

Unclaimed Property Task Force

Thursday, July 24, 2014

1:00p.m. – 3:00p.m.

Senate Hearing Room, Legislative Hall, Dover, DE

Meeting Attendance

Task Force Members:

Present:

| | | |
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| Senator Bryan Townsend | Bryan.Townsend@state.de.us | 302-744-4165 |
| Representative Bryon Short | Bryon.Short@state.de.us | 302-744-4297 |
| Senator Greg Lavelle | Greg.Lavelle@state.de.us | 302-744-4197 |
| Representative Jeff Spiegelman | Jeff.Spiegelman@state.de.us | 302-744-4179 |
| Secretary Jeffrey Bullock | Jeff.Bullock@state.de.us | 302-739-4111 |
| Secretary Thomas Cook | Tom.Cook@state.de.us | 302-577-8984 |
| Controller General Michael Morton | Michael.Morton@state.de.us | 302-744-4211 |
| Stan Stevenson, Esq. | sstevenson@rlf.com | 302-651-7707 |
| Jordon Rosen | jrosen@belfint.com | 302-225-0600 |
| Thomas Collins | Tom.Collins@debankers.com | 302-678-8600 |
| Michael Houghton | mhoughton@mnat.com | 302-351-9215 |
| Leonard Togman | ltogman@potteranderson.com | 302-984-6005 |

Absent:

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| Robert Tuinstra, Jr. | Robert.J.Tuinstra@usa.dupont.com | 302-774-0485 |
| Public | N/A | |
| Office of the Governor | N/A | |

Staff:

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| Michelle Zdeb | Michelle.Zdeb@state.de.us | 302-744-4059 |
| Kiki Evinger | Kathryn.Evinger@state.de.us | 302-744-4297 |

Attendees:

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| Freda Pepper | Keane | 610-232-0721 |
| Jamie Johnstone | DOF | 302-577-8965 |
| Arsene Aka | DOF | 302-577-8964 |
| Courtney Stewart | CGO | 302-744-4200 |
| Kim Gomes | Byrd Group, LLC. | 302-757-8303 |
| Michael Barlow | Office of the Governor | 302-577-8154 |

The Task Force meeting was brought to order at 1:04pm.

INTRODUCTIONS

Senator Townsend, co-chair, thanked the members of the Task Force and the public for attending the meeting. He apologized for not being able to participate in person but stated that he would be participating via conference call. The Senator then turned the meeting over to co-chair Representative Bryon Short.

Representative Short, co-chair, suggested that the members of the Task Force who were present state their names so that Senator Townsend knew who had attended. Representative Short then asked if Senator Townsend would like to make any opening remarks.

Senator Townsend thanked Representative Short. He stated that the Task Force was meeting in Dover due to construction at the Wilmington meeting location, Buena Vista. It is not his intent to have all of the Task Force meetings in Dover. He also notified the Task Force that Thomas Collins, Delaware Bankers Association, was present on the conference call.

REVIEW OF TASK FORCE TIMETABLE

Representative Short stated that there are currently two other Task Force meetings scheduled. The meetings are on Tuesday, August 12th from 1 p.m. to 3 p.m. and Wednesday, September 10th from 3 p.m. to 5 p.m. Both meetings will be held at Buena Vista in Wilmington. There will be a fourth meeting tentatively in October but it is not scheduled at this time. The report for this Task Force is due by November 1, 2014.

BACKGROUND OF SENATE CONCURRENT RESOLUTION 59

Representative Short asked Senator Townsend if he would like to give any background information about this subject or if he would prefer to skip to the ‘Overview of Issues’ topic.

Senator Townsend said he would like to begin discussing the issues.

OVERVIEW OF ISSUES

Representative Short began the discussion. He said that it is important to balance the fact that unclaimed property is the third largest source of revenue for Delaware with the State’s desire to maintain positive relationships with the companies that choose to reside here. On a more local level, constituents have called him and other State Senators and Representatives to report that they have lost money to the escheat program. The Representative stated that he worked with Secretary Cook, Department of Finance (DOF), several years ago to improve the escheat notification system. He then suggested that the other members of the Task Force, many of whom encounter this issue on a corporate level, state their opinions and observations on the subject.

Senator Lavelle said that everyone on the Task Force understood the importance of escheat and its relation to the State budget. Problems with the escheat process were brought to his and Senator Townsend’s attention, resulting in both legislators proposing legislation to rectify the

situation by extending the incentive program. Neither piece of legislation was passed, but this Task Force aims to examine the issue in-depth to find a more comprehensive solution. Additionally, Senator Lavelle brought attention to a line in the synopsis of SCR 59 that states that the Task Force seeks to improve the “fairness and compliance of Delaware’s unclaimed property program.” The key is to find out what the definition of “fairness” should be. He believes that the State and companies may have different ideas of what “fairness” means in this context. The State may be seeking to escheat as much money as possible, while companies may want a shorter auditing period.

Senator Lavelle questions whether the contracts that the State holds with service providers are also fair. He requested that Secretary Cook provide information on the State’s history of escheat collection on an annual basis over approximately the past 15 years. The Senator would also like to see copies of the contracts that the State holds with service providers, in order to examine the terms of the contracts. Additionally, he would like to see a record of the legal actions that have been filed against the State relating to this issue. There was an article in *The News Journal* that morning that detailed one such case. He further asked if there were other pending cases and what is the history of the current case. Senator Lavelle noted that he realized that the Task Force includes members with varying backgrounds on this issue and that he looks forward to hearing their views.

Secretary Cook stated that the case discussed in the newspaper that morning was the only such case that has been filed and that he could provide the Task Force with information on that particular case and its history.

Leonard Togman, public, retired attorney and partner at Potter Anderson, said that he agreed with Senator Lavelle that the issue of what constitutes fairness is important. There is a general perception that the auditing process is not fair, particularly the length of time the audit takes and the volume of information requested. These issues make the auditing process onerous. This negatively impacts Delaware’s reputation as a good state for states to be incorporated in.

Michael Houghton, Uniform Law Commission (ULC), said that he represents many Fortune 1000 companies either in terms of voluntary compliance, companies that are being audited by the State of Delaware or other states, or companies that are a part of Secretary Bullock’s Voluntary Disclosure Program (VDA). He thinks that there have been a number of modifications to the statute to address some of the concerns in the corporate community about unclaimed property. The reality of the situation is that there are thousands of corporations that are surprised to find out, after they have been invited to become incorporated in Delaware, that in retain their presence in Delaware they are subject to audits. Audits may or may not be considered aggressive. Companies should not be surprised to find that they have a legal obligation to file; this negatively impacts Delaware’s reputation.

This brings several questions to mind that may be answered during the course of the Task Force. First, does Corporate America believe that they are being dealt with in a fair and transparent way? Second, are there standards and criteria that are understandable relating to an audit? One issue he frequently encounters in his practice that clients find to be unfair is the look-back period that extends to 1981. A ten year look-back period may be more reasonable than a thirty-three year one. Mr. Houghton, in addition to serving on this Task Force, is also chairing a national Task Force for the Uniform Law Commission that is undertaking a revision of the

federal Uniform Unclaimed Property Act, which is the law in more than 40 states. The last revision was in 1995. As a result, he is collecting a vast amount of information about this issue on the national level that he would be happy to share with members of this Task Force. This Task Force does not have the time or capacity to do a total overhaul of the Delaware statute. He noted at some point this is an issue that needs to be addressed, since the Delaware statute is outdated.

Mr. Houghton emphasized that this is a delicate issue and actions need to be carefully examined so as not to negatively impact the State. Certain things can be done to promote transparency and consistency, but this is an almost \$600 million per year revenue source for the State, and the risk of consequences to the State's revenue need to be avoided. He does not advise that this process be undone, but some things can be done to make the process more palatable to Corporate America.

Jordon Rosen, Delaware State Chamber of Commerce (DSCC), agreed with many of the comments from previous members, especially regarding improving fairness and compliance. Delaware's reputation is at stake. He would like to see a best practices manual for audits of unclaimed property, both for auditors and for those providing oversight in Dover. Unclaimed property is the third largest source of revenue; scaring away corporations with unclaimed property laws puts this revenue stream at risk. Technology that businesses have today results in companies keeping better records, which leaves the State with less money in an audit. This is a shrinking revenue stream. His fear was that this large level of State revenue is in jeopardy.

Stan Stevenson, Delaware State Bar Association (DSBA), stated he is also a practitioner in the field and is involved in audits. He supported Mr. Rosen's statement because of technology there may not be much that can be done to hold onto that revenue stream. However, there are certain other things that Delaware should be doing simply because they are the right thing to do, including decreasing the audit length and the look-back period. In the last five years there have been improvements that have been made that benefitted the business community and have begun to improve the reputation of the State. Some improvements can also be made in getting property that has been escheated back to the rightful owner.

Representative Jeff Spiegelman asked if the Task Force would directly address some of the issues that have resulted from the Temple-Inland court case, including retroactively applying the 2010 change to State law. He asked if the Task Force wanted to dive into a federal court case. It could be a question for the future.

Senator Townsend answered that it is a topic that he has heard about from others. He said that the Task Force members must be mindful of the litigation and how it overlaps.

Secretary Jeff Bullock, Department of State (DOS), said that it would be helpful to talk about where the Markell Administration is on how this issue is handled, not only as a tax collection issue but as a matter of policy. Most of the comments he heard from Task Force members were about the audit functions. The Administration understands the controversy the audit process has created, including the cost of audits on the holder side and the look-back period. In the course of this Administration there have been conversations with large corporations about how Delaware's audits have affected them as well as about the auditing process's reputational impact on the

State. The issue that the Administration has been trying to deal with is how to get more companies into compliance. It is the legal responsibility of companies to be in compliance with Delaware's abandoned property laws. However, how companies meet that obligation, the rules that are in place and what is and is not considered abandoned property are points of controversy. Over the past several years the Administration has tried to move away from a model that relies heavily on audits and towards one that tries to incentivize compliance. That is why the Administration is focused on this Task Force being about compliance; if companies are in compliance, some problems resolve themselves.

Secretary Bullock stated getting companies into compliance is an issue. In order to pursue this model of incentivizing rather than auditing, DOS has created the VDA, and the DOF have been making reforms. The Secretary noted although it may not seem like it, he believes the model is working. About 550 companies have signed up for the VDA program—three times more than was originally projected. The program has been extended and over \$70 million was collected last year. Once more companies are in compliance, and they are required to file annual reports, the concerns that other Task Force members expressed will be less common. Secretary Bullock emphasized that the Task Force should focus on how to improve corporate compliance with Delaware statutes.

Mr. Houghton stated that one important way to incentivize compliance is to continue audits. He has had clients who received invitations to join the VDA program but refused. He does not have sympathy for these companies if they are audited because the State has set up infrastructure designed to heavily promote coming in on a voluntary basis. The only way people will think that means something is if there are consequences for not joining the program. He thought the audit program is an integral part of promoting compliance; “you have to have the carrot and the stick.”

Secretary Bullock agreed with Mr. Houghton. He compared this situation to the IRS, which was very audit-oriented twenty years ago. It is much less now and it has much more public outreach. However, the IRS still does audits because there is a need for consequences as well as incentives.

Secretary Cook said that part of the job of DOF is to make sure the audit process is fair and equitable. If there is a problem he wants to address it. He wants to hear from members how his department can make the process better. One of the changes that were made to make the process more transparent was, after the property has been escheated, the State sends out due diligence letters informing of the property they have and requesting contact. DOF has reunited over \$100 million with claimants this past year. In terms of revenue, over \$200 million comes in each year as a result of annual collections done by auditors.

Secretary Cook agreed with Secretary Bullock that the Administration's goal is to incentivize companies to file annually and join the VDA program. This makes annual revenue more stable and predictable. Some companies have ignored invitations to join the VDA program. He questioned why some companies have refused to join and yet are the ones that tend to have the most complaints about the system. Secretary Cook addressed the concern that the look-back period is too long by stating that if companies were in compliance then there is not a long look-back period. He has heard that the audit process has been referred to as “aggressive.” The Secretary stated he is interested in addressing this issue and wants to hear examples of the auditing process being aggressive. The DOF is following the law set forth by the General Assembly. If the law is changed, there could be consequences like Mr. Houghton mentioned.

OPEN DISCUSSION BY TASK FORCE

Representative Spiegelman said that the issue of the look-back period is at the crux of the Temple-Inland case. He asked Secretary Cook to explain the case further.

Secretary Cook gave some background on the litigation. He said that the company went through the audit process and DOF requested information from them. Then DOF gave an assessment based on the information that was provided to them. There is an appeals process in place that has been created in the past couple of years that provides for an independent reviewer to come in and hear both sides of the case and make a recommendation to the Secretary of Finance. The Secretary can accept, reject, or modify the recommendation. In this case, the recommendation was that the methodology was correct and a fair audit was done. Secretary Cook accepted this recommendation. The company had the option of appealing to the Court of Chancery, but they decided to sue in federal court.

Senator Lavelle asked to see the report from the previous legislative Task Force on unclaimed property. He also asked how many companies are there that are escheatable in Delaware, how many have chosen to report, and how many have chosen not to report.

Secretary Cook stated there are over 3,000 that annually report and that there are over one million escheatable companies. He compared it to the gross receipt tax in that it is a self-reporting system. Larger companies that do not report may be candidates for auditing.

Senator Lavelle asked what Secretary Cook meant by “larger companies.”

Secretary Cook said that if there is a certain segment of an industry where five out of six companies are reporting, the one that is not might be most likely audited. This is a self-reporting process.

Senator Lavelle asked if there is a law requiring companies to fill out forms and submit them to DOF.

Secretary Cook said that there is no such law currently.

Secretary Bullock said that there are some companies that are required to report because they are escheatable in Delaware, but that the amount of escheatable property is so small that it would not be worth the State’s time to pursue an audit.

Secretary Cook said that theoretically if someone had a sub shop that issued a payroll check that was never cashed that money would be escheatable to the State. However, it would likely be an insignificant amount that the State would not pursue. Larger companies, like Lehman Brothers, would have a larger escheatable amount so the State would be more likely to pursue an audit with them.

Senator Lavelle asked how DOF finds and picks these larger escheatable companies.

Secretary Bullock answered that they research the companies. As a result of the VDA program, DOS has access to the records of who is and is not in compliance with DOF. They look at the top 2,000 corporations in the world to see if they are in compliance. These companies are a good place to start because they are large and the chances that they do not have a lot of reportable escheatable property are small. The DOS sends out hundreds of invitations to participate in the VDA program. About 25% of those companies are participating in the program but, as Secretary Cook mentioned, that means that about 75% of the companies are not participating. These are very large and famous companies.

Senator Lavelle stated that it would be helpful if Secretary Cook could provide more information about what rate of returned claims is, as well as any other programmatic issues of DOF. This might be helpful for members who were not present at the last Task Force (2005) addressing this issue.

Mr. Houghton stated that unclaimed property is like a finite natural resource. He explained there are companies that have been in business for 20-50 years. In Delaware the law is that the first instance of unclaimed property must be reported to the state of the last known address of the owner of the property. If a company is incorporated in Delaware but operates primarily or exclusively in another state, Delaware still has a legal right to the unclaimed property. This is a frustrating issue for corporate owners. Unless federal law is changed, the state of incorporation has a right to the unclaimed property. Periodically the federal law is challenged and there is a threat that the state of incorporation would get nothing.

Representative Spiegelman asked if that was a potential outcome of the current Temple-Inland litigation.

Mr. Houghton said it is a potential outcome. Additionally, there is other pending federal litigation that he is involved in with the Attorney General's office that sues about 30 nationally known Delaware corporations. The litigation alleges that the companies committed fraud by not reporting their unclaimed property. The State is now dealing with a constitutional assault on the Delaware unclaimed property law as a result. Mr. Houghton recommended that the Task Force keep track of this case as it plays out in Delaware federal court because the results of it could have serious implications for the Delaware franchise. Eventually this "natural resource" of unclaimed property will run out as the State audits all of the large corporations in Delaware.

Mr. Houghton echoed Mr. Rosen's point that technology advances will also contribute to the drop in state revenue as companies start to have better record-keeping. They will want to avoid having their unclaimed property estimated for years that they no longer have records, since most companies do not keep records for over 30 years. The majority of the liability in audits is from estimated records, which corporations do not like because the estimated liability can be significant. Mr. Houghton questions what the State should do when the revenue stream dries up.

Secretary Cook stated that if a company goes through the estimation process there is something called "owner unknowable" property. The State gets the majority of its money from following the Secondary Rule (without address the property is escheated to the state of incorporation) of the Supreme Court. Secretary Cook suggested that the DOF give a presentation and Power Point that delves into some of these issues and that clarifies the auditing process. However, if there is a

complaint, it is important to remember that it is the State that runs the audit, not the auditing company. If there is any problem it falls back on DOF. He also reiterated his earlier request to hear from companies if DOF is being aggressive in its auditing process and to provide examples. He suggested that those companies make a presentation as well.

Mr. Togman said that there was a prior Task Force (2005) that considered this issue. At that Task Force, they invited people in the industry to come in and explain the problems they are facing with the system. He suggested that extending that invitation again for industry members to testify before the committee would be beneficial.

Representative Short asked Mr. Togman if industry members responded favorably to that invitation and came to testify.

Mr. Togman said that they did respond favorably and that a large number attended.

Mr. Houghton said that he noticed that Secretary Cook was understandably reacting to the word “aggressive.” He said he did not believe that the members of the Task Force were using “aggressive” to mean that Delaware or its auditors are unprofessional, personally offensive or berating companies. He thought they used the word to describe the tools that are used to implement the program, such as the look-back period and estimated liability. Companies do not have as much of a problem using seven years of records to estimate the previous seven years as they do seven years being used to estimate 25 years of liability. The appeals process is also concerning because it is convoluted and antiquated. It has an independent reviewer who is appointed by the Secretary of Finance and it is the Secretary of Finance who approves or rejects the result. Mr. Houghton said he understands the process, but nationally the system is criticized because it is seen to be a circular process. He agreed that outside groups and companies should be invited to make a presentation to the Task Force about their concerns. He suggested finding someone willing to represent and speak with one voice on behalf of these groups.

Secretary Bullock agreed that the appeals process may need to be reviewed and updated, though it has only been utilized once. However, it has been almost 20 years since *Delaware v. New York* (1996). Companies have had all that time to come into compliance, meaning that their look-back would not have been as long. If they had come into compliance in 1996 their look-back would have only been ten years. They chose to wait.

Mr. Houghton stated there is only one other state, California, that has a look-back period as long as Delaware’s. All other states have one version or another of the Uniform Law.

Secretary Bullock noted he wanted to make sure that the laws are not incentivizing illegal activity.

Mr. Houghton said that other states commence a series of audits over a shorter period of time so that the process is not dragged out. It prevents the running of the statute of limitations. An audit can be initiated as a sort of placeholder for a fuller review. States have agreed to this shorter look-back period but in return have increased their audits. No one should get a free ride. The State could consider giving companies a shorter look-back period but then make reporting

unclaimed property a stronger requirement. This would tell companies that they cannot have it both ways; if they want shorter look-back periods and greater fairness then they should have to comply with reporting laws.

Representative Spiegelman asked Mr. Houghton that if the look-back period was reduced to fifteen years but the likelihood of a State audit was much higher if that would more quickly deplete the revenue stream. There would be a spike in revenue but it would fall more quickly. Representative Spiegelman wondered if this would be almost a lose-lose situation.

Mr. Houghton answered that he does not think that there would be a spike in revenue because the period of review would be cut by more than 50%. He thought that it would actually level off. There are still a lot of companies left to audit and auditing is a time-consuming process. He agreed that it may be a lose-lose situation for the State, since the revenue will eventually run out in any case.

Senator Lavelle asked if there was a statute of limitations on this issue.

Mr. Stevenson answered that there is a statute of limitations but the company has to file a return in order to be entitled to it. He said that it is similar to a standard state tax limitation, where how far the look-back is depends on if there is a substantial understatement and if taxes have been filed in recent years. The problem in his opinion is that large corporation could flood offices with \$0 returns. He was not sure if there was a mechanism in place that could handle that many returns from that many companies.

Representative Spiegelman stated that there were a lot of aspects of this issue that he was not aware of. He asked Secretary Cook who he should talk to in order to get more information on the issue.

Secretary Cook said that he would be willing speak with Rep. Spiegelman. He said his office is willing to sit down with individual members to explain the details of the issue, in addition to the presentation that he will be giving the Task Force. He also suggested that he could make the actual auditors available to answer questions about the work that they do.

Senator Townsend said that he appreciated Secretary Cook being willing to sit down with members individually to answer their questions. In terms of the presentation, he said it could be done as part of the formal agenda of the Task Force or it could be distributed to members informally for them to review. Distributing the presentation informally could leave the Task Force with more time to consider other issues.

Mr. Togman said he agreed with Senator Townsend. At the last Task Force (2005) the State gave a presentation on their views and the industry gave a presentation with their comments. He thought it would be invaluable to the Task Force to hear both sides as a formal part of the Task Force meeting.

Senator Lavelle suggested that the presentation on the history of the issue could be included in the report.

Representative Spiegelman agreed with Senator Lavelle.

Mr. Houghton stated that it would be useful to ask interested constituencies to submit in writing their views on the issue for the Task Force to review. This would save time since it would not spend time covering the basics. He said that the ULC has come to the conclusion that auditors are a very necessary part of the process. Rules can be made, however, dictating what the role of the auditors should be, how many there should be, etc. A small number of auditing firms collectively handle up to 80% of these auditing cases. An argument could be made that the work should be spread around companies more easily, especially if there are native Delaware firms that would want to be involved in the process.

Secretary Bullock stated that because Delaware is a small state, hiring Delaware firms would likely end up causing a conflict of interest for him.

Representative Short reiterated Secretary Cook's point that it is critical that the Task Force hear about specific issues from the people involved in the industry.

Senator Lavelle said that the State has very large contracts with certain auditing companies. He asked if this caused an increase in competition. There may be a better deal for Delaware taxpayers. He also asked how DOF decides which companies to use and why Kelmar seems to be getting most of the business.

Secretary Cook said that the DOF has contracts with six entities that do this work, but others can submit applications to be considered for the job. DOF does look at what areas particular companies have experience auditing in when DOF decides which company to use. DOF has been looking to make sure that they spread the work around to multiple companies. Kelmar has supported the spreading around of the State's business, but the other companies are much smaller than Kelmar and may not be able to handle the same volume of work.

Secretary Bullock said that Kelmar has contracts with forty other states. If Delaware decides to give them less business it won't hurt them very much. They have diversified so much that they could not handle all of Delaware's audits even if they wanted to.

Mr. Houghton stated that even though Kelmar operates in forty other states, there are no other states in that group that generate as much revenue as Delaware does. In certain areas certain firms have expertise and that is why the work flows to them. The Task Force can investigate what it can do to encourage more capable auditors to work for the State.

Senator Lavelle asked for the names of three other service providers.

Mr. Houghton named Specialty Audit Services (SAS), Kelly Innovative Advocate Group, and Unclaimed Property Clearinghouse (UPCH, a Xerox subsidiary). In the past few years there have been a proliferation of other service providers.

Secretary Bullock commented that these smaller companies are often not capable of auditing a large Fortune 500 company.

Senator Lavelle asked how many of the companies in the Fortune 500 or Fortune 1000 are not in the program.

Secretary Bullock answered that a pretty significant number are not.

Representative Spiegelman asked if the State could ideally move towards using multiple smaller companies instead of fewer large companies if that would promote the idea of fairness.

Secretary Bullock said yes.

Secretary Cook said that DOF is not adverse to this idea, but that smaller firms may get overloaded and the audit process may take longer.

Representative Short stated that the House of Representatives is still pursuing the nomination of a House member of the public. Michael Barlow is also filling in for the Office of the Governor as they are awaiting an appointee as well.

PUBLIC COMMENT

Representative Short asked if any members of the public wanted to comment on this issue.

Kim Gomes, Byrd Group, LLC., said that she was present at the meeting on behalf of many clients, including the Council on State Taxation (COST). She stated that this issue is something that has garnered national attention. She offered to give Secretary Cook examples of what she would consider “aggressive” auditing behavior. COST would be happy to come in to testify. Since there is not a lot of time to examine this issue, she requested that the public comment period be continued and that members of the public be allowed to address the Task Force.

Mr. Togman commented that if members from the industry are invited, it may be difficult to get them to testify because they are concerned that if they have complaints they will get adverse reactions to their audits from DOF. Some were reluctant in the previous Task Force (2005) to testify.

Secretary Bullock said that he met with the Executive Director of COST about their concerns. He noticed that most of their complaints were historic and fewer were recent. He said it may be more valuable if the issues that industry members present are focused more on the present since Secretary Cook has done a lot of work to reform this area in the past several years.

Mr. Houghton said that he was also a member of the original Task Force (2005) and remembered the reluctance of some industry members to testify. He suggested one way to address the issue would be to invite the trade organizations to be the spokespeople for the industry. He also acknowledged the Division of Revenue’s reforms in the past several years as being very positive changes. He does not believe that this Task Force will complete an overhaul of the unclaimed

property law, but will instead address a shorter list of specific issues from the holder community and the State.

Representative Short thanked the Task Force members for attending and for their comments.

The meeting was adjourned at 2:31 p.m.