

IN RE: CCPA PUBLIC HEARING.

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REPORTER'S TRANSCRIPT OF HEARING  
THURSDAY, DECEMBER 5, 2019  
FRESNO, CALIFORNIA

JOB NO. 3621714

REPORTED BY: DARLINDA R. COMPEAN, CSR NO. 13094

PAGES 1 - 20

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14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

I N D E X

STATEMENT BY	PAGE
MS. SCHESSER	4
RITA CARPENTER	8
JESSICA LEE	12
BRYAN HARLEY	17

\*\*EXHIBITS WERE NOT MARKED\*\*

1  
2  
3  
4  
5  
6  
7  
8  
9  
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11  
12  
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14  
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16  
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FRESNO, CALIFORNIA

THURSDAY, DECEMBER 5, 2019; 10:10 A.M.

P R O C E E D I N G S

MS. SCHESSER: Good morning and thank you for being here. On behalf of the California Department of Justice and Attorney General Javier Becerra, I would like to welcome everyone to today's hearing regarding the proposed regulations for the California Consumer Privacy Act. My name is Stacey Schesser with the Privacy Unit of the Department of Consumer Law section and I will be the hearing officer for today's proceedings.

Also present here today with me are Eleanor Blume, Special Assistant to the Attorney General, and Lisa Kim, Deputy Attorney General of the Privacy Unit. For the record, today is Thursday, December 5th, 2019. The time is 10:11 a.m. We are at the Fresno Hugh Burns Building, Assembly Room Number 1036, 2550 Mariposa Mall, Fresno, California.

Before we begin, there are a few points that I would like to make. The notice of proposal we're making for the CCP regulations was published in the California Regulatory Notice Register on August 11th, 2019, in register number 41-Z starting at Page 1341. The notice

1 and related rulemaking documents were posted on the  
2 Attorney General's website on October 10th, 2019, and  
3 were mailed to all interested parties who had requested  
4 rulemaking notices. Today is the fourth of four public  
5 hearings that were announced in the notice.

6 The deadline for submitting written comments is  
7 this Friday, December 6th, at 5:00 p.m. Pacific Time.  
8 We have recently posted additional resources on our  
9 website about the DOJ's CCP rulemaking process,  
10 including two documents in PDF format entitled Tips On  
11 Submitting Effective Comments and Information About The  
12 Rulemaking Process. Please visit [www.oag.ca.gov/ccpa](http://www.oag.ca.gov/ccpa)  
13 for further information.

14 Today's public hearing is quasi legislative in  
15 nature and is being held pursuant to the California  
16 Administrative Procedure Act. The California  
17 Administrative Procedure Act specifies that the purpose  
18 of this hearing is to receive public comments pertaining  
19 to the proposed regulations. If you are speaking today,  
20 we ask that you limit your comments to the proposed  
21 regulations or the rulemaking procedure that we are  
22 following. We do not intend to answer questions or  
23 otherwise engage in dialogue in response to any written  
24 or oral comment; however, we may ask that you speak  
25 slower or louder or ask a limited follow-up question to

1 clarify a point.

2 Today's hearing is being audio recorded and  
3 transcribed by a court reporter. The transcript of the  
4 hearing and any written comments presented during the  
5 hearing will be part of the rulemaking record. Please  
6 try your best to speak slowly and clearly to help the  
7 court reporter create the best possible record. If you  
8 have brought written comments that you would like to  
9 submit during the hearing today, please give them to a  
10 staff member.

11 After the public comment period ends, the  
12 department will review and consider all relevant  
13 comments and recommendations provided at the public  
14 hearing and in writing. The department will then  
15 compile a summary of each relevant comment or  
16 recommendation and prepare a response to it, which will  
17 be included in the Final Statement of Reasons.

18 Once the Final Statement of Reasons is  
19 complete, the entire rulemaking record will be submitted  
20 to the Office of Administrative Law, and a copy of the  
21 Final Statement of Reasons, along with notification of  
22 any changes made to the proposed regulations will be  
23 posted on the Attorney General's website.

24 We are required to notify all persons who  
25 provided a comment and all those otherwise interested of

1 any revisions to the proposed regulations and any new  
2 material relied upon in proposing these rules.  
3 Accordingly, there is a check-in table located outside  
4 of this room where speakers and attendees can sign in  
5 and provide their contact information. You may sign in  
6 to speak without providing your name or contact  
7 information; however, please know that we will not then  
8 be able to provide you with notice of any revisions to  
9 the rules or any other rulemaking activities.

10 If you are intending to speak at today's  
11 hearing, you should have received a number when you  
12 signed in. When we call your number, please come up to  
13 the microphone. And, if you would like to be  
14 identified, state and spell your full name and identify  
15 the organization you represent, if any. If you have a  
16 business card, please provide it to the court reporter  
17 before approaching the microphone.

18 Each speaker will have five minutes to speak.  
19 To assist the speakers, Lisa will be holding up a card  
20 to alert the speaker when they have only 30 seconds left  
21 to speak. In the interest of time, if you agree with  
22 comments made by a prior speaker, please state the facts  
23 and add any new information you feel is pertinent to the  
24 issue. Also, there is no need to read aloud any written  
25 comments submitted. All comments, whether written or

1 oral, will be responded to by our office. If we have  
2 remaining time after all the speakers have had a turn,  
3 we will give the speakers an opportunity to take a  
4 second turn and add to your remarks. If you would like  
5 to make an oral comment today and have not yet received  
6 a number, please do so now.

7 Lastly, we will need to take breaks during this  
8 proceeding, including at least a 30-minute break at  
9 lunch for our court reporter, if the hearing goes that  
10 long. If it appears that we have no speakers waiting  
11 for their turn to provide comments, we will conclude the  
12 hearing.

13 At this time, can we please have the first  
14 speaker come to the microphone.

15 Good morning. Good morning, Speaker Number 1.  
16 Thank you for coming today.

17 MS. CARPENTER: Good morning and thank you for  
18 the opportunity to comment. My name is Rita Carpenter;  
19 R-I-T-A, C-A-R-P-E-N-T-E-R. I'm a compliance officer  
20 for Educational Employees Credit Union here in Fresno.  
21 Just a little background on our credit union, EECU  
22 provides financial services to more than 300,000 members  
23 in 12 counties across Central California. We serve  
24 teachers, students, other persons affiliated with  
25 education and their relatives.



1           The credit union agrees that protecting  
2   personal information of consumers is of the highest  
3   importance. We have very conservative information  
4   sharing practices and do not sell our member  
5   information. The credit union fully supports that  
6   consumers should have the right to choose how their  
7   information is shared and used or if it should be shared  
8   and used. That said, we have concerns with the recently  
9   proposed CCPA regulations. I'd like to speak to these  
10   points: Extending the effective and enforcement dates,  
11   the need for model notices, and clarification of the  
12   exemption for the information covered by other privacy  
13   regulations.

14           First, we ask that both the effective and  
15   enforcement dates be extended. CCPA was signed into law  
16   almost a year and a half ago; however, proposed  
17   regulations were not issued until recently on  
18   October 11th. Eighty-two days is not enough time to  
19   understand the complex requirements and become  
20   compliant. The proposed regulations are more detailed  
21   than the original statute. For our credit union,  
22   implementation will mean inventorying data, website  
23   modifications, developing forms and disclosures, new  
24   procedures and policies, and of utmost importance,  
25   training our staff so that they fully understand the

1 consumers' rights, our responsibilities, and have the  
2 tools needed to respond to consumer inquiries and  
3 requests for information.

4 As a financial institution, we are already  
5 highly regulated and must comply with regulations  
6 pertaining to privacy and data retention. It's  
7 important that we have time to clearly understand how  
8 CCPA and the existing regulations work together. Given  
9 the complexities of CCPA, businesses need additional  
10 time to fully understand requirements and implement  
11 compliance solutions. We ask that the effective date be  
12 extended by two years, and that the enforcement be  
13 delayed until six months after publication of final  
14 regulations.

15 Next, model notices and disclosures would be  
16 helpful to us and beneficial to consumers. They provide  
17 clarity, consistency, and assured compliance. CCPA  
18 states that notices must be easy to read and  
19 understandable to the average consumer. How does one  
20 decide if this standard is met? It's subjective.  
21 Businesses and many industries will be designing their  
22 own notices and industries often have a preferred format  
23 or lingo which may be understandable to them, but not  
24 the average person. Consider how a medical professional  
25 or someone in the legal profession might write their

1 notices.

2 Model notices and disclosures are common in  
3 other consumer protection regulations. Some of them  
4 that work well in the financial services industry are  
5 notices that tell you how to dispute fraudulent  
6 transactions or unauthorized transactions, fraudulent or  
7 unauthorized transactions in your bank account. There  
8 are also model notices that tell you how long a check  
9 will be held before the funds are made available to you.  
10 And, in real estate, nondiscrimination notices. Uniform  
11 notices would ensure consumers understand their rights,  
12 make it easier for them to exercise their rights, and of  
13 lesser importance, make it easier for us to comply.

14 Last I'd like to briefly comment that the  
15 exemption for personal information elective pursuant to  
16 other existing privacy regulations is somewhat unclear,  
17 confusing, and very much subject to interpretation.  
18 CCPA uses terms that are inconsistent with the Federal  
19 Gramm-Leach-Bliley Act and the California Financial  
20 Information Privacy Act. Personal information as  
21 defined in CCPA is much broader in similar terms than  
22 the existing regulations.

23 In addition, CCPA applies to personal  
24 information collected in any manner and for persons that  
25 are not currently covered by the other regulations. It

1 covers information even if there is no transaction or  
2 it's collected from a person with whom we have no  
3 relationship. This is more far reaching than the other  
4 privacy regulations. The proposed regulations did not  
5 provide the clarity we had hoped for. Clarification and  
6 perhaps examples would be helpful.

7 In summary, we want to support and comply fully  
8 with the intent and requirements of CCPA, but ask for  
9 additional time and guidance that will allow us to do so  
10 the way that benefits consumers most. Thank you.

11 MS. SCHESSER: Thank you.

12 Speaker Number 2, we invite you to the  
13 microphone. Good morning.

14 MS. LEE: Good morning. Jessica Lee;  
15 J-E-S-S-I-C-A, Lee, L-E-E. I'm a partner at the law  
16 firm Loeb & Loeb. That's L-O-E-B and L-O-E-B. As I  
17 mentioned, I'm a partner at Loeb & Loeb and its privacy,  
18 security and data innovations practice group I provide  
19 cochair. Our clients include advertisers and agencies,  
20 publishers and ad tech companies, as well as companies  
21 that are highly regulated in the financial and health  
22 care sectors. And I'm not here representing one client  
23 in particular, but conveying the concerns of many  
24 clients and friends who are impacted by the CCPA.

25 And I want to state at the out front that

1 everyone has been working diligently to prepare for  
2 January 1st and they have been for some time. However,  
3 the draft regulations were released as companies were in  
4 the process of building out their compliance plan, and  
5 they've introduced a number of new obligations and  
6 requirements, in some cases exceeding the scope of the  
7 statute. So companies are now struggling on how to  
8 implement some of these new obligations, which are not  
9 final and won't become final until after January 1st.  
10 And so, while the regulations have offered some really  
11 helpful guidance and clarity in some cases, they've  
12 raised some questions as well that we've seen companies  
13 struggling with.

14 And so, I won't reiterate my first point, which  
15 is like the prior speaker, the request to extend the  
16 enforcement date. My request was specifically extending  
17 the enforcement date of the draft regulations. And the  
18 only additional point I would add onto that is that it's  
19 not just the 82 days; it's the fact that the regulations  
20 won't become final probably until well until the early  
21 spring essentially, giving really only a couple of  
22 months to implement after other processes have been  
23 ruled out for the January 1st date. So we would ask  
24 that the date at least for the regulations be extended  
25 until January 1st, 2021.

1           My second point is on notice fatigue. We think  
2       there might be some potential notice fatigue created by  
3       the additional notice obligations in the regulations.  
4       The requirement to have notice at the point of  
5       collection in addition to a privacy notice and a do not  
6       sell link, we think would create confusion for  
7       consumers, and then unnecessary implementation burden  
8       for companies who are struggling with, you know, where  
9       to place all these notices and how to display them in a  
10      way that is actually helpful rather than confusing for  
11      the consumer.

12           So between the do not sell link, and the  
13      privacy policy, the potential ad choices icon that's  
14      displayed, and then this additional California privacy  
15      notice, there seem to be too many places to go and not  
16      kind of one clear, direct lane for consumers to go to  
17      find their information. So we would suggest an  
18      obligation that would combine these links into one  
19      location so that there is kind of a clear, direct place  
20      for consumers to go to get information on their privacy  
21      obligations. And this speaks to the requirements in  
22      article two of the regulations.

23           My third point is on the financial incentive  
24      programs. So we're concerned about the requirements for  
25      these financial incentive programs, particularly the

1 requirement that includes the obligation to provide a  
2 good faith estimate of the value of the consumer's data  
3 that form the basis of the incentive, and then the  
4 description of the method used to calculate the value of  
5 the consumer's data.

6 For us, this raises a number of concerns. It's  
7 obviously very difficult for companies to calculate on  
8 an individual user basis the value of the consumer's  
9 data. In many cases, an individual's data is worth very  
10 little. It could be, you know, pennies potentially and  
11 that's not going to add value of the financial incentive  
12 program, which is designed to encourage large numbers of  
13 consumers to opt into their program. A car company, for  
14 example, doesn't want to sell one car; they want to sell  
15 millions of cars. And so, the financial incentive  
16 program is based off of the value of getting access to a  
17 lot of information, not just one individual's  
18 information. So companies are struggling with what that  
19 looks like.

20 And then, of course, the method used to  
21 calculate that value is proprietary information and  
22 there is a concern about the business risk in that, not  
23 to the consumer necessarily, but to the other businesses  
24 who can see how they're evaluating their internal data  
25 matrix.

1           And so, while we understand the desire to help  
2     the consumer make an educated decision about whether the  
3     incentive is worthwhile, we think there might be a less  
4     prescriptive way to do so.

5           And just two final points here, with respect to  
6     requiring a business to treat an unverified request as  
7     an opt out, we see that's raising a number of  
8     challenges. First, there is some businesses that just  
9     aren't selling, so we're not sure it makes sense to  
10    require them to treat those individuals as an opt out.  
11    And then we have some clients who are concerned that  
12    they can't verify; meaning, they can't identify the  
13    person and there is actually no way to opt them out.  
14    They don't have the identifier to tie that person in a  
15    way or identify that person in a way that allows them to  
16    facilitate the opt out. So that requirement is raising  
17    a number of concerns.

18           And our last point is just on the requirement  
19    for companies to respond to browser signals. We suggest  
20    delaying that requirement until there is one unified  
21    signal or a standard or inform the other organizations  
22    that were previously active in this case. We understand  
23    that, you know, companies want to honor consumer  
24    choices, but with no clear browser opt out signals, that  
25    can cause a lot of confusion as to multiple signals



1 going back and forth and no clarity on which one to  
2 respond to or what the standard guardrails look like.  
3 We understand that this requirement is going to be built  
4 into the new ballot initiative that was put up, and that  
5 might be a point where we have more information about  
6 how to make this request.

7           So I'll just close by noting that businesses  
8 are spending a lot of time and money -- which is good  
9 for the lawyers, but not great for the businesses -- to  
10 prepare and adapt for these new regulations. And, you  
11 know, for many businesses there are still more questions  
12 than answers, particularly because there is not  
13 technology in place necessarily to facilitate some of  
14 these obligations. And so, we are looking forward to  
15 being able to work with the Attorney General's office,  
16 and we hope you will be amenable to helping companies  
17 who are trying to work through these challenges rather  
18 than punishing them for their good faith efforts to  
19 comply. Thank you.

20           MS. SCHESSER: Thank you.

21           We invite speaker number three to the  
22 microphone. Good morning.

23           MR. HARLEY: Good morning. My name is Bryan  
24 Harley. That's B-R-Y-A-N, H-A-R-L-E-Y. I'm the  
25 executive director of CMAC, the Community Media Access

1 Collective. We're a nonprofit organization located here  
2 in Fresno. Our mission is to empower people, young and  
3 old, especially in underserved communities, to be able  
4 to share their stories using media. We teach media arts  
5 skills and provide access to production equipment and  
6 facilities to create your own video, TV show, short  
7 film, podcasts and more. We believe very strongly about  
8 freedom of information and expression. And, in order to  
9 express ourselves freely, we need to be secure in our  
10 personal privacy. The chilling effect of surveillance  
11 and loss of privacy on free speech are compelling  
12 arguments that need to be on record.

13 Consumers need strong privacy protections to  
14 ensure we can control our own data. Consumers should be  
15 able to easily opt out of the sale of their personal  
16 information to third parties in a single step. There  
17 shouldn't be loopholes for targeted advertising.  
18 Privacy also shouldn't be a privilege for the wealthy.  
19 Companies should not be able to charge me more for  
20 expressing my privacy rights. Privacy is a right  
21 guaranteed by the California Constitution. The rules  
22 can and should be strengthened to protect residents with  
23 less financial resources. Thank you.

24 MS. SCHESSER: Thank you. I don't believe  
25 we've had a speaker register for the speaker number

1 four, but at this point I would like to open up the  
2 microphone for anybody who would like to speak in the  
3 audience.

4 Is there anybody else that would like to speak?  
5 Seeing that there are no more persons present to make  
6 any oral comments or anybody that desires to provide  
7 another comment to the record, it is now 10:30 a.m. and  
8 I hereby close this hearing on the proposed California  
9 Consumer Privacy Act Regulations. The written comment  
10 period ends on December 6th, 2019, at 5:00 p.m. Pacific  
11 Time. Written comments may also be e-mailed to us at  
12 privacyregulations@doj.ca.gov. On behalf of the  
13 Department of Justice and Attorney General Javier  
14 Becerra, thank you for participating in the rulemaking  
15 process.

16 (10:30 a.m.)

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18 --ooOoo--  
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25

STATE OF CALIFORNIA )

) SS.

COUNTY OF FRESNO )

I, Darlinda R. Compean, a Certified Shorthand Reporter for the State of California, hereby certify that I was present and reported in stenotypy all the proceedings in the foregoing-entitled matter; and I further certify that the foregoing is a full, true, and correct statement of such proceedings and a full, true, and correct transcript of my stenotype notes thereof.

Dated at Visalia, California, on  
Wednesday, December 11, 2019.

Harline R. Compear

Darlinda R. Compean, CSR No. 13094

<b>&amp;</b>	<b>455</b> 2:6,19	<b>advertisers</b> 12:19	<b>b</b>
<b>&amp;</b> 12:16,17	<b>5</b>	<b>advertising</b> 18:17	<b>b</b> 2:11 12:16,16 17:24
<b>1</b>	<b>5</b> 1:11 4:2	<b>affiliated</b> 8:24	<b>back</b> 17:1
<b>1</b> 1:25 8:15	<b>510-3906</b> 2:21	<b>agencies</b> 12:19	<b>background</b> 8:21
<b>1036</b> 4:19	<b>5:00</b> 5:7 19:10	<b>ago</b> 9:16	<b>ballot</b> 17:4
<b>10:10</b> 4:2	<b>5th</b> 4:17	<b>agree</b> 7:21	<b>bank</b> 11:7
<b>10:11</b> 4:18	<b>6</b>	<b>agrees</b> 9:1	<b>based</b> 15:16
<b>10:30</b> 19:7,16	<b>6th</b> 5:7 19:10	<b>alert</b> 7:20	<b>basis</b> 15:3,8
<b>10th</b> 5:2	<b>7</b>	<b>allow</b> 12:9	<b>becerra</b> 4:7 19:14
<b>11</b> 20:13	<b>703-5500</b> 2:7	<b>allows</b> 16:15	<b>behalf</b> 4:6 19:12
<b>11000</b> 2:6,20	<b>8</b>	<b>aloud</b> 7:24	<b>believe</b> 18:7,24
<b>11397</b> 20:16	<b>8</b> 3:7	<b>amenable</b> 17:16	<b>beneficial</b> 10:16
<b>11th</b> 4:24 9:18	<b>82</b> 13:19	<b>announced</b> 5:5	<b>benefits</b> 12:10
<b>12</b> 3:9 8:23	<b>9</b>	<b>answer</b> 5:22	<b>best</b> 6:6,7
<b>13094</b> 1:24 20:17	<b>90013</b> 2:13	<b>answers</b> 17:12	<b>bliley</b> 11:19
<b>1341</b> 4:25	<b>94102</b> 2:7,20	<b>anybody</b> 19:2,4,6	<b>blume</b> 2:18 4:15
<b>17</b> 3:11	<b>a</b>	<b>appearances</b> 2:1	<b>break</b> 8:8
<b>1702</b> 2:13	<b>a.m.</b> 4:2,18 19:7 19:16	<b>appears</b> 8:10	<b>breaks</b> 8:7
<b>1st</b> 13:2,9,23,25	<b>able</b> 7:8 17:15 18:3,15,19	<b>applies</b> 11:23	<b>briefly</b> 11:14
<b>2</b>	<b>access</b> 15:16 17:25 18:5	<b>approaching</b> 7:17	<b>broadly</b> 11:21
<b>2</b> 12:12	<b>account</b> 11:7	<b>arguments</b> 18:12	<b>brought</b> 6:8
<b>20</b> 1:25	<b>act</b> 4:10 5:16,17 11:19,20 19:9	<b>article</b> 14:22	<b>browser</b> 16:19,24
<b>2019</b> 1:11 4:2,17 4:24 5:2 19:10 20:13	<b>active</b> 16:22	<b>arts</b> 18:4	<b>bryan</b> 3:11 17:23
<b>2021</b> 13:25	<b>activities</b> 7:9	<b>assembly</b> 4:19	<b>building</b> 4:19 13:4
<b>213</b> 2:14	<b>ad</b> 12:20 14:13	<b>assist</b> 7:19	<b>built</b> 17:3
<b>2550</b> 4:19	<b>adapt</b> 17:10	<b>assistant</b> 2:18 4:15	<b>burden</b> 14:7
<b>269-6369</b> 2:14	<b>add</b> 7:23 8:4 13:18 15:11	<b>assured</b> 10:17	<b>burns</b> 4:18
<b>3</b>	<b>addition</b> 11:23 14:5	<b>attendees</b> 7:4	<b>business</b> 7:16 15:22 16:6
<b>30</b> 7:20 8:8	<b>additional</b> 5:8 10:9 12:9 13:18 14:3,14	<b>attorney</b> 2:5,12,19 4:7,15,16 5:2 6:23 17:15 19:13	<b>businesses</b> 10:9,21 15:23 16:8 17:7,9 17:11
<b>300</b> 2:12	<b>administrative</b> 5:16,17 6:20	<b>audience</b> 19:3	<b>c</b>
<b>300,000</b> 8:22		<b>audio</b> 6:2	<b>c</b> 4:4 8:19 12:15
<b>3621714</b> 1:23		<b>august</b> 4:24	<b>calculate</b> 15:4,7,21
<b>4</b>		<b>available</b> 11:9	<b>california</b> 1:12 2:3 2:7,10,13,16,20 4:1,6,9,20,23 5:15 5:16 8:23 11:19
<b>4</b> 3:5		<b>avenue</b> 2:6,19	
<b>41</b> 4:25		<b>average</b> 10:19,24	
<b>415</b> 2:7,21			

[california - disclosures]

14:14 18:21 19:8 20:1,6,12 <b>call</b> 7:12 <b>car</b> 15:13,14 <b>card</b> 7:16,19 <b>care</b> 12:22 <b>carpenter</b> 3:7 8:17 8:18 <b>cars</b> 15:15 <b>case</b> 16:22 <b>cases</b> 13:6,11 15:9 <b>cause</b> 16:25 <b>ccp</b> 4:23 5:9 <b>ccpa</b> 1:2 5:12 9:9 9:15 10:8,9,17 11:18,21,23 12:8 12:24 <b>central</b> 8:23 <b>certified</b> 20:5 <b>certify</b> 20:6,9 <b>challenges</b> 16:8 17:17 <b>changes</b> 6:22 <b>charge</b> 18:19 <b>check</b> 7:3 11:8 <b>chilling</b> 18:10 <b>choices</b> 14:13 16:24 <b>choose</b> 9:6 <b>clarification</b> 9:11 12:5 <b>clarify</b> 6:1 <b>clarity</b> 10:17 12:5 13:11 17:1 <b>clear</b> 14:16,19 16:24 <b>clearly</b> 6:6 10:7 <b>client</b> 12:22 <b>clients</b> 12:19,24 16:11	<b>close</b> 17:7 19:8 <b>cmac</b> 17:25 <b>cochair</b> 12:19 <b>collected</b> 11:24 12:2 <b>collection</b> 14:5 <b>collective</b> 18:1 <b>combine</b> 14:18 <b>come</b> 7:12 8:14 <b>coming</b> 8:16 <b>comment</b> 5:24 6:11,15,25 8:5,18 11:14 19:7,9 <b>comments</b> 5:6,11 5:18,20 6:4,8,13 7:22,25,25 8:11 19:6,11 <b>common</b> 11:2 <b>communities</b> 18:3 <b>community</b> 17:25 <b>companies</b> 12:20 12:20 13:3,7,12 14:8 15:7,18 16:19,23 17:16 18:19 <b>company</b> 15:13 <b>compean</b> 1:24 20:5,17 <b>compelling</b> 18:11 <b>compile</b> 6:15 <b>complete</b> 6:19 <b>complex</b> 9:19 <b>complexities</b> 10:9 <b>compliance</b> 8:19 10:11,17 13:4 <b>compliant</b> 9:20 <b>comply</b> 10:5 11:13 12:7 17:19 <b>concern</b> 15:22 <b>concerned</b> 14:24 16:11	<b>concerns</b> 9:8 12:23 15:6 16:17 <b>conclude</b> 8:11 <b>confusing</b> 11:17 14:10 <b>confusion</b> 14:6 16:25 <b>conservative</b> 9:3 <b>consider</b> 6:12 10:24 <b>consistency</b> 10:17 <b>constitution</b> 18:21 <b>consumer</b> 4:9,11 10:2,19 11:3 14:11 15:23 16:2 16:23 19:9 <b>consumer's</b> 15:2,5 15:8 <b>consumers</b> 9:2,6 10:1,16 11:11 12:10 14:7,16,20 15:13 18:13,14 <b>contact</b> 7:5,6 <b>control</b> 18:14 <b>conveying</b> 12:23 <b>copy</b> 6:20 <b>correct</b> 20:10,11 <b>counties</b> 8:23 <b>county</b> 20:2 <b>couple</b> 13:21 <b>course</b> 15:20 <b>court</b> 6:3,7 7:16 8:9 <b>covered</b> 9:12 11:25 <b>covers</b> 12:1 <b>create</b> 6:7 14:6 18:6 <b>created</b> 14:2 <b>credit</b> 8:20,21 9:1 9:5,21	<b>csr</b> 1:24 20:17 <b>currently</b> 11:25 <table><tr><th>d</th></tr><tr><td><b>d</b> 2:5 3:1 4:4 <b>darlinda</b> 1:24 20:5 20:17 <b>data</b> 9:22 10:6 12:18 15:2,5,9,9 15:24 18:14 <b>date</b> 10:11 13:16 13:17,23,24 <b>dated</b> 20:12 <b>dates</b> 9:10,15 <b>days</b> 9:18 13:19 <b>deadline</b> 5:6 <b>december</b> 1:11 4:2 4:17 5:7 19:10 20:13 <b>decide</b> 10:20 <b>decision</b> 16:2 <b>defined</b> 11:21 <b>delayed</b> 10:13 <b>delaying</b> 16:20 <b>department</b> 2:3,10 2:16 4:6,11 6:12 6:14 19:13 <b>deputy</b> 2:5,12 4:16 <b>description</b> 15:4 <b>designed</b> 15:12 <b>designing</b> 10:21 <b>desire</b> 16:1 <b>desires</b> 19:6 <b>detailed</b> 9:20 <b>developing</b> 9:23 <b>dialogue</b> 5:23 <b>difficult</b> 15:7 <b>diligently</b> 13:1 <b>direct</b> 14:16,19 <b>director</b> 17:25 <b>disclosures</b> 9:23 10:15 11:2</td></tr></table>	d	<b>d</b> 2:5 3:1 4:4 <b>darlinda</b> 1:24 20:5 20:17 <b>data</b> 9:22 10:6 12:18 15:2,5,9,9 15:24 18:14 <b>date</b> 10:11 13:16 13:17,23,24 <b>dated</b> 20:12 <b>dates</b> 9:10,15 <b>days</b> 9:18 13:19 <b>deadline</b> 5:6 <b>december</b> 1:11 4:2 4:17 5:7 19:10 20:13 <b>decide</b> 10:20 <b>decision</b> 16:2 <b>defined</b> 11:21 <b>delayed</b> 10:13 <b>delaying</b> 16:20 <b>department</b> 2:3,10 2:16 4:6,11 6:12 6:14 19:13 <b>deputy</b> 2:5,12 4:16 <b>description</b> 15:4 <b>designed</b> 15:12 <b>designing</b> 10:21 <b>desire</b> 16:1 <b>desires</b> 19:6 <b>detailed</b> 9:20 <b>developing</b> 9:23 <b>dialogue</b> 5:23 <b>difficult</b> 15:7 <b>diligently</b> 13:1 <b>direct</b> 14:16,19 <b>director</b> 17:25 <b>disclosures</b> 9:23 10:15 11:2
d					
<b>d</b> 2:5 3:1 4:4 <b>darlinda</b> 1:24 20:5 20:17 <b>data</b> 9:22 10:6 12:18 15:2,5,9,9 15:24 18:14 <b>date</b> 10:11 13:16 13:17,23,24 <b>dated</b> 20:12 <b>dates</b> 9:10,15 <b>days</b> 9:18 13:19 <b>deadline</b> 5:6 <b>december</b> 1:11 4:2 4:17 5:7 19:10 20:13 <b>decide</b> 10:20 <b>decision</b> 16:2 <b>defined</b> 11:21 <b>delayed</b> 10:13 <b>delaying</b> 16:20 <b>department</b> 2:3,10 2:16 4:6,11 6:12 6:14 19:13 <b>deputy</b> 2:5,12 4:16 <b>description</b> 15:4 <b>designed</b> 15:12 <b>designing</b> 10:21 <b>desire</b> 16:1 <b>desires</b> 19:6 <b>detailed</b> 9:20 <b>developing</b> 9:23 <b>dialogue</b> 5:23 <b>difficult</b> 15:7 <b>diligently</b> 13:1 <b>direct</b> 14:16,19 <b>director</b> 17:25 <b>disclosures</b> 9:23 10:15 11:2					

<b>display</b> 14:9 <b>displayed</b> 14:14 <b>dispute</b> 11:5 <b>documents</b> 5:1,10 <b>doj</b> 2:4,10,16 <b>doj's</b> 5:9 <b>doj.ca.gov</b> 2:8,14 2:21 <b>doj.ca.gov.</b> 19:12 <b>draft</b> 13:3,17	<b>entire</b> 6:19 <b>entitled</b> 5:10 20:8 <b>equipment</b> 18:5 <b>especially</b> 18:3 <b>essentially</b> 13:21 <b>estate</b> 11:10 <b>estimate</b> 15:2 <b>evaluating</b> 15:24 <b>example</b> 15:14 <b>examples</b> 12:6 <b>exceeding</b> 13:6 <b>executive</b> 17:25 <b>exemption</b> 9:12 11:15 <b>exercise</b> 11:12 <b>exhibits</b> 3:14 <b>existing</b> 10:8 11:16,22 <b>express</b> 18:9 <b>expressing</b> 18:20 <b>expression</b> 18:8 <b>extend</b> 13:15 <b>extended</b> 9:15 10:12 13:24 <b>extending</b> 9:10 13:16	<b>financial</b> 8:22 10:4 11:4,19 12:21 14:23,25 15:11,15 18:23 <b>find</b> 14:17 <b>firm</b> 12:16 <b>first</b> 8:13 9:14 13:14 16:8 <b>five</b> 7:18 <b>follow</b> 5:25 <b>following</b> 5:22 <b>foregoing</b> 20:8,9 <b>form</b> 15:3 <b>format</b> 5:10 10:22 <b>forms</b> 9:23 <b>forth</b> 17:1 <b>forward</b> 17:14 <b>four</b> 5:4 19:1 <b>fourth</b> 5:4 <b>francisco</b> 2:7,20 <b>fraudulent</b> 11:5,6 <b>free</b> 18:11 <b>freedom</b> 18:8 <b>freely</b> 18:9 <b>fresno</b> 1:12 4:1,18 4:20 8:20 18:2 20:2 <b>friday</b> 5:7 <b>friends</b> 12:24 <b>front</b> 12:25 <b>full</b> 7:14 20:9,10 <b>fully</b> 9:5,25 10:10 12:7 <b>funds</b> 11:9 <b>further</b> 5:13 20:9	<b>general's</b> 5:2 6:23 17:15 <b>getting</b> 15:16 <b>give</b> 6:9 8:3 <b>given</b> 10:8 <b>giving</b> 13:21 <b>go</b> 14:15,16,20 <b>goes</b> 8:9 <b>going</b> 15:11 17:1,3 <b>golden</b> 2:6,19 <b>good</b> 4:5 8:15,15 8:17 12:13,14 15:2 17:8,18,22,23 <b>gramm</b> 11:19 <b>great</b> 17:9 <b>group</b> 12:18 <b>guaranteed</b> 18:21 <b>guardrails</b> 17:2 <b>guidance</b> 12:9 13:11
<b>e</b>			<b>h</b>
<b>e</b> 3:1 4:4,4 8:19,19 12:15,15,15,16,16 17:24 19:11 <b>early</b> 13:20 <b>easier</b> 11:12,13 <b>easily</b> 18:15 <b>easy</b> 10:18 <b>educated</b> 16:2 <b>education</b> 8:25 <b>educational</b> 8:20 <b>eeecu</b> 8:21 <b>effect</b> 18:10 <b>effective</b> 5:11 9:10 9:14 10:11 <b>efforts</b> 17:18 <b>eighty</b> 9:18 <b>eleanor</b> 2:18 4:14 <b>eleanor.blume</b> 2:21 <b>elective</b> 11:15 <b>employees</b> 8:20 <b>empower</b> 18:2 <b>encourage</b> 15:12 <b>ends</b> 6:11 19:10 <b>enforcement</b> 2:4 2:10,17 9:10,15 10:12 13:16,17 <b>engage</b> 5:23 <b>ensure</b> 11:11 18:14	<b>f</b> <b>facilitate</b> 16:16 17:13 <b>facilities</b> 18:6 <b>fact</b> 13:19 <b>facts</b> 7:22 <b>faith</b> 15:2 17:18 <b>far</b> 12:3 <b>fatigue</b> 14:1,2 <b>federal</b> 11:18 <b>feel</b> 7:23 <b>film</b> 18:7 <b>final</b> 6:17,18,21 10:13 13:9,9,20 16:5	<b>g</b> <b>g</b> 4:4 <b>gate</b> 2:6,19 <b>general</b> 2:5,12,19 4:7,15,16 19:13	<b>h</b> 17:24 <b>half</b> 9:16 <b>harley</b> 3:11 17:23 17:24 <b>health</b> 12:21 <b>hearing</b> 1:2,10 2:3 4:8,12 5:14,18 6:2 6:4,5,9,14 7:11 8:9,12 19:8 <b>hearings</b> 5:5 <b>held</b> 5:15 11:9 <b>help</b> 6:6 16:1 <b>helpful</b> 10:16 12:6 13:11 14:10 <b>helping</b> 17:16 <b>highest</b> 9:2 <b>highly</b> 10:5 12:21 <b>holding</b> 7:19 <b>honor</b> 16:23

<b>hope</b> 17:16 <b>hoped</b> 12:5 <b>hugh</b> 4:18	<b>innovations</b> 12:18 <b>inquiries</b> 10:2 <b>institution</b> 10:4 <b>intend</b> 5:22 <b>intending</b> 7:10 <b>intent</b> 12:8 <b>interest</b> 7:21 <b>interested</b> 5:3 6:25 <b>internal</b> 15:24 <b>interpretation</b> 11:17 <b>introduced</b> 13:5 <b>inventorying</b> 9:22 <b>invite</b> 12:12 17:21 <b>issue</b> 7:24 <b>issued</b> 9:17	<b>leach</b> 11:19 <b>lee</b> 3:9 12:14,14,15 <b>left</b> 7:20 <b>legal</b> 10:25 <b>legislative</b> 5:14 <b>lesser</b> 11:13 <b>limit</b> 5:20 <b>limited</b> 5:25 <b>lingo</b> 10:23 <b>link</b> 14:6,12 <b>links</b> 14:18 <b>lisa</b> 2:11 4:16 7:19 <b>lisa.kim</b> 2:14 <b>little</b> 8:21 15:10 <b>located</b> 7:3 18:1 <b>location</b> 14:19 <b>loeb</b> 12:16,16,17 12:17 <b>long</b> 8:10 11:8 <b>look</b> 17:2 <b>looking</b> 17:14 <b>looks</b> 15:19 <b>loopholes</b> 18:17 <b>los</b> 2:13 <b>loss</b> 18:11 <b>lot</b> 15:17 16:25 17:8 <b>louder</b> 5:25 <b>lunch</b> 8:9	<b>mean</b> 9:22 <b>meaning</b> 16:12 <b>media</b> 17:25 18:4 18:4 <b>medical</b> 10:24 <b>member</b> 6:10 9:4 <b>members</b> 8:22 <b>mentioned</b> 12:17 <b>met</b> 10:20 <b>method</b> 15:4,20 <b>microphone</b> 7:13 7:17 8:14 12:13 17:22 19:2 <b>millions</b> 15:15 <b>minute</b> 8:8 <b>minutes</b> 7:18 <b>mission</b> 18:2 <b>model</b> 9:11 10:15 11:2,8 <b>modifications</b> 9:23 <b>money</b> 17:8 <b>months</b> 10:13 13:22 <b>morning</b> 4:5 8:15 8:15,17 12:13,14 17:22,23 <b>multiple</b> 16:25
<b>i</b>	<b>j</b> 12:15 <b>january</b> 13:2,9,23 13:25 <b>javier</b> 4:7 19:13 <b>jessica</b> 3:9 12:14 <b>job</b> 1:23 <b>justice</b> 2:3,10,16 4:7 19:13	<b>loeb</b> 12:16,16,17 12:17 <b>long</b> 8:10 11:8 <b>look</b> 17:2 <b>looking</b> 17:14 <b>looks</b> 15:19 <b>loopholes</b> 18:17 <b>los</b> 2:13 <b>loss</b> 18:11 <b>lot</b> 15:17 16:25 17:8 <b>louder</b> 5:25 <b>lunch</b> 8:9	<b>n</b>
<b>icon</b> 14:13 <b>identified</b> 7:14 <b>identifier</b> 16:14 <b>identify</b> 7:14 16:12,15 <b>impacted</b> 12:24 <b>implement</b> 10:10 13:8,22 <b>implementation</b> 9:22 14:7 <b>importance</b> 9:3,24 11:13 <b>important</b> 10:7 <b>incentive</b> 14:23,25 15:3,11,15 16:3 <b>include</b> 12:19 <b>included</b> 6:17 <b>includes</b> 15:1 <b>including</b> 5:10 8:8 <b>inconsistent</b> 11:18 <b>individual</b> 15:8 <b>individual's</b> 15:9 15:17 <b>individuals</b> 16:10 <b>industries</b> 10:21 10:22 <b>industry</b> 11:4 <b>inform</b> 16:21 <b>information</b> 5:11 5:13 7:5,7,23 9:2 9:3,5,7,12 10:3 11:15,20,20,24 12:1 14:17,20 15:17,18,21 17:5 18:8,16 <b>initiative</b> 17:4	<b>k</b>	<b>m</b>	<b>n</b>
<b>kim</b> 2:11 4:16 <b>kind</b> 14:16,19 <b>know</b> 7:7 14:8 15:10 16:23 17:11	<b>l</b>	<b>m</b>	<b>n</b>
<b>l</b> 12:15,16,16 17:24 <b>lane</b> 14:16 <b>large</b> 15:12 <b>lastly</b> 8:7 <b>law</b> 4:11 6:20 9:15 12:15 <b>lawyers</b> 17:9	<b>l</b> 12:15,16,16 17:24 <b>lane</b> 14:16 <b>large</b> 15:12 <b>lastly</b> 8:7 <b>law</b> 4:11 6:20 9:15 12:15 <b>lawyers</b> 17:9	<b>m</b> 2:18 <b>mailed</b> 5:3 19:11 <b>making</b> 4:22 <b>mall</b> 4:19 <b>manner</b> 11:24 <b>mariposa</b> 4:19 <b>marked</b> 3:14 <b>material</b> 7:2 <b>matrix</b> 15:25 <b>matter</b> 20:8	<b>n</b> 3:1 4:4 8:19 17:24 <b>name</b> 4:10 7:6,14 8:18 17:23 <b>nature</b> 5:15 <b>necessarily</b> 15:23 17:13 <b>need</b> 7:24 8:7 9:11 10:9 18:9,12,13 <b>needed</b> 10:2 <b>new</b> 7:1,23 9:23 13:5,8 17:4,10



[nondiscrimination - put]

<b>nondiscrimination</b> 11:10 <b>nonprofit</b> 18:1 <b>notes</b> 20:11 <b>notice</b> 4:22,24,25 5:5 7:8 14:1,2,3,4 14:5,15 <b>notices</b> 5:4 9:11 10:15,18,22 11:1,2 11:5,8,10,11 14:9 <b>notification</b> 6:21 <b>notify</b> 6:24 <b>noting</b> 17:7 <b>number</b> 4:19,25 7:11,12 8:6,15 12:12 13:5 15:6 16:7,17 17:21 18:25 <b>numbers</b> 15:12	<b>oral</b> 5:24 8:1,5 19:6 <b>order</b> 18:8 <b>organization</b> 7:15 18:1 <b>organizations</b> 16:21 <b>original</b> 9:21 <b>outside</b> 7:3	<b>please</b> 5:12 6:5,9 7:7,12,16,22 8:6 8:13 <b>podcasts</b> 18:7 <b>point</b> 6:1 13:14,18 14:1,4,23 16:18 17:5 19:1 <b>points</b> 4:21 9:10 16:5 <b>policies</b> 9:24 <b>policy</b> 14:13 <b>possible</b> 6:7 <b>posted</b> 5:1,8 6:23 <b>potential</b> 14:2,13 <b>potentially</b> 15:10 <b>practice</b> 12:18 <b>practices</b> 9:4 <b>preferred</b> 10:22 <b>prepare</b> 6:16 13:1 17:10 <b>prescriptive</b> 16:4 <b>present</b> 4:14 19:5 20:7 <b>presented</b> 6:4 <b>previously</b> 16:22 <b>prior</b> 7:22 13:15 <b>privacy</b> 2:4,10,17 4:10,11,16 9:12 10:6 11:16,20 12:4,17 14:5,13,14 14:20 18:10,11,13 18:18,20,20 19:9 <b>privacyregulations</b> 19:12 <b>privilege</b> 18:18 <b>probably</b> 13:20 <b>procedure</b> 5:16,17 5:21 <b>procedures</b> 9:24 <b>proceeding</b> 8:8	<b>proceedings</b> 4:13 20:8,10 <b>process</b> 5:9,12 13:4 19:15 <b>processes</b> 13:22 <b>production</b> 18:5 <b>profession</b> 10:25 <b>professional</b> 10:24 <b>program</b> 15:12,13 15:16 <b>programs</b> 14:24 14:25 <b>proposal</b> 4:22 <b>proposed</b> 4:9 5:19 5:20 6:22 7:1 9:9 9:16,20 12:4 19:8 <b>proposing</b> 7:2 <b>proprietary</b> 15:21 <b>protect</b> 18:22 <b>protecting</b> 9:1 <b>protection</b> 2:4,11 2:17 11:3 <b>protections</b> 18:13 <b>provide</b> 7:5,8,16 8:11 10:16 12:5 12:18 15:1 18:5 19:6 <b>provided</b> 6:13,25 <b>provides</b> 8:22 <b>providing</b> 7:6 <b>public</b> 1:2 5:4,14 5:18 6:11,13 <b>publication</b> 10:13 <b>published</b> 4:23 <b>publishers</b> 12:20 <b>punishing</b> 17:18 <b>purpose</b> 5:17 <b>pursuant</b> 5:15 11:15 <b>put</b> 17:4
<b>o</b>	<b>p</b>		
<b>o</b> 4:4 12:16,16 <b>obligation</b> 14:18 15:1 <b>obligations</b> 13:5,8 14:3,21 17:14 <b>obviously</b> 15:7 <b>october</b> 5:2 9:18 <b>offered</b> 13:10 <b>office</b> 6:20 8:1 17:15 <b>officer</b> 2:3 4:12 8:19 <b>old</b> 18:3 <b>once</b> 6:18 <b>ooooo</b> 19:18 <b>open</b> 19:1 <b>opportunity</b> 8:3 8:18 <b>opt</b> 15:13 16:7,10 16:13,16,24 18:15	<b>p</b> 4:4 8:19 <b>p.m.</b> 5:7 19:10 <b>pacific</b> 5:7 19:10 <b>page</b> 3:3 4:25 <b>pages</b> 1:25 <b>part</b> 6:5 <b>participating</b> 19:14 <b>particular</b> 12:23 <b>particularly</b> 14:25 17:12 <b>parties</b> 5:3 18:16 <b>partner</b> 12:15,17 <b>pdf</b> 5:10 <b>pennies</b> 15:10 <b>people</b> 18:2 <b>period</b> 6:11 19:10 <b>person</b> 10:24 12:2 16:13,14,15 <b>personal</b> 9:2 11:15 11:20,23 18:10,15 <b>persons</b> 6:24 8:24 11:24 19:5 <b>pertaining</b> 5:18 10:6 <b>pertinent</b> 7:23 <b>place</b> 14:9,19 17:13 <b>places</b> 14:15 <b>plan</b> 13:4		

<b>q</b>	<b>regulatory</b> 4:24	<b>retention</b> 10:6	<b>short</b> 18:6
<b>quasi</b> 5:14	<b>reiterate</b> 13:14	<b>review</b> 6:12	<b>shorthand</b> 20:5
<b>question</b> 5:25	<b>related</b> 5:1	<b>revisions</b> 7:1,8	<b>show</b> 18:6
<b>questions</b> 5:22	<b>relationship</b> 12:3	<b>right</b> 9:6 18:20	<b>sign</b> 7:4,5
13:12 17:11	<b>relatives</b> 8:25	<b>rights</b> 10:1 11:11	<b>signal</b> 16:21
<b>r</b>	<b>released</b> 13:3	11:12 18:20	<b>signals</b> 16:19,24
<b>r</b> 1:24 4:4 8:19,19	<b>relevant</b> 6:12,15	<b>risk</b> 15:22	16:25
8:19 17:24,24	<b>relied</b> 7:2	<b>rita</b> 3:7 8:18	<b>signature</b> 20:16
20:5,17	<b>remaining</b> 8:2	<b>room</b> 4:19 7:4	<b>signed</b> 7:12 9:15
<b>raised</b> 13:12	<b>remarks</b> 8:4	<b>ruled</b> 13:23	<b>similar</b> 11:21
<b>raises</b> 15:6	<b>reported</b> 1:24 20:7	<b>rulemaking</b> 5:1,4	<b>single</b> 18:16
<b>raising</b> 16:7,16	<b>reporter</b> 6:3,7	5:9,12,21 6:5,19	<b>six</b> 10:13
<b>reaching</b> 12:3	7:16 8:9 20:6	7:9 19:14	<b>skills</b> 18:5
<b>read</b> 7:24 10:18	<b>reporter's</b> 1:10	<b>rules</b> 7:2,9 18:21	<b>slower</b> 5:25
<b>real</b> 11:10	<b>represent</b> 7:15	<b>s</b>	<b>slowly</b> 6:6
<b>really</b> 13:10,21	<b>representing</b>	<b>s</b> 4:4 12:15,15	<b>solutions</b> 10:11
<b>reasons</b> 6:17,18,21	12:22	<b>sale</b> 18:15	<b>somewhat</b> 11:16
<b>receive</b> 5:18	<b>request</b> 13:15,16	<b>san</b> 2:7,20	<b>south</b> 2:12
<b>received</b> 7:11 8:5	16:6 17:6	<b>schesser</b> 2:5 3:5	<b>speak</b> 5:24 6:6 7:6
<b>recommendation</b>	<b>requested</b> 5:3	4:5,10 12:11	7:10,18,21 9:9
6:16	<b>requests</b> 10:3	17:20 18:24	19:2,4
<b>recommendations</b>	<b>require</b> 16:10	<b>scope</b> 13:6	<b>speaker</b> 7:18,20
6:13	<b>required</b> 6:24	<b>second</b> 8:4 14:1	7:22 8:14,15
<b>record</b> 4:17 6:5,7	<b>requirement</b> 14:4	<b>seconds</b> 7:20	12:12 13:15 17:21
6:19 18:12 19:7	15:1 16:16,18,20	<b>section</b> 4:11	18:25,25
<b>recorded</b> 6:2	17:3	<b>sectors</b> 12:22	<b>speakers</b> 7:4,19
<b>regarding</b> 4:8	<b>requirements</b> 9:19	<b>secure</b> 18:9	8:2,3,10
<b>register</b> 4:24,25	10:10 12:8 13:6	<b>security</b> 12:18	<b>speaking</b> 5:19
18:25	14:21,24	<b>see</b> 15:24 16:7	<b>speaks</b> 14:21
<b>regulated</b> 10:5	<b>requiring</b> 16:6	<b>seeing</b> 19:5	<b>special</b> 2:18 4:15
12:21	<b>residents</b> 18:22	<b>seen</b> 13:12	<b>specifically</b> 13:16
<b>regulations</b> 4:9,23	<b>resources</b> 5:8	<b>sell</b> 9:4 14:6,12	<b>specifies</b> 5:17
5:19,21 6:22 7:1	18:23	15:14,14	<b>speech</b> 18:11
9:9,13,17,20 10:5	<b>respect</b> 16:5	<b>selling</b> 16:9	<b>spell</b> 7:14
10:8,14 11:3,16,22	<b>respond</b> 10:2	<b>sense</b> 16:9	<b>spending</b> 17:8
11:25 12:4,4 13:3	16:19 17:2	<b>serve</b> 8:23	<b>spring</b> 2:12 13:21
13:10,17,19,24	<b>responded</b> 8:1	<b>services</b> 8:22 11:4	<b>ss</b> 20:1
14:3,22 17:10	<b>response</b> 5:23 6:16	<b>share</b> 18:4	<b>stacey</b> 2:5 4:10
19:9	<b>responsibilities</b>	<b>shared</b> 9:7,7	<b>stacey.schesser</b>
	10:1	<b>sharing</b> 9:4	2:8

<b>staff</b> 6:10 9:25 <b>standard</b> 10:20 16:21 17:2 <b>starting</b> 4:25 <b>state</b> 7:14,22 12:25 20:1,6 <b>statement</b> 3:3 6:17 6:18,21 20:10 <b>states</b> 10:18 <b>statute</b> 9:21 13:7 <b>stereotype</b> 20:11 <b>stenotypy</b> 20:7 <b>step</b> 18:16 <b>stories</b> 18:4 <b>street</b> 2:12 <b>strengthened</b> 18:22 <b>strong</b> 18:13 <b>strongly</b> 18:7 <b>struggling</b> 13:7,13 14:8 15:18 <b>students</b> 8:24 <b>subject</b> 11:17 <b>subjective</b> 10:20 <b>submit</b> 6:9 <b>submitted</b> 6:19 7:25 <b>submitting</b> 5:6,11 <b>suggest</b> 14:17 16:19 <b>suite</b> 2:6,13,20 <b>summary</b> 6:15 12:7 <b>supervising</b> 2:5 <b>support</b> 12:7 <b>supports</b> 9:5 <b>sure</b> 16:9 <b>surveillance</b> 18:10	<b>t</b> <b>t</b> 8:19,19 <b>table</b> 7:3 <b>take</b> 8:3,7 <b>targeted</b> 18:17 <b>teach</b> 18:4 <b>teachers</b> 8:24 <b>tech</b> 12:20 <b>technology</b> 17:13 <b>tell</b> 11:5,8 <b>terms</b> 11:18,21 <b>thank</b> 4:5 8:16,17 12:10,11 17:19,20 18:23,24 19:14 <b>thereof</b> 20:11 <b>think</b> 14:1,6 16:3 <b>third</b> 14:23 18:16 <b>three</b> 17:21 <b>thursday</b> 1:11 4:2 4:17 <b>tie</b> 16:14 <b>time</b> 4:18 5:7 7:21 8:2,13 9:18 10:7 10:10 12:9 13:2 17:8 19:11 <b>tips</b> 5:10 <b>today</b> 4:14,17 5:4 5:19 6:9 8:5,16 <b>today's</b> 4:8,12 5:14 6:2 7:10 <b>tools</b> 10:2 <b>training</b> 9:25 <b>transaction</b> 12:1 <b>transactions</b> 11:6 11:6,7 <b>transcribed</b> 6:3 <b>transcript</b> 1:10 6:3 20:11 <b>treat</b> 16:6,10 <b>true</b> 20:9,10	<b>try</b> 6:6 <b>trying</b> 17:17 <b>turn</b> 8:2,4,11 <b>tv</b> 18:6 <b>two</b> 5:10 9:18 10:12 14:22 16:5	<b>way</b> 12:10 14:10 16:4,13,15,15 <b>we've</b> 13:12 18:25 <b>wealthy</b> 18:18 <b>website</b> 5:2,9 6:23 9:22 <b>wednesday</b> 20:13 <b>welcome</b> 4:8 <b>work</b> 10:8 11:4 17:15,17 <b>working</b> 13:1 <b>worth</b> 15:9 <b>worthwhile</b> 16:3 <b>write</b> 10:25 <b>writing</b> 6:14 <b>written</b> 5:6,23 6:4 6:8 7:24,25 19:9 19:11 <b>www.oag.ca.gov</b> 5:12
		<b>u</b> <b>unauthorized</b> 11:6 11:7 <b>unclear</b> 11:16 <b>underserved</b> 18:3 <b>understand</b> 9:19 9:25 10:7,10 11:11 16:1,22 17:3 <b>understandable</b> 10:19,23 <b>unified</b> 16:20 <b>uniform</b> 11:10 <b>union</b> 8:20,21 9:1 9:5,21 <b>unit</b> 2:4,11,17 4:11 4:16 <b>unnecessary</b> 14:7 <b>unverified</b> 16:6 <b>user</b> 15:8 <b>uses</b> 11:18 <b>utmost</b> 9:24	<b>x</b> <b>x</b> 3:1 <b>y</b> <b>y</b> 17:24,24 <b>year</b> 9:16 <b>years</b> 10:12 <b>young</b> 18:2
		<b>v</b> <b>value</b> 15:2,4,8,11 15:16,21 <b>verify</b> 16:12 <b>video</b> 18:6 <b>visalia</b> 20:12 <b>visit</b> 5:12	
		<b>w</b> <b>waiting</b> 8:10 <b>want</b> 12:7,25 15:14,14 16:23	