 MR. ZAVISLAN: Yes.</p> <p>18 MR. ROMOLA: Do you think that was more</p> <p>19 effective than these meetings, having a board that --</p> <p>20 regularly?</p> <p>21 MR. ZAVISLAN: Yeah. Given what I saw,</p> <p>22 the lack of any substantial attendance at board</p> <p>23 meetings, I think this is better.</p> <p>24 MR. ROMOLA: Appreciate it. Thank you.</p> <p>25 MR. ZAVISLAN: Yes. Any questions? Yes,</p>	<p style="text-align: right;">32</p> <p>1 bill next legislative session to extend it. What I</p> <p>2 don't know, Dan, is whether that necessarily implicates</p> <p>3 DORA. I just don't know how that works.</p> <p>4 MR. VEDRA: And as an administrator, is</p> <p>5 there any obligation for you to provide input on that?</p> <p>6 Because my opinion is that I think that these meetings</p> <p>7 are effective. I think that the format in having them</p> <p>8 divided up into groups is not effective. I felt that</p> <p>9 the first meeting that we had with Ms. Meade was -- you</p> <p>10 know, I didn't think it was fair that the other side</p> <p>11 didn't have an opportunity to speak, and I appreciated</p> <p>12 that that was welcome at the last meeting. And that</p> <p>13 makes sense because dialogue, I think, leads to</p> <p>14 results. And so, you know, to have more of an</p> <p>15 opportunity to come together and discuss these issues</p> <p>16 on more than just a semiannual basis I think would give</p> <p>17 a little bit more heft behind the ideas and gain some</p> <p>18 momentum into things that would need to be done,</p> <p>19 preferred to be done.</p> <p>20 And then I think that another way to</p> <p>21 improve this process, you know, I come here to listen</p> <p>22 as well as to speak. And I know I can probably be</p> <p>23 criticized for speaking too much, but it would be nice</p> <p>24 to hear -- have more of an agenda about sort of the</p> <p>25 year to come, about topics that the administrator is</p>
<p style="text-align: right;">31</p> <p>1 T.A.</p> <p>2 MS. TAYLOR-HUNT: I want to second that</p> <p>3 on the collection agency board. I was on that board</p> <p>4 for two terms, and I think the thing that was most</p> <p>5 lacking was any feedback or input from the public.</p> <p>6 MR. ZAVISLAN: Okay. Yeah, I think</p> <p>7 that's -- certainly the times that I attended, there</p> <p>8 was -- I mean, we didn't even necessarily have board</p> <p>9 members always there, but certainly industry, and never</p> <p>10 the public. There would be seven people in the entire</p> <p>11 room, and four of them worked for us, so ...</p> <p>12 Any other questions or comments before we</p> <p>13 call this meeting to a halt?</p> <p>14 Yeah, Dan.</p> <p>15 MR. VEDRA: Yes, I had a question about</p> <p>16 the sunset. So the provision of the act that calls for</p> <p>17 these meetings is set to sunset unless renewed?</p> <p>18 MR. ZAVISLAN: Yes.</p> <p>19 MR. VEDRA: And so it's up to DORA then</p> <p>20 to determine whether they believe it's effective or</p> <p>21 whether -- I'm sorry, I just am misunderstanding that.</p> <p>22 MR. ZAVISLAN: No, you didn't</p> <p>23 misunderstand because I don't know formally whether it</p> <p>24 even requires DORA at this point. I think it will</p> <p>25 repeal by statute unless DORA or a legislator files a</p>	<p style="text-align: right;">33</p> <p>1 concerned with, that the administrator's seeing come up</p> <p>2 in the regular affairs so that people that are</p> <p>3 interested in those topics can then prepare in advance</p> <p>4 and say, Here's what you're concerned about, and here's</p> <p>5 how we view the issue so that it's more -- so not only</p> <p>6 that all the constituents are involved, but also that</p> <p>7 the administrator is setting an agenda for what you're</p> <p>8 seeing as well because you have a different</p> <p>9 perspective.</p> <p>10 MR. ZAVISLAN: Yeah, I think that's</p> <p>11 really fair. I hadn't really thought about that. The</p> <p>12 agendas are, as you've seen, very bare bones. It was</p> <p>13 my understanding -- I was not involved in the</p> <p>14 legislative process that led to the repeal of the board</p> <p>15 in the creation of these, so I don't have that</p> <p>16 background. I basically looked back and saw what Julie</p> <p>17 had done for the January meeting that year.</p> <p>18 But there is some sense for that. And</p> <p>19 certainly staff brings issues to me all the time that</p> <p>20 could very well be, you know, informally, as long as we</p> <p>21 make it clear that this isn't to substitute for</p> <p>22 rulemaking or any other kind of formal process, but do</p> <p>23 exactly what you're suggesting might make a great deal</p> <p>24 of sense.</p> <p>25 And if I'm still here, I will do that for</p>

<p style="text-align: right;">34</p> <p>1 July. I will make sure that whomever replaces me as a 2 permanent administrator has that idea in mind as well. 3 MS. MOODY: Good morning. Makyla Moody, 4 M-A-K-Y-L-A, last name, M-O-O-D-Y. I'm an attorney 5 here with Greenberg & Sada. I do a lot of creditor 6 rights litigation and et cetera. 7 In the summer's meeting I had addressed 8 about the advisory opinions that were released by the 9 administrator, and that nothing has been updated on the 10 administrator's website. I noticed in your report this 11 time there was an indication the administrator had 12 released a number of opinion letters, but those have 13 not been added to the website. Is there any intention 14 to do that? 15 MR. ZAVISLAN: So I'm not sure where you 16 get the information. I issued a letter opinion (sic) 17 in December that was on credit, on lending, but I don't 18 think we have issued a formal letter opinion on any 19 CFDCPA-related issues in my eight months here. 20 Certainly we've had a lot of 21 correspondence, we've had informal correspondence, but 22 I don't think anything that would be -- unless I've 23 just missed it, Makyla, and I'm sorry if I have, but 24 I'm not aware of it. 25 MS. MOODY: If I may, it says -- I guess</p>	<p style="text-align: right;">36</p> <p>1 distinction. If it's an enforcement letter, I don't 2 think that the person they give it to, who's being 3 enforced, wants that published. But if it's a, Hey, we 4 wonder if we're doing this wrong ... 5 MR. ZAVISLAN: Yeah, I'm going to follow 6 up, Makyla and Dan, on that very specific thing because 7 I'm not sure what exactly those are -- well, not so 8 much what they are, what our history has been about 9 updating those on our website. I don't think 10 historically we had that right. 11 MS. MOODY: And to be clear, I'm not 12 advocating that we publish the disciplinary actions, it 13 was the advisory position. 14 MR. ZAVISLAN: Right. And I think 15 that -- we may call them that, but I don't know that 16 they are advisory in the sense of giving an 17 interpretation of the statute, right, but we'll take a 18 look at it definitely. 19 MR. SHOOP: My name is Mike Shoop, 20 S-H-O-O-P. And I think what -- I think what you may be 21 thinking of is, there used to be an advisory opinion 22 issued on occasion by the administrator about a certain 23 rule or about a certain piece of legislation, and those 24 advisory opinions were public and sent to everybody. 25 Advisory letters regarding disciplinary actions have</p>
<p style="text-align: right;">35</p> <p>1 this is page 3. It says, Other actions by the 2 administrator in your report, it says 10 advisory 3 letters and 9 disciplinary letters were issued. If 4 it's an advisory letter, that would be noteworthy to 5 both consumers and the industry, as a whole -- 6 MR. ZAVISLAN: Oh, I see. 7 MS. MOODY: -- as to understand what 8 advice or opinions the administrator is taking, and we 9 were wondering if that will be published on the 10 website. 11 MR. ZAVISLAN: So we have not 12 historically, I don't think -- I know that you can look 13 and see who has had a disciplinary action. I don't 14 know historically, have we ever placed LOAs or 15 stipulated -- well, maybe stipulated finance orders on 16 the website, itself, I don't know. 17 We'd have to go back, and that would be 18 quite a heavy lift to go back, because as you can 19 imagine, we do a fair number of these. The advisory 20 letters there would have been staff advisories to an 21 agency about a particular issue. But I will look into 22 those and see what exactly those were. Those would not 23 necessarily come to or come from me. 24 MR. VEDRA: Would those be more an 25 enforcement-type letter or ... I mean, I can see the</p>	<p style="text-align: right;">37</p> <p>1 never been public. 2 MR. ZAVISLAN: I mean, certainly anything 3 that is an interpretation of an existing rule or 4 statute is public, is on our website, and there's a 5 link on the licensing page both on the lending side and 6 on the debt collection side to those. 7 MR. GREENBERG: Briefly, Alan Greenberg 8 again. On a similar vein, we think that those opinion 9 letters that are available for the public's approval 10 could stand a little updating. 11 MR. ZAVISLAN: Well, so, that Dunn Reedy 12 (phonetic) one from 1989 that I thought was still as 13 fresh as the day ... You know, it's a really -- we 14 actually have had this conversation in the last two 15 months as a very, very old Laura Hughes (phonetic) 16 opinion letter has become relevant again, not -- I 17 mean, the issue has become relevant again. And we had 18 the very conversation that you just mentioned about 19 whether or not we still think that that's the correct 20 interpretation today. 21 So I think that is definitely something 22 that a new administrator should definitely have on his 23 or her agenda to go back, because some of them are 24 really old. And you can tell they're really old 25 because it looks like they were on a typewriter, not a</p>

<p style="text-align: right;">38</p> <p>1 computer. I kid you not at all. Okay. Thank you. I 2 will definitely add that to an agenda as well. 3 MR. VEDRA: There's one from about 2005 4 that's wrong. 5 MR. ZAVISLAN: Well, Daniel -- 6 UNIDENTIFIED SPEAKER: Yeah, but that was 7 the 2000s, so ... 8 MR. ZAVISLAN: I can give you the three 9 months where I was previously the acting administrator, 10 and I can talk about the last eight months where I've 11 been the acting administrator, and I can guarantee you, 12 nothing wrong here. 13 Any last comments, questions, concerns? 14 Yes, Eileen. 15 MS. EVANS: Hi. I'm a financial analyst. 16 And just as a comparison with law and finance, the City 17 of Boulder has its comprehensive annual financial 18 report, which only accountants and finance people can 19 understand; then they have a simplified version for 20 people called the Pather (phonetic). And I'm wondering 21 if you could take this law and put it in a simplified 22 version for people to understand. 23 Because I still don't understand how a 24 debt collector attaches itself to a debt and what's 25 required at that first step. Because I had -- I had my</p>	<p style="text-align: right;">40</p> <p>1 you guys would hand out to ... 2 MR. ZAVISLAN: I think those have long 3 gone the way of the dust. It's probably worth looking 4 at that again and reviving something like that. I'm 5 just trying to think of a way rather than our office 6 saying, Well, here's what we think the FDCPA means -- 7 Dan. 8 MR. VEDRA: So I agree that that's 9 information that's necessary. And I think that it 10 would be helpful on all ends, because I imagine your 11 staff received lots of phone calls, I assume the 12 collection agencies received lots of phone calls, and I 13 received lots of phone calls that say, Why do they want 14 so much money from me, they bought this for pennies on 15 the dollar? 16 And there's a multitude of different ways 17 that debts are bought and sold and how ownership 18 changes or how rights change. And you can't capture 19 them all, but there's, like, three or four different 20 ones that come up most of the time. And so having that 21 information on the attorney general's website or on the 22 Stop Fraud Colorado website that would be much better 23 than people Googling it, finding these just bizarre 24 briefs that end up getting filed in court cases that 25 are 150 pages long; and they're talking about, you</p>
<p style="text-align: right;">39</p> <p>1 wage garnished before they had ever communicated 2 anything with me. So I'm looking for the very basics 3 of how this law works and where the abuses happen. The 4 same thing happens with the SEC governing -- or 5 overseeing financial advisors. 6 So having a list of -- in plain English 7 where the abuses are or where they might occur, what is 8 required would be helpful for nonattorneys. 9 MR. ZAVISLAN: Go ahead, T.A. 10 MS. TAYLOR-HUNT: We can help with that. 11 MS. EVANS: Okay. 12 MR. ZAVISLAN: So let me just put out as 13 a thought, again, probably not for me, but for whomever 14 is permanent. And this would, I think, in total 15 fairness, would be a collaborative type of effort 16 between consumer advocacy groups, debt collections, and 17 my office. If we were to put out that kind of a -- you 18 know, the laymen's view of the FDCPA, right, what it 19 means, what it says in a collaborative way; nonbinding, 20 right, not as in a formal opinion, what do those in the 21 room think about that kind of a collaborative approach 22 that would be educational and hope fully help consumers 23 who are on their own trying to sort through this? Tom. 24 MR. ROMOLA: Years ago, and I assume 25 they're still around, there used to be booklets that</p>	<p style="text-align: right;">41</p> <p>1 know, Supreme Court decisions from, like, the 18th 2 Century that make no sense, that would be very helpful, 3 I think, to everyone, and I think that there's probably 4 consensus on that here. I think it would be a great 5 idea. 6 MR. ZAVISLAN: So let me just make this 7 offer: I'm going to give you my email address, which 8 is jan.zavislan@coag.gov. Now, this is not an 9 invitation for you to email me about every single 10 possible thing. 11 What I'm looking for is if you are 12 interested down the road in participating in a group 13 discussion and/or drafting of such a thing, maybe it's 14 updating the brochures, maybe it's providing some 15 better guidance, I can't think of a better public 16 service that we could offer in conjunction with our 17 constituencies, both the regulated side and the 18 consumer side, on something that actually would be 19 meaningful out there as a -- informal maybe, but as a 20 public document. 21 So, please, only if you are interested in 22 participating in that kind of a process. And I can't 23 guarantee it's going to happen, but it's certainly a 24 conversation that I'll have with Phil Weiser and with 25 the new administrator, as I think it would be</p>

<p style="text-align: right;">42</p> <p>1 potentially a very positive step.</p> <p>2 MS. STURGES: Again, from the judicial</p> <p>3 perspective, there's a move to move towards plain</p> <p>4 language in our forms; and so I will definitely</p> <p>5 volunteer one of my colleagues who's working very</p> <p>6 closely with that. And consistent with that, also</p> <p>7 visually moving away from texts and being much more</p> <p>8 visual, like, almost doing a Candyland game type of</p> <p>9 visual for the public. So those efforts are efforts</p> <p>10 that judicial is looking at very hard because of the</p> <p>11 way people process information now.</p> <p>12 MR. ZAVISLAN: So I was, Sharon, a Chutes</p> <p>13 and Ladders guy instead of Candyland guy, so ...</p> <p>14 All right. So we will -- I think if I</p> <p>15 did -- we'll see what kind of interest we get. You</p> <p>16 know, there's things that we're going to have to think</p> <p>17 through a little bit, right. I mean, number one, you</p> <p>18 know, physician, you know, do no harm. We can't</p> <p>19 mislead further. We can't create confusion where there</p> <p>20 really shouldn't be confusion. We can't suggest that</p> <p>21 if we do the four or five things that Dan was talking</p> <p>22 about, that somehow that impliedly excludes others.</p> <p>23 So I think it's worth having at least</p> <p>24 some discussions about what that might look like, what</p> <p>25 that might include for everybody's benefit. But I'd</p>	<p style="text-align: right;">44</p> <p>1 CERTIFICATE</p> <p>2 STATE OF COLORADO)</p> <p>3 COUNTY OF DENVER) ss.</p> <p>4</p> <p>5 I, Teresa Hart, a Registered Professional</p> <p>6 Reporter and Notary Public for the State of Colorado,</p> <p>7 do hereby certify that the above-entitled hearing was</p> <p>8 taken in shorthand by me at the time and place</p> <p>9 hereinabove set forth and were thereafter reduced to</p> <p>10 typewritten form by computer-aided transcription; that</p> <p>11 the foregoing is a true transcript of the questions</p> <p>12 asked, testimony given, and proceedings had; that I am</p> <p>13 not attorney, nor counsel, nor in any way connected</p> <p>14 with any attorney or counsel for any of the parties to</p> <p>15 said action or otherwise interested in its event.</p> <p>16 IN WITNESS WHEREOF, I have hereunto affixed my</p> <p>17 hand and notarial seal this 4th day of February, 2019.</p> <p>18 My commission expires: January 19, 2020.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">TERESA HART Registered Professional Reporter and Notary Public CALDERWOOD-MACKELPRANG, INC.</p> 
<p style="text-align: right;">43</p> <p>1 like to do it -- my personal view, I'd like to do it</p> <p>2 and get industry buy-in for that kind of an outreach</p> <p>3 effort as well as the debtor side as well.</p> <p>4 Okay. Yeah, I know.</p> <p>5 MR. KUMOLA: One last question. Any</p> <p>6 update on that Lexington law issue?</p> <p>7 MR. ZAVISLAN: Nope.</p> <p>8 MR. KUMOLA: Is that the best answer you</p> <p>9 can give me?</p> <p>10 MR. ZAVISLAN: It's the only one I can</p> <p>11 give. We can talk offline, but I'm not going to be</p> <p>12 able to tell you much more than that at this point.</p> <p>13 MR. KUMOLA: All right. Thank you.</p> <p>14 MR. ZAVISLAN: Yes. It's not closed, if</p> <p>15 you had that fear.</p> <p>16 Any last questions, comments, statements?</p> <p>17 All right, seeing none, thank you all very much for</p> <p>18 coming over.</p> <p>19 (The proceedings were concluded at</p> <p>20 11:03 a.m., on Friday, January 25, 2019.)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	

A		B	
<p>a.m 1:9 43:20 able 16:5 18:9 23:19 43:12 above-entitled 44:6 absence 24:3 Absolutely 30:2 abuse 13:17 abuses 8:15 39:3,7 ACA's 23:24 accept 13:10 25:7 accepted 22:24 access 18:14 accomplish 22:4 accountants 38:18 accumulating 20:11 achieve 27:4 act 1:2 2:7,18 4:14,16,17 5:3,5 8:20 20:17 23:3 24:5 31:16 acting 1:10 2:4 4:11,22 5:11 38:9,11 action 35:13 44:14 actions 35:1 36:12,25 active 8:12 actor 19:9 actors 18:7 actual 22:16,18 add 38:2 added 34:13 additional 2:22 address 7:4 8:15 22:16,18,21 22:22 24:14 30:12 41:7 addressed 5:7,8 34:7 addresses 4:4 13:15 adequately 17:3 adjusted 26:16 Administrative 20:16 administrator 1:10 2:5,14,21 4:12,15,20,23 5:11,14 16:4 17:11,16,25 20:5,15 21:6 24:9 30:12 32:4,25 33:7 34:2,9,11 35:2,8 36:22 37:22 38:9,11 41:25 administrator's 10:7 33:1 34:10 adopted 4:15 adopting 20:22 advance 4:8 20:15 33:3 advantage 10:13 advice 4:13 9:7 10:10 35:8 advisories 35:20 advisors 39:5 advisory 23:16 34:8 35:2,4,19 36:13,16,21,24,25 advocacy 3:2 5:18 8:3 17:12 20:6,20 39:16 advocate 18:8 Advocates 10:1 advocates' 29:10 advocating 36:12 affairs 33:2 affixed 44:15 agencies 3:4,5 7:9 8:16 9:4 12:2 13:13 15:6 16:24 40:12 agencies' 19:6 29:10 agency 2:21 3:9 8:20 13:9 26:5 26:15 30:15 31:3 35:21 agenda 17:15,15 20:13,23 32:24 33:7 37:23 38:2</p>	<p>agendas 33:12 aggregated 22:3 aggressive 24:20 ago 14:19,25 15:12 16:11,12,17 39:24 agree 40:8 agreement 8:18,22 ahead 23:21 39:9 aisle 29:7 Alan 23:22 37:7 alerts 23:13 allow 20:18 allows 12:5,9,12,14 alright 16:7 amazement 24:6 ambulance 24:17,24 amended 11:14 American 23:8,8 amount 12:1 19:19 21:15 analysis 15:6 analyst 38:15 and/or 41:13 anecdotal 17:19 announcements 5:16 annual 3:14,14 38:17 answer 14:24 28:14 43:8 antiquated 21:24 anybody 3:19 7:4 9:22 14:9 24:13 application 14:25 15:5,21,25 appointed 21:6 appoints 20:5 appreciate 28:19 30:24 appreciated 32:11 appreciates 27:17 approach 39:21 approval 37:9 area 23:11,16 areas 5:5 20:20 24:16 arrangement 25:20 artist 19:3 asked 44:11 asks 19:15 Assembly 2:20 assist 9:13 10:10 Associated 7:8 Association 8:24 10:1 23:24 Association's 4:4 associations 3:2 assume 39:24 40:11 astounding 12:1 atrium 9:11 attaches 22:16 38:24 attachments 3:15 attend 13:25 attendance 6:2 30:22 attended 31:7 attitude 24:10 attorney 2:12 3:11 4:11,20 5:14 8:9 14:4 17:6 20:4,14 21:5 23:15 28:22 34:4 40:21 44:12,13 attorneys 3:4,9 6:25 9:18 authority 25:23 authorized 26:5 available 3:11 18:2 24:11 37:9 aware 4:25 5:3 14:2 16:23 24:1 34:24</p>	<p>back 3:21 15:12 22:24,25 25:21 30:14 33:16 35:17,18 37:23 background 33:16 bad 18:7,20 29:15 Baker 24:1 balance 25:10,23 27:4 bankruptcy 18:22,23,25 banks 9:10 Bar 4:4 8:24 23:24 bare 33:12 based 9:16 basic 3:17 basically 33:16 basics 39:2 basis 32:16 BBB 23:21 behalf 26:6 belief 17:2 believe 4:7 16:11 28:4 29:24 31:20 beloved 24:4 benefit 42:25 benefits 15:7,8 best 25:25 26:11 43:8 better 23:18 30:23 40:22 41:15 41:15 biannual 2:23 bifurcate 29:3 bill 2:20 3:1 15:8 16:11 25:10 32:1 billing 25:24 bit 3:19 32:17 42:17 bizarre 40:23 Blair 11:16 board 2:21 30:16,19,22 31:3,3 31:8 33:14 bones 33:12 booklets 39:25 bought 40:14,17 Boulder 38:17 box 22:18 branches 12:10 brand-new 14:4 Briefly 37:7 briefs 40:24 bring 12:20 29:20 brings 33:19 Broadway 1:8 brochures 41:14 bucks 19:10 building 9:9 28:6 bulk 18:22,23 buy-in 43:2</p>	<p>Candyland 42:8,13 capacity 4:22 capture 22:10 40:18 Care 25:7,17,21 carefully 21:10 Carr 1:7 carry 8:9 case 8:12,12,20 9:5 10:16 cases 9:1 22:17 40:24 category 23:17 cease 22:23 Center 1:7 8:11 centers 10:8,8 Central 23:8 Century 41:2 certain 36:22,23 certainly 5:5 6:19 10:22 15:16 20:3 21:4,25 22:3 31:7,9 33:19 34:20 37:2 41:23 CERTIFICATE 44:1 certified 22:25 certify 44:6 cetera 3:22 14:5 27:2,2 34:6 CFDPCA-related 34:19 CFPV 18:2,4 chair 9:25 chairman 7:8 challenge 23:1,9 change 14:3 24:10 40:18 changed 11:14 changes 40:18 child 26:3,6 Chutes 42:12 Citizens 15:20 City 38:16 claimant 9:4 claims 26:16 clap 27:18 clear 29:25 33:21 36:11 client 25:10 client's 25:9 clients 9:19 24:6 closed 43:14 closely 42:6 COAG.gov 3:12 Code 1:2,11 2:5 codes 21:18 coffee 3:22 collaborative 39:15,19,21 colleagues 42:5 collected 25:4 collection 1:2 2:7,18,21 3:4,5,9 4:7,14 5:3 6:24 7:8 8:11,16 8:19 9:3,20 12:2 13:3,9,18 16:21,24 17:8 19:6,13 22:7 23:6 24:18 25:11,12 26:5,15 26:17,23 29:10 30:15 31:3 37:6 40:12 collections 16:25 24:5 39:16 collector 38:24 collectors 16:21 24:19 25:19 27:5 Colorado 1:1,2,7,8 2:24 4:4,9 9:8,11,15,18 13:8 23:3,23 24:5 26:8 40:22 44:2,5 Colorado's 2:6 come 6:8,12 7:19 9:21 10:24 11:14 16:8 22:24 23:7 26:10</p>

<p>26:11 32:15,21,25 33:1 35:23 35:23 40:20 comes 18:12 27:20 coming 2:14,15 13:5 18:6 43:18 commencing 1:9 comment 21:4 comments 6:13,16 17:4,10 23:21 24:13 27:8 31:12 38:13 43:16 commission 44:17 committee 4:5,6 8:24 16:15 committees 2:23,24 common 18:17 communicate 15:18 communicated 39:1 companies 22:14 23:4,20 27:7 company 26:23,25 comparison 38:16 complaint 21:7,10,11 22:9 24:2 complaints 12:21,23 13:14 16:22 17:25 18:3 21:13,23 24:23 25:2,3 26:21 complete 27:21 completely 4:10 22:20 comprehensive 38:17 computer 38:1 computer-aided 44:9 concerned 33:1,4 concerns 30:11 38:13 concluded 43:19 conduct 3:24 conducted 3:25 conference 7:13 13:25 confusion 42:19,20 conjunction 41:16 connect 10:2 connected 44:12 connects 29:15 consensus 41:4 consider 9:8 11:18 13:8 20:21 considered 17:22 consistent 42:6 constituencies 41:17 constituents 29:16 33:6 constrained 29:11 construed 4:18 consumer 1:2,11 2:5 3:2 4:5 5:18 8:3,24 10:1 17:12 18:18 19:18,20 20:6,20 21:10,11,13 23:12,13 29:9 39:16 41:18 consumers 12:15,16 14:12 16:14 18:8 35:5 39:22 contacted 26:4,22 contain 3:15 continental 22:22 continues 27:23 contract 25:6 conversation 2:11 7:17 8:5 25:16 37:14,18 41:24 conversations 16:20 20:4 convince 19:1 cooperative 24:8 Corporation 9:16 dial 7:12 14:23 37:19 correction 7:16 correspondence 34:21,21 cost 15:7 21:20</p>	<p>council 23:25 counsel 25:17 29:17 44:12,13 countries 23:8 COUNTY 44:2 couple 3:17 9:7 19:16 court 6:6 8:22 10:6,15 19:11,11 40:24 41:1 courthouse 9:11 courthouses 10:9 courts 10:22 cover 27:1,1 create 42:19 creation 33:15 credit 1:2,11 2:5 34:17 creditor 34:5 creditors 3:5 23:23 27:5 criminal 19:5,9 24:7 criminalize 24:4 critical 11:24 criticized 32:23 crowd 8:6 currently 5:7 custody 26:7,7</p>	<p>difficulty 24:17 digest 21:3 diminish 11:24 direct 10:25 director 10:21 14:5 disciplinary 35:3,13 36:12,25 discuss 32:15 discussion 4:16 14:20 29:6,8 41:13 discussions 42:24 Dispute 10:21 distance 22:15 distinction 36:1 district 10:15 divided 32:8 divorce 26:3 document 41:20 doing 16:21,25 19:9 20:3 27:16 28:9 36:4 42:8 dollar 40:15 door 3:18 DORA 15:13,21 27:21 28:5 31:19,24,25 32:3 drafting 41:13 drink 3:23 Dunn 37:11 dust 40:3</p>	<p>Evans 8:8,10 10:4 11:9 17:7,13 38:15 39:11 event 44:14 everybody 2:3 4:1,25 5:24 6:2 6:11,19 18:13 29:20 36:24 everybody's 42:25 Everything's 8:6 exact 20:9 22:6 23:3 exactly 15:24 16:18 20:6 33:23 35:22 36:7 example 18:24 excellent 27:16 exchange 24:8 excludes 42:22 exist 19:7 existing 37:3 expanded 4:2 28:25 expenses 25:9 expire 12:8 expires 44:17 extend 28:2 32:1 extent 22:11</p>
D		E	F
<p>D 2:1 D-E-E-D-S 11:16 Dan 17:5 19:16 22:6 31:14 32:2 36:6 40:7 42:21 Daniel 38:5 database 8:23 18:2,14 21:7,16 21:19,23 22:1 24:10 databases 24:2 day 37:13 44:16 days 4:8 13:19 deadline 17:17 deal 17:12 20:3 26:12 33:23 dealing 18:10 21:24 25:14 debt 1:2 2:6,17 4:7,14 5:3 8:19 9:20 13:1 16:21,21 22:7,8 23:6,13 24:5,18,19,20,23 25:4 25:14,15,19,24 26:2,3,17,22 27:5 37:6 38:24,24 39:16 debtor 12:25 25:14 29:17 43:3 debtors 8:3,15 29:17 debts 25:3 26:9 40:17 December 4:8 12:8 34:17 decided 14:6 decisions 41:1 Deeds 11:15,15 defendants 17:8 definitely 14:8 36:18 37:21,22 38:2 42:4 deidentified 22:3 deidentifying 21:17 Denver 1:8 44:2 deny 13:2 department 1:1 2:25 11:18 13:3 15:5 desist 22:23 despite 24:3 determine 16:13 18:10 27:22 31:20 detract 11:23 correct 7:12 14:23 37:19 dialogue 6:21 32:13 different 20:11 33:8 40:16,19 difficult 9:4 19:7,8 23:4</p>	<p>E 2:1,1 E-I-L-E-E-N 8:10 E-V-A-N-S 8:10 easily 22:11 Eastern 23:7 education 19:20,25 23:12,18 educational 39:22 effective 30:5,19 31:20 32:7,8 efficient 11:23 18:5 effort 39:15 43:3 efforts 42:9,9 eight 5:10 34:19 38:10 Eileen 8:10 9:23,24 11:8 30:10 38:14 either 22:2,10 25:4 elevator 9:10 email 4:3 41:7,9 emanating 23:6 encounter 18:18 encountering 14:12 encourage 15:18 ends 40:10 enforce 23:2,19 enforced 36:3 enforcement 2:6 20:2 25:22 36:1 enforcement-type 35:25 English 39:6 entire 21:23 31:10 entitled 15:20 entity 12:18 error 7:11 especially 22:15 essence 8:22 essentially 20:17 establishing 20:23 estranged 26:2 et 3:22 14:5 27:2,2 34:6 European 23:7</p>		<p>facing 4:24 fact 5:1 29:3 fair 1:2 2:6,17 4:14 5:3 8:19 21:15 24:5 27:4 32:10 33:11 35:19 fairly 12:17 fairness 39:15 fall 5:12 falsified 8:21 familiar 30:15 family 26:2 far 2:10 13:18 14:24 24:18 farther 15:12 fashion 11:23 favor 9:3 FDCPA 39:18 40:6 FDPFA 19:11 fear 43:15 February 44:16 federal 19:11 24:3 feedback 31:5 feel 17:21 29:11 felt 32:8 figure 26:11 file 2:22 8:18 18:25 filed 3:14 8:22 9:1 12:21,23 40:24 files 18:22,23 31:25 filing 13:6 fill 2:9 finance 25:17,22 35:15 38:16 38:18 financial 38:15,17 39:5 Financing 25:7 find 18:23 22:21 23:4 finding 24:17 40:23 fine 30:6 firms 16:21,25 first 3:7,16 7:4 16:15 17:24 27:13 30:4 32:9 38:25 five 6:16 22:13 42:21 fix 7:11 focus 12:16 folks 10:8</p>

follow 6:20 36:5 follow-up 6:20,21 following 14:8 foregoing 44:10 form 44:9 formal 4:19 5:2,16 6:2 13:6 17:22 20:13,16,23 33:22 34:18 39:20 formally 31:23 format 27:23 32:7 format's 28:18 formerly 2:9 forms 10:11 42:4 forth 44:8 forum 17:19 forward 2:13 6:8 four 22:13 31:11 40:19 42:21 fraud 19:20 40:22 frequently 18:6,21 fresh 37:13 Friday 1:6 43:20 front 6:8 full 21:18 24:8 26:6,7 full-time 2:13 fully 15:20 26:16 39:22 function 12:15 functions 11:21 12:18 further 42:19	guess 34:25 guidance 41:15 guidelines 13:10 guy 42:13,13 guys 13:20 23:11 40:1	identify 10:11 11:12 18:6 22:16 23:19 illegal 22:7 imagine 35:19 40:10 immediately 13:2 implemented 12:24 implicates 32:2 impliedly 42:22 important 17:21 improperly 25:23 improve 32:21 inadequate 11:13 inappropriately 25:5 include 4:3 21:18 42:25 includes 2:6 6:24 12:10 including 9:19 income 9:16 incorrect 13:16,17 incurs 26:3 India 23:7 Indiana 12:4,13 indication 34:11 individual 26:23 individuals 17:7,13 industry 5:18 6:24 13:19 20:7 20:19 25:12 30:10 31:9 35:5 43:2 informal 4:10,18 13:10 25:20 25:20 34:21 41:19 informally 33:20 information 10:16 12:1 15:24 17:20,20 18:15,19,21,23,25 20:18 21:11 22:2 23:18 34:16 40:9,21 42:11 initiate 15:4 input 31:5 32:5 inquiry 24:9 instance 8:17 12:9 13:5 15:9 26:13 instances 15:2 instructed 24:7 insurance 26:16,25 27:7 intention 34:13 interest 16:1 42:15 interested 3:3,6 4:2,25 5:19 15:17 20:19 33:3 41:12,21 44:14 interesting 21:8 interim 1:10 2:4 13:7 16:4 internally 25:25 interpretation 36:17 37:3,20 interpretations 4:13 introduced 15:9 16:10 invitation 41:9 invite 5:17 invited 7:13 involved 12:18 33:6,13 involving 4:17 issue 11:11,11 12:20 14:15 18:9 20:17 21:20 23:3 24:13 26:14 28:12 33:5 35:21 37:17 43:6 issued 34:16,18 35:3 36:22 issues 4:7,17,24 5:7 8:23 9:19 18:6 26:1,10 28:6 30:11 32:15 33:19 34:19 issuing 13:8	jack 16:13 jailed 19:14 Jan 1:10 2:4 16:7 jan.zavislan@coag.gov 41:8 January 1:4,6 3:1,8 5:4 20:12 30:5 33:17 43:20 44:17 job 23:18 27:16 Joint 2:23 judicial 1:7 10:7,15 42:2,10 Judiciary 2:23 Julie 2:10 3:7 7:13 30:4 33:16 July 3:3,10,25 5:4 11:17 13:23 28:25 29:6,25 34:1 July's 20:12
G	H	K	K
G 2:1 gain 32:17 game 42:8 garnished 8:18 39:1 gather 17:20 general 2:12,20 5:14 14:4 20:4 20:15 21:5 23:15 28:23 general's 3:11 4:20 40:21 getting 12:18 13:14 23:18 40:24 give 6:18 9:7 10:10 32:16 36:2 38:8 41:7 43:9,11 given 14:15,22 23:10 30:21 44:11 gives 12:15 13:9 giving 36:16 go 3:12,20 5:10 9:9 12:17 13:5 14:7 15:22 20:24 23:21 24:21 35:17,18 37:23 39:9 goal 6:22 12:14 Goggan 11:16 going 2:13 4:21 5:21 6:6 8:2 16:13 29:19 36:5 41:7,23 42:16 43:11 good 2:2 19:3 29:6,7 34:3 Googling 40:23 gotten 25:1 governing 39:4 great 20:3 33:23 41:4 Greenberg 23:22,22,23 34:5 37:7,7 ground 5:21 18:17 group 7:5 8:25 11:25 41:12 groups 3:2 8:4 15:20 17:12 19:22 20:7,20 26:15 28:24 32:8 39:16 guarantee 38:11 41:23 guard 21:10	half 5:10 hallway 3:21 halt 31:13 hand 40:1 44:16 handheld 6:5 handle 25:25 handling 27:14 happen 39:3 41:23 happened 8:21 happens 39:4 happy 6:11 18:13 harass 19:1 hard 42:10 harm 16:14 42:18 Hart 44:4,19 Health 25:7,17,21 healthcare 25:6 26:25 hear 4:23,23 6:7,11 14:17 16:7 16:9 32:24 hearing 2:16 4:1 6:23 8:1 20:25 21:1,2 24:22 30:9 44:6 hearings 3:16 heated 12:25 heavy 20:2 35:18 heft 32:17 held 2:10 3:16 help 10:11 12:14 20:22 39:10 39:22 helpful 11:8 13:12 18:9 39:8 40:10 41:2 helping 8:15 helps 18:5 hereinabove 44:8 hereunto 44:15 Hey 36:3 Hi 9:24 17:5 38:15 highest 13:14 historically 19:24 35:12,14 36:10 history 36:8 hold 2:25 3:3 6:15 honest 5:9 22:23 hope 11:8 39:22 hopefully 2:14 hoping 13:8 hosted 3:7,8 hot 12:25 hour 1:9 House 2:20 housekeeping 3:17 huge 23:9 25:1 26:14 Hughes 37:15 huh 7:6 hundred 25:8	keep 9:10 kid 38:1 kind 20:9 22:7 33:22 39:17,21 41:22 42:15 43:2 knew 16:18 know 3:20 4:16 8:19 9:17 13:12 14:24 15:1 16:1 20:7 21:7 22:6,11 23:5,7,16 25:5 25:13 27:19,23,24 28:7,13,14 28:14,18 29:12,14 30:15 31:23 32:2,3,10,14,21,22 33:20 35:12,14,16 36:15 37:13 39:18 41:1 42:16,18,18 known 5:10	L
	I	J	L
	ID 22:10 Idaho 12:3,13 idea 21:11 29:15 34:2 41:5 ideas 9:1,22 11:12 17:18 20:11 21:2 32:17		L 1:7 lack 30:22 lacking 31:5 Ladders 42:13 language 42:4 Laura 37:15 law 1:1 2:25 4:9 9:9,11 11:18 15:2 16:21,25 26:8 38:16,21 39:3 43:6 laws 8:20 lawsuits 17:8 lawyer 18:18 26:23 lawyers 20:20 29:10,10 laymen's 39:18 leads 32:13 led 33:14 legal 4:12,13 9:7,13,15,19 10:10 25:17 legal-type 9:14 legislation 29:4,23 36:23 legislative 7:8 14:3,5 23:24 32:1 33:14 legislatively 26:19 legislator 31:25 legislature 2:24 7:11 15:9 16:10 28:10 legitimate 22:12 lending 34:17 37:5 let's 7:3 letter 34:16,18 35:4,25 36:1 37:16 letters 22:23 34:12 35:3,3,20 36:25 37:9 level 24:22 Lexington 43:6 librarians 9:12

library 8:13 9:9,12 license 14:16 15:3,10 licensed 12:18 15:14 29:16 licenses 12:6,7,9,11 licensing 3:12 11:19 14:22 21:23 37:5 lift 35:18 line 7:13 Linebarger 11:16 link 37:5 links 3:13 list 4:2 23:3 39:6 listen 32:21 listening 4:21 literally 3:18 litigation 34:6 little 3:19 32:17 37:10 42:17 loans 18:24 LOAs 35:14 local 7:13 15:18 locally 20:9 located 10:9 long 22:15 33:20 40:2,25 look 8:23 10:14 15:7 18:3,9 25:18 26:18 35:12,21 36:18 42:24 looked 27:3 33:16 looking 5:15 13:24 14:8 39:2 40:3 41:11 42:10 looks 6:17 37:25 lot 12:21 13:15 18:17,18 19:10 20:11 22:14,19 23:5 28:24 34:5,20 lots 40:11,12,13 loud 6:10 love 20:8	member 13:25 members 5:17,18 6:24 31:9 mention 9:15 mentioned 37:18 met 26:15 Michael 11:15 mike 8:8 13:22 36:19 miked 6:5 mind 9:21 28:17 34:2 mini 28:4 minutes 5:22 6:16 mislead 42:19 missed 34:23 mistake 18:11 misunderstand 31:23 misunderstanding 31:21 misunderstood 7:15 momentum 32:18 money 40:14 months 2:15 5:10 12:10 34:19 37:15 38:9,10 Moody 34:3,3,25 35:7 36:11 morning 2:2 34:3 move 42:3,3 movement 16:18 moving 2:13 42:7 Multistate 11:19 multitude 40:16	<hr/> O <hr/> O 2:1 obligation 32:5 obviously 5:17 16:5 occasion 36:22 occur 39:7 October 28:10 offer 10:23 41:7,16 office 4:20 10:7,21 11:21,24 16:4 19:18 21:9 23:2 39:17 40:5 offline 43:11 Oh 35:6 okay 6:16 7:15,20 10:4 11:5 31:6 38:1 39:11 43:4 old 18:24 30:15 37:15,24,24 once 7:24 12:7 one-off 18:10 ones 40:20 online 18:2 open 4:9 6:23 9:1 17:18 opinion 4:19 28:22 32:6 34:12 34:16,18 36:21 37:8,16 39:20 opinions 4:13 34:8 35:8 36:24 opportunity 6:18 21:3 29:1 30:12,13 32:11,15 opposed 12:16 orders 35:15 organizations 19:5,23 ought 5:8 20:21 outreach 17:11 19:20,25 20:9 43:2 outside 10:25 overall 23:2 overbilling 24:18 overly 24:20 overseeing 39:5 oversight 2:24 owe 13:1 ownership 40:17	38:22 40:23 42:11 perceive 13:13 percent 25:8 perfect 7:20 8:6 performs 11:22 period 12:10 permanent 5:14 20:5 34:2 39:14 person 19:13 36:2 personal 28:22 43:1 personally 29:18 persons 3:6 perspective 33:9 42:3 phantom 22:7 23:5,13 Phil 2:12 41:24 phone 13:16 22:9,12,13,15,17 22:20 23:6 40:11,12,13 phonetic 21:16 24:1 37:12,15 38:20 physician 42:18 piece 36:23 place 44:7 placed 2:21 35:14 plain 39:6 42:3 plan 21:5 play 7:19 please 6:1,8,9,16 41:21 PO 22:18 podium 6:12 point 9:5 10:2,24 31:24 43:12 points 24:21 policy 15:23 25:7,17,22 28:5 portion 27:19 position 2:9 4:19 21:8 27:15 36:13 positive 42:1 possibility 17:16 19:12 possible 14:6 41:10 possibly 6:23 potential 10:3,11 potentially 26:19 42:1 powers 22:5 practice 5:3 17:6 Practices 1:2 2:7,18 4:14 precisely 17:14 preferred 32:19 prefers 12:23 prepare 33:3 prerogative 5:13 presentation 14:1 president 23:23 pretty 21:10,24 23:9 27:15 29:25 previously 15:3 38:9 prices 16:13 primarily 20:11 private 17:6 probably 3:20 18:17 19:4 27:17 28:2 32:22 39:13 40:3 41:3 problem 18:11,12 29:2,18 problematic 24:3 problems 4:24 14:11,20 Procedure 20:16 proceed 21:5 22:8 proceedings 1:4,6 43:19 44:11 process 5:19 13:5,11 14:12,16 14:20,21,22 15:10,16 16:2,14 16:22 17:2 21:22 22:1 29:18
<hr/> M <hr/> M-A-K-Y-L-A 34:4 M-O-O-D-Y 34:4 ma'am 8:7 9:23 mail 22:25 main 12:11 making 5:15 16:25 17:22,22 24:2 Makyla 34:3,23 36:6 manager 13:3 mandatory 13:12 manner 18:3 Massachusetts 12:4,13 matters 9:20 Meade 2:10 3:7 32:9 mean 20:10 28:4 31:8 35:25 37:2,17 42:17 meaningful 41:19 means 7:2 30:9 39:19 40:6 media 21:12 mediation 10:23 11:1 medicaid 25:4,14,24 medical 24:20,23 25:3,9,15 26:1,3,24 27:6 meeting 2:8,25 3:4,8,23,25 4:9 7:12 10:24 13:23 14:10,19 24:14 29:25 30:4 31:13 32:9 32:12 33:17 34:7 meetings 3:8,11 4:9 5:4 20:9 20:12 27:14 28:23 29:21 30:19,23 31:17 32:6	<hr/> N <hr/> N 2:1 name 2:3 6:9,9,14,15 8:9 9:24 10:19 11:15 17:5 34:4 36:19 nation 12:6 national 7:14 9:25 11:19 13:25 nationwide 13:4 nature 11:24 near 6:8 nearly 19:25 necessarily 25:18 31:8 32:2 35:23 necessary 17:21 40:9 need 3:22 5:6,23 6:14 7:12 8:8 11:13,13 15:15 16:2 32:18 needs 3:19 negotiations 26:24 27:6 never 26:5 31:9 37:1 new 2:12 5:7,14 20:4,14,15 21:5,6 22:1 37:22 41:25 news 21:12 nice 27:4 32:23 nitpicky 7:18 NMLS 11:23 12:3,7 13:24 14:1 No-Call 23:3 nobody's 28:7 nonattorneys 39:8 nonbinding 39:19 Nope 43:7 notarial 44:16 Notary 44:5,20 noteworthy 35:4 notice 4:1,7 20:24 noticed 4:5 19:19 34:10 notification 29:1 number 5:1 11:25 22:9,17,20 25:1 34:12 35:19 42:17 numbers 13:16 22:12,15	<hr/> P <hr/> P 2:1 page 7:10 35:1 37:5 pages 40:25 paid 26:16 parallel 24:3 parent 26:4 parents 26:9 part 19:4 20:24 participate 5:19 participating 41:12,22 particular 10:15 18:7 35:21 particularly 24:23 parties 3:3 4:2 5:19 20:19 44:13 partly 20:1 partner 11:16 19:22 Pather 38:20 patients 27:6 pay 19:1,2 Payday 18:24 payment 25:9 pending 10:16 pennies 40:14 people 6:17 8:25 14:4 18:20,23 19:1,4,10 31:10 33:2 38:18,20	

<p>32:21 33:14,22 41:22 42:11 profession 15:4 Professional 44:4,20 program 12:24 proposal 15:3 proposals 20:18 propose 20:14 proposed 20:24 proposing 19:17 prosecution 24:8 protection 4:5 8:24 19:18 provide 4:12,13 32:5 provider 25:6 26:25 providers 25:23 provides 11:25 18:15 providing 41:14 provision 31:16 public 2:16 3:16 4:1 6:4,13,19 6:23 7:1,2 20:25 21:4 24:2,11 24:14 30:9,9 31:5,10 36:24 37:1,4 41:15,20 42:9 44:5,20 public's 37:9 public-facing 22:2 publish 36:12 published 35:9 36:3 pursuant 2:16 push 16:19 put 23:17 27:15 28:17,19 38:21 39:12,17 PV 21:16</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>question 14:18,19,21 27:10 28:16 31:15 43:5 questions 6:21 8:14 9:14 17:4 17:9 19:14 27:8 30:11,25 31:12 38:13 43:16 44:10 quick 14:23 quiet 8:5 quite 35:18</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>R 2:1 R-O-M-O-L-A 7:7 raise 22:4 raising 14:14 Ralph 1:7 rapid 24:18 rate 13:14 re-urge 11:20 reached 28:7,15 reaches 28:5 ready 27:11 reality 19:13 really 5:13 19:12 21:2,20 23:4 23:4 24:18 28:3 33:11,11 37:13,24,24 42:20 reason 12:22 20:1 recall 2:19 15:13 16:15 receive 16:22 received 17:25 40:11,12,13 reception 3:21 recommendation 28:3 recommended 15:14 record 6:2 redoing 21:22 reduced 44:8 redundant 12:17</p>	<p>Reedy 37:11 refer 25:21 referral 11:1 refocus 12:14 refusing 21:12 regard 20:10 regarding 25:3 36:25 Registered 44:4,20 regular 33:2 regularly 30:20 regulate 15:3 regulated 41:17 regulator 29:15 regulators 17:11 regulatory 13:13 15:6 20:2 reimbursement 25:8 relate 8:14 relates 24:24 relationship 26:2 released 34:8,12 relevant 10:12 37:16,17 relinquish 6:12 remember 15:23,24 remembering 16:17 removes 12:15 renewed 12:19 31:17 repeal 28:1 31:25 33:14 repealed 2:20 repeat 14:18 replacement 2:14 replaces 34:1 report 7:10 15:13,22 28:10,12 34:10 35:2 38:18 reporter 6:6 44:5,20 reporting 17:1 reports 2:23 3:14,15 28:6 represent 8:3 17:6 representation 29:8 representative 15:19 representatives 3:9 representing 3:5 8:3,11 17:13 request 11:20 17:17,23 20:17 requested 11:17 requests 17:10 20:18 require 14:2 29:23 required 4:9 15:20 38:25 39:8 requires 15:2 31:24 research 8:17 9:13 27:22 researching 8:12 reselling 22:14 resolution 10:22 13:11 25:20 resolve 13:4 resources 9:8,21 10:3 respond 12:24 response 13:6 24:8 responsibilities 2:22 23:10 responsible 26:9 restrooms 3:18 result 18:11 results 32:14 review 5:5 15:21,25 28:2 reviving 40:4 right 3:19 4:10 7:21 14:23 16:16 21:17,22 28:9 29:7 36:10,14,17 39:18,20 42:14 42:17 43:13,17 rights 34:6 40:18 risk 15:7</p>	<p>road 7:19 41:12 robust 18:5 role 4:12 roles 20:2 rolled 2:8 Romola 7:6,7,18,21,24 16:7,10 27:10,13 28:11,16 29:24 30:3 30:14,18,24 39:24 43:5,8,13 room 1:8 5:25 6:5,8,17 18:17 27:17 31:11 39:21 route 14:7 routed 13:2 rule 5:7 7:24 16:5 17:22 20:22 36:23 37:3 rulemaking 5:2,12,16 17:15,17 17:18,23 20:10,13,16,23,24 21:1 26:19 33:22 rules 4:15,17 5:6,21 11:12 20:25</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>S 2:1 11:6,7 27:9 S-H-O-O-P 36:20 Sada 23:23 34:5 Sampson 11:17 saw 30:21 33:16 saying 40:6 says 25:7 34:25 35:1,2 39:19 scam 19:3 scams 18:19 22:7 scheduled 27:25 seal 44:16 SEC 39:4 second 7:25 28:16 31:2 section 2:17 3:13 see 3:13 13:15 18:21 22:15 25:3 26:1,20 35:6,13,22,25 42:15 seeing 4:24 15:13 22:6 26:13 33:1,8 43:17 seek 24:7 seen 33:12 self-help 10:7,8 semiannual 32:16 senator 15:19 send 9:23 22:12,22,25 sense 28:24 29:5,19 32:13 33:18,24 36:16 41:2 sensitive 13:20 sent 4:1 26:17 36:24 separate 28:24 separation 26:3 serve 23:24 server 17:2 servers 14:12,16,20,23 15:10 16:14 service 11:19 14:21 16:22 17:3 41:16 services 9:16 10:23 26:6 session 4:22 32:1 set 6:18 14:4 17:16 20:13 25:10 31:17 44:8 setting 33:7 seven 31:10 sharing 17:18,19 Sharon 10:20 11:2 42:12 sheet 6:1 Sherlocks 10:9</p>	<p>Shoop 36:19,19 shorthand 44:7 shown 15:15 sic 8:20 11:19 19:2 25:1 34:16 side 9:11 19:20 32:10 37:5,6 41:17,18 43:3 sides 29:7,9 sign 11:3 sign-up 6:1 similar 3:3 16:11 37:8 simplified 38:19,21 simply 6:11 single 41:9 situation 9:17 10:12 26:8 small 3:22 23:9 sold 40:17 somebody 19:9 26:22 somewhat 9:16 sorry 31:21 34:23 sort 17:9,18,19 25:19 32:24 39:23 South 23:8 speak 6:10 19:21 29:1 32:11,22 SPEAKER 7:25 14:17 38:6 speaking 32:23 specific 36:6 spell 6:9 spelling 6:15 spent 19:17 21:15 spoofed 22:11 spoofing 23:15 spot 28:17,19 ss 44:2 staff 9:12,18 12:13 13:24,24 23:10 33:19 35:20 40:11 stand 37:10 Starbucks 3:20 start 2:3 13:24 21:1 started 7:3 state 1:1 6:9 9:11,18,25 10:6 10:14,18 12:11 15:2,18,19 19:4,11,22 25:6 44:2,5 statement 4:19 6:4,19,25 statements 6:13 27:8 43:16 states 12:3 22:22 statute 28:1 31:25 36:17 37:4 step 7:4 10:25 38:25 42:1 steps 13:7 stipulated 35:15,15 stipulation 8:21 stop 19:8 24:21 40:22 stopfraudcolorado.gov 19:21 straight-up 18:19 struggle 25:24 studies 8:12 Sturges 10:6,20,20 11:2,3,3,5,6 42:2 submit 21:3 submitted 12:2 subpoenas 22:13 Subsection 2:17 subsequently 26:17 substantial 30:22 substitute 33:21 success 2:10 successful 18:1 successfully 26:12 sued 21:12</p>
---	---	--	---

<p>suggest 20:20 42:20 suggesting 33:23 suing 19:10 summer 26:14 27:22 summer's 34:7 sunrise 14:25 15:5,13,21,25 sunset 27:20 28:4,10 31:16,17 support 20:3 supposed 24:21 29:21,22 Supreme 41:1 sure 10:20 12:22 17:1 22:4 24:1 24:9 25:13 27:12 28:23 29:4 34:1,15 36:7 surprise 7:6,7 surprised 7:5 swift 11:22 systematic 18:12</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>T.A 9:25 10:5 14:9 24:15 25:1 31:1 39:9 T.A.'s 14:21 take 5:22,23 6:7 10:12 15:7 18:22 36:17 38:21 taken 18:22 21:8 44:7 talk 7:24 11:11 12:13 30:1 38:10 43:11 talking 14:11 40:25 42:21 Taylor 25:1 Taylor-Hunt 9:24,25 14:10,14 24:16 31:2 39:10 techniques 13:18 technologies 21:25 tell 9:7 13:23 21:17 26:13 28:21 37:24 43:12 telling 2:12 29:9 Teresa 44:4,19 term 28:3 terms 17:24 31:4 testimony 44:11 texts 42:7 thank 7:23 9:1 10:5 11:7,9 13:20,22 23:20 24:12 27:14 27:17 30:24 38:1 43:13,17 Thanks 19:16 they'd 11:11,11 24:13 thing 18:1,21 31:4 36:6 39:4 41:10,13 things 3:18 19:7,17 32:18 42:16,21 think 2:7 3:10 4:3 5:11,13 6:17 13:18 18:1,13,16 19:24 20:1,7 20:21 21:15,17,18,25 23:12 26:8,18 27:3,16,24,25 28:11 28:17,20 29:1,14,15 30:3,7,9 30:12,18,23 31:4,6,24 32:6,7 32:10,13,16,20 33:10 34:18 34:22 35:12 36:2,9,14,20,20 37:8,19,21 39:14,21 40:2,5,6 40:9 41:3,3,4,15,25 42:14,16 42:23 thinking 16:17 36:21 Thomas 43:4 thought 14:15,22,24 15:11 33:11 37:12 39:13 thoughts 11:12 29:12 thousand 19:10 three 15:12 16:11,17 22:13</p>	<p>38:8 40:19 tightens 12:8 time 2:8 4:2 5:23 7:17 12:16 21:15 26:21,22 28:5,25 33:19 34:11 40:20 44:7 times 31:7 today 4:12,18 6:25 8:5 29:8 37:20 today's 24:14 Tom 7:5,7 16:6 20:8 27:9 29:13 39:23 topics 32:25 33:3 total 39:14 tough 27:15 28:19 track 23:11 transcript 1:4 6:7 44:10 transcription 44:9 transcripts 3:10,15 transitioning 11:18 tremendous 19:12,19 tremendously 18:1 trial 10:22 tried 5:12 7:11,16 true 44:10 truly 3:25 try 6:10,15 13:4 19:1 23:11 26:11,12 trying 2:9 13:20 14:15 25:21 39:23 40:5 turn 21:13 turns 22:18,18,19 twice 29:2,20 two 2:25 3:1,16 8:14 9:20 12:10 15:12 16:12,17 17:9,9 17:14 19:14,15 28:23,24 31:4 37:14 type 39:15 42:8 typewriter 37:25 typewritten 44:9 typically 17:7 25:18</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>UCCC 19:25 unaccepted 23:1 unassigned 22:20 undelivered 22:24 23:1 understand 21:19 35:7 38:19 38:22,23 understanding 14:3 27:21 33:13 undertaken 5:2 unfortunately 6:5 9:6 UNIDENTIFIED 7:25 14:17 38:6 Uniform 1:2,11 2:5 United 22:22 unlicensed 15:4 unregulated 15:4 unsuccessfully 21:13 update 43:6 updated 11:13 34:9 updating 5:6 36:9 37:10 41:14 upstairs 14:4 use 12:6 18:20,24,25 usually 22:8 utilize 12:3</p> <hr/> <p style="text-align: center;">V</p> <hr/>	<p>vacant 22:19 validity 27:22 value 19:12 21:14,20 22:1 variety 9:13 28:6 various 12:2,3 Vedra 17:5,5 31:15,19 32:4 35:24 38:3 40:8 vein 37:8 version 38:19,22 versus 15:7,7 20:2 view 7:1 33:5 39:18 43:1 violations 24:5 visual 42:8,9 visually 42:7 voice 8:9 volunteer 42:5 voted 16:15</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>wage 8:18 39:1 waiting 26:15 waiver 24:7 walking 9:10 want 3:24 4:23 6:4,25 10:1,14 10:24 13:1 14:7 27:13,18 28:1 31:2 40:13 wants 30:11 36:3 wasn't 14:5 15:15 way 3:24,25 5:25 7:24 8:5 18:20 21:1 22:3,8 26:11 27:14,25 29:3 30:14 32:20 39:19 40:3,5 42:11 44:12 ways 40:16 we'll 5:17,23 6:14 36:17 42:15 we're 13:19 14:2 17:19 20:11 21:22,24 22:6 23:19 24:17 26:13 29:19 36:4 42:16 we've 2:8 16:20 21:8,11 23:12 25:16,20 34:20,21 website 3:12 10:15 15:22 19:21 34:10,13 35:10,16 36:9 37:4 40:21,22 weeks 2:15 Weiser 2:12 41:24 welcome 7:1 32:12 went 4:7 WHEREOF 44:15 willing 7:4 29:12 windows 12:8 wireless 6:6 wise 16:12 WITNESS 44:15 wonder 29:18 36:4 wondering 8:25 24:22 35:9 38:20 work 4:6 9:19 16:25 19:6,7 22:1 worked 16:24,25 31:11 working 28:18,20 42:5 works 32:3 39:3 worth 40:3 42:23 wouldn't 16:3 written 3:13 wrong 36:4 38:4,12</p> <hr/> <p style="text-align: center;">X</p> <hr/>	<p style="text-align: center;">Y</p> <p>Yeah 16:6 29:24 30:7,21 31:6 31:14 33:10 36:5 38:6 43:4 year 5:17 12:7 14:6,19 27:20,20 29:2,20 32:25 33:17 years 3:1 5:1 14:25 15:12 16:11 16:12,17 19:18 21:9 30:8 39:24</p> <hr/> <p style="text-align: center;">Z</p> <hr/> <p>Zavislan 1:10 2:2,4 7:15,20,23 8:1 9:6 10:5,18 11:2,5,7,10 13:22 14:13,18 16:9,16 19:16 24:12,25 27:12,24 28:13,21 30:2,7,17,21,25 31:6,18,22 33:10 34:15 35:6,11 36:5,14 37:2,11 38:5,8 39:9,12 40:2 41:6 42:12 43:7,10,14 zip 21:18</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>1 7:13,13 10 35:2 10:06 1:9 11:03 43:20 12 13:3 1300 1:8 150 40:25 18th 4:8 41:1 19 44:17 1989 37:12 19th 4:8 1E 1:8</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2000s 38:7 2005 38:3 2017 2:19 2019 1:4,7 28:10 43:20 44:16 2020 28:10 44:17 216 2:20 25 1:4,6 43:20</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>3 35:1 30 4:8 19:18 21:9 31st 12:8</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4th 44:16</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5 7:10 5-16-117 2:17 5-16-128 24:4</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>65 6:17</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>7 2:17 70 6:18</p> <hr/> <p style="text-align: center;">8</p> <hr/>
--	--	--	---