



NATIONAL ASSOCIATION OF

UNCLAIMED PROPERTY ADMINISTRATORS

State: CO

Contact: Bianca Gardelli, bianca.gardelli@state.co.us

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

Once the restrictions are lifted, a due diligence attempt must be done. If no contact after 60 days, the properties must be delivered to the state of Colorado and a supplemental report submitted.

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

Due to this exception, mail would not be deemed lost. Once mail restrictions are removed, a second mailing must be attempted and normal procedures followed.

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Unsure

Response: Unsure

Questions or Comments: Statute requires, cannot provide a blanket exception



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State: VA

Contact: Vicki Bridgeman, vicki.bridgeman@trs.virginia.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

The mailing should be completed within 60 days of the date of the lifted restrictions.

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Unsure

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments: Would be best practice to document all phases of this special instance.



NATIONAL ASSOCIATION OF

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State: MO

Contact: Scott Harper, scott.harper@treasurer.mo.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments:



NATIONAL ASSOCIATION OF

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State: CT

Contact: Maria Greenslade, Maria.Greenslade@ct.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Unsure

Questions or Comments:

CT's holder reporting cycle required due diligence letters to be mailed in September or October 2019, and holder reports delivered on or before March 30, 2020. We will determine what, if anything, must be done for the 2021 reporting cycle which will require mailing due diligence letters in September or October 2020.

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Unsure

Questions or Comments:

CT's holder reporting cycle required due diligence letters to be mailed in September or October 2019, and holder reports delivered on or before March 30, 2020. We will determine what, if anything, must be done for the 2021 reporting cycle which will require mailing due diligence letters in September or October 2020.

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Unsure

Response: Unsure

Questions or Comments: CT's holder reporting cycle required due diligence letters to be mailed in September or October 2019, and holder reports delivered on or before March 30, 2020. We will determine what, if anything, must be done for the 2021 reporting cycle which will require mailing due diligence letters in September or October 2020.



NATIONAL ASSOCIATION OF

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State: OK

Contact: Kathy Janes, Kathy.Janes@treasurer.ok.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Unsure

Questions or Comments:

Request an extension to file from Oklahoma

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Unsure

Response: Unsure

Questions or Comments: Complete the Oklahoma Compliance Assistance Form @ https://www.ok.gov/treasurer/Unclaimed_Property/Compliance_Assistance_Program/index.html



NATIONAL ASSOCIATION OF

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State: VT

Contact: Albert LaPerle, al.laperle@vermont.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: No

Questions or Comments:

Vermont's Unclaimed Property Statute does not allow for a blanket waiver of reporting requirements. We urge holders to request extensions prior to the reporting date as required in 27 V.S.A. § 1247(f). Vermont reporting date is May 1st.

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: No

Questions or Comments:

Vermont's Unclaimed Property Statute does not allow for approval of this provision for all holders. We urge holders to request extensions prior to the reporting date as required in 27 V.S.A. § 1247(f).

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Unsure

Response: Unsure

Questions or Comments: Vermont's Unclaimed Property Division will work with all holders on a case by case basis to waive interest and penalties based on COVID19 related delays in reporting.



NATIONAL ASSOCIATION OF

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State: ID

Contact: Ingrid Bolen, ingrid.bolen@sto.idaho.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments:



NATIONAL ASSOCIATION OF

UNCLAIMED PROPERTY ADMINISTRATORS

State: SC

Contact: Dayle DeLong, dayle.delong@sto.sc.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: No

Questions or Comments:

South Carolina does not agree with a general exception, as we do not believe this will impact reporting to our state. If a transfer agent encounters an issue with a specific account owner, it may contact the state to discuss.

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: No

Questions or Comments:

South Carolina does not agree with a general exception, as we do not believe this will impact reporting to our state. If a transfer agent encounters an issue with a specific account owner, it may contact the state to discuss.

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."No

Response: No

Questions or Comments: South Carolina does not agree with a general exception, as we do not believe this will impact reporting to our state. If a transfer agent encounters an issue with a specific account owner, it may contact the state to discuss.



NATIONAL ASSOCIATION OF

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State: DC

Contact: Eric Eichler, eric.eichler@dc.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

The address of record must be on the list from the USPS.

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments: Due to the current global circumstance, all penalties will be waved.



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State: OR

Contact: Carolyn Harris, carolyn.l.harris@state.or.us

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Unsure

Questions or Comments:

While we would certainly agree that it shouldn't be escheated until the restrictions are lifted, the certainty of successfully reaching the owner after restrictions are lifted may cause very long holding periods and ambiguity in the reporting process.

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Unsure

Questions or Comments:

Oregon doesn't use returned mail as a triggering event for abandonment.

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments: We always encourage holders to reach out to us when there are issues affecting unclaimed property reporting.



NATIONAL ASSOCIATION OF

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State: NM

Contact: Stephanie Dennis, stephanie.dennis@state.nm.us

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Unsure

Questions or Comments:

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments:



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State: WA

Contact: Patti Wilson, pattiw@dor.wa.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

the question wording is a little confusing it mentions escheat and successful mailing together. the nature of escheat is that the mailing wasn't successful. Also, there needs to be added after restrictions, 'due to COVID-19'

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

Should clarify that "due to a service suspension in relation to COVID-19 should not be deemed to be lost."

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments: again question should be clarified as to what mail issue we are referring to, COVID-19.



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State: WI

Contact: Erin Egan, erinb.egan@wisconsin.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Unsure

Response: Unsure

Questions or Comments:



NATIONAL ASSOCIATION OF

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State: IN

Contact: Amy Hendrix, Amy.Hendrix@atg.in.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments:



NATIONAL ASSOCIATION OF

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State: MI

Contact: Terry Stanton, StantonT@michigan.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments:



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State: AZ

Contact: William Nagel, WNagel@azdor.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

A successful mailing would be any mailing that is able to be sent to an area affected by the mailing restriction.

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments: Any request to Waive Penalties and Interest should be sent to ReportingUnclaimedProperty@azdor.gov.



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State: FL

Contact: Walter Graham, walter.graham@myfloridacfo.com

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: No

Questions or Comments:

Florida does not "escheat." We also decline to issue "blanket" policies and statements, and will continue to appreciate and work directly with individual holders on a case-by-case basis - as provided in statute.

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: No

Questions or Comments:

Florida declines to issue "blanket" policies and statements, and will continue to appreciate and work directly with individual holders on a case-by-case basis - as provided in statute.

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."No

Response: No

Questions or Comments: Florida, as do most states, generally does not assess penalties and interest to holders. Such assessments, if any, are considered on a case-by-case basis.



NATIONAL ASSOCIATION OF

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State: WY

Contact: Jeff Robertson, jeff.robertson@wyo.gov

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments:



NATIONAL ASSOCIATION OF

UNCLAIMED PROPERTY ADMINISTRATORS

State: SD

Contact: Lee DeJabet, lee.dejabet@state.sd.us

1. Would your state agree that "no accounts be escheated for shareholders whose address is in an impacted country until the restrictions are lifted and at least one mailing to the owner has been successful."

Response: Yes

Questions or Comments:

2. Would your state agree that "shareholders whose mail is returned by the post office due to a service suspension should not be deemed to be lost."

Response: Yes

Questions or Comments:

3. Would your state agree that "request a waiver of interest and penalties for any property that is considered late due to this mail issue."Yes

Response: Yes

Questions or Comments: