MINUTES OF THE
SENATE COMMITTEE ON JUDICIARY

Seventy-sixth Session
March 24, 2011

The Senate Committee on Judiciary was called to order by Chair Valerie Wiener at 8:06 a.m. on Thursday, March 24, 2011, in Room 2149 of the Legislative Building, Carson City, Nevada. The meeting was videoconferenced to the Grant Sawyer State Office Building, Room 4412E, 555 East Washington Avenue, Las Vegas, Nevada. Exhibit A is the Agenda. Exhibit B is the Attendance Roster. All exhibits are available and on file in the Research Library of the Legislative Counsel Bureau.

COMMITTEE MEMBERS PRESENT:

Senator Valerie Wiener, Chair
Senator Allison Copening, Vice Chair
Senator Shirley A. Breeden
Senator Ruben J. Kihuen
Senator Mike McGinness
Senator Don Gustavson
Senator Michael Roberson

STAFF MEMBERS PRESENT:

Linda J. Eissmann, Policy Analyst
Bradley A. Wilkinson, Counsel
Lynn Hendricks, Committee Secretary

OTHERS PRESENT:

Michael Buckley, Commission for Common-Interest Communities and Condominium Hotels
Pamela Scott, Howard Hughes Corporation
Chris Yergensen, RMI Management, LLC
David Stone, Nevada Association Services, Inc.
Stephanie Cooper Herdman
Garrett Gordon, Southern Highlands Homeowners' Association
Angela Rock, Southern Highlands Homeowners' Association
Keith Lee, Lawyers Title Insurance Corporation; First American Title Insurance Company

Jonathan Friedrich
Rana Goodman
Chris Ferrari, Concerned Homeowner Association Members PAC
John Leach
Linda Rheinberger, Nevada Association of Realtors
Joanne Levy, Nevada Association of Realtors
Donna Toussaint
John Radocha
Yvonne Schuman
Jon Sasser, Legal Aid Center of Southern Nevada; Washoe County Senior Law Project
Randolph Watkins, Commission for Common-Interest Communities and Condominium Hotels
Ellen Spiegel
Tim Stebbins
Greg Toussaint, President, The Lakes Association
Robert L. Robey
Favil West, Commission for Common-Interest Communities and Condominium Hotels
Todd Schwartz, President, Spring Mountain Ranch Master Association
Mike Randolph, Homeowner Association Services
Azucena Valladolid, Consumer Credit Counseling Service
Heather Spaniol

CHAIR WIENER:
I will open the hearing on Senate Bill (S.B.) 243.

SENATE BILL 243: Revises provisions relating to financial obligations in common-interest communities. (BDR 10-295)

SENATOR ALLISON COPENING (Clark County Senatorial District No. 6):
I will read from my written testimony (Exhibit C).

I provided a handout that outlines the collections process (Exhibit D).

CHAIR WIENER:
Senator Allison Copening said S.B. 243 closely mirrors regulations that have been worked out. Are there many differences between the regulations and this bill? Section 1, subsection 2 of the bill lists different amounts for different

processes and services. How were these amounts determined? Section 1, subsection 5 of the bill says, "If a unit's owner owns 25 or more units in one common-interest community, the amount described in subsection 1 must not exceed an amount equal to $1,800 multiplied by the number of units owned ... ." What is the limit for a single unit owner?

MICHAEL BUCKLEY (Commission for Common-Interest Communities and Condominium Hotels):
I am on the Commission for Common-Interest Communities and Condominium Hotels (CCICCH) and participated in the working group Senator Copening put together last year.

This bill amends *Nevada Revised Statute* (NRS) 116.310313 passed in 2009 charging the Commission with regulating collection costs. The statute regulates all collection costs a homeowner could be charged. It does not regulate what the association or a collection company can charge.

The Commission adopted a regulation based on that. Over the last year, the regulation and statute have focused on the collection costs associated with a foreclosure. In most cases involving a delinquent homeowner, the association is unlikely to be paid unless the first lien forecloses and the lienholder would pay off the superpriority amount to the association.

It is important for the Committee to understand the foreclosure process. *Nevada Revised Statute* 116.3116 gives the association a lien once the declaration is recorded. That lien is prior to all second mortgages and junior mortgages. It is junior to the first mortgage except for the nine months—or six months for a condominium—which is called the superpriority. It occupies a first lien position regarding that superpriority amount. This bill does not address including these collection costs as part of the superpriority. It sets the amounts and does not address including them.

The foreclosure process for the association is modeled on the deed of trust foreclosure statutes and the execution statutes. To foreclose its lien, the association must first give a notice of delinquent assessment pursuant to NRS 116.31162, subsection 1, paragraph (a). After 30 days have passed and the notice of delinquent assessment has been given, the association may record a notice of default and election to sell pursuant to NRS 116.31162, subsection 1, paragraph (b). Then, a period of 90 days must elapse before the

association can give a notice of sale under NRS 116.311635. A period of publication and additional notice follows, and the foreclosure can occur.

Many of these notices must be given to several parties and must be recorded. The notice of sale must be published and served.

Federal regulations are layered on top of the foreclosure process and the superpriority. *Nevada Revised Statute* 116.3116 includes a limit on the superpriority based on federal regulations. Most of us look to Fannie Mae underwriting guidelines to spell out those limits. The statute states, while we have a nine-month superpriority in a planned community or six months for a condominium, if federal regulations dictate a shorter period, Nevada is governed by that shorter period. When the developer builds most developments and homes, he submits the project for Fannie Mae underwriting approval. Fannie Mae looks through the documents to ensure the project qualifies. For example, Fannie Mae underwriting guidelines B4-2.1-06 and B4-2.2-13 say the documents may provide for a superpriority lien in the amount of six months for a condominium. One Fannie Mae guideline permits that collection costs be included as part of the superpriority.

Other Fannie Mae guidelines are distinct from when Fannie Mae underwrites a project. They deal with Fannie Mae being a lender and foreclosing on a project. Other regulations state Fannie Mae may not pay collection costs.

The association enforces the lien. Associations are managed and operated by community managers licensed by the Real Estate Division of the Department of Business and Industry. Community managers cannot take all the steps to collect or enforce assessment liens. Sometimes, the manager turns the account over to a licensed collection agency, and that collection agency is not licensed by the Real Estate Division but by the Division of Financial Institutions of the Department of Business and Industry. Other players in the scenario are the mortgagees and the first and second lienholders but most often in this context the first lienholders.

The enforcement of the delinquent assessment involves title companies. In order for the collection company to determine who is entitled to or must be notified of a foreclosure, the collection agency contacts a title company and, at a certain stage in the proceedings, orders a trustee sale guarantee (TSG).

Notices must be mailed and served, process servers and newspapers are involved. An attorney may be involved if a homeowner filed bankruptcy. The attorney would make an appearance in the U.S. Bankruptcy Court for the District of Nevada as part of this collection process.

Before 2008, the Legislators were mainly concerned with protecting homeowners regarding foreclosures. They wanted to do everything possible to ensure homeowners got every opportunity to know something drastic would happen if assessment liens were not paid. *Nevada Revised Statute* 116.311635, subsection 1, paragraph (b), subparagraph 3, requires a copy of the notice of sale be given to the Office of the Ombudsman for Owners in Common-Interest Communities and Condominium Hotels. The Ombudsman reports to the Commission on notices he or she has received regarding sales. The Commission cannot do much except offer assistance.

Each time the association takes the next step in the foreclosure process, the fees go up. Collection companies and associations give warnings they are about to take the next step.

Many associations are facing difficulties because so many homeowners are delinquent with their assessments. Associations must dip into their reserves, raise assessments or create special assessments to meet their operating costs.

It might be better if foreclosures were faster. Costs would be lower, and the unit could be sold sooner. The buyer would start paying dues and assessments sooner. There is tension between giving homeowners every possible notice and speeding up the foreclosure process to keep the costs down.

In October 2009, the Commission began conducting workshops with stakeholders in the area. Members of the Commission met in a public meeting to discuss reasonable fees in this process. As a result of that meeting, the regulation, LCB File No. R199-09, was prepared. It listed the different steps in foreclosure and specified how much a collection agency could charge for each step it took.

In March 2010, the Commission heard public comment on collection costs. Much of the public comment during 2010 focused on collection fees from various people. Real estate agents and brokers have not been mentioned, but they are concerned.

In March 2010, a workshop on Proposed Regulation of the Commission for Common-Interest Communities and Condominium Hotels, LCB File No. R199-09, was held. Public comments were received and No. R199-09 was redrafted. Some of the concerns were costs. An important item for the Commission was to differentiate between actual fees a collection agency would receive and costs it would incur. For example, a title company must be paid to get a TSG. The collection agency has mailing costs, publication costs, etc.

Concern was also expressed that a collection company would increase its fees if a payoff was requested.

The Commission approved the regulation on March 24, 2010. Another workshop on No. R199-09 was held on July 8, 2010. In September, the Legislative Counsel Bureau (LCB) produced a revised version of the regulations. The Commission held an adoption hearing on December 7, 2010, when the regulations underwent further changes. Attorney fees were included. The Commission decided attorney fees not relating to foreclosure would not be included. Attorney fees are identified in section 1, subsection 4, paragraph (b) of the bill. That was part of the regulation.

The Commission adopted an overall cap of $1,950 for any foreclosure. The statute adopts a cap of $1,800. For example, if a bank is foreclosing on a developer's 50 unsold lots, it would not make sense to multiply $1,950 or $1,800 times 50 to foreclose on one owner. The regulation intended a balance. There is a certain amount of expense to foreclose on one unit. There is additional expense to foreclose on another unit owned by the same owner. However, the expense might not be the same. We debated the number and settled on 25 units. The idea behind the regulation is if a foreclosure involves 25 units, you are not permitted or bound by the caps. You can charge a multiple of those caps, but you must go to the board and agree upon an amount. The board and collection agency must agree upon the foreclosure and the costs.

A number of changes went into the regulation the Commission approved in December 2010. At that point, the regulation was ready to go back to LCB for approval before it went to the Legislative Commission. At that point, the Governor's moratorium on regulations came in. In most cases, the statute follows the regulation.

PAMELA SCOTT (Howard Hughes Corporation):
In Summerlin, we do not use the collection companies that had input into the regulation. It is important to talk about how this works from day to day. Mr. Buckley talked about the statutory requirements, but there are other charges not included in the statutory requirement. Much of that relates to making sure homeowners are aware of what is happening.

All associations are required to have a collection policy. They are required to send that policy out annually with the budget. Collection policies vary because assessments vary. If an association has a fee in excess of $200 a month, it probably cannot wait several months to start a delinquent collection process. It would probably start within 60 days. On the other hand, if your assessment is less than $50 a month, your policy might be to start the collection in six months. There are many circumstances, and one size does not fit all.

An intent to lien letter is the first item listed in section 1, subsection 2 of the bill. In Summerlin, our policy is that the accounting staff creates a file including the number of homeowners delinquent six months or more. The three master associations in Summerlin have a total of 26,000 units, so hundreds of these letters need to go. We contract the service because we do not have the staff to send that number of letters. That file is sent to a collection company for that service. It charges $40 to send that letter. After it has sent the letters, it does invoices, which are posted to our payables. The $40 charge is posted to the homeowner account. Not all associations do it that way.

This courtesy letter from Summerlin is not required by statute. It tells the homeowners the amount due and the amount of collection costs they have incurred at that point. They will be advised of the next step and the cost for the next step. As a general rule, we give them 35 days. We give the homeowners the manager's name to contact if they want to discuss how they can cure this penalty. After 35 days, if the delinquencies are not cured, liens can be filed against the units. Before that happens, we will probably review each account that received the intent letter to determine what might be in public records. In the management office, we do not have access to as many public records as a collection company has. We will do the best we can to determine whether the bank, a first security lender or someone else has started a foreclosure procedure.

Arguments have been made that an association does not need to perfect its lien by recording it. However, if it is not recorded and another entity has started a foreclosure procedure, that entity may not know a homeowners' association has a lien. It takes research. Some research must be done by a collection company. Once we determine whether a unit needs a lien, we send it to the collection company. Our collection company does the legal work for the lien. The collection company invoices us, and we pay the invoice and post the charge to the individual account. Many associations need the ability to pay those costs at the end of the process. We are fortunate in Summerlin that we can pay the costs up front.

CHAIR WIENER:
The sponsor mentioned the bill mirrors the regulation. What are the differences between the bill and the regulation?

MS. SCOTT:
The differences are mostly in the dollar amounts. A few of the charges in the regulation were eliminated from the bill. A new section 1 in the bill requires collection companies to invoice the associations. The associations would post those charges within 20 days, by the twentieth of the month following the date the charges were incurred. The association is not required to pay the collection company at that point. That would be between the association and collection company. The amount would be posted to the homeowner's account.

CHAIR WIENER:
I heard an amount of $1,950 and the bill says $1,800, the multiplier of the 25 units or more. What would the cap be for a single unit owner?

MS. SCOTT:
Section 1, subsection 1 of the bill says any of those fees in subsection 2 may not exceed a total of $1,800, so that would be the cap.

MR. BUCKLEY:
Section 1, subsection 1 of the bill includes the individual cap of $1,800 per individual foreclosure. Subsection 2 includes specific caps on individual services that could be done in connection with a foreclosure. For each action item, there is a specific limited amount.

Section 1, subsection 3 excludes out-of-pocket costs from the individual dollar amounts and fees. It excludes costs paid to third parties that are unaffiliated with the collection company or the association. Mailing and publishing costs for TSG charges are good examples.

Section 1, subsection 4 of the bill shows additional exclusions from the overall cap. There is a $200 cap on the fee paid to the management company as it prepares the records and sends them to the collection company. The management company cannot enforce the lien. That must be done by the collection agency. The management company must process the bills to send to the collection company. The other exception is reasonable attorney fees without any markup incurred by the association for services other than services with a specific cap. Those are excluded. The example was bankruptcy. Another example is dealing with the Federal Deposit Insurance Corporation (FDIC) on bank takeovers.

Section 1, subsection 5 relates to an association foreclosing on 25 units or more. The fee would not necessarily be 25 times $1,800. You would have to go back to the board for an agreed upon amount.

Section 1, subsection 6 is important and says if there is a payoff demand, the collection process must stop. An exception is when you record a notice, the statute requires mailing within a certain number of days. If a process is started and the statute requires that process be finished, you can continue to do that. When you receive a payoff demand, you may not charge additional fees for 15 days.

Section 1, subsection 7 relates to posting the costs of collection to a unit owner's account. The Commission feels a unit owner should be able to find out what he owes from the association. He or she should not be required to get that information from the collection company. Additionally, if the unit owner or mortgagee does not pay, the association will have to pay. The association has the contract with the collection company. It will reflect an association's payables and the financial status of the association.

CHAIR WIENER:
Is it correct that subsection 7 was not included in the regulation you had promulgated?

MR. BUCKLEY:
Yes. Section 2 of the bill was not in the regulation either. It requires that when a unit owner pays an amount, that amount is applied first to assessments and then to fines. This requires an association to establish a compliance account for fines separate from the assessment liens. When it receives a payment, the association applies it first to assessments unless the owner says otherwise.

Section 3 of the bill is the same as section 2. The reason for its difference is that the statute it amends, NRS 116.310315, changes on October 1. The bill has to amend these two statutes.

CHAIR WIENER:
Does it sunset?

MR. BUCKLEY:
On page 5 of the bill, subsection 2 comes out. It did not sunset. The statute changed effective October 1. *Nevada Revised Statute* 116.310315 remains in effect, but is in different forms between now and October 1.

SENATOR KIHUEN:
How do you determine the $75 contained in section 1, subsection 2, paragraphs (a), (b) and (c)? Is it a template letter you send out?

MR. BUCKLEY:
I was not involved in the working group. The working groups of Commissioners met and came up with this formula. There is a template, but the records must be researched to ensure the correct amounts. There may be different charges for those letters. These numbers have been discussed in various meetings from October 2009 to December 2010. There has been some give and take on these different numbers, but the consensus was these were reasonable amounts.

SENATOR KIHUEN:
Where does the $75 come from? Is it work hours? I am concerned because this is a template letter and $75 is high.

CHAIR WIENER:
This was part of my mirroring question. Where are the regulation and the bill aligned and where are they different? Why are there differences between the two?

SENATOR COPENING:
Ms. Scott, did you bring the comparison sheet with you?

MS. SCOTT:
Yes. I compared the regulation with the bill. The amount for that letter in the regulation was $150. The committee lowered it to $75 because not that much went into it.

SENATOR COPENING:
Please go through the numbers and compare them with the changes from the regulation.

MS. SCOTT:
Regarding section 1, subsection 2, paragraphs (a) through (q), the amounts in the regulation were as follows:

• Paragraph (a), $150.

• Paragraph (b), $90.

• Paragraph (c), $90.

Concerned Homeowner Association Members PAC (CHAMP) objected to paragraph (c), saying the courtesy letter was more than needed to be done because the Ombudsman sends a letter at that point. There was consensus that could be removed.

• Paragraph (d), $325.

• Paragraph (e), $400.

• Paragraph (f), $275.

• Paragraph (g), $125.

• Paragraph (h), $75.

• Paragraph (i), $125.

• Paragraph (j), $30. The committee raised it to $75.

• Paragraph (k), $30. The committee raised it to $75.

• Paragraph (l), $150.

• Paragraph (m), $30. There was a charge of $25 to send a letter about a default on a payment plan. The payment plan should be one process. It could include more than one letter and initiate the payment plan. The committee raised that to $100 and made it one charge for the entire process.

• Paragraph (n) was not in the regulation. I brought that to the attention of the committee as a necessary item because sometimes the association is ready to file a lien and may not file if the bank has already started its process. That process has to be followed and monitored, and we do contract that service.

• Paragraph (o). Superpriority demand letters were not differentiated in the regulation. The demand letters were $150 in the regulation.

• Paragraph (p), $100.

• Paragraph (q) was part of the bankruptcy proof of claim and has been separated in the bill. Both might not be necessary.

We eliminated a couple of charges from the regulation. There was a $2 labor charge for every letter mailed, not the postage charges. We eliminated the insufficient funds charge because it is not part of the collections process. We eliminated the substitution of agent document fee. That does not happen often. The regulation included a foreclosure fee which we eliminated because we have the notice of sale, conducting the sale and recording the deed.

SENATOR KIHUEN:
How do you justify charging $75 for a letter? All you have to do is remove the name of the previous person you sent it to and add the new person. This fee is high.

MS. SCOTT:
It involves more than producing a letter out of a database. Research must be done. The intent to lien will not go out if you discover something else is going on with that account. At each step, research must be done.

SENATOR COPENING:
Can someone enlighten us regarding the process involved with a letter being sent out?

CHRIS YERGENSEN (RMI Management, LLC):
I am in-house counsel for RMI Management. We do collections under Red Rock Financial Services. We manage 275 associations—92,000 homes in northern and southern Nevada. It is disconcerting to hear a question about what goes into preparing a letter. Many things must be done in preparation of a collection account. For example, Red Rock collection services employees 95 people. We have many costs, including rent, insurance, payroll costs, electricity, computers and technology. When an account comes to a collection company, we conduct research to ensure that account is accurate and our systems are working properly. In the process with the CCICCH, we disclosed a lot of our overhead costs and what goes into running our business. We disclosed our hard and variable costs.

For example, I have ten full-time employees who answer phone calls from homeowners. They have nothing to do with preparing the letter, but I must pay them to service what we do for the associations. They answer thousands of calls about homeowner questions a week. When we send out a letter, we receive calls regarding the letter we sent. I have eight full-time people to receive payments on behalf of the associations. There is a lot involved with sending out a letter.

DAVID STONE (Nevada Association Services, Inc.):
We represent many community associations, and we do collections for past due assessments. We do not just push a button to send out a letter. When we prepared our presentation for the Commission over the last year, we evaluated how many telephone calls we get with each demand letter. For each of those demand letters, we get an average of 1.5 phone calls. These people have issues with the association. They have questions on unposted charges and misposted charges. Sometimes they have legitimate concerns and sometimes not. We must have the staff to resolve problems, which we do most of the day. I have

25 employees. If it was as simple as pushing a button to generate a letter, I would not need those people. The requirements for Fair Debt Collection Practices Act compliance are costly. I must hire professional individuals. These people must be able to write a letter and have a basic understanding of the Fair Debt Collection Practices Act and state law. Those I hire must have a certain level of competency and professionalism to service these accounts.

When homeowners call, we try to solve their problems. For example, if we could refer those problems to the management company, we could cut down on charges. We are a full service organization. We try to make things better for the community manager and protect the assessment-paying homeowners.

STEPHANIE COOPER HERDMAN:
I am a licensed collection manager, and I do homeowners' association lien foreclosures as well as mortgage foreclosures. I am one of the two designated counsels for Freddie Mac in Nevada and one of the seven designated counsels for Fannie Mae. I am required to act under the United States regulations on Fannie Mae and Freddie Mac files. I get a flat fee for foreclosures. Senator Kihuen asked why $75 was appropriate for a collection letter. The United States, FDIC, Freddie Mac and Fannie Mae have all decided that is not the way to address this because of that same question. They have said there is a flat fee of $600 for the entire process. It is inane to break it down to $75 per letter. It is a cut-and-paste template process. The charge of $75 might be appropriate for the first letter, but after that the information is in the computer. For assessments of $20 a month, $1,800 is a lot of money. I deal with homes worth from $60,000 to $900,000 and do not charge that much.

SENATOR COPENING:
Is the process you do for the government the exact same process a private collections agency does?

MS. COOPER HERDMAN:
It is similar except the initial notice of intent to assess lien, which is a repetitive process. It is not necessary to file this. Ms. Scott made a valid point when she said her association purposely filed the notice so that the foreclosing entities knew the association existed. However, anyone doing a foreclosure must notify the association. If that person does not, it is a wrongful foreclosure action. It is the same process. The same number of steps are involved.

SENATOR COPENING:
Are you the same as a collections agency where you are employed or retained by a community association? Would you take over a homeowner account and begin that process with the homeowner by taking the calls and communicating back to the association? I am confused by that because I understood you were retained by Freddie Mac and Fannie Mae to do these things. It seems like different processes.

MS. COOPER HERDMAN:
I do represent associations also. I have done both sides of this coin. The foreclosure process for homes, not outside of the association process, requires mediation. That is included in the $600 and $400 fee. That is $1,000, not $1,800, and includes mediation. As an association attorney, I complete foreclosures for them at $1,100 to $1,200 in total costs. The government agencies conduct audits to ensure I have performed the services, mailing for example.

These collection companies are going unfettered and unwatched regarding their costs. When we add the fee on top of that, it can become an egregious process.

GARRETT GORDON (Southern Highlands Homeowners' Association):
I am speaking on behalf of Southern Highlands Homeowners' Association. This bill impacts companies that handle collections, associations and homeowners. When assessments are unpaid, the residents are impacted. Assessments are increased for other homeowners if the association is required to write off bad debt. Bills do not stop for the association if assessments stop. This requires an association to hire a collections company to collect this debt and move forward with a nonjudicial foreclosure process. Without this consequence, many people would pay other bills rather than assessments.

What is a reasonable cost? My clients favor a cap. Much time and effort was expended over the last year to determine the cap was $1,950 and set forth the line items for each step in the process. There is additional reduction to some of these costs. For the record, in an effort to be reasonable, we support the $1,800 and the other line items except for a few clarifications. This is reasonable, and we look forward to discussing whether there is common ground somewhere between $1,800 and $1,950. We are willing to cap this.

I asked the same question as Senator Kihuen regarding the $75 for a letter. Sometimes, unit owners hire an attorney when they get a demand letter. Additional time and effort is required to work with the attorney and answer telephone calls to work through that process. Time is also required to go before the board with a report of delinquency updates.

ANGELA ROCK (Southern Highlands Homeowners' Association):
We have submitted our comments (Exhibit E). Section 1, subsection 2, paragraph (a) talks about the amount that may be charged for a letter. Each community has different policies and procedures. We attempt to send many letters before we get to this stage. We send a letter at 60 days, and the charge is $25. We send another letter at 90 days, and the charge is $50. We need the opportunity and capability to send more than one letter. Events happen on a case-by-case basis that can disrupt, stop and/or reset the process.

For example, if someone received one of these letters, enters a payment plan and makes payments, the lien is released. If the homeowner does not pay off the base amount, there is another intent to lien. Please consider this. I do not know how you would define the per occurrence to ensure you can roll within the time frame.

Section 1, subsection 2, paragraph (m) relates to the payment plan. We request that could be done monthly. I suggest $25 a month. That way, if people can pay off their amounts in two or three months, maybe they are only at $75 rather than $100. People ask for two- and even three-year payment plans. There is a process in managing a payment plan. People often call and want to adjust their payment plans; they may miss a payment or want a new payment plan.

I have testified to the Commission on section 1, subsection 5 of the bill about the process of foreclosing on multiple units—an individual who owns 25 or more units. For consistency, one ought to treat all people equally in the same situations. Just because we are foreclosing on one home, the process is similar to foreclosing on 25 or 50 or 100. Once these units are parceled out individually, they must receive individual liens. You must do things by individual parcel number. I ask you to consider the fact you do have to do work on 25 separate accounts and separate units. When you allow a large landowner to lobby for a discount the individual homeowner does not get, that is a difficult public policy position to put the board in.

On section 1, subsection 6, I am speaking to the 15-day stay. I have two comments, Exhibit E, page 2. Many people confuse that with the 30-day stay they get when they file a dispute. That is not the same, and it confuses people. In the list of line items, you talk about limiting a payoff demand amount at $50. In this section, you refer to it as a demand payoff. I ask for consistency. That should actually be a technical event that happens when they get the official payoff demand. Calling to ask for their account balance is not a payoff request. It needs to be the official document. We need consistent language. The payoff demand is section 1, subsection 2, paragraph (l). That number is low.

I employ a full-time individual. The payoff process is complex, and you need someone who understands these things. At Southern Highlands, we audit the file and send someone to the home to do a final inspection and photograph the home. A lot of work goes into that process. In our case, that is not paid to the collection company. It goes to the management company.

Associations do things differently. The cap of $1,800 is not to a single entity. Different people are involved in this process who get portions of this money.

SENATOR COPENING:
In section 1, subsection 2, paragraphs (d), (e) and (f), you have $300, $350 and $275. Please explain. I understand those are not necessarily profit for a collection company. There are title costs and recordation fees.

MS. ROCK:
There are hard costs. You do engage in title research in doing those documents—finding lienholders, getting a list of those lienholders, determining where they are and how to notify them, and sending certified letters. Those are bigger work items. When you get to those levels, you get more interaction from the homeowner and potentially more calls. You get into higher liability areas, and you need experts and people who are more educated in bringing those things forth.

SENATOR COPENING:
I understood these are actually costs, third-party costs such as a title company, whose charges are passed on to the collections company.

MS. ROCK:
At Southern Highlands, that is the case. I was clarifying a carveout for that in the statute. We have those higher numbers at Southern Highlands because there is a cost to get the TSG, and these items are charges from a third party.

KEITH LEE (Lawyers Title Insurance Corporation; First American Title Insurance Company):
My clients issue TSGs. It is in the nature of a preliminary title report. They do title searches and determine all the people in the line of title—those who have recorded encumbrances and others who, as a matter of law, become part of the chain of title. This is important because NRS 116 requires everyone in the line of title to receive notice of the foreclosure of the lien.

Generally speaking, my clients work for the debt collector. On rare occasions, they will work for the homeowners' association. On some rare occasion, they will work for the community manager. They issue the TSG to the debt collector, and the debt collector does what he or she must do to comply with the law in giving notification. We usually get involved in that process when a notice of default is prepared and ready to be recorded.

Regarding section 1, subsection 2, paragraphs (d) and (e), we do record the lien as an accommodation. There is a fee for recording the lien and the notice of default. There is a fee for recording the notice of sale as well. Generally, we issue the TSG to the debt collector. That debt collector must do his or her due diligence as well with respect to that TSG to make sure the bases are covered.

Title insurance is a competitive business. Our fees are on a schedule posted with the Division of Insurance. They are open to the public. Those fees are set. An exhibit submitted shows costs (Exhibit F). It shows a cost of $290 for the TSG. Generally, the fees run from just under $300 to sometimes as high as $450. If there is a long period of time between issuing the TSG and a sale, the title report may have to be updated to ensure there are no intervening liens recorded. There is often a charge for that. Sometimes, it is done as an accommodation.

The title companies' role in this process is included in section 1, subsection 3, paragraph (a) of the bill. The cost of the TSG and other title costs are specifically excepted from the cap of the costs incurred for the collection.

I have a question regarding section 1, subsection 3, paragraph (b) using the term "agent." On rare occasions, my title company clients work for either the community manager or the board of directors of the homeowners' association. I am fearful in that case we may be an agent. I do not want to get caught up in unintended consequences. There is an agency relationship between us and the collection agency. We are probably okay with the language there. I do not want to be caught up in issues of subagency and implied agency and the problems that may arise. With the Chair's permission, I will speak with Ms. Eissmann and Mr. Wilkinson to make sure we are okay with that.

CHAIR WIENER:
You mentioned it is a competitive business and the fees range. Are those fees capped by the regulatory body?

MR. LEE:
They are not capped by the regulatory body. It is a filing required with the Division of Insurance. Each company has its own sliding scale and has certain nuances to it, but it is pretty much the same. Those are not capped or proved by the Division of Insurance. They are simply a filing to show the rates. That is public record on file with the Division of Insurance. The cap is dictated by the marketplace and competition.

JONATHAN FRIEDRICH:
I have heard self-serving statements by the collection companies. You have my written testimony (Exhibit G). We must not forget the collection agencies get most of this money. The associations only get nine times the monthly assessment. How is the word "reasonable" defined? What is reasonable to me may not be reasonable to the collection companies.

I provided you with a copy of a lien, Exhibit G, page 2. *Nevada Revised Statute* 116 states a homeowners' association can do its own liens. The association spent $14 to place this lien on the property. The home went to foreclosure. The association got its nine months superpriority.

RANA GOODMAN:
With this bill, we are forgetting the human factor. Before any of the management companies turn this over to collection, they do not contact the homeowner. Before I moved into the association where I live, for five years I was president of an association with 1,200 homes. During that time, one of

the management companies filed a foreclosure without board approval. The company had sent one notice to the homeowner who had a renter in that home. The owner was out of the Country. The renter did not notify the owner. The house was sold. He was only two months late. The assessments in that association were $56 a quarter. I called the management company and put it on notice it was being fired. We were sued because this was done. The man paid the fine. We had to stop the sale of the house, and I asked the management company why it did not call the owner and whether it knew the owner did not live in the house. People notify us when they have a renter, and they give a new address where they want the invoices sent. The company replied it had not done that.

I own several properties. My management company sends me notices on a condominium I own. When I retired, I notified the State I no longer had my business. All my properties are now owned by my family trust. They still send me notices in my corporate name.

All the management companies have to do when a property is ready to go into foreclosure or get a lien is make a phone call to the owner. Then, if the owner does not take care of it, they turn it over to collection. The assessments must be paid or the rest of us have to carry the weight.

Section 1, subsection 3 says, "In addition to the fees charged to a unit's owner to cover the costs of collecting a past due obligation ... ." So, the total fees permitted can be more than $1,800. It refers to a lot of other fees, which adds up to more than $1,800. Perhaps you could include language that the unit owner must be called before this process begins.

SENATOR COPENING:
I thought the statutes required management companies to notify the homeowner before it went into collections.

MS. GOODMAN:
They do have to by letter, but they do not do it personally. That step is missing. We spoke to several homeowners who have gone into foreclosure, and not one of them was contacted personally.

MR. FRIEDRICH:
I previously provided you with examples of collection fees. Some of the delinquencies were several hundred dollars, some were $1,500 to $1,700. The bottom line was $4,000 to $6,000.

CHAIR WIENER:
I have that information in my office. It is our intention not to allow the spiraling into the thousands of dollars.

SENATOR KIHUEN:
In what instances do people not receive the letter when it is mailed to them? You say we should require a telephone call.

MS. GOODMAN:
Sometimes, people have a renter in their house. The management company may not be aware there is a renter or does not have the forwarding address or does not look it up. They send it to the address they used to have. Then, the owner does not get the letter.

SENATOR KIHUEN:
If the person is renting the house, picks up the mail and misplaces it or accidentally throws it away, that is the only communication source from the collection company to the owner of the house?

MS. GOODMAN:
Yes, as reported to me by the gentleman whose house was foreclosed on.

SENATOR KIHUEN:
People should be contacted. Constituents have called me about this issue. They have reported they did not receive a letter. The fee is $75 every time a letter is sent. Before you know it, the bill is $3,000, and the owner did not receive the letters.

CHAIR WIENER:
If an owner's telephone number is with the house, the renter may not forward the call to the owner. What telephone number should be provided if the owner is out of the Country or no longer living in the house?

MS. GOODMAN:
The management company should have it. The owner should be responsible for providing the telephone number to the management company. If not, it is the owner's fault.

Many times, once the collection agency has the account, the management company will not discuss anything with the owner.

CHRIS FERRARI (Concerned Homeowner Association Members PAC):
I am neutral on the bill. We are all trying to achieve the same result. There is a problem when collection costs are $2,832 for $308 in past dues (Exhibit H). That is an 819 percent markup. In Demand G, you have $326 in past HOA dues and $3,050 in collection costs, Exhibit H. That is an 835 percent markup. The question is how to address it.

It is important to clarify that my group, CHAMP, consists of real estate investors who buy homes that are sitting, often through foreclosure and other processes. They do not know if the home will have a kitchen or windows, or what condition the property will be in. Before I took this client, I called several people and found this is not just an investor issue. This affects the first-time home buyer, second-time home buyer, someone buying a short sale, and someone buying a foreclosure. This is a widespread issue.

If someone buys a home with a $6,000 lien, it is essentially a new down payment that cannot be financed and will be paid. Often times, it is a $3,000 lien, and $326 will go to the HOA. That is the fundamental problem we are dealing with.

I signed in as neutral because what the Commission is trying to do and what this bill is trying to do is good in its intent. It involves a cap and is getting to the heart of the problem. My concern is in section 1, subsection 3. We have the $1,800 cap for the items in paragraphs (a) through (q). Do you want a solid cap so when someone purchases a home, he knows what the maximum can be? Section 1, subsection 3, paragraph (a) of the bill, includes the words "without limitation."

Section 1, subsection 4 of the bill includes a reasonable management company fee and reasonable attorney fees and actual costs. I am not debating the merit of the intent of this bill, it is a question of having a solid cap. I spoke with

Stephanie Cooper Herdman, and we will propose a bill that includes a $1,475 actual cap.

These fees do not make the HOA whole. I request a cap that cannot be increased with different services and that we provide that consistency to everyone in Nevada who is trying to transact real estate. This impacts everyone in the process of purchasing property.

Regarding title associations, if there is a cost associated with that TSG, we would like to cap that fee, absolutely.

JOHN LEACH:
This should be handled by regulation rather than statute. As Mr. Buckley said, he went through a long process to arrive at that. The 2009 Legislature granted the authority to the Commission. That is not unique. The Commission handles many things. It is experienced in common-interest communities. The Commission members have a unique understanding of the industry. They went through many workshops and public hearings. The regulation was well-thought-out and planned.

The benefit of a regulation over a statute is that you can change it. The Commission meets regularly throughout the next couple years. If something is set in stone in a statute, there are no modifications. For example, the 2009 Legislature had no idea what was going to happen to some of the banks and the FDIC takeover. Please consider the fact there is a regulation. It would be appropriate. If this process must go into a statute, the commencement point should be the Commission's regulation for the various reasons stated.

It is appropriate to have the line item limits. However, a cumulative limit is inappropriate because many things are outside the control of the collection company or the association. For example, if you are dealing with a homeowner who wants to work it out and you are at the notice-of-sale point, you must postpone it. The law allows you to postpone up to three times without having to start over. In addition, many times you are asked for payoff demands from lenders trying to close property. They ask for a payoff demand one month and another one the next. This goes on for many months. The line item caps the total amount you can charge for that component. However, if the cost becomes excessive, you should not have to perform the service for free. It is an

accountability issue. The person asking for the service should be accountable for paying it.

In section 1, subsection 1, the word "directors" should be added. This puts a limit on officers, agents and community managers. It does not mention directors. Nevada law says the directors may act in all instances on behalf of an association. Similarly, that section also talks about officers, employees, community managers or collection agencies and does not reference law firms. Law firms or a catch-all phrase should be added to include any party acting as a third-party collector on behalf of the association, rather than omitting that.

If this goes into statute, the $1,950 in the regulation is appropriate. When we send the first letter, we check the bankruptcy records to ensure if there is a bankruptcy, we do not violate the automatic stay. We check the assessor's records to determine ownership.

We recommend the numbers in the regulation be used regarding section 1, subsection 2, paragraphs (a) through (q) rather than the line items.

CHAIR WIENER:
You are offering language, so if you want us to consider that as amendments, please provide that in writing.

MR. LEACH:
I did send something yesterday. It apparently did not get there.

CHAIR WIENER:
Please resend it.

MR. LEACH:
I want to comment on the payoff demand issued by the escrow company. We are just filling out the demand escrow companies give us, but they do not just ask for a payoff. Usually, they ask for a breakdown on the assessments, any violations on the property, the insurance coverage and whether any litigation is pending. The amount in the statute was $50, the amount in the regulation should be $150 because the companies are asking for a lot of information. It is not simply the assessment. The escrow companies determine what they want, and we try to give them what they want.

A couple of items have been omitted from the statute that were included in the regulation. If nonsufficient fund charges are not collection costs, they should be included in the costs recoverable for the association. That does not go to a collection agency. If a person breaches a payment agreement, there should be correspondence with that person. However, that has been exempted, and the statute includes a line item for preparation of the letter. It is inappropriate to exclude that.

The mailing fee is included because some foreclosures would require only two notices; others may require dozens of notices.

LINDA RHEINBERGER (Nevada Association of Realtors):
I support S.B. 243. I am a member of Senator Copening's working group. We have met and considered the entire process. We received input from representatives from the broad spectrum, which includes members of the working group. This bill addresses the problems in our practices. That is the reason for the bill.

JOANNE LEVY (Nevada Association of Realtors):
I am a member of Senator Copening's working group. I support S.B. 243, especially the capping of collection fees.

DONNA TOUSSAINT:
We are forgetting the people who live in associations. Homeowners' associations cannot collect when a property goes to foreclosure. The rest of the group has to pay those assessments, which means their assessments are raised. A regulation would be better because it can be changed. Please consider those who pay their assessments on time because they are the ones being hurt.

JOHN RADOCHA:
I provided you with an amendment for S.B. 243 or S.B. 195 (Exhibit I). Under NRS 116.31034, subsection 8, paragraph (b), if a homeowner believes retaliation and selective enforcement have been used against him or her, all liens and fines are extinguished. I would like to see that in your bill. I am bringing this up because I have applied for the board. Yesterday, I received a letter and it says:

> I am in receipt of your board candidate application form and supplemental statement. Please be advised that the statements

made have been deemed libel and constitutes defamation against the board of directors per NRS 116.31034, subsection 8, (b).

The association is not obligated to distribute any disclosure pursuant to this subsection if the disclosure contains information that is believed to be defamatory, libelous or profane. This is my letter for application to the board. I said disclosure for board candidate, March 11. I have never been delinquent in my assessments for common expenses. Therefore, I am in good standing. I got a form requiring a candidate for the board to be a member in good standing. A candidate is not in good standing if he or she has any unpaid past due assessments or construction penalties that are to be paid to the association. They have already taken my vote away from me.

SENATE BILL 195: Revises provisions relating to the costs of collecting past due financial obligations in common-interest communities. (BDR 10-832)

YVONNE SCHUMAN:
While searching for a home builder in 2002 and 2003, I was appalled by the home sales process. I saw abuses. I am here today because of abuses by HOA collection agencies. I am not opposed to S.B. 243, I am neutral. I support the general intent, but shortcomings need to be addressed. There should be a cap. For the individual, there is no cap because each of those fees can be charged and are often charged multiple times. There are additional costs. Many collection agencies perform collection services on behalf of HOAs for less than $1,000 on a routine basis. This bill should do more to lower the fees and create a real cap that will not force collection agencies out of business.

JON SASSER (Legal Aid Center of Southern Nevada; Washoe County Senior Law Project):
We get involved in this issue on a slightly different level, usually after the fact. Last Session, you passed a foreclosure mediation process. We represent homeowners who are upside down in their mortgages and are going through the process trying to work out a deal in foreclosure mediation. Often, when you have a large lien as a result of these excessive HOA collection fees, it is a barrier for that homeowner to stay in his home and work out a modification process because of the lien.

We also see people dealing with collection agencies and dealing with something that was a $100 to $300 problem that has escalated to a higher sum they

cannot afford. They try to work out a payment plan. It is hard to navigate the issues between the investors and the collection agencies.

RANDOLPH WATKINS (Commission for Common-Interest Communities and Condominium Hotels):
I am a member of the CCICCH. The Commission vetted the collections issue for over a year. I support S.B. 243 with the amounts in the regulation and not in this bill.

Speaking as a community manager, I want to address some concerns. All homeowners are contacted at their mailing addresses when they have delinquencies or violations. The homeowners are responsible to make sure the management company has their mailing addresses. It is interesting to note that when notice of a meeting is sent to homeowners, they show up at the meeting. If you send a certified letter advising they are behind on their assessments, that letter will go unclaimed. We all know that when we buy into an HOA, we enter into a contract for the covenants, conditions and restrictions to pay assessments in a timely manner and to provide the necessary contact information.

We did not hear from the banking industry in the Commission hearings. No banker associations or groups took a position. I want to note that bankers take the same risk as anyone when they buy a foreclosed home that has collection fees or outstanding assessments.

We heard earlier from an attorney who charges only $600. She said that was a contracted amount with Fannie Mae, Freddie Mac and other federal agencies. That is fine if you have a big client like that and you can accept $600 to do a larger volume of work; perhaps you can do it for that amount.

ELLEN SPIEGEL:
I served on Senator Copening's working group. I support this bill, but I prefer it with the higher numbers. During the 2009 Session, I sponsored A.B. No. 204 of the 75th Session, which required boards to send out their collection policies to all their homeowners annually. Homeowners are given notice of exactly what the process is and what the associated fees are. Nobody should be blindsided.

Not one homeowner I know has ever written to an association. I have asked Commissioners, debt collectors and community managers if people have written

to a HOA, saying they do not like the collection policy or the fees and requesting they be changed. When something is uncontested, people should live up to that.

My association has a budget of approximately $2 million. We have defaults of somewhere between 15 percent and 20 percent of the assessments. We only pay $41 a month. That means we are not collecting somewhere between $285,000 and $380,000 a year in assessments. Even with collection costs, we have a fiduciary responsibility to everyone in the community to collect the money owed to the association. If fees are over the caps, we still have to pay that overage because the costs are not going away. We must collect as much as we can so incremental costs are not passed along to other homeowners.

TIM STEBBINS:
I oppose this bill because it is too high. For a long time the collection agencies have been imposing outrageous fees on people. That is why this issue came before the Legislature last Session and is here again. I support any caps to make sure people who buy know exactly what is involved when they buy a home. It boils down to what the cap should be. That may require breaking it down to every item.

GREG TOUSSAINT (President, The Lakes Association):
Homeowners' associations exist for the benefit of the people who live there. *Nevada Revised Statute* 116 should be looked upon as what is good for the people who live in the community. This argument is about money between collection companies, attorneys, banks and real estate investors.

Last year, our assessments were raised to pay for bad debts. It is vital that we collect money owed to us. These new restrictions may reduce our collections in some ways, in particular the cap. What will a collection company do when it reaches the cap? They will stop working to collect more money. That will result in more costs to our homeowners. We may have to pay the collection company to collect the money owed to the Association, or we may have lower collections. In either case, we would need to raise assessments. I urge the Committee to think about this cap as something that may result in higher assessments for everyone.

SENATOR COPENING:
Do you have any suggestions of what else to do?

MR. TOUSSAINT:
I do not disagree with the cap on individual services. Should we stop collecting? Should we assume there is nothing to be done? Not every collection is a foreclosure. Sometimes, it is just someone who does not want to pay. If you take the weapon away—the collection fees—there is no ability to collect. The cap is the key problem. I do not know what those amounts should be. The last thing I want is the collection company to stop collecting money owed.

ROBERT L. ROBEY:
Mr. Buckley said in the end, the association is responsible for all costs. I assume he was referring to the costs of the attorneys, the collection companies, each mailing and postage. I am concerned if a lien is filed, the association only gets its superpriority lien of nine months. It does not matter if there is $10,000 in collection costs, the association is only going to get nine times the amount.

MS. COOPER HERDMAN:
I am neutral on this bill. I agree with a cap. My opposition to that is the amount of the cap and how inclusive it is. The costs should be inclusive in that cap to make these companies run efficiently. The State does not have the resources to audit to ensure all the costs added on top of the cap are actual costs.

FAVIL WEST (Commission for Common-Interest Communities and Condominium Hotels):
I am a member of the CCICCH. Every person who has testified today has testified at our workshops. We started out looking at this without a cap, and we ended up with a cap because that is what everyone convinced us we should have. I support Mr. Leach when he comments this should not be statutory. This should be regulatory because we are in the middle of an anomaly right now that will go away within three to five years. Then, the investors will not be here and we will be stuck with a law that is probably inappropriate. I support elements of the bill, and I am against other elements of the bill. If these people charge too much, nobody will go to them.

TODD SCHWARTZ (President, Spring Mountain Ranch Master Association):
I am board president for Spring Mountain Ranch Master Association. We cover 1,620 single-family homes. Our budget is over $900,000. In just assessments, excluding late fees, interest, fines and everything else, we have over $150,000 in outstanding assessments. I am not the HOA. The management company is not the HOA. The residents comprise the HOA. That is often forgotten.

I am neutral. I hear and read people's requests for payment plans, and a small minority comes to talk to us. You would think they would show up at the meeting to ask for a payment plan or reductions. I am happy when they come forward because we can work with them. I have noticed a majority of people come forward after the foreclosure has been filed. It is something about responsibility. What else can we do to try to educate them? Maybe caps are not right because of the economic times. Maybe regulation is the way to go. I am neutral because I cannot explain what the actual costs are. I do not know what the full steps are. Costs are involved with sending letters. A time frame between letters is not mentioned.

MIKE RANDOLPH (Homeowner Association Services):
We are a licensed collection agency. I specialize in recovery of homeowners' association assessments. I have a number of issues with the bill. I support some of the bill. I support the cap. This should be regulatory rather than statutory so we can work on it over the years because things will change. We have not seen a market like this before.

Regarding the line item fees, you have removed the insufficient funds fee. When homeowners bounce checks to the collection agency, I cannot charge them even though my bank charges me. Regarding section 1, subsection 7 of the bill, you will increase the cost to the management company and the collection agency making sure that information is going back and forth every month. If someone in the accounting department at the management company does not see the flag on an account saying it is in collections, the homeowner calls. We take the phone calls and handle that account. We give the homeowner figures. When that account is at the collection agency, it is the collection agency's job and responsibility to handle that contact. I can see issues with that.

I heard Stephanie Cooper Herdman mention a $600 fee she charges Fannie Mae and Freddie Mac but said when she does a homeowners' association recovery, she is in the area of $1,100 to $1,200. There are good things in this bill, but it needs work.

AZUCENA VALLADOLID (Consumer Credit Counseling Service):
I will read from my written testimony (Exhibit J).

HEATHER SPANIOL:
Senator Copening mentioned we need to keep the collection agencies in business. Should we allow the collection agencies to rake homeowners so they stay in business? I understand collection agencies and other agencies have costs for paper, pens, stamps and copies. I am here for the homeowners who live in their homes. Why is $75 charged for a letter?

Senate Bill 243 includes fees, reasonable attorney fees. Who determines what is reasonable for attorney fees? I appreciate the cap in the bill. It is a start, but it is high. There is room to add more costs. Everyone who supports this bill was either on the committee who drafted it or will reap the benefits from the bill. If the committee that put the bill together makes money from it, how will it be fair to homeowners? Most people would not buy a home in an HOA.

CHAIR WIENER:
I will close the hearing on S.B. 243. The hearing is open for public comment.

MS. SCHUMAN:
Earlier, a management company representative suggested the cap for a payment plan of $100 was too low, and that figure should be monthly or at least $25 monthly. I am concerned if homeowners are on payment plans of $100 a month or $50 a month to pay off their delinquencies, how will they ever pay it off if they are also paying $25 to $100 a month for the privilege of having that payment plan?

MR. RADOCHA:
The word "belief" is subjective. In NRS 116 there are a lot of subjective words, and it is usually in the homeowners' favor. I am disappointed that NRS 116 seems to override a constitutional right for me to speak.

SENATOR KIHUEN:
I want to express my support to make sure S.B. 195 is rescheduled.

CHAIR WIENER:
There being nothing further to come before the Committee, we are adjourned at 10:54 a.m.

RESPECTFULLY SUBMITTED:

Kathleen Swain,
Committee Secretary

APPROVED BY:

Senator Valerie Wiener, Chair

DATE:

EXHIBITS			
Bill	**Exhibit**	**Witness / Agency**	**Description**
	A		Agenda
	B		Attendance Roster
S.B. 243	C	Senator Allison Copening	Written testimony
S.B. 243	D	Senator Allison Copening	HOA collection timeline
S.B. 243	E	Angela Rock	Proposed Amendment to SB 243
S.B. 243	F	Keith Lee	Examples of closing costs
S.B. 243	G	Jonathan Friedrich	Comments and Amendments on Senate Bill 243
S.B. 243	H	Chris Ferrari	Slide showing collection costs
S.B. 195	I	John Radocha	Proposed amendment to SB 195
S.B. 195	J	Azucena Valladolid	Written testimony