

Comments of Jill Randall, Esq.
Legal Services for the Elderly
5 Wabon Street
Augusta, ME 04330
Received October 26, 2015

Please find the following comments on NASAA's Proposed Model Legislation or Regulation to Protect Vulnerable Adults From Financial Exploitation:

- Section 2 paragraph 4 (a) the end of the sentence should include the language "either in the eligible adult's name individually or jointly held with any other person"
- Section 2 paragraph 4(b) should read guardianship *or conservatorship*
- Section 2 paragraph 4(b)(i) and (ii) should include the language "either in the eligible adult's name individually or jointly held with any other person"
- In Section 2(7), the definition should read "**Qualified representative**" means any employee, agent [etc.]..." The reason for this is that all of the enumerated types of status (including "employee," when added) constitute "representatives," but do not come within the recognized meaning of "employee" in common usage or universal statutory definition. If this change were made, the reference would also need to be changed in Sections 4,5,6, and 7(a).