

Brian A. J. Crocker, Notary Public
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3212



September 13, 2018

Martha H. Brown
Assistant Counsel, Department of State
Office of Chief Counsel
401 North Street, Room 306
Harrisburg, PA 17120

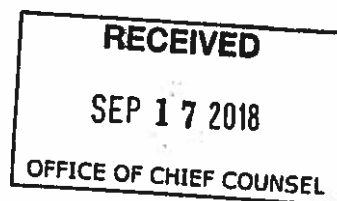
Dear Martha,

Enclosed find my concerns about notaries being required to compare the signature on the record to the signature of the individual on the identification presented for acknowledgment, verification on oath or affirmation and signature witnessing or attestation.

Thank you for your consideration,

A large, stylized handwritten signature in black ink, appearing to read "Brian A. J. Crocker".

Brian A. J. Crocker



RULONA	Proposed Regulations	Comments
Section 305 (a)(2) The signature on the record is the signature of the individual.	Section 167.61 (e) The notary public shall compare the signature on the record to the signature of the individual on the identification presented.	The assumption is the notary is confirming that the signature belongs to the individual, but the customer has already been positively identified. Notaries are not trained as signature experts. People do not duplicate their signatures every time they sign. Signing a paper document with a pen looks different than the signature from the identification, which was signed with a wand and a signing pad.
Section 305 (b)(2) The signature on the statement verified is the signature of the individual.	Section 167.63 (d) The notary public shall compare the signature on the statement verified to the signature of the individual on the identification presented.	The assumption is the notary is confirming that the signature belongs to the individual, but the customer has already been positively identified and signed in the presence of the notary. Notaries are not trained as signature experts. People do not duplicate their signatures every time they sign. Signing a paper document with a pen looks different than the signature from the identification, which was signed with a wand and a signing pad.
Section 305 (c)(2) The signature on the record is the signature of the individual.	Section 167.64 (d) The notary public shall compare the signature on the record signed to the signature of the individual on the identification presented.	The assumption is the notary is confirming that the signature belongs to the individual, but the customer has already been positively identified and signed in the presence of the notary. Notaries are not trained as signature experts. People do not duplicate their signatures every time they sign. Signing a paper document with a pen looks different than the signature from the identification, which was signed with a wand and a signing pad.