consumer financial services update

New York Rolls Out Updates to Mortgage Servicing Rules

February 28, 2020

As stated in the **alert distributed on December 23, 2019**, the New York Department of Financial Services' (NYDFS) Final Mortgage Servicing Rules (Final Rules) were published and became effective on December 18, 2019. The Final Rules are applicable to persons who are engaged in the servicing of mortgage loans in New York State, whether or not that person is registered as a mortgage servicer (i.e., as a matter of state law, the rules apply to organizations exempt from licensing and registration).

The Final Rules were officially adopted on December 18, 2019 after nearly a decade of Emergency Rules enacted under Part 419 and contain material differences.

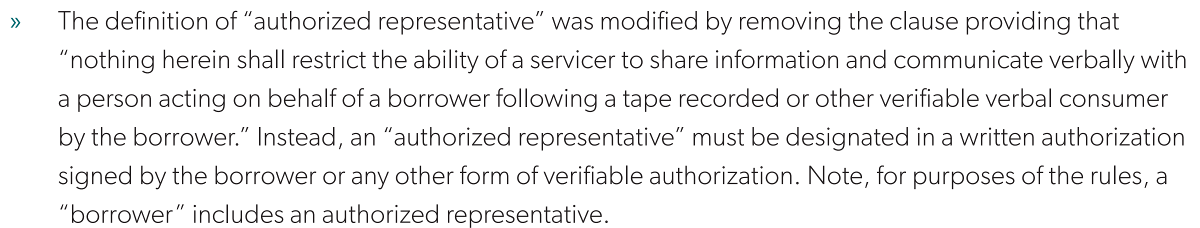
Since our December 23, 2019 alert, we compared the Final Rules to the prior Emergency Rules under Part 419 (Emergency Rules) and highlighted the key material changes that servicers should be aware of. We also compared the new/changed Final Rules against the RESPA and TILA servicing regulations (Federal Rules) to highlight key distinctions between some of the new Final Rules and the analogous Federal Rules that servicers should be aware of. Servicers should also note that while the Final Rules are reorganized and renumbered, many of the existing requirements contained in the Emergency Rules continue to apply.

Below is a brief section-by-section analysis of the Final Rules:

New Section 419.1 contains definitions of terms that are used in Part 419 and not otherwise defined in Part 418.

- Compared to the prior Emergency Rules, the following material changes were made:
  - The following definitions were added: "affiliated relationships," "billing cycle," "borrower," "business day," "complete loss mitigation application," "clearly and conspicuously," "loss mitigation application," "loss mitigation option," "mortgagee," "servicing mortgage loans," "settlement service," "single point of contact," "third-party provider," "transferee servicer," "transferor servicer," and "plain language."

©2020 McGlinchey Stafford PLLC



» The definition of "authorized representative" was modified by removing the clause providing that "nothing herein shall restrict the ability of a servicer to share information and communicate verbally with a person acting on behalf of a borrower following a tape recorded or other verifiable verbal consumer by the borrower." Instead, an "authorized representative" must be designated in a written authorization signed by the borrower or any other form of verifiable authorization. Note, for purposes of the rules, a "borrower" includes an authorized representative.

New Section 419.2 describes the requirements for the handling of monies placed by a servicer into an escrow account.

- Compared to the prior Emergency Rules, the following material changes were made:
  - » New Section 419.2(b) requires servicers that advance their own funds in paying an escrow disbursement due to a deficiency, which is not the result of a borrower's payment default, to wait 30 calendar days after providing written explanation to the borrower before seeking payment of the funds necessary to correct the deficiency from the borrower. The Emergency Rules did not require the servicer to wait 30 days.
  - » Note: The Federal Rules do not require a servicer to wait 30 days before seeking payment after providing a borrower with written notice of an escrow account deficiency.

New Section 419.3 describes requirements for crediting payments from borrowers and handling late payments.

- Compared to the prior Emergency Rules, the following material changes were made:
  - » New Section 419.3(b) relates to reasonable payment requirements and specifies a reasonable cut-off time. The provision provides that the "end of the business day" would be considered reasonable for receipt of a mailed check at the location specified by the servicer. Under the prior Emergency Rules, a cut-off time of 5 pm for receipt of a mailed check was considered reasonable.
  - » New Section 419.3(d) requires that late payments be credited to "interest, principal, taxes, insurance, and other fees before any late charge is collected." The Emergency Rules only required that "[l]ate payments must be credited before any late charge is collected."
  - » New Section 419.3(f) allows servicers to send notices of non-credit electronically if the borrower has opted for paperless billing. The Emergency Rules only allowed the servicer to send the borrower the notice by mail at the borrower's last known address.
  - » New Section 419.3(g) requires servicers to establish written policies and procedures for determining the handling of unapplied funds and payments held in suspense accounts. This was not required under the Emergency Rules.
  - » New Section 419.3(g) also requires a servicer to, if it retains a partial payment in a suspense or unapplied funds account, on accumulation of sufficient funds in any suspense or unapplied funds account to cover a periodic payment, treat such funds as a periodic payment and credit the periodic payment to the borrower's loan. This was not required under the Emergency Rules.
  - » New Section 419.3(h) prohibits a servicer from applying funds from a suspense or unapplied funds account to pay fees until all unpaid principal, interest and escrow amounts are paid and brought current or the loan is discharged or foreclosed. This was not required under the Emergency Rules.
- Note: With respect to late charges, the Federal Rules prohibit pyramiding but do not impose a specific payment waterfall.

New Section 419.4 describes the requirements of an annual account statement, which must be provided to borrowers in plain language showing: the unpaid principal balance at the end of the preceding 12-month period, the interest paid during that period, the application of payments during that period, and the amounts deposited into and disbursed from escrow. The section also describes the servicer's obligations with respect to providing a payment history when requested by the borrower or borrower's representative, payoff balances, and periodic statement requirements.

- Compared to the prior Emergency Rules, the following material changes were made:
  - New Section 419.4(a) requires, among other things, that the annual account statement include the application of all payments during the immediately preceding 12-month period. This was not required under the Emergency Rules.
  - New Section 419.4(c) requires the servicer to provide each borrower, for each billing cycle, a periodic statement. This was not required under the Emergency Rules.
    - **Note:** The requirement to provide certain disclosures in welcome packets, periodic statements, and annual statements that existed in the Emergency Rules also remains but with modification.
  - New Section 419.4(d) requires the servicer to provide a plain language statement to the borrower with the total amount that is required to pay off the mortgage loan as of a specified date, within a reasonable time, but no more than 7 business days after receipt of a request from the borrower. Under the Emergency Rules, servicers only had 5 business days to provide this statement to a borrower following the request. Other restrictions in the Emergency Rules, including the restrictions on fees in connection with a payoff statement or release remain in the Final Rules.
  - New Section 419.4(e) states that the requirements of the entire section do not apply to borrowers who are debtors in bankruptcy under Title 11 of the United States Code if doing so would violate the automatic stay provisions thereof. This provision was not included under the Emergency Rules.
- Compared to the Federal Rules, servicers should take note of the following:
  - New Section 419.4(c)(6) requires, among other things, the periodic statement to include an "escrow statement," including the amounts deposited into escrow and disbursed from escrow during the applicable period. This is not required under the Federal Rules.
  - New Section 419.4(c)(7) requires, among other things, the periodic statement to include, if the borrower is 45 days delinquent, a "breakdown of the total payment amount needed to bring the account current, <u>including a detailed breakdown of the actual fees and charges claimed, as well as, a date upon which the payment amount specified will expire and no longer be sufficient to bring the account current</u>." The Federal Rules only require a breakdown of the total payment amount needed to bring the account current.

New Section 419.5 sets forth the requirements relating to fees permitted to be collected by servicers and how often such fees may be charged to a borrower.

- Compared to the prior Emergency Rules, the following material changes were made:
  - New Section 419.5(a) modifies the requirements with respect to the required Schedule of Fees that a servicer is required to maintain and keep current by expanding on the explanation. The explanation of each fee must now include an explanation of when and why the fee will be charged. This is an expansion of the explanation requirement that was contained in the Emergency Rules.
  - New Section 419.5(b) clarifies that all authorized fees must be reasonably related to the cost of rendering

that service. The Emergency Rules did not explicitly apply this requirement to all types of authorized fees.

- » New Section 419.5(c) requires that attorneys' fees charged in connection with a loss mitigation option, a reinstatement or loan satisfaction must be disclosed, with a full breakdown of the tasks performed, to the borrower prior to entering into the agreement governing the loss mitigation option, reinstatement or loan satisfaction. This was not required under the Emergency Rules.
- » New Section 419.5(d) requires that a late fee cannot be assessed if a borrower is making timely trial modification payments. This was not specifically required under the Emergency Rules.
- » New Section 419.5(e) sets forth requirements related to property valuation fees and prohibits a servicer from charging a property valuation fee to a borrower more than once in a 12-month period. The Emergency Rules did not contain any requirements related to property valuation fees.

New Section 419.6 describes the requirements for handling borrower complaints and inquiries.

- Compared to the prior Emergency Rules, the following material changes were made:
  - » New Section 419.6(a) requires that the servicer establish and maintain a toll-free number or collect calling service that enables borrowers to speak with a living person who is trained to answer inquiries and instruct borrowers on how to file written complaints. The Emergency Rules did not require the person to be trained on how to instruct the borrower on how to file a written complaint.
    - **Note:** The Emergency Rules allowed the superintendent, for good cause, to waive or modify the requirement for a servicer to provide a toll-free number or collect calling service that gives the borrower access to a live person trained to answer inquiries and resolve or help resolve complaints. New Section 419.6 does not allow for such a waiver.
  - » New Section 419.6(b) requires that certain information be clearly and conspicuously disclosed in every welcome packet, periodic statement, coupon book, annual statement, and website maintained by a servicer. The information includes the address to which the borrower can direct complaints and inquiries, the toll-free telephone number or collect calling services provided by the servicer, whether the servicer is registered with the Department of Financial Services, and that the borrower may file complaints and obtain further information about the servicer by contacting the New York State Department of Financial Services Consumer Assistance Unit at 1-800-342-3736 or by visiting the Department's website at **www.dfs.ny.gov**. The Emergency Rules did not require this disclosure be made on the servicer's website. In addition, the Emergency Rules required servicers to disclose, if applicable, that the servicer is registered. The Final Rule appears to require an affirmative disclosure, even for servicers subject to the regulations, but who are not registered. Finally, the disclosure regarding making complaints and receiving information from the New York State Department of Financial Services is slightly modified.
  - » New Section 419.6(e) sets forth requirements for servicers related to any written complaint from the borrower, including those transmitted electronically. The requirements in this provision were not included under the Emergency Rules.
- Compared to the Federal Rules, servicers should take note of the following:
  - » New Section 419.6(b) contains additional information to include on periodic statements, in addition to the items noted elsewhere, which go beyond the requirements imposed by the Federal Rules.
  - » New Section 419.6(e)(3)(ii)(a)(2) requires the servicer to respond to a borrower prior to the date of

foreclosure or within 15 business days after the servicer receives a complaint, whichever is earlier, if that complaint is related to commencement of foreclosure proceedings in violation of the Final Rules. The Federal Rules only require the servicer to respond to a borrower prior to the date of foreclosure or within 30 business days after the servicer receives a complaint, whichever is earlier.

  - New Section 419.6(e)(3)(ii)(b) provides that for certain complaints, a servicer may extend the time period for responding by an additional 7 business days if, before the end of the 30-day period, the servicer notifies the borrower of the extension and the reasons for the extension in writing. The Federal Rules provide for a 15-day (excluding legal public holidays, Saturdays and Sundays) extension in this situation.
  - New Section 419.6(e)(3)(iii)(b) requires that, if a servicer determines that a document requested by the borrower in a complaint is privileged or confidential, the servicer must include in its response "a reasonable description of the contents of the each withheld document and the basis for withholding the document if it determines that a document requested by the borrower is privileged or confidential." The Federal Rules do not require the servicer to include a reasonable description of the contents of each withheld document or the basis for withholding the document.
  - New Section 419.6(e)(5) requires a servicer to have a process that enables borrowers to escalate complaints or pending loss mitigation matters for a supervisory level review. This is not required under the Federal Rules.

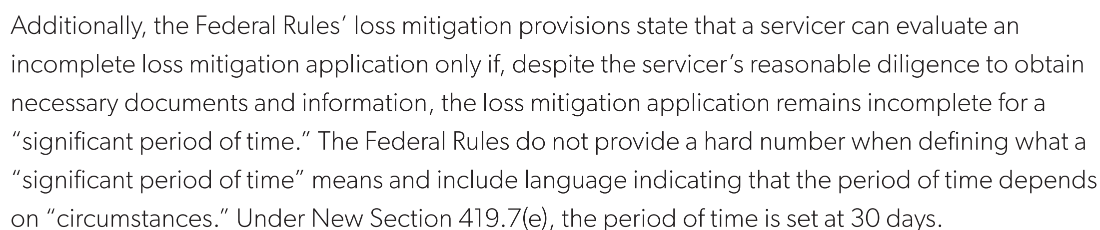
New Section 419.7 sets forth the servicer's obligations with respect to handling of loan delinquencies and loss mitigation, including an obligation to make reasonable and good faith efforts to pursue appropriate loss mitigation options, including loan modifications. This section includes requirements relating to procedures and protocols for handling loss mitigation, including providing borrowers with information regarding the servicer's loss mitigation process, decision-making, and available counseling programs and resources.

- Compared to the prior Emergency Rules, the following material changes were made:
  - The requirements set forth in New Section 419.7, in part, contain similar requirements to those set forth under Section 419.11 under the Emergency Rules; however, there are significant differences. Notably, New Section 419.7 appears to be based in large part on the three sections of the RESPA servicing rules relating to early intervention (12 C.F.R. § 1024.39), continuity of contact (12 C.F.R. § 1024.40), and loss mitigation (12 C.F.R. § 1024.41). While significant similarities exist between New Section 419.7 and these RESPA sections, there are also material differences (further explained below) that servicers need to be aware of. Therefore, servicers need to review the entire section to ensure its processes are compliant.
- Compared to the Federal Rules, servicers should take note of the following:
  - Personnel assigned to a delinquent borrower and what they are required to do:
    - Under the Federal Rule's continuity of contact provisions, servicers are required to, among other things, assign personnel to a delinquent borrower not later than the 45th day of the borrower's delinquency. New Section 419.7(b) has similar requirements to the continuity of contact provisions of the Federal Rules; however, New Section 419.7(b) requires servicers to assign a single point of contact to any borrower who is at least 30 days delinquent or has requested a loss mitigation application (or earlier at a servicer's option).
    - Additionally, New Section 419.7(b) states that the single point of contact must have direct and immediate access to personnel with the authority to stop foreclosure proceedings and places

an obligation on the single point of contact to communicate immediately to such personnel any information received indicating that it may be necessary or appropriate to stop a foreclosure proceeding. New Section 419.7(d) also requires the single point of contact to transfer a borrower to an appropriate supervisor upon the borrower's request. These two requirements placed on the single point of contact are not explicitly required under the Federal Rules.

- Written notice of delinquency requirements:
  - Under the early intervention provisions of the Federal Rules, among other things, servicers are required to make good faith efforts to establish live contact with a delinquent borrower on the 36th day of a borrower's delinquency and written notice is not required until the 45th day of delinquency. The early intervention provisions of the Federal Rules also describe the content that needs to be included in the delinquency notice. However, New Section 419.7(c) requires additional information related to: (1) the nature and extent of the delinquency, (2) the servicer's loss mitigation protocols, (3) a list of documents and information that a borrower must submit to be considered for any given loss mitigation option, and (4) the preferred means by which documents should be delivered to the servicer.
  - Under New Section 419.7(c), servicers are also required to send a late payment notice to a borrower no later than 17 days after a payment becomes due and remains unpaid.
- Actions required following the receipt of a loss mitigation application:
  - The Federal Rule's loss mitigation provisions require, among other things, notification to the borrower within 5 business days after receiving the loss mitigation application confirming receipt of the loss mitigation application and stating whether the loss mitigation application is complete or incomplete. If a servicer determines an application is incomplete, New Section 419.7(d) requires the servicer to also state the effect of the borrower's failure to submit all required documentation and the action that the servicer will take if the borrower does not submit the documents or information necessary to make the loss mitigation application complete. New Section 419.7(d) also requires the following additional information to be included in the notification confirming receipt of a loss mitigation application: (1) key elements of the loss mitigation process related to third-party approvals, (2) the average length of time for a decision to be made, and (3) actions the servicer, lender or mortgagee may take.
- Actions required following the determination of a loss mitigation application:
  - The Federal Rules' loss mitigation provisions require, among other things, that a servicer include specific information in its notification of whether or not a loss mitigation application is granted or denied. If granted, the servicer is required to include in its notification the nature of the loss mitigation option being offered and the amount of time a borrower has to accept or reject the offer. New Section 419.7(e) requires additional information to be included in the notification such as: (1) changes to the terms of the mortgage loan, (2) a breakdown of the loan balance and an itemization of any fees or charges assessed, and (3) any amounts capitalized and applied to the balance of the mortgage loan.

    If an initial loss mitigation is denied, New Section 419.7(e) also provides additional protection to the borrower by requiring a review to be performed by supervisory personnel. This additional supervisory review is not required under the Federal Rules.



Additionally, the Federal Rules' loss mitigation provisions state that a servicer can evaluate an incomplete loss mitigation application only if, despite the servicer's reasonable diligence to obtain necessary documents and information, the loss mitigation application remains incomplete for a "significant period of time." The Federal Rules do not provide a hard number when defining what a "significant period of time" means and include language indicating that the period of time depends on "circumstances." Under New Section 419.7(e), the period of time is set at 30 days.

Finally, the Federal Rules' loss mitigation provisions state that a servicer may require that a borrower accept or reject an offer of a trial or permanent loss mitigation option no earlier than 14 days after extending the offer. New Section 419.7(g) extends this time period to 30 days.

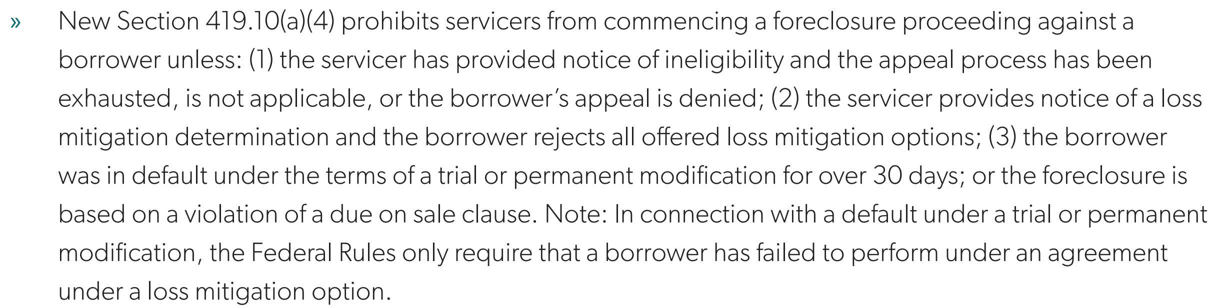
New Section 419.8 describes the Volume of Servicing Report that the Superintendent may require servicers to submit to the Superintendent, including information regarding the servicer's mortgage loan servicing activities. The requirement applies only to registered servicers, servicers who are required to register, and exempt organizations regulated by the Superintendent.

New Section 419.9 describes the books and records that servicers are required to maintain as well as other reports the Superintendent may require servicers to file in order to determine whether the servicer is complying with applicable laws and regulations. These include books and records regarding loan payments received, communications with borrowers, financial reports, and audited financial statements. This section applies only to registered servicers, servicers who are required to register, and exempt organizations regulated by the Superintendent.

- Compared to the prior Emergency Rules, the following material changes were made:
    - » New Section 419.9(b) clarifies that all telephone and written communications relating to the servicing of each mortgage loan must be kept for 3 years and also clarifies the types of communications between the servicer and borrower that must be kept include specific information about complaints from the borrower. The Emergency Rules did not explicitly impose a 3-year recordkeeping requirement regarding telephone and written communications relating to the servicing of each mortgage loan.
- Compared to the Federal Rules, servicers should take note of the following:
    - » Under Regulation X law, the general recordkeeping requirement imposed on servicers is 1 year after the date a mortgage is discharged or servicing is transferred.

New Section 419.10 sets forth the activities prohibited by the regulation, including engaging in misrepresentations or material omissions, and establishes a duty of fair dealing for servicers in connection with their transactions with borrowers.

- Compared to the prior Emergency Rules, the following material changes were made:
    - » New Section 419.10 eliminates prohibitions formerly found in Emergency Rules 419.14(b), (c), (d), and (e). Those prohibitions surrounded the required amounts of, the noticing of, the placement of, and refunds surrounding hazard, homeowner's or flood insurance. The Final Rules do not contain similar prohibitions.
    - » New Section 419.10(a) states that a servicer is prohibited from engaging in unfair or deceptive or abusive business practices. The Emergency Rules did not include the express prohibition of "abusive" practices.
    - » New Section 419.10(a)(3) expressly prohibits servicers from requiring an authorized representative to provide the representative's social security number to verify that a representative is authorized to act on behalf of the borrower. This was not expressly prohibited under the Emergency Rules.



» New Section 419.10(a)(4) prohibits servicers from commencing a foreclosure proceeding against a borrower unless: (1) the servicer has provided notice of ineligibility and the appeal process has been exhausted, is not applicable, or the borrower's appeal is denied; (2) the servicer provides notice of a loss mitigation determination and the borrower rejects all offered loss mitigation options; (3) the borrower was in default under the terms of a trial or permanent modification for over 30 days; or the foreclosure is based on a violation of a due on sale clause. Note: In connection with a default under a trial or permanent modification, the Federal Rules only require that a borrower has failed to perform under an agreement under a loss mitigation option.

  If a borrower has submitted an incomplete loss mitigation application, a servicer may not proceed with foreclosure unless and until 15 days (excluding legal public holidays, Saturdays and Sundays) have passed after the requisite notice has been provided Note, however, this restriction applies only in connection with a single incomplete loss mitigation application for a particular borrower.

» New Section 419.10(a)(5) similarly prohibits a servicer from moving for judgment of foreclosure and sale, or conducting a foreclosure sale, if the borrower is complying with a trial loan modification, forbearance or repayment plan, there is an approved short sale or deed in lieu with proof of funds, or where a borrower submits a complete loss mitigation more than 37 days prior to a foreclosure sale unless: (1) the borrower is not eligible for any loss mitigation option and the appeal process is not applicable; (2) the borrower has not requested an appeal within the applicable time period; (3) the borrower's appeal has been denied; (4) the borrower rejects all loss mitigation options offered by the servicer; or (5) the borrower is more than 30 days delinquent under a trial or permanent modification agreement.

New Section 419.11 sets forth a servicer's obligations with respect to the oversight of third-party providers, including requiring a servicer to perform appropriate due diligence and conduct periodic reviews of third-party providers' qualifications, as well as make disclosures regarding the use of third-party providers. For purposes of the Final Rules, "third-party provider" is defined broadly as any person or entity retained by or on behalf of the servicer, including, but not limited to, foreclosure firms, law firms, foreclosure trustees and other agents, independent contractors, subsidiaries and affiliates, that provide insurance, foreclosure, bankruptcy, mortgage servicing, including loss mitigation, or other products or services, in connection with the servicing of a mortgage loan.

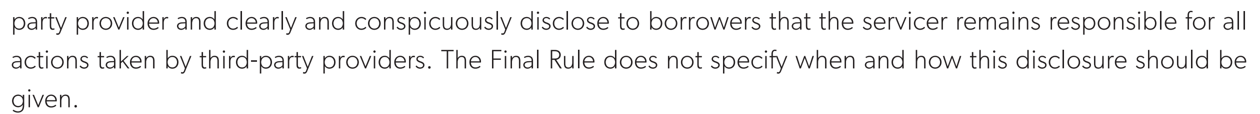
The prior Emergency Rules did not contain similar provisions, so servicers must review the entire section to ensure its processes are compliant; however, key components of the Final Rules include the following:

- New Section 419.11(a) requires servicers to perform appropriate due diligence of third-party providers' qualifications, expertise, capacity, reputation, complaints, information systems, document custody practices, quality assurance plans, financial viability, and compliance with licensing requirements and applicable rules and regulations.

- New Section 419.11(b) requires servicers to require third-party providers to comply with a servicer's applicable policies and procedures and applicable laws and rules.

- New Section 419.11(c) states that all servicers utilizing third-party providers remain responsible for all actions taken by the third-party providers.

- New Section 419.11(d) requires servicers to clearly and conspicuously disclose to borrowers if it utilizes a third-



party provider and clearly and conspicuously disclose to borrowers that the servicer remains responsible for all actions taken by third-party providers. The Final Rule does not specify when and how this disclosure should be given.

- New Section 419.11(e) requires servicers to conduct periodic reviews, not less than annually, of each third-party provider the servicer retains. Note, the Federal Rules require servicers to conduct periodic reviews of third-party providers, but do not specify that such reviews must be completed "not less than annually."
- New Section 419.11(f) states that servicers must ensure that all third-party providers have appropriate and reliable contact information for servicer employees who possess information relevant to the services provided by the third-party provider.
- New Section 419.11(g) requires a servicer to take appropriate remedial steps when problems are in reviews of third-party providers, including termination of a relationship with a third-party provider.
- New Section 419.11(h) requires servicers to develop policies and procedures as to how servicers will oversee and communicate with counsel and those with the authority to fully dispose of a case concerning foreclosure proceedings. The regulation also sets forth minimum requirements that such policies must include.

New Section 419.12 sets forth requirements for mortgage servicing transfers, including a requirement that servicers permit borrowers to continue making existing trial modification payments and imposes disclosure requirements in connection with the first monthly statement provided after a transfer. The prior Emergency Rules did not contain similar provisions.

- New Section 419.12(a) requires that the first monthly statement provided by a transferee servicer include a copy of the transferee servicer's welcome packet and a payment history for the preceding 36 months of the borrower's account showing the date, amount, and application of all payments credited to the account and the total unpaid balance during this period.
  - Note: The Final Rule imposes additional disclosure obligations in connection with a servicing transfer than the notice requirements imposed by RESPA § 6 and Regulation X.
- New Section 419.12(b) requires a transferee servicer to allow a borrower under an existing trial loan modification to continue making those payments for the remainder of the trial modification period.
- New Section 419.12(c) requires a transferee servicer to allow a borrower who has successfully completed a trial modification prior to the effective date of the transfer to continue making trial payments until permanent modification documents can be provided.
- New Section 419.12(d) prohibits a transferee servicer from denying a loss mitigation option solely because the borrower was denied by the previous servicer.

New Section 419.13 establishes requirements with respect to affiliated relationships, requiring, among other things, notice to the borrower of such an arrangement and market rate terms. For purposes of the Final Rule, an "affiliated relationship" means a relationship between two or more entities where one such entity, directly or indirectly, through one or more intermediaries, controls or is controlled by or is under common control with another such entity. The Final Rule imposes restrictions akin to those imposed by RESPA § 8, which applies to settlement services, to mortgage servicing.

- New Section 419.13(a) requires servicers, within 10 days of entering into an affiliated relationship, to provide written disclosure of the nature of the relationship to each borrower whose mortgage loan is subject to the arrangement.

The disclosure is required to include the nature of the affiliated relationship and an estimated charge or range of charges generally made by such affiliate.

- New Section 419.13(b) requires affiliated relationships to be negotiated at a market rate and prohibits a servicer from giving or accepting fees, kickbacks, or other things of value in connection with affiliated relationships, other than fees permitted by Section 419.5 of the Final Rules and: (1) a return on an ownership interest (subject to certain restrictions); (2) bona fide dividends, and capital or equity distributions, related to ownership or franchise relationship; or (3) bona fide business loans, advances, and capital or equity contributions between entities in an affiliated relationship, which are for an ordinary business purpose and are not fees for the referral of settlement service business or unearned fees.

New Section 419.14 sets forth a compliance transition period.

- This section sets forth a 90-day transition period that allows mortgage servicers to continue following the existing Emergency Rules under Part 419 until March 17, 2019. Accordingly, there is no similar section under the existing Emergency Rules under Part 419 or under federal law.

If you have questions, reach out to one of the authors of this alert or another member of the firm's Consumer Financial Services team.

Jeffrey Barringer
member > albany

(518) 874-3428
jbarringer@mcglinchey.com

Emily Honsa-Hicks
associate > cleveland

(216) 455-5068
ehonsahicks@mcglinchey.com

Colin Quillinan
associate > albany

(518) 874-3423
cquillinan@mcglinchey.com

© 2020 McGlinchey Stafford PLLC. This alert is published by the law firm McGlinchey Stafford. It is not intended to provide legal advice or opinion. Such advice may only be given when related to specific fact situations that McGlinchey Stafford has accepted an engagement as counsel to address. This material may be considered advertising under certain rules of professional conduct. No representation is made that the quality of legal services to be performed is greater than the quality of legal services performed by other attorneys. McGlinchey Stafford PLLC in AL, FL, LA, MS, NY, OH, TN, TX, and DC. McGlinchey Stafford LLP in CA.