

MINUTES OF COMMISSION MEETING

April 28, 2011

Present at the New Jersey Law Revision Commission meeting held at 153 Halsey Street, 7th Floor, Newark, New Jersey, were Chairman Vito A. Gagliardi, Jr., Commissioner Albert Burstein and Commissioner Edward J. Kologi. Grace C. Bertone, Esq. of Bertone Piccini LLP, attended on behalf of Commissioner Rayman Solomon, Professor Ahmed I. Bulbulia of Seton Hall Law School attended on behalf of Commissioner Patrick Hobbs, and Professor Bernard Bell of Rutgers University School of Law attended on behalf of Commissioner John J. Farmer, Jr. Skip Stabile, Chief Legislative Aide to Senator Nicholas Scutari, was also in attendance.

Also in attendance were: David McMillin of Legal Services of New Jersey; Beverly Brow Ruggo of New Jersey Citizen Action; Viva White, a Newark resident; and Donna Jackson and Cassandra Dock of Concerned Citizens to Revitalize Community. Ms. Tharney introduced Christopher Cavaiola, a graduate student at Monmouth University who will be working with Staff as an extern for the summer.

Minutes

The March 17, 2011 minutes were unanimously approved on a motion by Commissioner Kologi seconded by Commissioner Bulbulia, subject to the correction of comments by Commissioner Bell on pages 6 and 9; to clarify that he was asking questions rather than making statements. Commissioner Gagliardi requested that when he is absent, as was the case in March, the minutes should identify the chair of the meeting. The March meeting was chaired by Commissioner Burstein.

Debt Management Services Act of New Jersey

Laura Tharney explained that one commenter, Ellen Harnick of the Center for Responsible Lending, was planning to attend the meeting but her plane was delayed in Raleigh. A letter submitted by Ms. Harnick was included in the packet of information distributed to the Commission members at the beginning of the meeting. Ms. Tharney explained that she would summarize the comments included in the packet and that Ms. Harnick had indicated that she would be happy to supply additional information or clarification if the Commission requested it.

The Uniform Law Commission (“ULC”, formerly NCCUSL) revised the UDMSA project in February 2011. The project was again revised in April 2011. Beginning with the Memorandum dated April 18th, Ms. Tharney explained that there were issues on which the Commission did not make a determination at the last meeting

because it sought more information. She indicated that the formal statement from the NJSBA was still outstanding, so Staff was not able to provide information to the Commission regarding the Bar Association's position concerning the application of the Act to attorneys.

When the Commission asked Staff for more information regarding the language calling for a bonding company to have an "A" rating, Staff asked DOBI about the requirement. DOBI advised that it recommended the elimination of any reference to the insurer's rating. The DOBI representative indicated that there was no such requirement in New Jersey law. The current law requires only that the surety company be authorized by law to do business in this State. Previously, the Commission had suggested that a threshold requirement might be appropriate, and Ms. Tharney asked for guidance.

Commissioner Burstein suggested that there was a significant difference between the rating requirement currently in the draft and a simple requirement that a company be authorized to do business in the State. Mere authorization does not address the entity's fiscal responsibility; it simply requires the filing of a piece of paper. He added that his experience with rating agencies during the last several years suggests that a rating is not necessarily a standard that means much, but using a rating as the standard would be preferable to mere authorization. Ms. Tharney mentioned the concern expressed by DOBI previously that limiting the Act to companies that have an A rating might eliminate some entities that would conduct themselves appropriately. She noted that the original draft included language calling for either an A rating or a finding by the administrator that the entity is satisfactory. The Commission elected to retain that language.

At the last meeting, the Commission also asked Staff to find out how quickly DOBI generally acted when issuing or denying an application for licensure. Ms. Tharney explained that DOBI had expressed concerns regarding the imposition of a short time period to act on a large number of license applications if the law was changed. DOBI did indicate, however, that they generally acted on license applications within 90 days, but asked that they not be held to that time period. The preference expressed by DOBI was for no deadline to be included in the statute. Ms. Tharney explained that the UDMSA provided for a 120 day period with a 60 day extension of the time. Commissioner Bertone recommended incorporating that UDMSA language and the Commission agreed.

With regard to the issue of private enforcement of the Act, Ms. Tharney explained that the language in this section of the draft had been modified to authorize an award of treble damages in an expanded group of cases (more cases than included in the UDMSA) but that it stopped short of saying any violation of the Act can result in treble damages. She explained that some violations are administrative in nature, for example, failing to

provide documentation regarding the certification of a counselor. She said that although this was a violation of the Act, imposition of treble damages for such a violation did not seem to be appropriate. She explained that Staff had focused on provisions that were consumer protective in nature, and made those subject to treble damages. The Commission agreed with the course taken by Staff.

David McMillin said that he had commented on this project a number of times and appreciates the time that the Commission and Ms. Tharney have paid to this issue. He explained, however, that as currently drafted, the language differs from that found in any comparable consumer protection statutes in New Jersey. He expressed his concern with a statutory statement characterizing obtaining remedies pursuant to two different statutory schemes as inherently duplicative, since it is not clear whether those remedies would fully or partially overlap. One statute may, for example, provide for treble damages, while another allows recovery for expert fees. Receiving an award pursuant to both of those statutes is not necessarily duplicative. Mr. McMillin said that courts are used to lawyers bringing multiple claims based on same underlying conduct and, as a matter of course, preclude duplicative recoveries. He recommended that the statute not suggest that remedies awarded pursuant to different statutes are inherently duplicative, but allow the courts to make those determinations. Ms. Tharney indicated that removing the language pertaining to double recovery would appear to address the issue raised by Mr. McMillin. Chairman Gagliardi agreed, suggesting that doing so would advance consumer protection.

Ms. Tharney next explained that the inclusion of the definition of “lead generator” in the draft, was important and had previously been suggested by Legal Services. There was no Commission objection to that inclusion or to the inclusion of language requiring an applicant for a license to provide an irrevocable consent authorizing the administrator to review and examine trust accounts.

With regard to powers of attorney, Ms. Tharney explained that, initially, the UDMSA permitted an individual to confer on a provider a power of attorney authorizing the provider to settle the individual’s debt for no more than 50% of principal amount of debt. The revised UDMSA does not permit an individual to do so. Ms. Tharney explained that she had heard that this change poses a problem because, according to CareOne, in approximately 36% of cases, they cannot reach the individual consumer to obtain authorization within the five day period set by the creditor for the conclusion of the deal. As a result, an individual may be offered a beneficial settlement by a creditor, which requires confirmation in five days, and it might take 11 or more days to hear from customer, so the deal is lost. The power of attorney does not permit the providers to randomly settle debts, but it did allow them to settle debts for less than 50% of the

amount of the debt, which has been described as a useful tool beneficial to the individual consumer. Ms. Tharney explained that it had been suggested that this modification to the language of the UDMSA might have resulted from an erroneous interpretation of the FTC Rule change. If there is a concern that a power of attorney might be used by unscrupulous providers to collect fees before they are legally entitled to them, then there may be a way to address that without putting settlements at risk. Chairman Gagliardi asked if Ms. Tharney was anticipating additional feedback on this issue and indicated that the Commission would await that feedback. Mr. McMillin said that it would be premature for him to provide an opinion regarding this provision at this time.

As concerns the cancellation of an agreement, Ms. Tharney explained that the Act previously contained language pertaining to a three-day right of cancellation, as well as provisions addressing cancellation within 30 days. The revised version contains streamlined provisions allowing a consumer to terminate the agreement at any time and any money not paid to a creditor or properly taken as fees is to be returned at the time of cancellation. The Commission approved the inclusion of the streamlined language.

With regard to fees, Ms. Tharney explained that the selection of the appropriate amount of fees is difficult and indicated that Mr. McMillin had comments on this area as well. First, she explained that the FTC Rule change dealt with the issue of when fees could be taken. Previously, a consumer dealing with a predatory provider would pay hundreds or thousands of dollars with the expectation that that money would be used to pay creditors. Later, those consumers would be told that those funds were instead used to pay the provider's fee, and that no payments had yet been made to any creditor. The FTC Rule change addressed this issue for certain providers by stating that the entity could not charge or receive a fee until an agreement had been reached with at least one creditor and at least one payment had been made in accordance with that agreement. The Commission's draft is stricter than that because it applies to anyone engaging in debt-settlement. The amount of the fee is still in issue. In the UDMSA, and in bill A1949, a provider could collect 30% of the savings an individual realized as result of the efforts of the for-profit provider.

Other states, like Maine and Illinois, set the fee at 15% of the savings realized by the consumer. Ms. Tharney indicated that there seems to be some agreement about the fact that tying the fee to the consumer savings is a useful tool that keeps the interests of the provider and the consumer aligned. For-profit entities, however, say that they cannot work for less than 30% of savings. It was suggested that Staff look at Maine, since it was claimed that no for-profit providers operate there. When Ms. Tharney spoke with the Maine office that handles this aspect of consumer protection in Maine, she was told that there were providers operating there. Ms. Tharney cannot state that they are actually

operating, and not just registered. Ms. Tharney said that the fact that 15% works in Maine is no guarantee that it will work here, and she noted that Maine's 15% fee is different from the one appearing in the New Jersey draft. Maine's fee is based on amount of debt at time it is settled. If \$7,000 of debt was the subject of an agreement in Maine, and it was settled for \$5,000, but, by the time of settlement it had ballooned to \$10,000, in New Jersey a for-profit provider would receive a fee based on \$2,000 (the difference between the amount of debt enrolled, and the amount paid to settle the debt). In Maine, however, a for-profit provider would receive a fee based on \$5,000 (the difference between the amount of the debt at the time of settlement and the amount paid to settle the debt).

When discussing fees, for-profit entities say that the work that they do is more labor-intensive than the work of not-for-profits. Not-for-profits disagree. Consumer protective groups, like those for which Ms. Harnick submitted comments, say that even if a fee is set at 15% of savings as in the New Jersey proposal, unless 80% of the consumer debt is settled (which is rare – TASC indicated that that only 34.4% of its customers settled 75% of their debts) the consumer will derive no benefit from debt settlement. Ms. Tharney suggested that since New Jersey's version of 15% of savings represents a smaller amount than Maine's 15%, the Commission may wish to consider a number between 15% and, perhaps, 20% percent of savings. She indicated that a chart had been provided by CareOne, identifying the states in which they are unable to operate because of fees that are too low. Chairman Gagliardi noted that some states had a 20% fee rate. Ms. Tharney clarified that figure represented 20% of the enrolled debt (the debt brought to the table by the consumer at the time the agreement is signed), not of savings. Chairman Gagliardi asked if any state had a 15% fee like we are proposing. Ms. Tharney said that Illinois did, and she did not yet have information regarding how the new fee limitation was working in that state. Connecticut limits fees to 10% of savings, and CareOne has indicated that it cannot do business there. Chairman Gagliardi observed that if a provider does not achieve substantial savings for the consumer, the consumer ends up with more debt than when he or she started. Ms. Tharney said that she has heard that happens frequently. Commissioner Bertone said that keying fees to consumer savings makes a great deal more sense. Commissioner Burstein asked if there was some potential mid-ground between applying the percentage to enrolled debt and applying to savings – perhaps some kind of sliding scale akin to the manner in which consumer debt is handled by the commercial law bar. Ms. Tharney asked if he was referring to a different fee amount depending on the amount of the debt, such as “x” fee for debt up to \$20,000; a different fee for debts between \$20,000 - \$50,000, etc. Commissioner Burstein confirmed that was what he was referring to, like the manner in which the Commercial Law League used to handle such matters. Commissioner Bertone said that if the fee is set too low, it discourages real competition between companies and discourages companies from entering New Jersey, leaving only the scofflaws operating in the state. Chairman

Gagliardi asked Staff to look at other states with low limits to see what is happening in those states. He suggested it was odd that the state with the second highest per capita income would have the second lowest percentage, but added that Connecticut having the lowest fee rate was even more odd. He indicated that the Commission needed additional guidance in this area and Ms. Tharney said Staff would obtain additional information.

Mr. McMillin said that Ms. Tharney had summarized some of the research that Ellen Harnick was hoping to address on behalf of the Center for Responsible Lending. He explained that as CRL had worked through the numbers, it became clear that a consumer could benefit from a debt-settlement agreement only if the fee is set at 15% of savings. He added that low income individuals in relatively wealthy states like New Jersey and Connecticut had incomes just as low as individuals in other areas of the country and a fee cap protects the most vulnerable consumers. Mr. McMillin noted that the Commission had heard from a number of other consumer protective organizations, all of whom had raised serious concerns about having for-profit providers in first place, and all had urged the Commission to use the Illinois 15% percent of savings fee cap to provide consumer protection. He suggested that this was a strong aspect of the current report and indicated that the override provision allowing DOBI to change the fee amount is not appropriate. He also said that it was his understanding that Maine's statute did not specify whether the fee is based on the enrolled debt or the debt at the time of the settlement.

Commission Burstein asked Mr. McMillin about Illinois, explaining that many months ago, when the Commission first began this project, Illinois had only recently enacted its statute and there was not yet enough experience to determine whether complaints about the level of its fee were real or just transitory. He asked if Mr. McMillin had any information about whether the Illinois fee level has discouraged for-profit entities from operating in the state. Mr. McMillin indicated that he did not know about that, and it might still be too early to obtain that information. He added that he has heard that efforts to work around the advance fee prohibition of the FTC Rule are becoming more prevalent nationwide and the loophole exempting attorneys from the Act is a problem. Ms. Tharney said she would look at Illinois during her additional research.

The section concerning administrative remedies now contains language clarifying that the provisions apply to anyone who administers a trust account. Some providers try to avoid sanctions by having trust accounts separately administered so they are not actually touching the money. The Commission approved this change. Also, Staff did not remove certain language regarding private enforcement even though ULC did. Ms. Tharney indicated that she wants to find out why the language was removed before taking any action. Ms. Tharney also indicated that she had removed language tying the effective date of the Act to the promulgation of regulations by DOBI because she did not want a

delay in adoption of regulations to derail the implementation of the Act. Instead, the draft will provide for a six month delay in the effective date of the statute to allow DOBI time to adopt regulations if it chooses to do so.

Also, Staff will not remove language referring to the trust account section of the Act since that might cause confusion if the Act is to apply to individuals or entities who have unrelated trust accounts for other reasons. The Commission said this was acceptable. The Commission also approved Staff's inclusion of additional consumer protective language from the most recent ULC draft, including language pertaining to the requirements of a financial analysis and the need to specify the amount of savings that has to accrue before a settlement offer will be made.

In Section 15, pertaining to fees and other charges, language from the latest ULC draft was incorporated, dealing with payments based on the number of creditors and with permissible payments. The Commission approved these changes. The Commission also approved changes requiring additional information from providers in Section 16, which pertains to periodic reports and the retention of records.

Ms. Tharney said that this project has not yet been released as a tentative report and asked that the Commission authorized such a release with a long comment period to allow Staff to determine if ULC makes any more changes to the document at its annual meeting in late July. The Commission would see the project again in September, potentially for release as a final report.

Commissioner Burstein indicated that he was still concerned with the participation of for-profit entities and that part of the Commission agreed to include them in the draft was in reliance on the comments of representatives of DOBI. He said he did not wish to undo the work done, but to consider it in the context of the remaining issues that the Commission is wrestling with. Ms. Tharney indicated that New Jersey is one of the only states that does not allow for-profit entities to participate and that regulating for-profits affords New Jersey consumers more protection than the current situation where scofflaws have a monopoly. She also noted that ULC had removed the provisions making for-profit participation optional from its latest drafts in recognition of the fact that almost every state allows for-profits to operate. She added that the representative from Maine had suggested that Maine was, five years or so ago, where New Jersey is today and that, from his perspective, the state does not regret its decision to allow for-profits to participate. So far, Maine's experience has been that to extent companies register, a bond is posted, insurance is available, there is someone to contact in the event of a problem, and the company usually tries to settle rather than disappear in the night.

The Commission agreed to release the project as a tentative report on motion by Commissioner Burstein seconded by Commissioner Bulbulia.

Effect of Abstentions

Mr. Cannel explained that Commissioner Kologi had responded to Staff's first version with three corrections. He clarified that if a person is participating in the meeting, it does not matter whether the person actually is physically present. He also pointed out that it was necessary to use the word "abstention" in the act itself. Commissioner Kologi also expressed his view that the most important provision is what is now in subsection c.; that provision should be first. Staff revised its draft with a draft to implement Commissioner Kologi's corrections.

Commissioner Kologi commented that Staff had improved the draft by condensing the language to a government entity as defined in the Open Public Meetings Act. Commissioner Bell inquired whether, if one takes out a few words, it then causes a problem with subsection (a). Chairman Gagliardi stated the solution is to make clear that the member is participating in the meeting physical presence is not required. Commissioner Kologi stated that Staff's earlier memorandum with case citations really got to the heart of the matter. The intent of the voter (having been around public officials for 30 years at all levels) is that someone who wants to abstain does not want his or her vote to be counted either way. That person just does not want to be involved.

Chairman Gagliardi asked for a motion to release the project as a final report with the changes reflected in the handwritten notes – subject to the language "is participating in meeting but". The motion was unanimously passed.

One of the members of the public who attended the meeting expressed the view that abstention should mean the person abstaining is not involved. In response Chairman Gagliardi stated that it was the Commission's intention that this would be the law in the state in order to prevent this problem.

N.J.S. 14A:5-28 – Books and Records

Ms. Tharney explained that, at the last meeting, the Commission had asked for additional information regarding questions posed by Commissioners.

First, with regard to the Model Act and other states, it appears that the Model Act and other states approach this issue in the same way that the court did in *Cain v. Merck*. When "minutes" is expressly limited to minutes of shareholder meetings, then

shareholder minutes only are covered by the statutory language. When “minutes” is used without qualification, then the term refers to minutes of proceedings a corporation keeps as a matter of law, and includes minutes of shareholder meetings, board meetings and executive committee meetings.

Second, with regard to whether the right of access applies to shareholders or to the general public, the statute applies only to shareholders, throughout the statute, the term “shareholder” is used consistently and nowhere are the rights of the general public to demand business records of a corporation mentioned. Third, the statute appears to apply to holders of both voting and non-voting shares of stock; the class or series held appears to be irrelevant for purposes of the right of inspection. Fourth, it appears that the right of inspection applies only to the beneficial holder of the shares, no section of the statute allows a street name holder or a stock broker the power to act in ways statutorily reserved to a shareholder.

Ms. Tharney asked if the Commission wanted Staff to combine the information in the two memoranda on this project and turn it, and the draft statutory language, into a tentative report. Commissioner Burstein suggested releasing the project as a tentative report. Commissioner Bell asked if the reference to minutes should include other committees in addition to the executive committee since there could be other committees and subcommittees. Ms. Tharney said that the language of the memorandum refers to any minutes required to be kept, but Chairman Gagliardi pointed out that the memorandum refers only to the board and executive committees. Commissioner Burstein said that maybe the language should be broader.

Chairman Gagliardi suggested that there is sufficient sentiment on the Commission to potentially expand this project beyond the language in the draft but asked that Staff should obtain more information and prepare draft language for potential release as a tentative report in May. Commissioner Bell asked if there was language in the documents that reflects what Staff found as far as the breadth of the project, as applied to voting and non-voting shareholders, for example. Chairman Gagliardi suggested that such comments could appear either in the comment section or in the draft statutory language. Commissioner Bell added that there was a case pertaining to the information on page two of the memorandum. Staff will provide supplemental information for the next meeting.

UCC Article 9 Revisions

Mr. Cannel explained that at the last meeting, the Commission decided to follow the majority view and adopt the stricter rule for the name of the borrower. Staff drafted the tentative report based on that decision. A Tentative Report may lead interested parties

to indicate whether this is the course they want. Commissioner Burstein moved to release this project as a tentative report and Commission Bulbulia seconded the motion. All were in favor.

Effect of Expungement on Collateral Consequences of Conviction

Ms. Tharney explained that, as the memorandum indicates, this project results from a case that was brought to Staff's attention as a result of ongoing searches for cases in which the court calls for legislative action or clarification.

The case in question deals with the collateral consequences of a criminal conviction. The case itself deals with a rather narrow issue. A detective with the Monmouth County Prosecutor's Office conducted an unauthorized criminal background check using a restricted database. She was convicted of a disorderly person's offense and one of collateral consequences was she was forever barred from holding public employment. Her conviction was later expunged. The case posed the question of whether she could then seek public employment. The Court found that she could not.

The question is whether the Commission wants to take on a project in this area. Language could be drafted to follow the majority opinion. One option is the addition of a subsection to the statute to clarify that expungement does not remove the bar to holding public office. An alternative is to take a broader approach and eliminate the language which says "Unless otherwise provided by law" at the beginning of the relevant section of the statute and actually clarify any exceptions after reviewing the statutes to identify collateral consequences.

Commissioner Burstein said that it was puzzling that whoever drafted this statute didn't seem to appreciate the draconian nature of forfeiture. Mr. Cannel said that if a young police officer, for example, engaged in some improper activity and then wishes to be hired as a teacher many years later, the person is barred from doing so. Commissioner Burstein said it does not necessarily have to be a permanent bar to protect the public in a case with the sort of infraction described here. He suggested a more sophisticated standard regarding the use of a permanent bar based on the severity of the offense.

Commissioner Kologi said that the Legislature created a rule that expungement wipes the slate clean, and then provided exceptions, the issue raised in this case could have been addressed legislatively, but wasn't. Commissioner Bell said that in his view, the consequence of a permanent bar is draconian, but the legislature knew what it was doing and determined that this particular problem needed very strong medicine. Commissioner Burstein said that sometimes it is not possible for the Legislature to

consider all of the ultimate consequences. Mr. Cannel said that he did not think that the Legislature, when it said “forever”, had expungement in mind one way or the other.

Chairman Gagliardi said that by building some flexibility in to this section of the statute, this Commission has a chance to do something that affects lives in a tangible way. He said that he is reminded of what he has heard Newark’s current Mayor say again and again, which is the strange dilemma you put people in when they get out of prison and are so severely limited from holding a variety of jobs for the rest of their lives. Chairman Gagliardi said that the Commission should make a list of the current disqualifications and do what the Commissioners think is right after reviewing the items on that list.

Mr. Cannel said that the Commission may also want to broaden the collateral consequences language generally since there is now conflicting law on collateral consequences and clarification is needed. Commissioner Kologi pointed out that there are currently three ways to be barred from public office – commit a crime of the third degree or higher, commit a crime using your office, or commit a crime touching upon your office. Mr. Cannel said that, as it now stands, if someone burglarizes his neighbor’s house, this is an act of dishonesty and he will lose his job, but he can obtain another job. If, however, a person inappropriately runs a background check on someone he shouldn’t, then he is forever barred.

Commissioner Bell said that he supports looking at the relevant issues more broadly and that this sounds like an interesting project. He did, however, suggest that if the Commission plans to significantly modify the lifetime ban on holding public office, then a strong justification is required for doing so. The Commission determined that this was a worthwhile project. Commissioner Gagliardi said that the Commission will consider what an expungement will mean. Commissioner Kologi suggested that varying levels of consequences should be considered depending on the severity of the crime.

UMOVA

Ms. Brown explained that Staff had been asked by Robert Giles, the Director of the Division of Elections, to ask the Commission to table this project for a couple of months so that he could review Staff’s memorandum. Staff also wanted time to further examine recently passed legislation that might affect adoption of the law in New Jersey. The Commission agreed to table the issue.

Proposed Projects

Mr. Cannel explained that Senator Loretta Weinberg and OLS had alerted Staff to antiquated statutes. If the Commission wanted Staff to prepare a general repealer, it had been a long time since one had been proposed and the Commission could decide down the road what should be included.

Chairman Gagliardi said that if OLS is suggesting it, it may be time for one. Chairman Gagliardi stated that the Commission would take the list of statutes to be included under advisement.

URPTODA

Ms. Brown reminded the Commission of this uniform law that had been considered by the Commission in March of 2010. It provides a mechanism for non-probate transfers of real property. At that time, the Commission had asked for more feedback. Ms. Brown advised that this project was presented at the Real Property, Trust and Estate Law Section of the Bar, Board of Consulters meeting in March of 2011, and after that meeting and further e-mail exchanges, it had been represented to Staff that no one who responded was in favor of adoption of this uniform law. Ms. Brown was advised of the view that the uniform law does not permit anything that cannot be accomplished by will. It was agreed that Staff should prepare a final report for the May meeting recommending that the law not be adopted.

Miscellaneous

Commissioner Gagliardi asked whether the Commissioners would consider meeting in the morning in the fall, and suggested that the Commission experiment with a morning meeting. Chairman Gagliardi set the meeting for 10:00 a.m. for the months of September, October and November. December's meeting would stay at 4:30 p.m.

Ms. Brown also advised the Commission that she and John Cannel had met with OLS and AOC representatives regarding the New Jersey Adult Guardianship Act, that there are one (and perhaps two) sponsors for the law which is in the bill drafting process. Finally a member of the public raised as a project the issue of suspensions of people's licenses for parking tickets because municipalities vary with regard to how long they wait before imposing suspensions.

The next Commission meeting is scheduled for May 19, 2011.