

1 STATE OF COLORADO DEPARTMENT OF LAW  
2 COLORADO FAIR DEBT COLLECTION PRACTICES ACT  
3 UNIFORM CONSUMER CREDIT CODE

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4 TRANSCRIPT OF PROCEEDINGS  
5 January 25, 2019

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6 Proceedings had on Friday, January 25,  
7 2019, at the Ralph L. Carr Colorado Judicial Center,  
8 1300 Broadway, Room 1E, Denver, Colorado 80203,  
9 commencing at the hour of 10:06 a.m., before  
10 Jan Zavislan, acting or interim administrator of the  
11 Uniform Consumer Credit Code.

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2	<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20 General Assembly, in House Bill 216, repealed the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>	4	<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>
3	<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>	5	<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>

6	<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>	8	<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>
7	<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>	9	<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>

10	<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>	12	<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>
11	<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 &amp; 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>	13	<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>

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

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

22	<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.                  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.                  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>	24	<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.                  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.                  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.?                  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.                  25 MR. ZAVISLAN: So I have to -- so that's</p>
23	<p>1 as unaccepted or undelivered. So it's a challenge.                  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.                  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.                  22 MR. GREENBERG: I'm Alan Greenberg,                  23 Greenberg &amp; Sada; president of the Colorado Creditors                  24 Bar Association, and I serve on ACA's legislative                  25 council.</p>	25	<p>1 T.A. Taylor (sic). We have not gotten a huge number of                  2 complaints about this.                  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 &amp; 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.                  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.                  16 And we've actually had a conversation                  17 with legal counsel over at Health Care Policy &amp; 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 &amp; 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>

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<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>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>
27	29
<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>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>



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1 talk.

2 MR. ZAVISLAN: Absolutely.

3 MR. ROMOLA: I don't think there was

4 any -- like, the first meeting that Julie did in

5 January, that was not effective, but the one you did

6 was fine.

7 MR. ZAVISLAN: Yeah, I think that --

8 again, I've been around for so many years now, I just

9 think public hearing means public. And whether you're

10 in the industry or whether you're Eileen who has

11 questions and issues and concerns and wants an

12 opportunity to address the administrator, I think they

13 should have an opportunity to do that.

14 MR. ROMOLA: You're from way back, and I

15 know you're familiar with the old collection agency

16 board.

17 MR. ZAVISLAN: Yes.

18 MR. ROMOLA: Do you think that was more

19 effective than these meetings, having a board that --

20 regularly?

21 MR. ZAVISLAN: Yeah. Given what I saw,

22 the lack of any substantial attendance at board

23 meetings, I think this is better.

24 MR. ROMOLA: Appreciate it. Thank you.

25 MR. ZAVISLAN: Yes. Any questions? Yes,

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1 T.A.

2 MS. TAYLOR-HUNT: I want to second that

3 on the collection agency board. I was on that board

4 for two terms, and I think the thing that was most

5 lacking was any feedback or input from the public.

6 MR. ZAVISLAN: Okay. Yeah, I think

7 that's -- certainly the times that I attended, there

8 was -- I mean, we didn't even necessarily have board

9 members always there, but certainly industry, and never

10 the public. There would be seven people in the entire

11 room, and four of them worked for us, so ...

12 Any other questions or comments before we

13 call this meeting to a halt?

14 Yeah, Dan.

15 MR. VEDRA: Yes, I had a question about

16 the sunset. So the provision of the act that calls for

17 these meetings is set to sunset unless renewed?

18 MR. ZAVISLAN: Yes.

19 MR. VEDRA: And so it's up to DORA then

20 to determine whether they believe it's effective or

21 whether -- I'm sorry, I just am misunderstanding that.

22 MR. ZAVISLAN: No, you didn't

23 misunderstand because I don't know formally whether it

24 even requires DORA at this point. I think it will

25 repeal by statute unless DORA or a legislator files a

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1 bill next legislative session to extend it. What I

2 don't know, Dan, is whether that necessarily implicates

3 DORA. I just don't know how that works.

4 MR. VEDRA: And as an administrator, is

5 there any obligation for you to provide input on that?

6 Because my opinion is that I think that these meetings

7 are effective. I think that the format in having them

8 divided up into groups is not effective. I felt that

9 the first meeting that we had with Ms. Meade was -- you

10 know, I didn't think it was fair that the other side

11 didn't have an opportunity to speak, and I appreciated

12 that that was welcome at the last meeting. And that

13 makes sense because dialogue, I think, leads to

14 results. And so, you know, to have more of an

15 opportunity to come together and discuss these issues

16 on more than just a semiannual basis I think would give

17 a little bit more heft behind the ideas and gain some

18 momentum into things that would need to be done,

19 preferred to be done.

20 And then I think that another way to

21 improve this process, you know, I come here to listen

22 as well as to speak. And I know I can probably be

23 criticized for speaking too much, but it would be nice

24 to hear -- have more of an agenda about sort of the

25 year to come, about topics that the administrator is

33

1 concerned with, that the administrator's seeing come up

2 in the regular affairs so that people that are

3 interested in those topics can then prepare in advance

4 and say, Here's what you're concerned about, and here's

5 how we view the issue so that it's more -- so not only

6 that all the constituents are involved, but also that

7 the administrator is setting an agenda for what you're

8 seeing as well because you have a different

9 perspective.

10 MR. ZAVISLAN: Yeah, I think that's

11 really fair. I hadn't really thought about that. The

12 agendas are, as you've seen, very bare bones. It was

13 my understanding -- I was not involved in the

14 legislative process that led to the repeal of the board

15 in the creation of these, so I don't have that

16 background. I basically looked back and saw what Julie

17 had done for the January meeting that year.

18 But there is some sense for that. And

19 certainly staff brings issues to me all the time that

20 could very well be, you know, informally, as long as we

21 make it clear that this isn't to substitute for

22 rulemaking or any other kind of formal process, but do


23 exactly what you're suggesting might make a great deal

24 of sense.

25 And if I'm still here, I will do that for

34	<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 &amp; 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>	36	<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>
35	<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>	37	<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>

38	<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>	40	<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>
39	<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>	41	<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> <div style="text-align: center;">  <p>TERESA HART Registered Professional Reporter and Notary Public CALDERWOOD-MACKELPRANG, INC.</p> </div>
<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, Thomas.</p> <p>5 MR. ROMOLA: One last question. Any</p> <p>6 update on that Lexington law issue?</p> <p>7 MR. ZAVISLAN: Nope.</p> <p>8 MR. ROMOLA: 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. ROMOLA: 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>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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