

1 DIVISION OF LABOR STANDARDS AND STATISTICS
2 AT THE COLORADO DEPARTMENT OF LABOR AND EMPLOYMENT
3
4 PUBLIC RULEMAKING HEARING
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8 HEARING OF PROCEEDINGS - DECEMBER 16, 2019
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11 Proceedings had on Monday, December 16th,
12 2019, at Room 12A, 633 17th Street, Denver, Colorado,
13 80202, commencing at the hour of 3:06 p.m., before
14 SCOTT MOSS, Director of the Division of Labor Standards
15 and Statistics; LIZ FUNK, Labor Standards Director;
16 EVAN GRIMES, Labor Standards Senior Policy Advisor and
17 Direct Investigations Manager; SAIDA MONTOYA, Labor
18 Standards Claims Investigations Manager; ERIC YOHE,
19 Labor Standards Outreach Manager; MICHAEL PRIMO,
20 Division Director of Operations and Rule Coordinator;
21 JOSE LOPEZ, Compliance Investigator and Interpreter;
22 and Members of the Public.
23
24
25

1 I N D E X P A G E
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3 PUBLIC RULEMAKING HEARING: December 16, 2019
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P R O C E E D I N G S

1
2 MR. MOSS: Good afternoon. My name is Scott
3 Moss. I'm the director of the Division of Labor
4 Standards and Statistics here at the Colorado
5 Department of Labor and Employment.

6 Can folks hear me in the back without a
7 microphone? Okay. I guess those of you who can't,
8 just didn't respond. That's fine.

9 I want to thank you for joining us for this
10 rulemaking hearing today on Monday, December 16, 2019,
11 for the record. Also here, starting from - I'll start
12 from the right, are Evan Grimes, the labor standards
13 direct investigations manager and senior policy
14 advisor; Eric Yohe, labor standards outreach manager;
15 Saida Montoya, labor standards claims investigations
16 manager; Liz Funk, labor standards director; Michael
17 Primo, division director of operations and rule
18 coordinator; and Jose Lopez, compliance investigator
19 and also today our interpreter for anyone who wants
20 to speak in Spanish when they testify.

21 Today we will be accepting testimony on
22 proposed Colorado Overtime and Minimum Pay Standards
23 Order number 36, also known by its acronym, the COMPS
24 Order, or just COMPS, as you can refer to it.

25 The notice of rulemaking and all rulemaking

1 documents were filed with the Colorado Secretary of
2 State on November 15th. Then on November 18th, all
3 rulemaking documents were posted on our web page and
4 also circulated to all of the hundreds of stakeholders
5 who had asked to be on our rulemaking contact list.
6 Formal notice was then published in the next issuance
7 of the Colorado Register on November 25th.

8 Before we begin, I need to state a few rules
9 and guidelines, all of which are written in a handout
10 in both English and, on the reverse, in Spanish, that
11 we'll be distributing for anyone who arrives late, or
12 who didn't hear these introductory remarks. But
13 they'll also be available in the back of the room if
14 anyone wants to see them.

15 First, this hearing was noticed for 3:00 p.m.
16 While no end time is required by law, we will, as we
17 publicized, stay until at least 6:00 p.m. for anyone
18 who can't arrive until after business hours. If anyone
19 hasn't yet spoken by 6:00 p.m., we can and will stay
20 later. But if you are in touch with anyone arriving
21 late, please encourage them to arrive by 6:00 p.m. if
22 at all possible.

23 After 6:00 p.m., we can accommodate late
24 arrivals, but we'll need to send someone down to the
25 first floor to let any new arrivals in, which we can

1 do, but we may not be able to continue doing that on
2 a perpetual basis after 6:00 p.m.

3 Second, please start your comments with
4 your name and, if any, your job and role. However,
5 if you need or wish to remain anonymous, you may
6 exercise your right to confidentiality under Wage
7 Protection Act Rule 4.7. You can give just your
8 first name or a pseudonym, and describe as much of
9 your job and your role as you can or wish to. If you
10 do not genuinely need to remain anonymous, please do
11 give as much identification as you can, for those who
12 will be reading the transcript of this proceeding
13 afterwards.

14 Third, please try to limit your comments
15 to three minutes, but we will try to allow longer
16 comments typically up to approximately five minutes,
17 as long as there is not a long line of people waiting
18 to speak as the later hours arrive. If you do not get
19 to finish what you plan to say within a reasonable
20 number of minutes, we still want to let you to say as
21 much as you feel like.

22 We have allowed folks to write any extended
23 comments on pads in the back of the room on the
24 counter back there. And to do that, after your
25 allotted minutes, write the name and affiliation you

1 gave in your oral comments and the time you're
2 starting to write those extended comments, so we
3 can connect those pages to your oral comments you've
4 just given. If you finish any -- when you finish
5 any written extended comments, please remove those
6 pages from the pad, staple them if there's more than
7 one page, and put them in the bin on the table.
8 Those handwritten comments will be attached to the
9 transcript, so they will authentically be part of
10 the record.

11 Fourth, written comments anybody submits
12 or will submit before the comment deadline of
13 December 31st are as much a part of the record as
14 any oral testimony today. So the transcript of this
15 hearing and all written comments are equally being
16 read by me and by multiple members of the labor
17 standards policy team you see in this room in front
18 of you. So if you have already provided or will
19 provide written comments, you don't need to repeat
20 all of your points. You can just give an overview
21 or highlights. The deadline for submitting comments,
22 again, is December 31st. You can submit them by
23 e-mailing Michael Primo, whose card is on the table
24 outside with his e-mail address. The home page of
25 the division also has a link to the comment process

1 and Michael's e-mail.

2 Fifth, photos or video or audio recording are
3 permitted, but to let individuals exercise their right
4 to confidentiality, if you are taking any audio or
5 video, please inform one of the labor standards staff,
6 whether Michael Primo or someone else, and simply take
7 your photo, audio, or video only of speakers at the
8 podium or in front. So aim the photo or video this way
9 or sideways from the side over there, and you're free
10 to come up there to take any pictures or video if you
11 like.

12 If you wish to be testifying without having
13 photo or video taken of you, you can still go volunteer
14 and line up to speak, but you can speak from behind the
15 podium -- the microphone is removable -- or you can
16 just try to speak loudly. But by standing behind the
17 first row of chairs, photo and video will not be taken
18 of you.

19 Sixth, if you have any questions about these
20 rules or about the conduct of the hearing, you can ask
21 Michael Primo, again, rule coordinator and operations
22 director of the division. If he cannot answer your
23 questions, he can relay them to me. He will just
24 simply wait until any speaker has finished his or her
25 remarks, so as not to interrupt speaking at the moment.

1 Seventh, please speak in a clear, slow voice
2 so the reporter, Haley, taking down all of the comments
3 and trying to transcribe them accurately, can hear you.
4 The transcript will be posted on the same web page
5 with all of the written comments, at some point after
6 the days off for Christmas, but in time for anyone
7 who is or isn't here to review the transcripts and
8 consider any follow-up before the December 31st comment
9 deadline.

10 With that, thank you again for taking the
11 time to attend this public hearing and for
12 participating in our rulemaking process. We'll now
13 proceed with oral testimony. I do have requests from
14 approximately 10 individuals who had asked, due to a
15 need to leave early, if they could speak at the start.

16 So to start, I'll read off the first five
17 names, so those folks can prepare. First is Greg
18 Habner. Second is Emily Sirota. Third, Carmen Flores.
19 Fourth, Marilyn Winokur. Fifth, representative from
20 LIUNA. And then I'll proceed to six through ten. Then
21 we'll take comments from the public. Thank you.

22 First, Mr. Habner.

23 MR. HABNER: Hello and good afternoon. My
24 name's Greg. I am a Denver, Colorado native. I was
25 working in the cannabis industry for about three years

1 as a salaried employee. During this time, I was
2 working six days a week, 60 to 70 hours per week. My
3 health was entirely affected. My personal time was
4 entirely affected. I could not find excessive time to
5 clean, cook home meals, or even exercise. And sleep
6 clearly diminished over time. Sorry.

7 The Colorado Overtime and Minimum Pay
8 Standards order is going to heavily affect all salaried
9 employees in the cannabis industry just as equally as
10 the rest of the employees in Colorado. I believe that
11 47,000 is barely a good start for how much rent has
12 increased due to the number of population increase in
13 Colorado. 47,000 is barely just hitting the minimum
14 standards needed.

15 I believe that it needs to be thoroughly
16 increased, and the amount of time to increase it needs
17 to be decreased as well. Six years is going to be
18 taking too long for the amount of minimum that is being
19 given due to the Colorado minimum -- or the Colorado
20 Overtime and Minimum Standards order.

21 It definitely needs to affect people much
22 more quickly. People are suffering quite a bit in all
23 areas and aspects and ways of life of Colorado. Thank
24 you.

25 MR. MOSS: Thank you. Slight amendment to

1 the order. I hadn't realized there was another similar
2 request from someone who arrived early. We go with
3 Emily Sirota next, then Michael Gifford, then Carmen
4 Flores, Marilyn Winokur.

5 MS. SIROTA: Good afternoon, Director Moss
6 and team. I'm state representative Emily Sirota
7 representing House District 9 from Southeast Denver.
8 Thank you so much for the months of work that the
9 department has dedicated to developing a new wage
10 order. And I appreciate the opportunity to share my
11 comments on the Colorado Overtime and Minimum Pay
12 Standards order proposal.

13 I hope you have had the opportunity to review
14 the letter sent to Director Barela from myself and 27
15 other legislators in response to the proposed rule.
16 I've been closely following CDLE's process for
17 addressing overtime, salary exemptions, and working
18 conditions delineated in the new order. And over the
19 course of the summer and fall, I've come to hear from
20 many Colorado workers who stand to be impacted by this
21 new rule.

22 While the proposed changes offer extensive
23 positive improvements from current conditions, I do
24 offer some recommendations for further enhancement.
25 For too long, workers have been forced to work

1 countless hours without pay and face the untenable
2 choice of keeping a job or sacrificing time with their
3 families, often at the cost of their own health and
4 wellbeing. Our workers deserve fair compensation for
5 the hours they work.

6 I've heard from so many workers who have
7 shared that this higher salary threshold would be
8 life-changing for themselves and their families. The
9 proposed phased-in approach to overtime salary
10 threshold is important to allow workers and businesses
11 time to adjust to new standards.

12 However, if the federal Obama threshold had
13 gone into effect as proposed, we would already see a
14 salary threshold of \$51,000 in January of 2020. I ask
15 you to consider speeding up implementation from the
16 six-year phase-in to a four-year phase-in so that the
17 final level is no less than 57,500 in 2023.

18 This would correct the erosion of overtime
19 protections for Colorado workers more quickly,
20 immediately providing protections to nearly a hundred
21 thousand more workers while still maintaining the
22 important phased-in approach to implementation.

23 I also wish to draw attention to another
24 encouraging component of the COMPS order, which is to
25 cover workers in all industries for basic protections

1 for meal and rest breaks, as well as overtime
2 protections unless specifically exempted.

3 This will provide much more clarity for
4 employers and employees, as well as ensure more workers
5 receive these critical protections. Research shows
6 these breaks can prevent injuries, burnout, and other
7 health complications, especially for those doing manual
8 labor in harsh Colorado conditions.

9 Breaks also protect public safety by ensuring
10 rest to those constructing our roads and bridges and
11 other projects. Within this context, inclusion of
12 agricultural workers for rest breaks is a step forward,
13 but those same workers are still not entitled to any
14 meal breaks or overtime pay under the proposed rule.
15 Out of concern for the health, safety, and basic human
16 rights of all workers, I urge you to consider putting
17 the rights of these workers in line with other workers
18 in Colorado.

19 Overall, the COMPS order is a major step
20 forward for our Colorado workers, and I'm grateful that
21 the CDLE has proposed such meaningful protections.
22 Colorado will join several other states across the
23 country in recognizing that we can and should do
24 better.

25 I will continue to follow the developments of

1 the rulemaking closely, and I eagerly anticipate a
2 strong final rule from the CDLE that continues to
3 recognize the importance of protecting all workers
4 throughout the state. Thank you so much for your time
5 today.

6 MR. MOSS: Thank you. Is Michael Gifford
7 here? Okay. Then we'll proceed to Carmen Flores.

8 MS. FLORES: Thank you for the opportunity to
9 speak. My name is Carmen Flores. I'm a Colorado
10 native. I'm also a 10th-grade dropout. I have a
11 bachelor of science and I have earned my master's
12 degree. I have an M.B.A. in operations management and
13 an undergraduate in human resources.

14 I want you to take note of one special thing.
15 6:00 a.m. to 10 p.m. is 16 hours a day, seven days a
16 week, 112 hours. My pay for the company I work for was
17 52,000 a year. I worked for this company from May 20th
18 to August 12th. I was an area manager. I was
19 responsible for profit and loss, labor, budget,
20 customer satisfaction, recruiting, on-boarding,
21 customer complaints, job schedules, and store visits.

22 The company that I work for was Prestige
23 Maintenance out of Dallas, Texas. They held a contract
24 for Kohl's, JC Penney's, and Floor & Decor. My area
25 covered from Broomfield to Casper, Wyoming, from

1 Louisville to Aurora, Colorado. I had 27 sites. I was
2 responsible for 35 employees. We were a janitorial
3 service, and I was the area manager.

4 The -- what ended up happening is I never was
5 able to do any of the tasks that I was originally hired
6 for. We were required to have a 7:00 a.m. shift to
7 clean Kohl's, the stores, and a 6:00 p.m. shift.
8 Whenever any of my hourly employees wouldn't show up, I
9 was required to go clean. Once again, I was doing
10 janitorial, carpet cleaning, windows, floors, and
11 cleaning.

12 At one of the sites, I was hurt, and I was
13 taken to the -- I went -- I drove myself to the
14 emergency room. They found that my blood pressure was
15 at 180 over I don't know what, and it should be at 130.
16 I was put on blood pressure medication and advised to
17 quit my job immediately. I was seen by a workman's
18 comp doctor who put me on time off, and my personal
19 doctor put me on a work restriction. During that time
20 period, they had found four aneurysms.

21 What ended up happening is I was responsible
22 for the north area, and the south manager had quit.
23 And it was a Saturday, and they wanted me to take over
24 his area, too, and I told them that I was -- during
25 that entire time, I was on an eight-hour work

1 restriction, but I still worked the entire time. I
 2 reminded them that I couldn't make it because I was on
 3 work restriction. It was a Saturday, and I had already
 4 exceeded my eight hours.

5 I ended up going to the emergency room that
 6 day. I couldn't walk in. I was put in a wheelchair.
 7 I couldn't sleep. I had severe headaches, dizzy,
 8 nervousness. I returned to work, and was told that I
 9 was fired, and the reason, they decided to exercise
 10 their 90-day probationary period.

11 I had got another job within a week, and
 12 after about three weeks, I had no more headaches, and
 13 I -- they injected a dye into my brain, and found that
 14 I had no aneurysms. In closing, I want to tell you
 15 16 hours a day, seven days a week, 112 hours. I was
 16 making a thousand dollars a week. I worked 112 hours.
 17 That comes down to \$8.92 an hour. I would like to know
 18 when anybody in this room has ever worked for \$8.92.
 19 Thank you very much.

20 MR. MOSS: Thank you. Next, Ms. Marilyn
 21 Winokur.

22 MS. WINOKUR: Good afternoon. My name is
 23 Marilyn Winokur, and I live in Denver. And I am on the
 24 board and on the steering committee of Coloradans for
 25 the Common Good. Coloradans for the Common Good is a

1 broad-based, diverse organization of 22 non-profit
 2 organizations that include congregations, labor unions,
 3 civic and neighborhood organizations, and other
 4 non-profits. A number of our member organizations are
 5 represented here today, they include B'nai Havurah,
 6 Denver Jewish Reconstructionist Congregation; House for
 7 All Sinners and Saints; Trinity Presbyterian Church;
 8 the Denver Classroom Teachers Association; and the
 9 Sixth Avenue United Church of Christ.

10 Maybe everybody could just stand up who
 11 are -- so you can see how many people are here today
 12 from our organization.

13 MR. MOSS: Can you stand up again, please?
 14 I count 11 folks. Thank you.

15 MS. WINOKUR: I had the opportunity at the
 16 public hearing this past August to speak in support of
 17 expanding the wage order coverage to include workers
 18 who are not covered and to advocate that overtime
 19 salary threshold be raised to 2.5 times the minimum
 20 wage, or approximately \$62,000.

21 While the proposed COMPS rule does not
 22 include everything we've originally advocated for, we
 23 applaud the CDLE and Governor Polis for substantial
 24 changes to the order and for putting Colorado on a path
 25 to providing basic workplace protections.

1 We are pleased that the order does include
 2 many workers previously not covered, such as
 3 construction and manufacturing workers, as well as
 4 thousands of other workers. We are glad that once
 5 COMPS is finalized, there will be guaranteed minimum
 6 wage, overtime pay, and meal and rest breaks, and we
 7 appreciate this progress.

8 However, and this is very important, in the
 9 proposed COMPS order, agricultural workers will only be
 10 entitled to an average of a 10-minute rest break every
 11 four hours and only five of those ten minutes need to
 12 be continuous. If they're not covered by the federal
 13 labor -- Fair Labor Standards Act and thousands of farm
 14 workers and animal herders are not covered, these
 15 workers are not entitled to meal breaks, overtime pay,
 16 or, in some cases, even minimum wage.

17 Let's remember that these workers do manual
 18 labor in harsh Colorado conditions with the summer sun
 19 beating down on their heads and their backs, or the
 20 winter frost penetrating their bodies. Their right to
 21 rest breaks and meal breaks is essential to prevent
 22 injuries and adverse health complications. How can it
 23 be okay to carve out our most marginalized and
 24 vulnerable workers from the critical protections that
 25 are rightly being provided to all other workers?

1 This is grossly unfair and immoral, and it's
 2 why I'm joining others from Coloradans for the Common
 3 Good and fasting today for justice for farm workers.
 4 And we implore you to include agricultural workers as
 5 you do other workers in the final ruling.

6 Regarding raising the overtime salary
 7 threshold, the COMPS order proposal has the threshold
 8 starting at 42,000 in 2020 and ramping up to 57,000 in
 9 2026 before adjusting annually for inflation.

10 At 57.5, thousands of workers will be covered
 11 and we commend the CDLE for taking these steps to
 12 ensure workers are paid fairly for the time they work.
 13 However, the rule starts low and takes too long to ramp
 14 up. While we understand the need for business to be
 15 able to plan for an increase in overtime pay, we are
 16 urging the CDLE to ramp up by 2023 to 57,5 and not wait
 17 until 2026.

18 Colorado workers have had overtime
 19 protections eroded so that now only 8 percent of
 20 salaried workers in Colorado are entitled to overtime
 21 pay. Workers should not have to wait six years to have
 22 these protections restored. As workers across the
 23 state wait for the overtime salary threshold to reach
 24 adequate levels, the cost of living continues to rise.
 25 Despite low unemployment and a healthy business

1 environment, Colorado salaried workers are struggling
2 to save for retirement, for their kids' education and
3 to afford housing and basic healthcare.

4 Let's be clear. This doesn't mean that an
5 employer has to pay anyone the salary threshold. It
6 only means that employees are entitled to overtime pay
7 if they work more than 40 hours per week and don't
8 already earn at the threshold level. A faster phase-in
9 of the overtime threshold will allow hundreds of
10 thousands more Colorado workers to be paid for the
11 hours they work, and keep up with the rising costs of
12 living in our state.

13 To summarize, Coloradans for the Common Good
14 urges the CDLE to, one, expand COMPS coverage to
15 include -- to fully include agricultural workers, and,
16 two, to ramp up the overtime salary threshold of 57,5
17 by 2023. Thank you.

18 MR. MOSS: Thank you. And I'll read the next
19 six people before we just take volunteers from the
20 floor. Next will be a representative from LIUNA, then
21 Pastor Reagan Humber. Next, Ean Thomas Tafoya. Next
22 Sheila Lieder. Next Pamela Trejano [phonetic]. Next
23 Rabbi Evette Lutman. Then we'll take volunteers from
24 the floor.

25 Who is here from LIUNA? I didn't have a

1 name. I apologize. Sir, are you here from LIUNA?

2 MR. PIMENTEO: We just appreciate what you
3 guys are doing.

4 MR. MOSS: I'm sorry. What was your name
5 again?

6 MR. PIMENTEO: Joe Pimenteo, P-i-m-e-n-t-e-o.
7 I wasn't planning to speak today, but we appreciate
8 what's going on, and we appreciate what's going on and
9 the way everything's going. Like I said, I wasn't
10 ready to speak today. Our representative isn't here
11 today. So sorry about that.

12 MR. MOSS: It's okay.

13 MR. PIMENTEO: I'm just - [pause]

14 MR. MOSS: Thank you. Next, Pastor Reagan
15 Humber.

16 REVEREND HUMBER: Good afternoon. I'm the
17 Reverend Reagan Humber. I'm pastor of House for All
18 Sinners and Saints. We're a Lutheran congregation just
19 a few blocks away. I'm also a leader with Coloradans
20 for the Common Good. As Marilyn Winokur said, we are a
21 broad-based organization of congregations, unions, and
22 civic organizations here in town. We're also here with
23 our friends from Jobs With Justice.

24 We are grateful for the improvements included
25 in CDLE's proposed wage order. Many workers will

1 benefit greatly, but we are here today to talk about
 2 what's left out of that proposal. Again, as Marilyn
 3 said, we are fasting for farm workers today. We
 4 decided to forego eating today to remember the gifts we
 5 receive every day from our sisters and brothers who
 6 work in the fields, the same sisters and brothers who
 7 are being forgotten by the Colorado Department of Labor
 8 in the proposed wage order.

9 By fasting, praying, and speaking out, we are
 10 calling the broader community, but especially Governor
 11 Polis and Mr. Barela to remember Colorado farm workers
 12 and extend the same protections to them that most of us
 13 enjoy.

14 For Christians, this is the time of year that
 15 we wait for Christmas. And if you remember the story,
 16 we remember that God first announced God's vision of
 17 peace to farm workers, to shepherds, glory to God in
 18 the highest and peace to all people, they sang. And
 19 they sang this because farm workers then and
 20 unfortunately still now are desperate, the most
 21 desperate to be reminded that they are not alone, that
 22 they have not been forgotten, and that they, too, have
 23 sacred dignity.

24 First Timothy from Christian Scripture also
 25 reminds us of the ancient law that the laborer deserves

1 to be paid. But the laborers are not getting paid, not
 2 all of them, especially thousands of farm workers here
 3 in Colorado. Many don't receive the minimum wage or
 4 get enough rest during their workday, let alone get
 5 overtime pay.

6 So this is why I and the rest of Coloradans
 7 for the Common Good and many from my congregation are
 8 fasting today, because the laborer deserves to be paid.
 9 Thank you.

10 MR. MOSS: Thank you. We'll now take Ean
 11 Thomas Tafoya.

12 MR. TAFOYA: Hello. My name's Ean Thomas
 13 Tafoya, and I am the co-chair of the Colorado Latino
 14 Forum, which is a non-profit dedicated to empowering
 15 Latinos and Latinos in particular, in this case, around
 16 economics.

17 I do want to start by saying that I've had
 18 these jobs where you work 60 hours a week on a salary.
 19 It's not fair, and it steals from my ability and other
 20 people my age to develop a future. These are dollars
 21 that I can't put into buying housing. We look at the
 22 skyrocketing housing market right now. It's clear that
 23 even \$57,000 is really not enough.

24 I don't really understand why we fought for a
 25 40-hour workweek for people to continually be exempted.

1 You know, I do want to say that it's great that you are
 2 covering more people. I do think you can go faster if
 3 this is the course that you want to stay on. You know,
 4 but this is the American dream, to allow people to have
 5 access.

6 I just returned from several days in San Luis
 7 Valley, where I was meeting with the Latinos Farmers
 8 and Ranchers Association. And I want to be clear that
 9 Cesar Chavez and Corky Gonzales and the Brown Berets
 10 and the people who are fighting all of these years for
 11 equal and fair protections all the way back into the
 12 1970s and '60s would be just ashamed that people
 13 wouldn't be entitled to at least 10 minutes of a break
 14 after they've been working in the hot fields.

15 My relatives were pickers and they spent time
 16 fighting just for restrooms. This seems like a
 17 no-brainer, and I'm not really sure why it got left
 18 out. The economy's growing. The agriculture economy's
 19 growing. I just attended the Colorado Economic
 20 Outlook. I'm not sure that the industry is saying the
 21 sky is going to fall if you don't (indiscernible).

22 You know, the Fair Standards Labor Act goes
 23 all the way back to, what, 1938. We're talking in
 24 1998, even though I worked at a museum, I got entitled
 25 to that access. And I wasn't outside, working outside.

1 So before I went to college, I worked as a
 2 laborer. My father is a plumber. My dad is a -- my
 3 uncle's an electrician. I spent time working in these
 4 really hard conditions, and they deserve to -- the same
 5 protections as the rest of us.

6 And so I said this the last time I was here.
 7 You know, a typical, all-white board has the
 8 opportunity to protect a lot of people that are
 9 different than yourselves. In this era that we're
 10 going through, we're fighting if you'll put us in cages
 11 and not paying us fair wages, and you have the
 12 opportunity to change that. Thank you.

13 MR. MOSS: Thank you. We'll now take Sheila
 14 Leder. And I'll also add that this wasn't as important
 15 before the air coming on, but for the fact that the
 16 room's going to get quite warm otherwise, we have a lot
 17 of people here, it just got louder, especially for
 18 folks in the back. So if you could speak in the
 19 microphone, either moving it forward, or it's removable
 20 if you prefer. Thank you.

21 MS. LIEDER: Good afternoon. My name is
 22 Sheila Lieder, and I'm here to comment on behalf of the
 23 Colorado Alliance for Retired Americans, which has
 24 29,000 union members statewide. Our mission is to
 25 support the needs of our retired members for a healthy,

1 financial, stable retirement.

2 We understand that your office is open for a
3 public comment period on the proposed Colorado Overtime
4 and Minimum Pay Standards Order, COMPS, number 36,
5 2020, previously known as the Colorado Minimum Wage
6 Order, last issued Colorado Minimum Wage Order number
7 35.

8 Although the majority of our members no
9 longer work, some of them have had to return to the
10 workplace. Retirees has built this country, and we
11 will always support current workers. We have
12 appreciated the CDLE's work and engagement in the
13 stakeholder process. Our organization has also
14 submitted a comment encouraging the department to
15 expand industries covered under the Colorado Wage Order
16 to include all workers and institute a statewide
17 overtime salary threshold, 2.5 times the minimum wage.

18 While the proposed COMPS rule does not
19 include everything we had originally advocated for, we
20 do applaud CDLE for the substantial changes to the
21 order and putting Colorado on a path to protect all
22 individuals' basic workplace protections.

23 All workers deserve a chance to have a meal.
24 The proposed COMPS order does not afford this right to
25 workers in the agricultural industry. We encourage the

1 department to truly cover all workers, protecting all
2 workers' meal and rest breaks. And overtime pay is
3 good for Colorado's workforce. Workers' health and
4 safety and the public health of our state by not only
5 minimizing injury and allowing workers to stay in the
6 workforce longer, but also to keep our food safer and
7 free from the many salmonella and other outbreaks that
8 have happened throughout the globe.

9 And for the overtime piece, a faster phase-in
10 over four years will allow hundreds of thousands more
11 Colorado workers to be paid for the hours they work and
12 keep up with the rising costs of living in our state.
13 Restoring overtime protections and the 40-hour workweek
14 is good for our members because of needed family time,
15 time to cook healthy meals. Stress levels, mental
16 health, gender equity, it all reduces burnout.

17 In addition, I'm here to thank CDLE for the
18 expanded coverage of workers and for the first steps on
19 overtime threshold. In closing, I would ask for
20 covering agriculture, ensuring no backsliding happens
21 on coverage, and a faster phase-in because workers'
22 rights are human rights.

23 The Colorado Alliance for Retired Americans
24 are looking forward to continuing to engage in the
25 public comment period and are hopeful to a strong final

1 rule to protect all workers across Colorado because I
2 believe Colorado leads the way. And thank you for your
3 time.

4 THE REPORTER: Could you spell your name?

5 MS. LIEDER: S-h-e-i-l-a, last name,
6 L-i-e-d-e-r. Colorado Alliance for Retired Americans.
7 Thank you.

8 MR. MOSS: Thank you. Next, Pamela Trejano
9 [phonetic].

10 Next, Rabbi Evette Lutman.

11 RABBI LUTMAN: Good afternoon. I'm Rabbi
12 Evette Lutman, the rabbi at B'nai Havurah in Denver.
13 And I'm with the Denver Jewish Reconstructionist
14 Congregation. I'm also here, as you can tell from my
15 button, I'm a leader with the Coloradans for the Common
16 Good.

17 For farm workers, I'm frankly confused as to
18 why the rule change, which is awesome in some respects,
19 carves out an exception for agricultural workers. So I
20 was trying to think of why are agricultural workers
21 different such that they're not deserving of the same
22 kinds of protections. I couldn't come up with an
23 answer, but I bet you guys have one.

24 As a Jewish faith leader, I'm guided by the
25 central narrative of the Jewish people, our liberation

1 from slavery, the worst imaginable work environment.
2 Our tradition reflects an understanding of the power
3 and balance between employers and employees, and when
4 there is an imbalance like that, there's a need to
5 protect the weaker of the two. That's what you guys
6 are all about, I think.

7 I can't, and my congregation can't, be
8 passive bystanders to unjust working conditions for
9 farm laborers. The Torah, the Old Testament, tells us
10 that we can't stand idly by the blood of our neighbors.
11 So our obligation goes beyond simply, don't wreck
12 anything, do no harm, but we're told instead you have
13 to assertively pursue justice.

14 As you know, the -- there's no collective
15 bargaining for farm workers. They are -- they're not
16 here, and the reason they're not here and the reason
17 that I'm standing here hopefully in their stead and
18 everyone else that's here is because if they are here
19 on an H2A visa, that visa is tied to the employer, the
20 employer fires them, the visa expires, they become
21 illegal.

22 We depend on these folks for all of our
23 sustenance, and they are in the weakest position. We
24 have to pursue fair treatment. We can't allow our --
25 you know, when we eat the food that we eat, if it's

1 grown by people who are not fairly compensated, then in
 2 that meal, we have consumed and been complicit in an
 3 unfair system. Every time we eat food grown by
 4 unprotected farm workers, that's what we're doing.
 5 We're participants.

6 Just think about that for a second. We're
 7 participants in a system that I know you-all are good
 8 people, and it conflicts with your own values, it
 9 conflicts with our own values. We consume food grown
 10 from ground fertilized by sadness, oppression, and
 11 isolation.

12 It blows my mind to think about only having
 13 10 minutes of rest. I'm in the field -- I'm trying to
 14 imagine I'm in the field. I've never grown anything.
 15 It blows my mind to think about having only 10 minutes
 16 of rest every four hours. Imagine you're in the sun.
 17 Where are you going to go to the bathroom in 10
 18 minutes? And for meals, where am I supposed to eat my
 19 meal? Even the ox that is tethered to the thresher is
 20 allowed to eat as it's threshing. We should not treat
 21 people any differently or less than the most basic farm
 22 animals.

23 Lest we sustain ourselves by the labor of
 24 them who are not meaningfully sustained themselves, we
 25 need fair wages for farm workers. We need overtime

1 wages, meal breaks, a meaningful rest break that allows
 2 us to take care of biological needs.

3 This public hearing is intended to influence
 4 you, and I know as good folks -- I hope you will be
 5 influenced to do the right thing. Thank you.

6 MR. MOSS: Thank you. I will now take any
 7 volunteers from the floor. If you could -- I'll call
 8 on several people now in order, and if you could just
 9 arrange yourself.

10 So, sir. And then one, two, three
 11 (indicating), four -- put your hand down when I call on
 12 you -- five, six, seven, eight, nine, ten. And then
 13 I'll call on other folks after that. Thank you.

14 We'll start with your name since I'm no
 15 longer calling any folks by name.

16 MR. BLOCK: I'm Dan Block, D-a-n, B-l-o-c-k.
 17 I'm an attorney with Robinson, Waters & O'Dorisio. I
 18 represent both employers and employees. I'm also on
 19 the Colorado Leadership Council, the National
 20 Federation of Independent Business. And our firm is a
 21 member of the Colorado Chamber of Commerce.

22 I've been asked to also speak, in addition to
 23 on myself individually, on behalf of NFIB and the
 24 Colorado Chamber. The NFIB will be submitting comments
 25 about the minimum salary amounts, so I won't go into

1 that.

2 I want to speak to specific sections of the
3 order, and I want to start with 1.7.1. It refers to
4 exceptions from regular pay, and it does mention
5 vacation pay, holiday pay, sick leave. What's not in
6 there, which is common, is paid personal leave. So I
7 would ask for clarification, that you add paid personal
8 leave.

9 Next, I'd like to go to Section 1.8.1, which
10 is travel time. The rule says that is time spent on
11 travel for the benefit of the employer with an
12 exclusion. I would like to see that made consistent
13 with the Fair Labor Standards Act, which excludes
14 travel time outside of the normal business hours,
15 whether that's during the week or on the weekend. It
16 will avoid confusion about what is travel time in the
17 Colorado law versus federal law.

18 Next, I'd like to go to section 2.2.4. That
19 is the outside salesperson's exemption from coverage.
20 It refers to an employee must spend a minimum of
21 80 percent of the workweek in activities directly
22 related to his or her own outside sales.

23 I raised this issue before that that seems
24 arbitrary. It would certainly be hard to say that
25 somebody who spends 79 percent of their time on outside

1 sales is exempt, but if you get to 80 percent you're
2 not. And how are we going to prove that? It would be
3 much better if we went to a standard equal to the Fair
4 Labor Standards Act of a majority of the person's time.

5 Also, the rule has exemptions which do
6 essentially match what's in the Fair Labor Standards
7 Act with one big exception, and that is the computer
8 employees exemption. I would like to see that added
9 also to avoid confusion about whether those employees
10 qualify under Colorado law as they would under federal
11 law.

12 Next is section 5.2.4. This refers to the
13 required 10-minute rest period, and the new provision
14 now that a failure to authorize and permit that break
15 is compensable time and needs to be added. And that's
16 fine. My concern with this provision is that employees
17 who are not only told they can take a 10-minute break,
18 but are told they must take a 10-minute break will
19 sometimes skip that 10-minute break.

20 And as I read especially the first part of
21 this subsection, it doesn't make it clear that if the
22 employer has authorized and permitted the break and the
23 employee just does not take it, that should not be
24 compensable. The employee should not be able to skip
25 breaks, and then, on termination, provide a list of

1 times he or she claims he or she didn't get the break,
2 although it was authorized, permitted, and in some
3 cases, they were told to take the break.

4 The final section I want to discuss,
5 section 6.3.1, uniforms. This is mostly unchanged, I
6 see, from the existing rule. However, the subpart A
7 refers to uniforms that are plain and washable. Then
8 the second part refers to ordinary plain and washable
9 street wear.

10 So my confusion and that of people who call
11 me asking about it is, what is the difference between
12 plain and washable in the first section, and ordinary
13 plain and washable street wear. If there is no
14 difference, let's take that out and we'll combine those
15 subsections. If there is a difference, we need to know
16 what -- what is street wear. It's too vague a term.
17 So I'd ask that if you have some idea of what the
18 people in your division are supposed to -- how they're
19 supposed to interpret that, that it be put in there so
20 it's not left so vague. That's all I have.

21 MR. MOSS: Thank you. If I could ask you a
22 question just to follow up. You can feel free to
23 respond in writing rather than on the spot, but on the
24 computer employees rule, you mentioned -- and I
25 appreciate you briskly moving through, but in 2.5.2

1 (b), is there a particular aspect that you would
2 recommend changing?

3 MR. BLOCK: 2.5 -- sorry. Just a minute, let
4 me find it here.

5 MR. MOSS: Take your time.

6 MR. BLOCK: Pages are out of order. 2.5, you
7 said?

8 MR. MOSS: 2.5.2(b), just if there are
9 specifics that you think need to be changed or
10 clarified.

11 MR. BLOCK: Oh, okay. So you're on the
12 professional exemptions, right?

13 MR. MOSS: Correct.

14 MR. BLOCK: Oh, I see. The computer is in
15 there, but it's not in the earlier provision. I
16 suppose in that 2.5.2(b), it would be better to clarify
17 that referring to the FLSA as to how it defines
18 computer employees because it goes into more specifics
19 about who they are, what types of jobs qualify.

20 MR. MOSS: Thank you.

21 MR. VORTHMANN: Good afternoon. I'd like to
22 be the first one to thank you for turning on the air.
23 I appreciate that.

24 Good afternoon, Director Moss. My name is
25 Chad Vorthmann, V-o-r-t-h-m-a-n-n. I am the executive

1 vice president of Colorado Farm Bureau, but I am here
 2 today on behalf of the Colorado Agriculture Council and
 3 its more than 20 member organizations in support of the
 4 agriculture-related provisions in the Colorado Overtime
 5 Minimum Pay Standards order number 36.

6 While we understand the intent of the draft
 7 order, we will be submitting written comments in
 8 addition to my testimony here today to suggest language
 9 to better clarify the department's intent regarding the
 10 applicability of the new proposed order.

11 Colorado's agricultural production is
 12 diverse, very diverse, ranging from dry land wheat and
 13 irrigated corn production on the eastern plains to
 14 alfalfa and potatoes in the San Luis Valley. Livestock
 15 raising occurs across the state of Colorado, but
 16 dominates the Western Slope. And specialty ag
 17 production including our famous Rocky Ford cantaloupe,
 18 Palisade peaches, aquaculture nurseries and
 19 greenhouses, as well as our emerging wine industry is
 20 spread from the Arkansas River Valley to the northern
 21 Front Range and Grand Valley of the Western Slope.

22 With this diversity comes the need for
 23 diverse employees, skills, and talent. We appreciate
 24 the dialogue we've had with the department in
 25 preparation for this rulemaking and are pleased that

1 the draft proposed COMPS order number 36 recognizes the
 2 complexity and uniqueness of Colorado's agriculture
 3 industry, as well as the need to protect agriculture
 4 workers and food producers and thereby consumers
 5 against mostly financially burdensome provisions of the
 6 proposed order.

7 In our prior informal written comments to the
 8 department, not only did we try to demonstrate the
 9 uniqueness and diversity of the agriculture industry,
 10 we also tried to demonstrate how agricultural producers
 11 are price takers, not price makers, and are, with the
 12 exception of some specialty sectors of the industry,
 13 forced to accept whatever price is being offered for
 14 their commodities.

15 Further, we tried to demonstrate how
 16 circumstances across the country and around the globe
 17 impact those commodity prices and farm income. This
 18 was underscored by the University of Colorado's Leeds
 19 School of Business economic outlook that has painted a
 20 somber picture for Colorado's ag industry for several
 21 years.

22 Past reports stated that the agriculture
 23 producers are "weathering a storm of commodity prices,
 24 trade uncertainties, and unfavorable economic
 25 conditions." And quoting another section, "Someone is

1 making money in Colorado ag and food systems, it just
2 may not be the farmers and rangers."

3 No matter how efficient a farmer or ranger's
4 operation may be or how much planning they do and how
5 much management they employ to control costs, including
6 labor costs, in a low margin, commodity-driven
7 business, the potential to be operating at a loss is
8 never far from reality.

9 Further illustrating this is that more than
10 85 percent of food costs cover marketing, processing,
11 wholesaling, distribution, and retailing with farmers
12 and ranchers just taking home 14.6 percent from every
13 consumer food dollar.

14 For Colorado's producers, a wheat grower
15 receives \$0.11 on two pounds of bread that retails for
16 3.79. A beef producer gets just \$1.72 for a one-pound
17 top sirloin steak retailing for 10.49. A gallon of
18 fat-free milk that retails for \$4.09 returns just \$1.71
19 to the dairy farmer. And a \$10.99 six-pack of beer
20 returns just \$0.04 to the farmer.

21 Avoiding burdensome regulations allows
22 smaller farms to survive market swings and slows
23 consolidation of agriculture into fewer larger farms
24 and ranches. Policy proposals should recognize these
25 trends to ensure they are not counter to the interests

1 of consumers, rural communities, and policy makers.

2 In closing, I want to say again we appreciate
3 the department's intention and consideration of the
4 concerns we have raised as an industry and look forward
5 to the continued dialogue. I brought an additional
6 copy of my testimony and ask that it be submitted as
7 part of the record for the proceedings. Thank you.

8 MR. MOSS: Thank you. I'll just ask, does
9 the written testimony have anything other than what you
10 said?

11 MR. VORTHMANN: It is extended, yes.

12 MR. MOSS: Okay. Please hand it to the
13 reporter, and it will be appended. Thank you. If you
14 could hand it over now. I would just ask the reporter
15 to flag in the transcript where that is appended.

16 THE REPORTER: Yes.

17 MR. SANTO: Good afternoon. My name is
18 Michael Santo. I'm with the law firm of Bechtel,
19 Santo, and Severn in the Western Slope of Colorado,
20 specifically Grand Junction. We principally work with
21 small employers who are trying to comply with the order
22 and, in doing that, are here to ask the department to
23 clarify a number of the issues that are in the order
24 which appear confusing.

25 For example, if you look at section 1.4, it

1 defines employee as "The purpose of the COMPS order
2 relevant factors in determining whether a person is an
3 employee include the degree of control the employer may
4 or does exercise over the person and the degree to
5 which the person performed work that is the primary
6 work of the employer."

7 You have in there the word "include,"
8 limiting it to just those two factors. This statement
9 is inconsistent with Colorado case law, specifically
10 Soft Rock Geological Services, which states that all
11 relevant factors must be considered. And so we would
12 ask the department to clarify that those factors can
13 include, but are not limited to those factors.

14 The second clarification we ask concerns the
15 duty basis test. The first one being the
16 administrative employee test, section 2.21. If you
17 look at that first sentence, it states that "The
18 individual must directly serve the executive and
19 regularly perform duties."

20 Let's just take that term, "the executive."
21 Executive, of course, is defined in executive and
22 supervisor, but that implies that there are more than
23 one executive in the organization. Yet, 2.21
24 specifically identifies that the employee must directly
25 serve the executive.

1 So is it the division's, the department's
2 intent to only cover by this administrative employee
3 exemption those individuals who specifically report to
4 the CEO and no other individual? Because if you look
5 on the rest of it, it would appear that there are other
6 qualifications that then must be shown once the person
7 is shown to work with the executive.

8 Perhaps that should say an executive or
9 executives, plural. But by limiting it to only those
10 individuals, the entire administrative exemption, to
11 only those individuals who report directly to the
12 executive substantially limits the administrative
13 exemption, particularly in comparison to how that is
14 applied by the Fair Labor Standards Act. It creates
15 confusion particularly for small employers as to whom
16 they can classify as exempt under the administrative
17 exemption.

18 The next test, 2.22, the executive exemption,
19 one of the tests, the final test says, "The employee
20 must spend a minimum of 50 percent of the workweek in
21 duties directly related to supervision." Of course the
22 term "supervision" is not even defined in COMPS. So
23 there's no way for employers, small employers in
24 particular, to understand what is meant by the term
25 supervision.

1 Did the department, for example, mean it to
 2 be the same thing as the Fair Labor Standards Act,
 3 which doesn't use that term either, but instead uses
 4 the term "management"? And so those two terms create
 5 inconsistent -- or create confusion for small employers
 6 trying to understand, is it supervision, is it
 7 management? What is it?

8 In addition, the Fair Labor Standards Act
 9 looks at the primary duty basis test, to what is the
 10 individual's primary duty. The example I always use is
 11 a fireman. What does a fireman spend the majority of
 12 their time doing? Well, thankfully for all of us, it's
 13 not fighting fires. Well, what is their primary
 14 duties? Fighting fires.

15 The division has taken that, the department
 16 has taken that to mean that the individual must spend,
 17 in the COMPS order, 50 percent or more of their time.
 18 That would require this executive exemption person to
 19 spend 20 to 25 hours a week hiring, firing, creating
 20 performance reviews, doing performance improvement
 21 plans. That's a substantial amount of time.

22 I have to admit I don't know a lot of people
 23 who spend 20 to 25 hours only engaged in those
 24 activities, and so we request the department change
 25 that 50 percent threshold to be the primary duty, not

1 simply 50 percent.

2 The next issue concerns section 5, which goes
 3 into the rest break issue. One of the hallmarks of all
 4 wage and hour laws -- and I'm going to include the
 5 Colorado Wage Act, the Fair Labor Standards Act and the
 6 previous minimum wage order -- looked at paying
 7 nonexempt employees for time worked.

8 This order specifically changes that, in
 9 essence requiring small employers to pay employees for
 10 time not worked because the requirement to add 10, 20,
 11 30 minutes on at the end of the day for additional time
 12 not worked.

13 Addition [phonetic], section 5 has an
 14 inconsistent application if you looked at it. If the
 15 employer has the employee work through lunch, the
 16 employer is permitted to compensate the employee for
 17 that time worked over the lunch hour. But the
 18 department and in COMPS is not permitting employers to
 19 do that with respect to breaks.

20 So does that mean we're eventually going to
 21 see a claim that an employee who works over lunch now
 22 must receive not only the 30 minutes they worked
 23 through lunch, but additional 30 minutes after work
 24 when they're not working? That is an inconsistent
 25 application of law. We would request a clarification

1 on that.

2 Finally, the final thing I'm here to address
3 is that I would ask the department to recognize that
4 while all of the speakers until myself have come up
5 from Denver, you represent more than just Denver. You
6 have an entire state, an entire region.

7 We on the Western Slope do not have the same
8 cost of living as Denver. We do not have the same
9 housing prices. We do not have the same gas prices.
10 We do not have the same food prices. We commute a
11 whole heck of a lot less. Keep in mind that you
12 represent the entire state, not just Denver.

13 And so in particular with respect to those
14 salary basis tests, you're going to cause substantial
15 problems for small employers in rural communities and
16 on the Western Slope with respect to those numbers.
17 Those may be Denver numbers, but I can tell you they
18 are not Grand Junction, Delta, Montrose, Durango.
19 Those are different numbers. Thank you very much for
20 your time today.

21 MR. MOSS: Thank you. If I could ask a
22 follow-up.

23 MR. SANTO: Of course.

24 MR. MOSS: I knew I could ask a follow-up so
25 we could go dive into the weeds of the rules like you

1 did, so I appreciate that.

2 MR. SANTO: Attorneys love to dive into
3 the weeds. Don't put that into the record.

4 MR. MOSS: On the rule for an employee, I
5 appreciate your points about potential ambiguities in
6 the language. However, we copied the new language of
7 8-4-101(5) of HB 19-1267, which takes effect in
8 16 days. Is it your view that we should clarify beyond
9 or change the statutory text to provide more clarity?

10 MR. SANTO: Yes. It would be helpful.
11 Because, for example, 8-70-115 provides for nine
12 factors that can be used to determine whether or not
13 the individual is an independent contractor or worker.
14 Softrock Geological Services said every factor should
15 be considered when determining whether the worker is an
16 employee or an independent contractor, yet the
17 beginning part of that test specifically focuses on
18 including. And so we would just ask that it say
19 including, but not limited to.

20 MR. MOSS: Thank you.

21 MR. SANTO: Thank you.

22 MR. CHEVALIER: Good afternoon. My name is
23 Lorin Chevalier. I'm with PeopleCare Health Services.
24 I'll spell my name. First name is L-o-r-i-n. Last
25 name, C-h-e-v-a-l-i-e-r.

1 So I'm with PeopleCare Health Services, which
2 is a home care provider. We provide assistance for
3 children with disabilities, for the elderly. We work
4 primarily through the Colorado Medicaid program, and we
5 provide care for roughly 800 Medicaid consumers
6 throughout the state of Colorado, all across the state.
7 I'm here to support the wage order. It is important to
8 us to be able to attract and retain good employees,
9 both in our administrative roles, as well as in our
10 field caregiver roles.

11 My primary point is one of bringing to your
12 attention a potential unintended consequence that needs
13 to be addressed so that we can continue to ensure the
14 delivery by our entire industry of quality care to the
15 Medicaid consumer population throughout the state of
16 Colorado.

17 To that point, we have also recently
18 supported the Colorado minimum wage increase.
19 Likewise, we've supported the Denver minimum wage
20 increase. We have had the pleasure of meeting and
21 speaking directly with Executive Director Barela and
22 with Pat Teegarden, who was just -- looks like he
23 stepped out -- on those topics.

24 And again, it's all part of what our industry
25 needs to do, to raise wage levels, to provide good

1 living standards for employees who are delivering
2 personal care services under the Colorado Medicaid
3 program, as well as supporting the administrative
4 employees in our offices who support all of the care
5 management and other administrative responsibilities of
6 providing care through the Medicaid program.

7 Where there's a challenge is that we have to
8 be able to cover all of the cost increases that are
9 coming at us regardless of what direction they're
10 coming from. So while the increase in the minimum --
11 in the overtime exemption rate will cause some cost
12 increases to us, that's acceptable. The overtime
13 increases will bring additional cost increases to us.

14 We also are currently in a challenging
15 situation for -- due to the shortage of R.N.s, of
16 skilled nursing talent in Colorado and nationwide. So
17 our industry is seeing our R.N.s being pulled away by
18 facilities such as, you know, hospitals and others that
19 can pay more than we can under Medicaid reimbursement.
20 So we've got to figure out a way to cover that cost.

21 And we also have additional cost increases
22 that are coming from federal mandates. There is a new
23 IT requirement that is bringing additional costs
24 effective January 1, along with some inefficiencies
25 that we have to be able to cover.

1 And there was legislation passed this past
2 session, Senate Bill 19238, which requires new training
3 programs that also carry with it additional cost
4 increases, along with just the standard increases in
5 health insurance and liability insurance and in
6 ensuring network -- IT network security to meet the
7 requirements of HIPAA and other federal IT
8 requirements.

9 So all of those are the costs that we need to
10 maintain. Our challenge is that as we work with the
11 Colorado Medicaid administrator, which is the
12 Department of Healthcare Policy and Financing, their
13 primary focus on determining reimbursement rate
14 increases is based only on one subset of all of those
15 cost increases.

16 They're only looking at the increase in the
17 minimum wage, both statewide and in Denver, and looking
18 to allow or request rate increases to cover that
19 component of our operating expenses, ignoring the cost
20 increases from the increase in the overtime exemption
21 level, as well as all of the other cost increases I've
22 just mentioned.

23 So the net effect, potentially, is if we
24 can't cover all of those costs, then we can't afford to
25 provide care for the Medicaid consumers. And there's

1 about 4,000 of them in the city of Denver alone, and
2 statewide in the programs that we serve, the number is
3 closer to 20,000. So there's a large population
4 statewide who are at risk of losing the necessary
5 supports if organizations like PeopleCare are not able
6 to cover all of our costs.

7 So all of that really implies that we need to
8 collaborate, coordinate with Department of Healthcare
9 Policy and Financing. Again, I know Director Barela,
10 Executive Director Barela and Pat Teegarden are on it
11 and they're aware of it. But I want to underscore that
12 there is the potential of loss of access for care to a
13 large Medicaid population if we can't make sure we're
14 covering all of these cost increases with reimbursement
15 rate increases.

16 And just one final bit of reality is that
17 because of the Denver minimum wage increase, we are
18 seeing providers like ours pull out of the Denver
19 market already effective January 1, and we're getting a
20 large number of referrals to take on those cases. And
21 sadly, we have to turn them down because we can't
22 take -- we could not operate and provide care with the
23 City of Denver's new minimum wage and all of the other
24 cost increases without losing money and jeopardizing
25 our ability to serve the rest of the population that we

1 serve.

2 So that's where I request your assistance in
3 collaborating and working together, you know, with the
4 home care and home health industry, along with the
5 Department of Healthcare Policy and Financing to make
6 sure that we are able to cover all of the increases to
7 meet the needs of the Medicaid population. Thank you.

8 MR. MOSS: Thank you. One question. If you
9 can, can you tell us how many workers, whether exactly
10 or approximately, PeopleCare has.

11 MR. CHEVALIER: We are over 800 workers
12 across the state.

13 MR. MOSS: Thank you.

14 MS. JENSBY: Good afternoon. My name is
15 Ellen Jensby, J-e-n-s-b-y. I'm the public policy
16 director for Alliance. And we weren't sure of the
17 format today, so I actually have a couple of colleagues
18 here. We planned to present our testimony together if
19 that's okay for them to come up as well.

20 MR. MOSS: That's fine.

21 MS. JENSBY: Okay. Great. So Alliance is a
22 non-profit statewide association of community-centered
23 boards and program-approved service agencies that
24 provides services to people with intellectual
25 developmental disabilities all across the state of

1 Colorado.

2 The vast majority of these services are
3 provided through Medicaid home and community based
4 services waiver programs, similar to what the last
5 commenter said. Reimbursement rates are established by
6 the state and CCBs and PASAs receive these
7 nonnegotiable reimbursements following the delivery of
8 services.

9 They cannot charge the people they serve any
10 money for the services that they provide. Outside of
11 fundraising, some small state programs, and
12 reimbursement from the Division of Vocational
13 Rehabilitation under CDLE for a few employment
14 supports, Medicaid is the only payer for these
15 services, which are not available through private
16 insurance.

17 IDD providers rely on Medicaid reimbursements
18 for 90 percent or more of their revenues. Therefore,
19 they cannot increase their revenues to cover increasing
20 costs without increases in reimbursement rates. When
21 costs are increased through regulatory changes, such as
22 the COMPS order, there is no automatic mechanism to
23 increase reimbursement rates to cover them, placing
24 strain on their ability to serve a population of people
25 who rely on these supports for the most fundamental

1 needs.

2 Since 2012 CCBs and PASAs were specifically
3 exempted from a Colorado minimum wage order, both
4 explicitly by the 2012 advisory bulletin, as well as,
5 arguably, because their business functions did not fall
6 under any of the four workforce categories named in the
7 order.

8 The proposed COMPS order would newly cover
9 these entities. CCBs and PASAs are committed to
10 upholding the rights of their employees and paying fair
11 wages even though their ability to increase
12 compensation is limited by the reimbursement rates they
13 receive.

14 Alliance does not oppose the application of
15 the order to these entities, but we do request some
16 narrow exemptions without which the order will place
17 undue burden on these providers to continue to provide
18 quality home and community-based services.

19 With that I'll turn it over to my colleague,
20 Randy Brodersen to talk about the salary threshold and
21 the duties test.

22 MR. BRODERSEN: Thank you. My name is Randy
23 Brodersen, B-r-o-d-e-r-s-e-n. I'm the executive
24 director of North Metro Community Services. We're the
25 community center who serve people with the intellectual

1 and developmental disabilities in Adams County. And
2 I'm going to talk to you a little bit about the salary
3 threshold and the duties test proposed in the order.

4 First of all, we would request agencies
5 providing services through Colorado Medicaid home and
6 community-based services waivers being exempt from the
7 state-level salary threshold.

8 Because providers rely almost exclusively, as
9 you've heard in the last two testimonies, on
10 nonnegotiable state-established reimbursement rates for
11 their revenue. And in the case of most IDD
12 organization, that accounts for 90, 95 percent of their
13 revenues.

14 We cannot charge customers for the services
15 they deliver, and because there will not be a
16 commensurate rate increase to cover costs of the
17 increasing salary threshold, these agencies will be
18 disproportionately negatively impacted by a state-level
19 salary threshold.

20 Just for example, the proposed salary -- or
21 the proposed rate increase for next year in the
22 governor's budget is .29 percent, and obviously, that
23 does not begin to cover the costs of some of the things
24 that have been referred to here.

25 In other states that have adopted a higher

1 salary threshold than the federal one, compliance has
2 put strains on providers to continue to offer services
3 to populations who rely on them for the most basic
4 functions of their daily lives.

5 The salary threshold will hit rural
6 communities especially hard. For example, one of our
7 rural provider agencies, only five of the agency's 200
8 employees would be eligible for exempt status by 2020
9 in the proposed threshold. Because overtime is
10 incredibly unpredictable in the sector that supports
11 people around the clock, moving employees to an hourly
12 basis creates significant issues for agencies in
13 predicting their employment costs and for employees in
14 predicting their pay. People simply would not know
15 from pay period to pay period what they were going to
16 earn, if they get no overtime this pay period and
17 20 hours of overtime the next pay period.

18 The salary threshold also creates issues in
19 the workplace morale when a significant number of
20 employees who have been exempt for years or even
21 decades suddenly have to keep time sheets and track
22 every phone call, text, and e-mail. These morale
23 issues are a serious blow in the sector that already
24 experiences nearly 40 percent turnover with our direct
25 service professionals and struggles to compete with

1 fast-food chains and the like for employees for really
2 challenging and responsible jobs.

3 Furthermore, many of the midlevel employees
4 in our field view themselves as professionals and
5 desire the recognition and flexibility that comes along
6 with being considered an exempt employee.

7 THE REPORTER: Can you slow down a little
8 bit?

9 MR. BRODERSEN: Okay. As we attempt to
10 tackle the workforce crisis facing disability
11 providers, which exists both on the state and national
12 level and is only predicted to grow over the next
13 decade, every opportunity to professionalize our
14 workforce is needed. The state level salary threshold
15 would hinder rather than help these efforts.

16 We'd also request the duties test for exempt
17 employees mirror that in the Fair Labor Standards Act.
18 In the disability field, we see two issues in the
19 following exemptions. The executive and supervisor
20 issues of -- by narrowing the test duties to an
21 employee must perform at least 50 percent of their
22 workweek in direct duties related supervision, of the
23 number of employees that would be considered exempt has
24 dramatically decreased.

25 Due to the unpredictable needs of the people

1 served and recruitment retention challenges faced by
 2 IDD providers, many supervisors, even executive
 3 directors, at some of our smaller agencies regularly
 4 have to jump in and provide care to -- for waiver
 5 participants which would place their exempt status in
 6 question.

7 And administrative employees, because the
 8 order goes back to, I believe, what Mr. Santo was
 9 referring to, requires employees to report directly to
 10 the chief executive officer, a number of program
 11 managers would no longer be exempt. So that is an
 12 issue too we would need some clarification on.

13 By keeping the duties test the same as the
 14 Fair Labor Standards Act, the order would reduce
 15 confusion among employers and employees.

16 And with that, that's pretty much all I have.
 17 I want to turn things over to my colleague Laura Ball
 18 from the CCB in Boulder to talk about exemptions from
 19 the orders, rest and overtime provisions.

20 MS. BALL: Thank you. My name is Laura Ball,
 21 and I'm the human resources director for Imagine, which
 22 is a community center board serving both Boulder and
 23 Broomfield Counties. My comments today will cover some
 24 narrow exemptions for the rest period and overtime
 25 provisions of the wage order.

1 First, we request the wage order rest period
 2 provisions not apply to employees of waiver providers
 3 when performing certain services because of the nature
 4 of the work does not practically allow for a guaranteed
 5 rest period.

6 By law providers are responsible for ensuring
 7 the health and safety of the waiver participants they
 8 serve. Many individuals with disabilities served under
 9 Colorado's Medicaid's waivers require constant or near
 10 constant supervision with activities of daily living
 11 that cannot be scheduled.

12 The workers providing these services, called
 13 direct support professionals, are assisting waiver
 14 participants with multiple aspects of their daily
 15 lives. For example, the same employee may support one
 16 person with toileting, taking medication, and managing
 17 a panic attack all in the same hour.

18 Additionally, the home and community-based
 19 service model emphasize individualized services with
 20 efficient staffing to make people's needs in order to
 21 allow for people to live in the least restrictive
 22 setting. For federal regulations and also in alignment
 23 with best practice, providers are increasingly required
 24 to provide waiver participants with meaningful
 25 community activities, including employment, in which

1 they can be as independent as possible.

2 This means that an individual or a small
3 group of individuals may be working at, volunteering
4 for, or visiting other community businesses or
5 locations not owned or operated by the provider. Often
6 there is only one worker on site to provide support,
7 making a guaranteed rest period impractical.

8 Additionally, requiring providers to pay
9 staff for rest periods, not guaranteed rest period,
10 periodically is also -- it would take increased costs
11 without providing a mechanism to increase revenue to
12 cover this cost.

13 Therefore, we request narrow exemptions to
14 encompass the following services and situations:
15 Residential habilitation; supported employment;
16 services that involve supported individuals to
17 participate in community activities; personal care and
18 respite services that provide a one-on-one basis; and
19 services provided when the individual served would be
20 at risk to themselves or others if left unsupervised.

21 We have proposed this specific language in
22 our written comments, which we submitted electronically
23 earlier today. And we'd be happy to work with the
24 department on this language between now and the
25 effective date of the order.

1 Next, the order's requirement to pay overtime
2 over 12 hours should not apply to employees providing
3 residential and respite services to HCBS waiver
4 participants. Because of the supervision and support
5 of the needs individuals receiving residential waiver
6 services, agencies have unique staffing models to
7 utilize 16-hour, 18-hour, and two-and-a-half-day shifts
8 to ensure continuity of support and minimize disruption
9 in their homes. These shifts are also attractive for
10 our DSPs because they can work shorter weeks.

11 Because providers would receive no additional
12 funding to compensate for paying overtime to the staff,
13 making them subject to the way the order overtime
14 provisions would require drastic staffing changes which
15 would be problematic for providers, employees, and the
16 individuals they serve.

17 Respite services can also provide an entire
18 day with only one respite worker available to support
19 the individual. Again, the goal of home and
20 community-based services is to provide people with
21 disabilities the support that allows them to live in
22 homes and communities of their choosing with little
23 disruption as possible. Unique staffing models in
24 these individual homes makes it possible while also
25 helping with the recruitment and retention challenges

1 we are faced with.

2 We have submitted exempt language for the
3 overtime section in our written comments, and again,
4 we'd be happy to work with the department to tailor the
5 language if needed. Thank you so much for the
6 opportunity to speak today.

7 MR. MOSS: Thank you.

8 MS. SCHMIDT: Good afternoon, Director Moss.
9 My name is Lauren Schmidt, S-c-h-m-i-d-t. I am
10 testifying today in my capacity as the acting executive
11 director for the Colorado Outward Bound School. I'm
12 here with several members of the Outward Bound
13 community, including Sarah Hartley, the chair of our
14 board of directors from the law firm of Bryan Cave
15 Leighton Paisner; Greg Vallin from the board of
16 directors from the law firm of Brownstein Hyatt Farber
17 Schreck; and Peter O'Neil, our outgoing executive
18 director.

19 I have several former Outward Bound
20 instructors here as well. I think it would be helpful
21 for everyone here on behalf of Outward Bound to stand
22 just so the department can see that the COMPS order is
23 one that is extremely important to us.

24 MR. MOSS: I'll note there are seven folks
25 here from Outward Bound.

1 MS. SCHMIDT: Thank you. So we have
2 submitted written comments requesting an exemption from
3 the proposed COMPS order. We have also solicited
4 letters of support from a number of former Outward
5 Bound instructors. I won't re-read our comment letter
6 here, but I do think it's helpful to have some
7 background on what the Colorado Outward Bound School
8 does for purposes of this discussion.

9 So the Colorado Outward Bound School is part
10 of the national and international Outward Bound system.
11 We are the first Outward Bound School in the United
12 States, and we have been operating continuously in
13 Colorado since 1962. We are a leader in the field of
14 outdoor experiential education.

15 Our core curriculum consists of multi-week
16 wilderness expeditions using the Colorado wilderness as
17 our classroom. Those expeditions tend to last anywhere
18 between one week and 81 days. The majority of our
19 employees are our instructors who we also refer to as
20 our field staff. And we have approximately 150 field
21 staff that are operating in Colorado.

22 Generally, these are temporary seasonal
23 employees. Our high season is our summer season,
24 although we don't operate exclusively in the summer.
25 Our instructors are extensively trained by the Colorado

1 Outward Bound School in both technical outdoor skills
2 and our specialized curriculum, which focuses on
3 leadership and character development.

4 They are with our students in the field for
5 days, weeks, or at times even months. Although our
6 instructors work and rest in the field, they are
7 technically on call 24 hours a day to be available for
8 students. And as such, we have always paid them a per
9 diem wage.

10 When our instructors return from the field,
11 they are often working at our base camps, the largest
12 of which in Colorado is our Leadville base camp, where
13 we run approximately 75 percent of our operations. And
14 they then stay on the base camp and sleep and eat at
15 the base camp with our students. So in that sense,
16 it's somewhat equivalent to a summer camp when they are
17 on the base camp.

18 On a federal level, all Outward Bound
19 Schools, including Colorado Outward Bound, are exempt
20 from the Fair Labor Standards Act pursuant to the
21 exemption for seasonal recreational establishments.
22 And we have submitted a 2006 opinion letter from the
23 U.S. DOL Wage and Hour Division to that effect.

24 Since we have started operating in Colorado
25 in 1962, the Colorado Outward Bound School has not been

1 within the industry category subject to the current
2 version or prior versions of the Colorado minimum wage
3 order. And we have been operating for 57 years under
4 that presumption. However, without an exemption in the
5 proposed COMPS order, it appears that the school would
6 likely be covered.

7 Moving away from the per diem model for our
8 course instructors, assistant instructors, horse
9 directors, and logistical support staff to a wage and
10 hour overtime model would almost certainly force us to
11 stop running the long-distance wilderness courses that
12 are the foundation of our educational programming.

13 We would submit that the field instructor job
14 is more analogous to an in-residence position, like the
15 ones reflected in proposed rule 2.2.7. And I'm
16 referring here to the description of the in-residence
17 property manager, because, in the basis, purpose, and
18 findings, because I think it's analogous.

19 As you've described it, those positions
20 require people to be expected to be on call at all
21 hours, making tracking and compensating overtime and
22 arranging for regular breaks difficult or impossible.
23 That's very similar to the model that we have for our
24 field staff when they're operating in the wilderness.

25 So as a broad matter, the hourly pay and

1 overtime model is not conducive to the outdoor rec
2 industry and particularly the segment of the outdoor
3 recreation industry that leads long-distance wilderness
4 expeditions.

5 So we would respectfully submit that this is
6 an industry that is vitally important to Colorado and
7 that the Colorado Outward Bound School is an
8 organization that's important in Colorado, and we would
9 request an exemption specific to the Colorado Outward
10 Bound School or more generally applicable to outdoor
11 field staff workers as set forth in our comments.

12 Thank you very much for your consideration
13 and the opportunity to testify today.

14 MR. MOSS: Thank you.

15 MS. SCHMIDT: Thank you.

16 MR. MOSS: We'll take a couple more speakers.
17 But I'll note that I'll take a break at 4:43 because
18 that will have been 90 minutes straight.

19 Was anyone else already in line or --

20 MR. TURNER: Good afternoon. Andrew Turner,
21 T-u-r-n-e-r. I'm a partner of the Kelman Buescher firm
22 here in Denver, and I'm here this afternoon
23 representing the Hispanic Affairs Project, referred to
24 as HAP. As the Division knows, HAP is a grass roots
25 organization of farm workers, immigrant workers, and

1 allies in Mesa, Delta, Montrose, San Miguel, Ouray, and
2 Gunnison Counties.

3 HAP appreciates the Division's efforts to
4 modernize the wage order. I'd like to applaud you for
5 that effort, but I'm here today to express our profound
6 disappointment in the preliminary results.

7 Those results that exclude thousands of
8 Colorado farm workers, whom we all depend upon when we
9 sit down for our meal breaks, from overtime, minimum
10 wage, and meal break protections themselves, those
11 results fly in the face of your statutory mandate.

12 Your statutory mandate is expressed in the
13 Colorado Minimum Wages of Workers Act. Section 86106
14 states that "The director shall determine the minimum
15 wages sufficient for living wages. The director shall
16 determine standards of conditions of labor and hours of
17 employment not detrimental to health."

18 What your statutory mandate doesn't say is
19 that the director shall establish the wages and hours
20 sufficient for uninterrupted profit. It doesn't say
21 that the director shall establish conditions sufficient
22 for competitiveness. It doesn't say that the director
23 shall establish conditions sensitive to commodity
24 pricing. Your mandate is sufficient for living wages
25 and sufficient for health.

1 Minimum wage and overtime rules that would
 2 leave 33 percent of farm workers in poverty are not
 3 sufficient for living wages. Eight, ten, twelve-hour
 4 days, workdays with no meal break are not sufficient
 5 for health.

6 And we just respectfully submit that HAP
 7 hopes that the division will focus on its statutory
 8 mandate that the general assembly passed through
 9 formerly. Thank you.

10 MR. MOSS: Thank you. Just let me line up
 11 two more folks. Sir, and then you can go next, miss.
 12 And then we'll take a break and then we'll take any
 13 more speakers.

14 MR. PERKO: My name is Charles Perko,
 15 P-e-r-k-o. My name is Charles Perko. I am the
 16 president of the United Steelworkers Local 3267 out of
 17 Pueblo, Colorado. I am a worker who is not from the
 18 Denver area, so I am here to represent all of those who
 19 come from areas that are not Denver, as a previous
 20 speaker specifically stated that you do represent.

21 Pueblo, while some people would say that we
 22 have a lower cost of living, it is not that much lower
 23 than many people think. Our housing costs are rising,
 24 and our gas prices are higher. There are a lot of
 25 costs that are on par -- with the exception of

1 exorbitant rent that you have in the Denver area,
 2 they're on par with what we see in Denver because we
 3 are Front Range.

4 The reason I'm here today is to speak
 5 primarily in support of the removing of the
 6 manufacturing exemption to the rules. I represent 150
 7 steelworkers in quality, clerical plan protection and
 8 few in the engineering department who, in many cases,
 9 we have a past practice that allows them break time.
 10 In many cases, breaks are built into their job because
 11 they work in batches.

12 I do however represent several employees who
 13 work 12 hours straight without a break. And if we
 14 codify that, as this rule does, the ability for them to
 15 take time away from their job or if the company does
 16 plead, as they often do, that they cannot shut the
 17 process down to provide for that break, that they
 18 provide some compensation for that time worked that
 19 otherwise they would not have to. I strongly believe
 20 that would incentivize the company to provide that
 21 break.

22 We have a process at the rail mill where
 23 rails pass by about once every minute. You can imagine
 24 for 12 hours a day staring at every inch of an 80-foot
 25 rail about 500 times in a 12-hour shift on average,

1 that in a blinking, strobing LED light, that can get
2 very tiring. And so 10 minutes in a four-hour period
3 should be a bare minimum for the amount of break time
4 that should be allowed under this rule. And it's a
5 great start.

6 I also serve as the rapid response
7 coordinator for District 12 here in Colorado. District
8 12 is the 11 western states, and I do this
9 for -- within our state. And as such I speak on behalf
10 of approximately 2,000 steelworkers, both in
11 manufacturing, the service industry, as well as
12 professional workers in the pharmacy field at grocery
13 stores throughout the state.

14 Because I speak for so many members in so
15 many different fields, I can honestly say that when it
16 comes to these sorts of exemptions that people are
17 asking for, narrow exemptions provide for -- wider
18 exemptions provide for wider exemptions, and finally,
19 we get to the spot where we were before, where entire
20 fields have been exempt from these very minimum
21 standards for what a worker should have to deal with in
22 their day-to-day working life.

23 And so I ask when you provide these
24 clarifications that many of these previous speakers
25 have been asking for, you err on the side of a minimum

1 of exemptions such that as many workers as possible are
2 covered.

3 I also strongly join my voice with all of
4 those who protest the exemption for farm workers. I
5 believe that they work so much harder than I do and
6 that they should be covered by the same wage laws as
7 well. Thank you.

8 MR. MOSS: Thank you. We'll take two and
9 then a break.

10 MS. RAY: Good afternoon. My name is Lorrie,
11 L-o-r-r-i-e. Last name is Ray, R-a-y. And I'm from
12 Employers Council. We have -- Employers Council is a
13 non-profit organization that helps employers in all
14 aspects of the employment relationship. We have about
15 4,000 employers that we represent. Most of our
16 employers have between 10 and 300 employees. And so we
17 really do represent most of the smaller employers.

18 And my concern always with regulations that
19 affect smaller employers is the manner in which they
20 can learn about the regulations, first of all, and that
21 they find the regulations confusing, particularly if
22 they conflict with federal law. So that is one of my
23 concerns about this wage order, is it does create a
24 number of conflicts with federal law that you really
25 have heard about already.

1 I also want to point out something that has
2 not been pointed out, and that is that most businesses
3 in Colorado are small. And we have a number of
4 non-profits in Colorado that are strapped for cash.

5 There's also, as has been pointed out, a
6 great deal of income disparity for those employers in
7 non-profits in the metro areas as opposed to lower-paid
8 rural areas. My fear is if you increase the salary
9 basis test to 42,500, it will send some of those
10 employers to surrounding states. That's already kind
11 of happened in Denver with some of the manufacturing,
12 and I'm concerned that that will continue to happen.

13 Another concern I have in regards to
14 confusion for employers, is on January 1st, employers
15 will have to start paying their exempt employees
16 \$35,568 a year. Then if your proposal goes through,
17 they'll have to start paying employees 42,000 -- 42,500
18 a year in the middle of the year. So they'll
19 effectively have two increases in one year, and I think
20 that this will create confusion for them.

21 I also believe that employees value time and
22 flexibility. More and more recruiters are recruiting
23 with the promise of flexibility. And indeed, one
24 popular proposal that employers are starting to offer
25 is a four-weekday workweek, four days, eight hours a

1 day. And this is another way to bring in employees
2 because not all employees are interested in pay, some
3 are much more interested in flexibility.

4 The other thing you should be aware of that I
5 don't hear talked about much is that employers will not
6 necessarily increase the pay to meet the minimum salary
7 basis test. What some employers will do is switch
8 their employees to non-exempt and then hold their hours
9 at 40 hours.

10 I do think this is a difficult time to do
11 this because of the very low unemployment in Colorado.
12 I think the marketplace -- because we have such low
13 unemployment, we have a stronger marketplace for
14 employees to apply at other jobs if they're concerned
15 about the salary basis.

16 When I look at our Employers Council surveys
17 and look at how many employers are paying below the
18 42.5 threshold, what I find is that the two industries
19 that are most impacted are the non-profits and the
20 hospitality and leisure. These are important
21 industries for our state, and I'm concerned we're
22 putting them at a disadvantage.

23 For the hospitality and leisure industry,
24 this is putting additional strain on them, especially
25 for hotels when they're facing intense competition from

1 Airbnb and the like.

2 We know how much non-profits are the fabric
3 of Colorado. Now, both the leisure industry and the
4 non-profit industry are industries that younger workers
5 often go into. They know they're not going to be paid
6 as much in those industries and, quite frankly, they
7 don't expect to spend their careers in those
8 industries, unless they go higher up into the
9 organization. These workers are often willing to trade
10 money for experience or the chance to do the work.

11 Finally, the 42,500 minimum salary base is
12 going to hurt businesses because they're going to have
13 two sets of increases they're going to need to think
14 about, the increase in January and the increase in the
15 middle of the year. And those businesses who are
16 budgeting right now for next year I think will have
17 difficulty with that.

18 I think we really underestimate the number of
19 small employers we have who are not -- don't even know
20 we have a hearing here today because they just aren't
21 tuned in in that way. They really are just trying to
22 survive in the current economy.

23 I thank you for your attention, and I will
24 also be submitting extended comments to your website.
25 Thank you very much.

1 MR. MOSS: Thank you. We'll take one more
2 speaker, then a break right after.

3 MS. MILLS: Great. Thank you, Director Moss,
4 and to the whole panel for being here. My name is
5 Melanie Mills, M-e-l-a-n-i-e, M-i-l-l-s. I'm the
6 president and CEO of Colorado Ski Country U.S.A. And
7 we represent 23 ski areas in all parts of the state and
8 of varying sizes, including several with a very small
9 number of year-round salaried employees.

10 I want to highlight some of the broad
11 concerns our industry has with the proposed overtime
12 exemption for salaried workers. We have concerns about
13 how this will impact seasonal businesses like ours that
14 fluctuate greatly by season and weather. The ski
15 industry's business at busy times is the mirror image
16 of the agricultural industries. Our busy times are
17 when the snow flies and children are out of school.

18 Ski industry employees are snow farmers. The
19 department partially recognizes this with a partial
20 overtime exemption from the COMPS order contained in
21 Rule 2.4.3 for hourly employees, and the FLSA
22 recognizes this with its broad seasonal employee
23 exemption.

24 Our business and number of guests fluctuate
25 greatly with the weather. Accordingly, many of our

1 employees work longer hours over the winter period and
 2 holidays when guests are on the slope and services are
 3 needed, just as the ag industry's hours fluctuate when
 4 the weather cooperates for growing and harvesting.

5 Over the summer and fall months, those same
 6 ski area workers are working less than full-time hours
 7 because off-season operations do not have the same
 8 urgency as the busy winter periods. Many areas are
 9 closed in the off-season, and salaried managers and
 10 coordinators work substantially fewer hours during
 11 these periods. They're enjoying the fruits of their
 12 labors during the busy season.

13 This is a lifestyle choice for many of our
 14 employees. These seasonal fluctuations are part of the
 15 expectations of every worker. They know when they are
 16 hired that they will work a lot in the ski season and a
 17 little in the off-season.

18 This is fundamentally different than many of
 19 the workers that we've been talking about today where
 20 they are unexpectedly subject to extensive overtime,
 21 week in and week out throughout the entire year.

22 I would also raise our concern about the
 23 statewide applicability of the overtime rule salary
 24 thresholds with no flexibility for rural or Western
 25 Slope areas outside of the Denver metro and Front Range

1 communities.

2 We're also concerned about the aggressive
 3 \$3,000 a year increase in the exemption which greatly
 4 exceeds the rate of inflation and the growth in our
 5 business.

6 The department should consider the challenges
 7 this proposed salaried overtime exemption will present
 8 for Colorado's seasonal outdoor recreation businesses,
 9 including the ski industry, the major economic driver
 10 of many mountain and rural communities in our state.

11 The department should also consider whether
 12 this rule should be applied uniformly across the state
 13 and the impacts of an annual \$3,000 increase between
 14 now and 2026.

15 We intend to submit a written comment in the
 16 coming days containing a more specific request for
 17 changes to the rule. And if I can, I'd be happy to
 18 answer any questions you have today.

19 MR. MOSS: Thank you. I have only one
 20 question, and it can definitely be left for the written
 21 comment because it's statistical. And it's that if in
 22 writing your comment you could indicate any estimate of
 23 how many folks would be potentially covered by the
 24 salary threshold because they fit into some duties
 25 test, either the executive, administrator,

1 professional, or other, so that we can be better
2 informed as to how many folks will be affected by the
3 salary because they qualify under some duties test.

4 MS. MILLS: Got it. Thank you.

5 MR. MOSS: Thank you. We'll now take a break
6 until 4:55. It is now 4:47. I thank everybody for
7 fitting in 21 speakers in barely an hour and a half so
8 far. So we'll try to keep mostly sticking to the five
9 minutes per person. Thank you.

10 (A recess was taken from 4:47 p.m. to
11 4:57 p.m.)

12 MR. O'NEIL: Thank you, Director Moss and
13 your colleagues, for giving me the opportunity to
14 speak. My name is Peter O'Neil.

15 MR. MOSS: So is that Peter?

16 MR. O'NEIL: Peter, yes. I'm a former
17 Colorado Outward Bound School -- often referred to as
18 COBS in my comments -- instructor, as well as former
19 executive director at COBS. I worked for the school
20 for 11 years in the field as an instructor and course
21 director. I also served as the executive director of
22 the school for eight years. So I understand the
23 business applications of how we are able to afford to
24 pay our field staff. And like I said, I was field
25 staff for 11 years being paid not a lot of money.

1 That's not why I did the job.

2 For those 11 years when I was in the field, I
3 was responsible for the welfare of our students,
4 including being responsible for their safety. The
5 school's mission using our spectacular wilderness
6 classroom, is to transform the lives of young adults
7 through challenge and discovery to make them better
8 leaders and to learn that there is more in them than
9 they know.

10 Working with our students is the most
11 inspiring job I've ever had. And when I was on duty
12 out in the wilderness, I worked 24 hours a day for 23
13 to 30 days at a time. I did not take the job for the
14 pay. It was the best job I've ever had. It was my
15 first post college graduate education, so to speak.

16 What I learned in those years was what it
17 takes to build and lead a high-performing team.
18 Following my immersive 11 years of leadership training
19 as a COBS field staff, I was admitted to the Stanford
20 Business School, and I went on to co-found three
21 different businesses. I would never have been set up
22 for this path in life if it wasn't for my 11 years as
23 field staff at COBS.

24 As a former instructor, I support providing
25 COBS with an exemption from the proposed wage and hour

1 COMPS minimum wage order. Being a COBS instructor is a
2 calling. It is akin to the Peace Corps and Teach For
3 America.

4 I'll tell a story, and then I'll end my
5 comments. Last week I had breakfast with Senator Mark
6 Udall. Mark and I share two things. We were both
7 Colorado Outdoor Bound School instructors for many
8 years, and we were both executive directors for COBS.
9 And we worked out in the field for those long,
10 grueling, multiday, sometimes a month at a time, jobs.

11 And Mark said to me, he said, "Peter,
12 remember what I used to say on the campaign trail when
13 the press would ask me, what was the best job you ever
14 had?" And his campaign handlers were adamant that he
15 shouldn't say this. And what he used to say was, "the
16 best job I ever had was being a Colorado Outward Bound
17 School instructor."

18 And his campaign handlers say, "Mark, you're
19 not supposed to say that, you're supposed to say a
20 senator or a congressman was the best job." And he said
21 he inevitably still said, "it was the best job I ever
22 had, being a COBS instructor."

23 And Mark has agreed to also put in some
24 comments because for him, this institution, which as
25 Lauren Schmidt said, started back in 1962, founded by

1 Charlie Gates, Bill Coors, and a woman who many people
2 don't know, Ruthie Brown, one of the founders of Aspen,
3 has been instrumental not only in changing the lives of
4 young students, but instructors such as myself.

5 So thank you for giving me the time to speak,
6 and hopefully, we qualify for an exemption.

7 MR. MOSS: Thank you.

8 MS. JOHNSON: Hi. Good evening. I'm Allyson
9 [phonetic] Johnson with ParentsTogether Action. I'm
10 here on behalf of 1,377 folks from Colorado who have
11 signed a petition that I would like to read out loud.
12 Parents Together Action is a group of about 2.5 million
13 parents from around the country who take action
14 together about sort of issues pertaining to parents and
15 affecting parents around the country.

16 The petition reads, "A strong healthy
17 workforce is critical to this economic growth. But as
18 the overtime plan currently stands, 206,000 people have
19 to wait until 2026 to get the overtime pay that they've
20 earned. I encourage you to increase the overtime wage
21 threshold more quickly than in the proposed rule so
22 that Colorado salaried workers can save for retirement,
23 for our kids' education and to afford housing and basic
24 healthcare."

25 So can I give you this pile of signatures

1 or --

2 MR. MOSS: If you can give it to the

3 reporter.

4 MS. JOHNSON: Sure.

5 MR. MOSS: If you can put a mark in the

6 transcript to note where it goes. Thank you.

7 MS. JOHNSON: Thank you very much.

8 MR. MOSS: Thank you.

9 MS. McMOORE: Hi. My name is Haley Shay

10 McMoore, M-c-M-o-o-r-e. I was made aware of your work

11 on overtime protections by Towards Justice, and I'm

12 here to share my story as someone who needs the

13 protections that you're working for.

14 I'm the first woman in my family to graduate

15 from college and have been working since I was 15. But

16 even with experience, work ethic, and education

17 credentials, I have not earned a living wage in

18 Colorado. I have worked as an educator, a community

19 organizer, and held a director role at a statewide

20 non-profit, routinely working in excess of 60 hours per

21 week.

22 I'm committed to the causes I served, but I'm

23 also committed to myself, my autonomy, and my financial

24 security. Without overtime protections, I have been

25 overworked and underpaid as a professional. This

1 prevents me from achieving elements of the American

2 dream I was told about. Not making a living wage and

3 being expected to work unpaid overtime hours has kept

4 me busy, exhausted, and further away from dreams of

5 home ownership or being able to provide for the

6 children I hope to one day have.

7 Your current plan will extend overtime

8 protections to salaries up to \$42,500 in 2020. I want

9 to tell you what it has been like for me to make

10 \$42,500 and less in Colorado. \$42,500 quickly becomes

11 \$2,800 a month. I'm lucky to pay 1300 for rent, which

12 is 300 below the average cost of rent in Denver. That

13 leaves about 1500 for bills and living. After my car

14 payment, insurance, student loans, and other bills, I

15 would regularly have about \$75 per week for food and

16 fuel and would regularly go into debt. Because only

17 money pays the bills, not experience, not flexibility,

18 only money.

19 I urge you to phase in protections for

20 salaries over \$42,500 more quickly because cost of

21 living in Colorado demands it. Thank you for making

22 overtime protections a priority. This is about so much

23 more than labor. It is an issue of gender equity,

24 empowerment, and creating opportunities to break cycles

25 of generational poverty.

1 MR. MOSS: Thank you. You don't mind a
2 follow-up question?
3 MS. McMOORE: Sure.
4 MR. MOSS: Feel free not to answer on the
5 record, but if you can, can you tell us what level or
6 levels of pay you received when you were working over
7 60-hour weeks?
8 MS. McMOORE: \$38,000.
9 MR. MOSS: And about how many hours did you
10 say you worked?
11 MS. McMOORE: Probably 50 hours when we were
12 not working on campaigns. But upwards of 65 when we
13 were on campaigns.
14 MR. MOSS: Upwards of 65, you mean over 65?
15 MS. McMOORE: Yes.
16 MR. MOSS: Thank you.
17 MS. McMOORE: Thank you.
18 MR. LEWIS: Good evening. Alan Lewis,
19 A-l-a-n, L-e-w-i-s, speaking on behalf of Natural
20 Grocers. We're a 65-year-old family-run Colorado
21 company. Six stores in Denver itself and 740 in the
22 state. We also operate 160 stores in 20 different
23 states.
24 Just as a reminder, we're a leader in wages
25 for entry-level and management employees. We provide

1 free nutrition education, extensive employee
2 development. Our starting wage for someone with a high
3 school equivalent is \$13 an hour, higher in certain
4 areas, in the ski resorts, as we've heard, because it's
5 more expensive.
6 All of our employees are full-time. They are
7 required to take their breaks or they get written up,
8 including their lunch. They're required to be on the
9 clock when they read their e-mails at night, or they
10 will be written up.
11 They get 401(k), medical benefits, dental
12 benefits, and a dollar-an-hour credit,
13 non-discretionary bonus to be used in the store.
14 Extensive cross-functional training on our enterprise
15 resource systems, software, HR services, cash
16 management, customer service, et cetera.
17 We call this Vitamin Cottage University. We
18 have high turnover because it's an easy university to
19 qualify for. You sign up at \$13 an hour. A couple
20 years later you come out, and you're incredibly
21 qualified to work in any number of different places.
22 So we have nothing to apologize for. We're
23 here with grave concerns about this whole process, but
24 as -- personally, as someone who walked on the picket
25 lines with my parents who were striking for Denver

1 Public Schools in the '60s, you carry that with you for
2 a long time, that sense of insecurity.

3 But everyone needs to be -- realize that this
4 process is taking place in isolation of everything
5 else. Denver is raising its minimum wage to 15.85.
6 Even us progressive employers, keeping as much money in
7 the wages as we can, we will be at somewhere around
8 13.85 without anybody telling us differently in 2020
9 when the 15.85 goes into effect.

10 We have a lot of employees in this state.
11 You start that minimum wage here, everyone on the
12 ladder gets an increase. It will wipe out our free
13 cash flow in our Denver stores.

14 What does that mean? Well, suddenly, it's
15 not very attractive to work -- open stores in Denver.
16 A lot less money to provide bonuses and incentives.
17 The Family Medical Leave Act in Colorado, which is
18 endlessly be trying to pass, is another \$500,000 cost
19 to us in Colorado. It's 20 percent of our free cash
20 flow in this state. And we pinch pennies into dimes
21 all day long. It's our ethic. We provide affordable
22 food to all communities at the lowest possible price.

23 So in and of itself, the new wage for exempt
24 employees doesn't necessarily affect us. If we take
25 the definitions of wages in Title 8, our normal stepped

1 wages for our exempt employees will be more or less in
2 line with the increases that are being proposed. But
3 there are huge unintended consequences, and the
4 Employers Council mentioned a few of them, but I want
5 to just talk about what happens in a high volume, low
6 margin industry like agriculture, like grocery.

7 Our brass ring as an industry is a 1 percent
8 profit at the end of the year. We never make it.
9 Kroger never makes it. It's the brass ring, 1 percent.
10 Now, Kroger's \$130 billion. We're roughly around
11 \$900 million across those 20 states.

12 So when you talk about these small increases
13 here or there, they're actually highly impacting of our
14 bottom line, our profitability, where we can open
15 stores, how many people we can employ.

16 When you look at all of the demands being
17 made on us to increase wages, it's far more than
18 anything that's being discussed here or the Denver
19 minimum wage or the Family Act, or, or, or from the
20 feds.

21 In particular, the fact that the Colorado
22 Minimum Wage Act passed last year giving local
23 authority to minimum wage doesn't define wages. So
24 Denver has decided they're not going to define wages
25 except as base pay. So I asked the bill sponsor,

1 "Well, aren't you going to get sued, aren't you going
2 to litigate this endlessly because you don't have a
3 definition?" She says, "Absolutely. I'm an attorney.
4 I can't wait."

5 Now, we're trying to fix that, because that's
6 just a huge oversight. It's going to cause endless
7 problems.

8 So let's look at the unintended consequences.
9 And Mr. Moss, I'm about to wrap up, so thank you for
10 your patience with the time. If you look at our
11 competitors and how they respond to wage increases or
12 just the cost of labor, you see a big grocery chain,
13 who I'm going to kindly not name, who broke the
14 Union 12 years ago so current members got their full
15 benefits, new members got part-time jobs with no
16 benefits. Somebody knows who I am talking about.

17 You have computers running the check-outs,
18 which don't get wages. You have gig economy, people
19 stocking who aren't even employees. You have
20 outsourced labor, people who aren't even -- I mean,
21 they're getting temporary wages for cash at the end of
22 the night. And then when you have a part-time or
23 outsourced person, you're not paying benefits. You're
24 robbing Peter to pay Paul.

25 You're not doing any training because all

1 they have to do is come in and stock. If you notice on
2 the shelves, there's a picture on every shelf every
3 three inches. All you need to know is match the
4 product on the cart to the product that's on the shelf
5 and put it there. That's your training.

6 So we need to look at this in a much bigger
7 picture. I'm sympathetic with every argument that
8 people need to make more, but what we're really doing
9 here is rewarding the largest, richest companies with
10 the most wealthy shareholders by allowing them and
11 incentivizing them to eliminate employment, potentially
12 move out of state or not open stores in Denver, to
13 eliminate benefits, eliminate training, eliminate other
14 services.

15 This is the danger to this single approach to
16 say, let's just raise wages. Because that's not really
17 what's going to happen. We will hold the line like we
18 have for the last 65 years as best we can. But this is
19 a huge burden that's going to have unintended
20 consequences. And unemployed people don't make wages.

21 And someone else mentioned that making these
22 decisions and moving these calendars up during a time
23 of high employment, economic expansion, and a sense of
24 wealth and abundance is really shortsighted, because
25 the abundance is at the top, not at the bottom. The

1 abundance is in tech and biotech, not in agriculture
2 and grocery.

3 So I'll leave it for that. We will submit a
4 detailed comment with cross-references to the rule.
5 And I thank you for your time. Questions or --

6 MR. MOSS: No, thank you.

7 MR. O'NEIL: Thank you.

8 MR. HARRISON: Adam Harrison, El Centro
9 Humanitario. Who's getting paid to be here? Who's on
10 salary? Anybody on salary? I'm on salary. Raise your
11 hand if you are an hourly worker and you are here
12 because this matters to your life. Hell, yeah.

13 We're hearing a lot of facts today. We're
14 hearing a lot of numbers from labor, and from the
15 employers we're hearing doom and gloom and no facts and
16 no evidence. And in fact, an extreme misunderstanding
17 of the way that labor law works in America and
18 something that's actually explained, I think, on page 2
19 of this wage order, you don't have to raise wages.

20 We're not talking about raising wages. What
21 we're talking about is a couple of different things El
22 Centro Humanitario applauds this department for finally
23 doing for the people of this state.

24 One is it's important that people not be
25 worked ragged for 80 hours a week. It's vital. It's

1 important to health. And this department has
2 recognized them, looked at the statistics presented in
3 the different comments and in its own studies at the
4 effect that working too hard has on your health, your
5 community, has on your family, has on your inability to
6 take care of your family. How in the hell does a woman
7 who makes \$30,000 a year pay for daycare to work at an
8 hourly job or a so-called salaried job as a team leader
9 at frickin' "Groceries Are Us," how does she afford
10 that at \$30,000 a year?

11 When I just looked into it -- I'm a freaking
12 litigator, and I can't afford to pay the \$20,000 a year
13 it would take to take care of my two babies, and so my
14 wife has to stay home and we're trying to make it that
15 way. But I'm lucky.

16 Employers, there are several options that you
17 have. And this is a clarification that has to be made,
18 I think is already made in the order, if not in the
19 statement of basis, purpose, and specific statutory
20 authority that this department has put together.

21 Once the salary basis goes up to \$42,500,
22 which is barely enough to make rent, you can, A, hire
23 more workers and not work all of them more than
24 40 hours a week. You can, B, raise the hourly -- raise
25 the salary of each person to \$42,500 who you want to

1 run ragged and you want to have to work those 80 hours
2 a week. Or you can hire more people.

3 All of those are a benefit to the people of
4 Colorado and to the individual workers. And so that's
5 the good news for employers who have come basing all of
6 their arguments on the idea that this is a raise in
7 wages and it's a terrible burden and it's a cost
8 without beginning -- without even trying to understand
9 the fact that there are those choices.

10 What we need, however, are some more choices
11 for employees. We've had it declared to us quite
12 boldly by the Employers Council that the young and
13 exposed people who take jobs in hospitality, they take
14 those jobs knowing they're going to get experience,
15 they take those jobs knowing they're not going to make
16 any money, so that's on them.

17 Wouldn't it be nice if they could also afford
18 a life in Colorado? Wouldn't it be nice if, for
19 example, the young people at the community center
20 boards who were described to us by three separate
21 testimonies of people who were on salary and who are
22 here covered for these hours that they're working
23 because they're -- that's an assumption on my part,
24 but -- these people who are executives have come here
25 telling us it's not necessary for our department.

1 I can tell you having worked for the people
2 who are actually helping the disabled and mentally
3 challenged people at the community center boards that
4 they're working for \$10 an hour up to now. That was
5 almost admitted by the third testimony -- the third
6 testifier from Alliance who said that we're competing
7 with fast-food industries.

8 Well, damn it, why don't you get in front of
9 the Medicare and explain that you're competing with
10 fast food for these jobs that you're describing as so
11 important to the individual waiver holders, these jobs
12 that require people to take care of someone whose
13 health and safety are so in need.

14 I defy any industry telling us that they have
15 to -- that they have to have no breaks, that they can't
16 let any of their individuals stop every three hours,
17 stop one time within four hours. I defy one of them to
18 provide you with evidence, with facts that show that
19 it's not good for these individuals to take breaks,
20 that it can't be done, because that evidence won't be
21 provided to you. All that will be provided to you is
22 speculation that it's some kind of apocalyptic cost to
23 them to have to give somebody a break.

24 Now, we appreciate the inclusion of
25 construction within this because construction is an

1 area where these people are physically -- on their
2 backs building up our state who have had -- who for too
3 long have been taken advantage of, for too long been
4 exempt in this. And we applaud the five pages of
5 analysis and careful looking at the construction
6 industry that this department has done.

7 In rebuttal to the employers who have said,
8 we just can't afford to follow these laws, I would
9 suggest that the good actors within each industry are
10 already following these laws. The good construction
11 companies are already giving breaks, are already trying
12 to keep people so that they're not working 15 hours on
13 top of a building all the time, without breaks and
14 without overtime.

15 What this does is it requires the bad actors
16 and the people who would like to be bad actors to rise
17 up to a higher level. The Employers Council, again
18 misunderstanding the nature of labor law in America,
19 said that there are conflicts with the Fair Labor
20 Standards Act. There is not one conflict with the Fair
21 Labor Standards Act in the COMPS order, that the Fair
22 Labor Standards act is the lowest basement we've ever
23 had for the last 30 years. There's no conflict.

24 Colorado is permitted and allowed to live by
25 a higher standard. Those are my comments for El Centro

1 Humanitario.

2 As a private attorney who has represented
3 about a dozen teachers at different times, I would like
4 to point out that there is no analysis and no reasoning
5 within the explanation given by this department as to
6 why teachers are included with doctors and lawyers as
7 an exemption. And I believe that's a great oversight,
8 and a great injustice.

9 Thank you for your time.

10 DR. FRITZ-MAUER: Good evening. My name is
11 Dr. Matthew Fritz-Mauer. I'm an attorney at Kelman
12 Buescher where I practice labor and employment law, and
13 my academic research focuses on labor markets, wage and
14 hour law, and labor standards enforcement.

15 I want to respond to some of the comments
16 that are in the written record and that we've heard
17 here today. These comments tell all of you that the
18 COMPS order is too much too soon, that it's going to
19 hurt the economy, be bad for business, and ultimately
20 it's going to be bad for workers. The effect of these
21 comments is to tell you that the COMPS order is too
22 much, it's dangerous, because it's a radical shift from
23 the status quo.

24 So I want to talk about the status quo for a
25 minute. Like my friend Adam just said, federal law

1 sets a floor. Over the years the federal government
2 has increased the overtime salary threshold. It has
3 never been tied to inflation, and so what we've seen is
4 that the federal government will increase the overtime
5 salary threshold, sit there for decades, and then it
6 will increase it again, it will sit there for decades.
7 Now we have another increase coming in January.

8 When it comes to the status quo, it's
9 important to understand that if the overtime salary
10 threshold set in 1975 had just kept track with
11 inflation, it would be \$58,000 today. In 1975,
12 60 percent of salaried workers earned less than the
13 overtime salary limit. Today it's 7 percent. When the
14 new federal overtime threshold goes in to effect in
15 January, it's going to be 15 percent.

16 We've come a long way from the New Deal.
17 What we've seen is a hollowing out of our basic
18 protections, our basic workers' rights, and along with
19 it, we've seen a hollowing out of the working class and
20 the middle class.

21 So the effect of these comments is to say
22 this is a dramatic shift from what it is. It's
23 dangerous. It's changing too much. That's simply the
24 wrong way to think about this. The COMPS order is a
25 realignment. It's a realignment that's entirely

1 consistent with the best values that we have, with the
2 values that undergird the Fair Labor Standards Act,
3 that created the 40-hour workweek, that built unions,
4 that allowed people to live a decent, dignified life,
5 to have basic rights at work.

6 Now, when you consider everything I just
7 said, \$42,500 is actually really modest. Increasing it
8 \$3,000 a year outpaces inflation right now, but it's a
9 long overdue and necessary adjustment to what it's
10 been.

11 So I applaud you all for what's in the COMPS
12 order, and I hope you will keep this framing in mind.
13 And keep in mind it's just necessary and it's overdue.
14 And we shouldn't rely too much on federal law because
15 it's federal inaction that has actually brought us all
16 into this room. It's federal inaction and inadequate
17 action that has made this completely necessary. Thank
18 you.

19 MR. MOSS: Thank you. I think we'll now take
20 another queue. One, two, three, four, five, six,
21 seven, eight, nine, ten.

22 MR. ARNOLD: Good evening. My name's Gary
23 Arnold. I'm here on behalf of Rocky Mountain Pipe
24 Trades District Council number 5 representing
25 approximately 3-and-a-half thousand plumbers,

1 pipefitters, HVAC technicians, pipeliners, and
2 sprinkler fitters.

3 Director Moss, the rest of the panel, I
4 appreciate your time and applaud your efforts to date,
5 applaud the robust stakeholder process that has been
6 undertaken to try to ensure that the best possible
7 policy is developed.

8 Pipefitters Local 208 as part of the Rocky
9 Mountain District Council wholeheartedly supports your
10 efforts. We applaud your inclusion of the additional
11 industries, specifically construction. With our
12 members performing strenuous manual labor in Colorado's
13 harsh conditions year-round, their ability to take
14 appropriate breaks, meal breaks and breaks from the
15 strenuous activities is necessary.

16 As many of the speakers have said before, I
17 think some of the good actors are doing that. We have
18 fought for our members rights to have those proper meal
19 breaks and work breaks for some time now, and we feel
20 like this levels the playing field for good actors that
21 are performing within the industry.

22 We would also like to thank you for the
23 significant increase in the minimum threshold
24 qualifying for overtime. As noted in the speaker
25 beforehand, I think there was a significant amount of

1 time taken before we got to this level. \$42,500 seems
2 appropriate for the state of Colorado and the current
3 economy that we're enjoying.

4 We applaud the timeline that's been laid out
5 with the \$3,000 increases and ultimately raising it to
6 57,000 plus by 2026. Through discussions with our
7 signatory employers, they have expressed some
8 challenges with a midyear implementation due to
9 salaried employees not being able to adjust benefits as
10 they move from salary to hourly.

11 We are not necessarily opposed to a
12 January 2021 initial implementation, but if such a
13 thing were to take place, we feel that it would be
14 common sense to shorten up the overall timeline, thus
15 speeding up the implementation of the 57.5 before it's
16 tied to the Consumer Price Index.

17 So short and sweet, we thank you for your
18 efforts. Happy to answer any questions.

19 MR. MOSS: Thank you.

20 MR. ARNOLD: Thank you.

21 MR. WARDRIP: Thanks, guys. Good to see you
22 all again. I'm Jason Wardrip, W-a-r-d-r-i-p. I'm the
23 business manager for the Colorado Affiliated
24 Construction Trades Council. I currently represent
25 about 14 different crafts, 24 different -- excuse

1 me -- 24 different unions with well over 10,000 people
2 that they represent themselves.

3 I want to thank you guys very much for
4 listening to workers, including construction, in the
5 wage order, in the minimum wage order -- excuse me, in
6 the wage order. I think it was an antiquated idea that
7 we exclude such a strenuous profession.

8 Even though the collective bargaining
9 agreements should be maintained in the inclusion, even
10 through us having a decent relationship with our
11 contractors, with the current generation of
12 contractors, that doesn't mean the next generation of
13 contractors won't come to the negotiating table and
14 come up with this idea that we can be more competitive
15 if we got rid of breaks. I think that's a great way to
16 get a lot of people hurt really fast. I think we just
17 need to make sure everybody's included so we that can
18 maintain health and safety of the workforce.

19 We're all happy to see the department has
20 chosen to increase the minimum wage order -- minimum
21 overtime provisions, excuse me. We agree it makes
22 sense to have responsible growth, but we also think
23 that six years, in the time frame to get to
24 5,000 -- \$57,500 by 2026 is far too long of a time
25 frame.

1 In our economic world in the state of
2 Colorado, it's very difficult to live on that kind of
3 money. And I think that if you're going to expect
4 somebody to get a second job, as I heard earlier which
5 I think is completely erroneous, I think that you have
6 to give them the opportunity to have that second job
7 without working 60 hours a week. You have to give them
8 the opportunity to be able to get a second job and
9 still work 40 hours and 20 hours to be able to
10 maintain. Or if you want them to work 60 hours, give
11 them the amount of money that they need to be able to
12 survive. It's not that we're asking for a wage
13 increase. We're asking you to pay them 40 hours a week
14 or give them overtime over 40. Pretty simple.

15 We have a bunch of good businesses already
16 doing this. All we're trying to do is uplift the
17 people or the companies that seem to be unscrupulous or
18 think that they can run people ragged, beat them to
19 death, and say, we're doing a good job for these people
20 because they're going to work for us for under \$42,500.
21 Good for us, yay, me. That's not cool, man.

22 There's a lot of people that are already
23 doing the right thing, and they need the
24 opportunity -- we need to bring up the other people to
25 be able to compete at the same level as the ones that

1 are already doing good business.
 2 Hey, if they go out of business -- I'm just
 3 going to say it. If they go out of business, I need to
 4 work, they can come work with me.

5 So anyways, I'm going to keep it short and
 6 simple. Thank you for everything that you guys have
 7 done. Thank you for listening to workers across the
 8 state of Colorado. And I appreciate it. Any
 9 questions, I'm happy to answer.

10 MR. MOSS: Thank you.

11 MR. BAYLESS: Shannon Bayless, Southwest
 12 Carpenters 555. I'm just going to read you a letter
 13 real quick dated December 13, 2019.

14 "Mr. Joseph M. Barela, Dear Director Barela,
 15 On behalf of more than 1800 Colorado members of the
 16 Southwest Regional Council of Carpenters, I write to
 17 applaud the CDLE's proposed Colorado Minimum Pay
 18 Standards order, the COMPS order. The COMPS order
 19 represents a positive step forward that will improve
 20 the lives of working people across Colorado and make
 21 Colorado more economically competitive.

22 "Thanks to the CDLE's efforts, Colorado
 23 construction workers will be guaranteed the same basic
 24 protections as other workers, including minimum wage
 25 requirements, rest and lunch breaks, and overtime. Not

1 only are these the right things to do for workers, they
 2 will improve productivity, reduce the threat of wage
 3 theft, and worker misclassification, boost our economy,
 4 and send the message that Colorado is leading the
 5 nation in ensuring that an honest day's work deserves
 6 an honest day's pay."

7 "The CDLE should reject any efforts to slow
 8 down the proposed implementation timeline, create
 9 additional carve-outs for businesses, or lower the
 10 minimum exempt salary threshold. After waiting nearly
 11 two decades for any changes to basic worker
 12 protections, Colorado's working families deserve timely
 13 action."

14 "Additional delays and carve-outs will only
 15 make it harder for Colorado to close the skills gap and
 16 recruit needed construction workers for critical
 17 projects. The COMPS order is a productive, reasonable,
 18 and measured step forward for the State, and we look
 19 forward to continue working with the CDLE to build a
 20 stronger Colorado. Sincerely, Daniel Lang for the EST,
 21 Southwest Regional Council of Carpenters. Carbon copy,
 22 Scott Moss, Division of Labor Standards and Statistics,
 23 Colorado Department of Labor and Employment and Jared
 24 Polis, Governor of Colorado."

25 Thank you.

1 MR. MOSS: Thank you. I want to note there
2 are a number of folks standing. If all of you sitting
3 could raise your hand because I want to try to get a
4 count whenever folks are standing in support.

5 I'll note that it's approximately three dozen
6 individuals. Unless you have a different count, sir.

7 MR. THOMPSON: I'd like to submit this.

8 MR. MOSS: Please go ahead. I'll ask the
9 reporter to mark this spot.

10 MR. THOMPSON: My name is Mark Thompson,
11 T-h-o-m-p-s-o-n. I'm with the Southwest Regional
12 Council of Carpenters. I'd like to start by
13 acknowledging that within 15 minutes of being here, we
14 were granted the 10-minute rest break. So progress is
15 made already.

16 I don't want to take a lot of time. We have
17 followed you around, you followed us around. We've
18 submitted written comment. We've been here and
19 provided public comment. We've shared our stories.
20 You've listened to our stories. I want to thank you
21 for your diligent efforts and your hard work. I
22 acknowledge this has been a long hard process, and I'm
23 very pleased with the work that you have done.

24 I want to thank you for including
25 construction in the proposed rule, the Colorado

1 Overtime Minimum Pay Standards, COMPS. Our industry is
2 polluted with labor brokers, unscrupulous contractors
3 that regularly cheat workers, not only out of their
4 wages, also their overtime and their basic rights and
5 protections that all workers should have.

6 Rest breaks, lunch breaks, anyone deserves
7 that. Our industry is very physical. Our guys work
8 long hours. A rest break is as much a safety issue as
9 it is anything else. Your efforts will help level the
10 playing field for responsible contractors. We heard
11 that from our friends at the building trades. We heard
12 that from our friends at the pipe trades.

13 This has been a long process. I ask you to
14 stay the course. I thank you again for your hard work.
15 I thank you again for the break we got earlier. I'll
16 leave it for someone else.

17 MR. MOSS: Thank you.

18 MS. GENOVESE: My name is Renee Genovese.
19 I'm with the Colorado Carpenters Local 555.
20 G-e-n-o-v-e-s-e. I've been with the Colorado
21 Carpenters for over 22 years.

22 And I've been to several of these meetings on
23 the minimum wage order overtime changes, and there's a
24 common theme that I've been hearing from several
25 different areas of workers. And these times are tough.

1 We need both parents in the household to work and
 2 provide for the family, whether it be a job that has
 3 health insurance or -- you know, you just need to both
 4 be working to make ends meet. You can't do it on one
 5 income anymore.

6 And I've heard several people, not just
 7 today, but including today, talk about the fear of
 8 having children. It's not in their cards. It's not in
 9 their plans because they can't afford it, and that's
 10 not right. That's not the direction Colorado wants to
 11 be going.

12 I know just myself nine years ago, I paid
 13 over \$25,000 one year, for child care, for two kids.
 14 So if I'm paying \$25,000 plus in one year for just two
 15 kids to go to daycare, and we've got people that are
 16 making less than \$40,000 a year, I know that my income
 17 wasn't much after that daycare expense, but that job
 18 brought in health insurance for my family, which was
 19 needed. So yeah, my kids went to daycare, but we had
 20 health coverage.

21 And I just can't see anybody deciding to miss
 22 their chance at having a family because our state
 23 doesn't provide the wages to have that. It's not
 24 right. We got to have that. People have to be able to
 25 afford to have a family. It's not right to have two

1 people going to work or two people working two jobs and
 2 too scared to have a child. That's all I got to say.

3 MR. MOSS: Thank you. Was there someone next
 4 in line?

5 MS. OLANDER: Hello. Thank you for being
 6 here today and having us here. We really appreciate
 7 and probably going a little past your time maybe, but
 8 thank you for staying also. My name is Debbie Olander.
 9 I'm with United Food and Commercial Workers Local 7.

10 THE REPORTER: Can you spell your last name?

11 MS. OLANDER: O-l-a-n-d-e-r.

12 MR. MOSS: Do you have a position with the
 13 UCFW?

14 MS. OLANDER: I do. I am the political
 15 director, have been on staff 21 years.

16 On behalf of the 1.3 million members of the
 17 United Food and Commercial Workers Local number 7, I
 18 come to you today -- we represent members in the
 19 grocery stores, meat packing plants, Kaiser Permanente,
 20 meat processing, healthcare, and cosmetology sections.

21 I just wanted to make a couple of points
 22 today and ask you to ensure that workers are not forced
 23 to work excessive hours, are barely compensated and are
 24 allowed rest breaks, increasing employees' -- that
 25 increases employees' safety, productivity, health, and

1 wellbeing.

2 Under the proposed rule, agriculture workers
3 will only be entitled to a 10-minute rest break for
4 every four hours of work, and they will not be entitled
5 to meal breaks and overtime pay. All workers, no
6 matter the industry, should be included in basic
7 workplace protections.

8 This proposed rule is an important step
9 forward, but there is more work to be done. While tens
10 of thousands of salaried workers will get the overtime
11 pay they deserve starting next year, hundreds of
12 thousands more will need to wait an additional six
13 years for the overtime pay that they have earned.

14 While many more Colorado workers will be
15 covered by minimum wage, overtime, and rest and meal
16 break periods policies, it is deeply concerning that
17 farm workers, who are our most marginalized and
18 vulnerable workers, are still carved out of basic
19 overtime protections under the proposed rule. Thank
20 you.

21 MR. MOSS: Thank you.

22 MR. MENDEZ: Hello. My name is Miguel
23 Mendez.

24 MR. MOSS: Can you spell that?

25 MR. MENDEZ: Yeah. M-i-g-u-e-l. And then

1 Mendez is M-e-n-d-e-z.

2 So I work with the Colorado Center of Law and
3 Policy, but today I'll be speaking as a personal
4 statement, a citizen of Colorado. I'm personally a
5 product of overtime. I'm a product of hard manual
6 labor. My father was part of the construction of DIA.
7 He's been part of the construction of -- or the
8 expansion of I-25, and he's been a part of numerous
9 construction projects here in Colorado for all of my
10 life.

11 I remember when I was in kindergarten, I
12 would come home from school. I would go into the back
13 closet in his room where he would actually be catching
14 up on sleep because he would be working overnight. So
15 that's one of the things that really stuck with me,
16 that I know that there are thousands of Coloradans, men
17 and women, that are all sacrificing their own bodies,
18 their own hard work, really for their children and for
19 their families so that they can provide. And really,
20 depending -- no matter what the laws say, they will put
21 in those hours to make up for whatever their family
22 might need.

23 So my point today is that you have the
24 opportunity to expand these coverages for people that
25 are putting in the most hours in Colorado. And I

1 advocate that you do it quicker so that you protect
2 these people quicker and that you protect them sooner
3 rather than later because those two years could
4 potentially be -- could affect children that are, you
5 know, growing up in their most formative years. And
6 these parents are all out there sacrificing their own
7 bodies for their children, and really they'll do
8 anything for them.

9 So in addition to that, I also want to submit
10 an additional 30 postcards that also advocate to
11 protect all workers, including farm workers, and it
12 also advocates for the rising threshold sooner rather
13 than later.

14 MR. MOSS: Thank you. I'll ask the cards be
15 given to the reporter and flagged as part of the
16 transcript.

17 Are there others who are in the queue, or
18 should I start a new queue? At this point, just as a
19 matter of logistics, we will probably go little over a
20 half-hour before break. That's probably six or seven
21 people. So I'll ask if folks want to form a line now
22 for the next six or seven folks.

23 MR. BURDS: Good afternoon. My name's Jimmy
24 Burds. I'm the owner of Colographic up in Commerce
25 City. Member of Good Business Colorado and they've

1 asked me to speak here too.

2 MR. MOSS: Are you speaking for Good Business
3 also?

4 MR. BURDS: Yes. I'll tell you when I'm not.

5 MR. MOSS: Okay.

6 MR. BURDS: First of all, thank you for the
7 work you've done so far. You've got everyone pretty
8 much covered right now, and it's the right thing to do
9 for workers, and really it's easier for employers, too.
10 I wasn't sure if I was under that or not. It really
11 didn't -- there's no way of looking to tell if my
12 business needed to do it or not. It doesn't really
13 matter. The employees all make more than that minimum,
14 and I only have one on salary who's far above that.

15 I would like to make sure it's expanded so
16 everyone gets a meal. It's pretty crazy that people
17 who work the hardest for us and feed us and everything
18 can't take a break and eat themselves. You know, and I
19 also believe when people have a little rest, you know,
20 they're going to be more focused and do a better job,
21 so it really is a benefit to the employer.

22 We're happy that the overtime threshold is
23 increasing, but we believe it should be rolled out
24 faster. You know, I think there's a misunderstanding
25 I've heard a few times here that you have to give

1 somebody a raise, and that's not the truth. All you
2 have to do is put them on hourly and when they work
3 over, pay them overtime.

4 Mostly the rest is my commentary. Forty-hour
5 workweek was put in place for a better quality of life
6 and because people were being worked to death. And
7 overtime really should be used, you know -- I mean,
8 when we plan our business, we have enough employees
9 that the idea is they work 40 hours a week and we meet
10 our numbers.

11 If we need them to work overtime, we have
12 peaks, it's great because we're making -- our
13 overhead's paid, we're making a lot more money paying
14 them overtime than at the beginning of the month when
15 they're on their regular wage.

16 The other thing is, you know, we shouldn't
17 run our businesses based on the idea that somebody's
18 always working 50, 60 hours. We should hire more
19 people. It's just the right thing to do. Really what
20 we're doing when we have lots of people on salary and
21 overtime and we just do that, it's generally -- and I
22 say we as employers -- it's avoiding the cost of adding
23 another employee with the overhead that comes with the
24 benefits and things like that.

25 So it really -- it really waters down the

1 benefits to the employee. And for me, you know,
2 it -- none of this really affects me, except that in
3 our industry, you know, most of our people, like I
4 said, make over that 42, but we compete against people
5 that pay as low as 30 and no benefits. We pay a
6 hundred percent of their health insurance premium for
7 the person working and match their 401(k) at a hundred
8 percent, things like that -- or their simple IRA.

9 And I have to compete with these people who
10 just abuse their, you know, their employees. And you
11 know, we still get to compete because we, you know,
12 do -- people do work hard for us because we appreciate
13 them.

14 So in conclusion, I have to say please give
15 these hard-working people lunch. Shorten the phase-in
16 time, because again, if that's hard for somebody to
17 take them from a salaried 35,000 a year up to 42, then
18 just start paying them overtime or make them hourly and
19 put them on overtime.

20 And thank you again for what you've done so
21 far. Appreciate it. Do you have any questions?

22 MR. MOSS: No. Thank you.

23 MR. FINGER: Hi. My name's Craig Finger.
24 I'm an attorney at Brownstein Hyatt Farber Schreck.
25 We -- our firm represents a number of employers in

1 Colorado. We have submitted a more detailed comment,
2 so I'll be brief.

3 For Colorado employers, a primary concern is
4 just determining when their policies and practices are
5 compliant with Colorado law, and that's been a
6 historical concern with the prior minimum wage order.
7 And we think with this new COMPS order, it's a great
8 opportunity to clarify some of these uncertainties that
9 have arisen. And this is particularly the case with
10 regard to when Colorado law differs from federal law.

11 The COMPS order -- the proposed COMPS order
12 now specifically addresses certain provisions of the
13 FLSA, which it intends to follow, certain provisions
14 that it certainly intends to diverge from, but that's
15 still a number of gaps that we would appreciate some
16 clarification on.

17 For example, compensability of very common
18 issues, such as preshift time; preshift activities that
19 may be work related but aren't necessarily duties the
20 employee was hired to do; on-call time; on-call meal
21 periods. These are all fairly common issues that exist
22 in a number of workplaces, and employers of Colorado
23 just don't know whether their practices are compliant.

24 So we would ask the division to either
25 clarify that they intend to follow federal authority

1 with regard to some of these issues, or if Colorado has
2 a different standard, then to provide some
3 clarifications, definitions, some sort of framework for
4 employers to assess whether or not their practices are
5 compliant.

6 MR. MOSS: Thank you.

7 MR. RIDGEWAY: Hi. My name is Daniel
8 Ridgeway, R-i-d-g-e-w-a-y. I hadn't intended to speak
9 tonight, but my colleagues are pretty eloquent, I
10 think, in speaking for the construction workers.

11 But although I've been a carpenter since I
12 was 17, I did teach high school for 10 years. I can't
13 believe you guys left the schoolteachers out and the
14 professionals in general. Schoolteachers are one of
15 the most abused categories as far as not getting breaks
16 and tacking on extra work that you aren't paid for.
17 And -- I regularly worked 50, 55-hour weeks that, you
18 know, half the time they weren't even acknowledged,
19 but -- they just dump on more work to those guys all
20 the time.

21 This rubric of professional, I don't
22 understand why they -- they need to have breaks also,
23 and there's no reason to exempt professionals as a
24 category. I'm actually married to a physician. When
25 she was working for a big healthcare corporation, they

1 would regularly work days where they couldn't even go
2 to the bathroom, you know.

3 If it's written in the law, then it's going
4 to be followed, but if they -- they deserve --
5 anybody -- I don't know why all these exemptions are in
6 the proposal because humans are humans and they need to
7 be protected, and it should be written down in the law.
8 Thank you.

9 MR. MOSS: Thank you.

10 MS. RODRIGUEZ: Hi. Good evening. I'm
11 Jennifer Rodriguez. Thank you for the opportunity to
12 comment on the proposed Colorado Overtime and Minimum
13 Pay Standards. I am a managing attorney for the
14 migrant farm worker division of Colorado Legal
15 Services.

16 For the last 12 years, I've been working with
17 farm workers throughout the Colorado, and I've seen
18 their struggle to earn a decent living for their
19 families, and I've seen the deplorable conditions in
20 which they live and work.

21 By engaging in this rulemaking process,
22 Colorado has the opportunity to do what's right and
23 fair for farm workers. Farm workers, just like other
24 workers, should be able to earn a decent living and
25 work in conditions that are not detrimental to their

1 safety and their health.

2 First, I'd like to talk about how the
3 proposed order is excluding farm workers from the right
4 to rest breaks and lunch breaks. People often talk
5 about how hard backbreaking work -- how hard farm work
6 is, and how it's backbreaking and how it's something
7 they could never do.

8 And I was going to ask you all to really
9 think about it and to put yourself in that position. I
10 don't know if you have -- I was going to ask everyone
11 in the room, but because there's so many construction
12 workers, I don't think it's going to be that hard for
13 them to be able to put themselves in that position of
14 thinking of a time where it was really, really hot
15 outside and you try to go work out in your garden or
16 you had to do yard work or maybe even a time where you
17 had to walk a few blocks to a meeting on a hot July
18 afternoon, and you could barely handle the heat.

19 Now think about working all day, every day
20 out in that heat. July 20th, 2019, Colorado reached
21 its hottest temperature yet, 115 degrees in Lamar,
22 Colorado. That was at John Martin Dam. This isn't too
23 far from Rocky Ford where those delicious cantaloupes
24 and watermelons are grown in the southeastern region of
25 Colorado.

1 Farm workers who work in the fields are bent
2 over for long periods of time planting, pruning,
3 weeding, picking vegetables. They're frequently
4 hunched over, having to bend over and stand up and
5 crouch down again, lifting trays and buckets full of
6 produce and carrying them to the truck at the end of
7 the row multiple times a day, going back and forth.

8 They do this work eight to ten hours a day,
9 sometimes over 12 hours, six, sometimes seven days a
10 week. There's a reason that farm work ranks among one
11 of those most hazardous job conditions. The work is
12 physically intense. It can involve the use of
13 hazardous equipment. And oftentimes, just as I
14 mentioned, they have to endure extreme heat for long
15 hours.

16 So how is it that most other workers are
17 entitled to rest breaks, time to eat lunch, overtime
18 and minimum wage, but not farm workers? A lot of those
19 other jobs don't involve strenuous physical labor and
20 long hours in extreme heat, yet they all get those
21 protections.

22 Construction workers, probably the most
23 hazardous occupations, are entitled to these
24 protections, which is wonderful. Please don't get me
25 wrong. It's about time. But why not farm workers?

1 With farm workers, it's going to be left to
2 the discretion of their employer how much they're paid,
3 whether they're entitled to a break, whether they're
4 entitled to eat lunch. There are more women working in
5 agriculture than there are in construction. In fact,
6 recent studies show that the number of women working in
7 agriculture is growing.

8 There are also children as young as 12 years
9 old working in agriculture. In construction, youth
10 under 16 can only do an office job, but in agriculture,
11 12 and 13-year olds, if their parent is out working
12 with them on the same farm or has given their
13 permission and it's not the during school hours, they
14 can be out there on the fields working with everyone
15 else.

16 Over this past year, I've -- every year I
17 talk to a lot of farm workers about their work. And
18 just over the past year, I took some notes to be able
19 to share with you today about some of the things that
20 they told me. I had farm workers tell me how they felt
21 dizzy while they're working out in the fields. They
22 felt as if they were going to faint. Some even said
23 they had vomited or witnessed a co-worker vomit, which
24 they thought was because of the heat.

25 Some described how their field supervisor or

1 boss would stand there and yell over and over again to
2 go faster, work faster. Some complain about not having
3 enough water. Many complain about not having enough
4 water and not being close enough to the toilets to
5 actually be able to use it.

6 Every year I feel like the stories of workers
7 suffering from kidney stones and other kidney-related
8 problems is increasing. I think there's a connection.
9 I'm not a medical professional, but I see it.

10 Another very common complaint is field
11 supervisors abusing their power. These workers that
12 tell me about this may have nothing bad to say about
13 the farm owner, but the field supervisor can make their
14 life miserable on a daily basis. They deny them
15 breaks. They can deny their workers breaks just
16 because they're having a bad day or maybe because some
17 of the women on the crew denied their sexual advances
18 or didn't laugh at his inappropriate jokes or maybe
19 because he simply did not think they were working hard
20 enough or fast enough.

21 Temperatures are on the rise with climate
22 change. Just as hotter days and longer summers will
23 affect the quality of the crops, they will also affect
24 the quality of life for the people who cultivate and
25 harvest them.

1 All of this is to say that farm workers
2 should -- all farm workers should be entitled to rest
3 breaks and lunch breaks, too, just like everyone else.
4 It shouldn't be left up to the employer to decide.

5 The way the proposed order is written
6 currently, farm workers are not entitled -- there are
7 some farm workers who are covered by the rest breaks,
8 but they don't receive rest breaks like the other
9 workers do. The farm workers that are currently
10 covered under the proposed order are only entitled to
11 receive an average of 10 minutes for every four hours
12 worked. They're not entitled to get the 10 hours every
13 four hours.

14 It can be spread out throughout the day, and
15 as long as it averages to that at the end of the day,
16 it's in compliance. There's a five-minute requirement
17 that -- sorry -- even the five minutes they're
18 guaranteed for every four hours worked doesn't need to
19 be consecutive.

20 So this means that a Colorado farm worker
21 could work a 10-hour day and get five minutes' worth of
22 breaks throughout the morning shift, ten minutes to eat
23 lunch, and then have another five minutes' worth of
24 breaks spread out over the remaining five hours of work
25 before they're done for the day.

1 This does not allow for any kind of
2 meaningful break to find shade, bring down your body
3 temperature, make a phone call to your child's school,
4 call the doctor's office, or even call CDLE to make a
5 complaint.

6 And then what about all of the other Colorado
7 farm workers who aren't entitled to any type of rest
8 break under the proposed rule? There's a large number
9 of Colorado farm workers that aren't even entitled to
10 Colorado minimum wage or the breaks, which is my second
11 point.

12 Because a lot of Colorado farm workers could
13 be exempt from the FLSA minimum wage, they, as you
14 know, will also be exempted from the proposed order.
15 One of the big exemptions is the 500-man-day exception.
16 This means that those farms that do not utilize 500-man
17 days or more in any given quarter from the preceding
18 year are exempt from FLSA minimum wage requirements for
19 the current year.

20 And in order to get 500-man days, you would
21 need to have about seven full-time ag employees or
22 more. The 2017 census of ag reported approximately
23 37,000 people employees farm workers in Colorado.
24 About 17,000 of those Colorado farm workers work on
25 farms that employ 10 or more employees.

1 MR. MOSS: I apologize. 17,000 out of how
2 many?

3 MS. RODRIGUEZ: 17,000 out of 37,000. So out
4 of 37,000, about 17,000 work on farms that employ 10 or
5 more employees. The remaining approximate 20,000 work
6 on farms that employ nine or less agricultural workers.
7 And out of that 20,000, 13,500 work on farms that
8 employ four or less agriculture workers.

9 So it's this 13,500 that almost surely would
10 be exempt. Others in this 20,000 are likely to be
11 exempt too, but we can't be sure, just like we are with
12 the 13,500, just the way the data came out. But the
13 13,500, that's more than a third of Colorado farm
14 workers.

15 Another exemption that has a big impact on
16 Colorado is those who are primarily engaged in the
17 ranch production of livestock, sheep herders, cattle
18 range workers. And then there's an exemption for
19 certain hand harvest laborers paid on a piece rate
20 basis. These are also not entitled to receive the
21 federal minimum wage.

22 In conclusion -- sorry to take up so much
23 time -- but I ask for the exclusion of farm workers
24 from the Colorado minimum wage provisions, the overtime
25 provisions, the lunch and rest breaks to be

1 reconsidered so that Colorado farm workers receive the
2 same protections and benefits of other Colorado
3 workers.

4 I'm going to be submitting other written
5 comments as well, and so I can give a copy of this with
6 the citations at that time or --

7 MR. MOSS: At that time would be good. Thank
8 you. One question. You mentioned you've spoken to a
9 lot of farm workers, and I know you have. Can you give
10 a rough estimate of how many farm workers you've spoken
11 to over the years?

12 MS. RODRIGUEZ: Over the years? Every summer
13 I think that we -- it ranges -- I think I put it in my
14 comments I submitted in August, but probably between
15 400, 700, 800. I think this last year was around 800
16 farm workers over the summer, like the peak of the
17 harvest from June through August. That's the only time
18 I really track it, so I can't really track year-round.

19 MR. MOSS: And every year, a similar number?

20 MS. RODRIGUEZ: Yes.

21 MR. MOSS: And is there a lot of turnover
22 year to year?

23 MS. RODRIGUEZ: In some of the regions, yeah.
24 It depends. We cover the entire state, so we have --
25 I'm talking about all the farm workers who are in the

1 northeastern region, on the Western Slope, down in the
2 San Luis Valley, and in the southeast region like La
3 Junta and Pueblo.

4 MR. MOSS: And how many years have you been
5 talking to workers in that capacity?

6 MS. RODRIGUEZ: Twelve years.

7 MR. MOSS: Thank you.

8 MR. DOUGHERTY: Hello. My name is Dennis
9 Dougherty. I'm the executive director of the Colorado
10 AFL-CIO. We represent 130,000 union members across the
11 states and are made up of 190 local affiliated unions.

12 I want to commend CDLE for the progress that
13 you've made by putting out the rule, but want to point
14 out a couple things here. An AFL motto is a fair day's
15 wage for a fair day's pay. And a recent statistic came
16 to light that in 1975, under federal law, 62 percent of
17 workers were eligible for overtime when they worked
18 more than 40 hours a week.

19 Now, less than 8 percent of workers receive
20 the overtime pay they should earn. So for us, that is
21 not trending in the direction of a fair day's wage for
22 a fair day's pay. And if I can make an analogy, this
23 is not an airplane that is flying at 30,000 feet
24 without turbulence and enjoying a smooth ride. This
25 would be an airplane that has one engine out and the

1 oxygen masks have dropped.

2 And we -- the Colorado AFL-CIO and the
3 working families need somebody to enter that cockpit,
4 adjust course, and fix the plane. Those oxygen masks
5 that are down, those are the working families of
6 Colorado, and this is where CDLE comes into play, and
7 why I want to commend you for what you've done so far.
8 I will say that we would like to see a phase-in faster
9 than that proposed, hopefully, that among three years.

10 We do appreciate the construction industry
11 covered. However, I want to echo what others have said
12 about the agricultural sector. We would like to see
13 all workers covered. Agricultural workers may not be
14 as represented as some of the other sectors and some of
15 the other workers, but they are among the most abused
16 and marginalized workers in Colorado, and we feel they
17 should be included as well. Thank you.

18 MR. MOSS: Thank you. And I thank you for
19 having that presence of mind to keep your train of
20 thought about your airplane analogy going enough to not
21 start talking about circuses.

22 MR. CLARK: My name is Doug Clark, C-l-a-r-k,
23 just like the candy bar. Once again, I want to thank
24 the CDLE for taking their time. And all I want to say
25 is really I appreciate that -- the progress that we

1 made, and if we could just stay the course on what
2 we're doing.

3 I'm a third-generation carpenter, and it's
4 super important, if you think, since we've been here
5 that we're going to be going on our second break pretty
6 soon within a short amount of time. Being in the cold,
7 she mentioned the hot -- the lady before me mentioned
8 the hot. The cold affects us just as much. If we can
9 take a little 15-minute break and warm up, have a cup
10 of soup, have a cup of coffee, warm our fingers, warm
11 our toes, get back with it, we tear it up when we're
12 out there. That's all I'm asking, if we can just stay
13 the course.

14 What I want to do real quick. So I just
15 wrote -- jotted down a couple names. And the names I
16 jotted down is just so we know that they're not
17 numbers. So Mikes, if you would raise your hand.
18 Juan, if you'd raise your hand. MT, raise your hand.
19 Greg, raise your hand. Jordan, raise your hand.
20 Shannon --

21 MR. MOSS: Slow down a bit.

22 MR. CLARK: Shannon, Gus, Tomas, Kevin,
23 Edgar, Larry, Dan, Bob, Orlando, Caroline, Renee,
24 Adrian, John, Domingo, Stefan, Luis, Gary, Jason. You
25 guys aren't forgotten. And David.

1 So just my point, that we're not just a
2 number. We're faces and we do this every day. So I
3 appreciate your time.

4 MR. MOSS: Thank you.

5 MS. HANKINS: Caroline Hankins [phonetic],
6 Local 555 Carpenters Union. I just wanted to -- I'm a
7 first-generation carpenter and a third-generation
8 farmer from Texas. I grew up in the heat working in
9 the fields and working for a lot of farmers. We didn't
10 get the breaks. I've hauled the fruits and vegetables
11 to the truck all day long, ended up with skin cancer.

12 I've been 40 years working out in the sun.
13 We didn't get the breaks and stuff, but I do now with
14 the union. And I just wanted to reiterate everything,
15 ask you guys to please do the right thing for these
16 farmers, for these -- all the construction workers are
17 not included with breaks and overtime. The unions,
18 most of the unions are. I'm glad I joined the union.
19 It was the best decision I ever made in my career.

20 But not all the construction industry is
21 included in this. And the farmers are hurting really
22 bad. So I thank you for your time and listening to us.
23 Thank you. Any questions?

24 MR. MOSS: No, thank you. We'll take a break
25 after this.

1 MR. SELIGMAN: Thank you. So David Seligman
2 from Towards Justice. S-e-l-i-g-m-a-n. So it was
3 about a year ago that a colleague of mine at Towards
4 Justice testified before the Colorado Department of
5 Labor regarding the last proposed minimum wage order,
6 and I asked her afterwards how the testimony had gone.
7 And she said, "is it typical to show up to a hearing
8 and be the only person testifying?"

9 I think this gives you some sense of how far
10 we've already come. And workers in Colorado and
11 advocates are tremendously appreciative of the agency
12 for creating an open, full administrative process and
13 for taking in good faith a real effort at investigating
14 its -- the agency's mandate to protect the health and
15 wellbeing and living wages of workers.

16 I'd like to respond first to some of the
17 assertions made throughout the day regarding the
18 minimum salary threshold. There was a suggestion that
19 the minimum salary threshold -- increasing the minimum
20 salary threshold will cause the sky to fall and it will
21 put business -- put certain industries out of business
22 entirely.

23 First of all, all of the data we've seen
24 regarding Colorado's economy suggests a growing economy
25 that has not yielded the kind of benefits we expect

1 towards workers. So as the economy has grown, we just
2 have stagnated. The only increases we've seen over the
3 last decade or two when it comes to the real wages of
4 workers have come when there's been an intervention,
5 like increasing minimum wages that provide minimum
6 labor standards for workers.

7 We've also seen a tremendous uptick in worker
8 hours. So workers in Colorado are working longer and
9 longer hours. There's data that suggests that Colorado
10 workers may be -- may be among the top three or four
11 hardest working, you know, workers in the country when
12 it comes to work hours.

13 And nothing to suggest that restoring
14 overtime protections for workers who have had them in
15 the past and that were intended to have them since the
16 New Deal will destroy business.

17 There was also a suggestion that somehow
18 increasing or restoring overtime protections will
19 interfere with worker flexibility. Nothing about these
20 proposed roles will interfere with the flexibility of
21 employers to set up, you know, individualized schedules
22 for workers.

23 When those schedules are under 40 hours a
24 week and 12 hours a day, in fact, it won't change
25 anything about the employment. It's only when workers

1 work longer than that that they will be entitled to
2 overtime or that the employer, if they want to continue
3 to maintain the exemption, will have to increase their
4 salaries to the minimum salary threshold.

5 I want to caution specifically regarding some
6 of the proposals today to carve out certain industries.
7 The first thing that I'll note about those is that we
8 heard from some specific industries and from business
9 owners within those industries, but we have not heard
10 from workers within those industries.

11 There was a suggestion that workers, for
12 example, within the ski industry know what they're
13 getting into when they sign up for the job, that they
14 understand that because of the demands of seasonal
15 employment, that there are periods within which their
16 hours may exceed 40 hours in a work week.

17 First of all, there's nothing to suggest that
18 we should take that as a given without having heard
19 from the workers who work in those industries. But
20 beyond that, it's also important to know there's
21 nothing to prevent these varying levels of seasonal
22 employment for -- varying, you know, work hours, you
23 know, across seasons, so long as you're still paying
24 people, you know, overtime or paying them the minimum
25 salary threshold.

1 Also on this point, we heard both from the
2 ski industry and from employers within certain health
3 services industries that these increased salary
4 thresholds will dramatically reshape their workforce
5 and, you know, result in dramatically more workers
6 being covered by overtime laws.

7 I suspect that in many of these cases, most
8 of these workers are already entitled to overtime. So
9 you know, it doesn't matter of course whether you're
10 paid -- no matter what salary you're paid. If you
11 don't fall within one of the exempted categories, you
12 should be entitled to overtime.

13 There was someone from one industry group
14 earlier said that only five of his 200 employees would
15 have a salary above the proposed minimum salary
16 thresholds. I suspect that of those 200 workers, most
17 of them shouldn't be exempt to begin with. And until I
18 think we see some specific data from these industries
19 about how many workers actually fall within some of
20 these duty tests, I think it's inappropriate to provide
21 these carve-outs.

22 Thank you very much for hearing from workers
23 during this process. We are really appreciative of
24 some of the proposed changes here. Like so many
25 others, we think it's critical that you extend the same

1 protections you've extended to so many workers to farm
2 workers, some of the most marginalized and mistreated
3 in the state.

4 You'll see we haven't heard from any farm
5 workers today. I think it's also important to
6 recognize how fearful many of them are to come forward
7 in many contexts. And also, farm workers historically
8 have been excluded from, for example, the National
9 Labor Relations Act, which would have given them a
10 voice in these kinds of conversations.

11 But of course, that doesn't change your
12 mandate, your mandate to protect the health, safety,
13 and living wages of workers. And I think it's
14 important to recognize that mandate in deciding the
15 scope of coverage.

16 With respect to the salary basis, we commend
17 the agency for implementing -- for proposing a salary
18 threshold that will get us close to the proposed Obama
19 rule, the Obama rule backed by substantial economic
20 data that demonstrated that it wouldn't destroy jobs
21 even in the lowest possible living regions in the
22 country.

23 But we urge you of course, as others have
24 indicated, to implement those thresholds faster, to
25 make the ramp-up happen over a four year period as

1 opposed to six. Thank you.

2 MR. MOSS: Thank you. We can take a couple
3 more folks before our break if there's anyone waiting.
4 We'll take a break.

5 (A recess was taken from 6:14 p.m. to
6 6:25 p.m.)

7 MR. MOSS: If you can state your name.

8 MS. FLORA: My name is Larissa Flora,
9 L-a-r-i-s-s-a, F-l-o-r-a. I'm a Colorado resident, a
10 salaried worker, and an organizer of Working
11 Washington. I organize salaried workers around this
12 issue of overtime protections, and I would like to
13 present the following position to the CDLE.

14 So I'd first like to read the position to the
15 Colorado Department of Labor and Employment.

16 "We are salaried workers, their families and
17 friends, and we urge the CDLE to pass the COMPS order
18 to protect our time. Too many of us are working longer
19 hours without seeing any benefit. It undermines our
20 health, relationships, and our ability to enjoy our
21 lives. We are tired of being burnt out, and now we
22 have the opportunity to make a lasting change.

23 This rule would provide an incentive to our
24 employers to value our time and would require we either
25 not work overtime or be paid for it when it's

1 necessary. We need your support to make this change a
2 reality. Our time is valuable whether we are salaried
3 or not. The current system negates that value and robs
4 us of time with our families and to live our lives.
5 Restore overtime protections for salaried workers in
6 Colorado so we can get paid for all of the work that we
7 do."

8 This was signed by 509 Colorado residents
9 across all industries. 424 of those signers are
10 salaried workers. 370 of those salaried signers report
11 regularly working more than 40 hours a week. 313 of
12 those salaried signers report regularly working more
13 than 50 hours a week. And again, this is across all
14 industries. Over a hundred signers wrote additional
15 comments, and I would like to read just a select few, I
16 promise, for you.

17 MR. MOSS: Go ahead.

18 MS. FLORA: One comment from Nicholas Culp of
19 Loveland, Colorado. "As a sous chef, I was required to
20 work 70-plus hours a week at a restaurant in Loveland
21 for a salaried compensation which would average out to
22 about \$8 an hour, which is far less than those I was
23 managing were making, resulting in burnout and a
24 growing alcohol problem to cope. I now work hourly and
25 make about a hundred dollars less a month with half of

1 the hours. This industry needs far more monitoring and
2 protections from greedy owners."

3 From Mandy Baxter in Fort Collins. "Because I
4 am the salaried employee, I have to send the other
5 employees home after they have worked 40 hours to save
6 on overtime costs while I stay for hours longer to
7 finish the work. I work through lunch almost every
8 day, and I don't get compensated for it."

9 MR. MOSS: Did she say what industry she was
10 in?

11 MS. FLORA: I do not have that.

12 MR. MOSS: That's okay.

13 MS. FLORA: From Alisha Reichert [phonetic]
14 in Littleton. "For the past four years, I've worked as
15 a salaried restaurant manager where my average workweek
16 was roughly 60 hours a week, sometimes 70 hours per
17 week during their summer busy season. Even during the
18 winter slow season, I never worked less than 50 hours a
19 week. Moreover, as a salaried employee, I was required
20 to be on call 24/7. If any issue arose outside my
21 normal working hours, I was required to be available if
22 needed. In this way, denying salaried employees
23 overtime pay results all too often in a complete loss
24 of personal life as employers basically own all of an
25 employee's time and are legally allowed to make

1 burdensome demands of their employees with salaried
2 compensation."

3 From Rebecca Dispoto [phonetic] in Colorado
4 Springs. "I'm an hourly employee. My fellow salaried
5 employees work anywhere from 50 to 80 hours a week.
6 Most of the work gets piled onto them because it is
7 cheaper. They do not have to be paid for their work
8 over 40 hours."

9 From Jalen Newkirk in Arvada.

10 MR. MOSS: Can you spell Jalen?

11 MS. FLORA: J-a-l-e-n.

12 "I am the center manager of an AAMCO
13 Transmissions. I receive a flat \$663 after taxes a
14 week while I work anywhere from 60 to 70 hours. I have
15 to use this to support myself, my wife, and our
16 two-year-old daughter. This is not doable, especially
17 in Colorado, and I am ready to get actually paid for
18 the work and effort I put into my job."

19 From Cody Boden [phonetic] in Fort Collins.
20 "I just wish I wasn't worked from 60 to 80 hours and
21 still hurting for money."

22 From Kelly Sharfenberg [phonetic] in Denver.
23 "I'm supposedly acquiring comp time that I can never
24 use because I am never allowed to be gone."

25 From Kathleen Rapier [phonetic] in Fort

1 Lupton. "I'm signing as a wife to a manager whose time
2 is more valuable to his family than his work for which
3 he is not compensated for his additional hours."

4 From Carl Ford in Longmont. "It is not fair
5 to expect someone to give their life for a company to
6 make another buck."

7 From Tana [phonetic] Smith in Denver. "I've
8 seen this ruin the health and wellbeing of my
9 supervisors. I'm signing this for all retail
10 management."

11 One last one from Sarah Nasatka in Colorado
12 Springs.

13 MR. MOSS: Can you spell Nasatka?

14 MS. FLORA: N-a-s-a-t-k-a. "The company
15 regularly expects staff to come in early, stay late,
16 and work on weekends. When complaints are raised that
17 we have lives and need personal time, we are regularly
18 informed that we are salary and are expected to work as
19 long as it takes."

20 These are just a few of the comments that
21 demonstrate how broken expectations of salaried workers
22 are in Colorado. You've heard from business
23 representatives today that people might value
24 flexibility over their pay, but salaried employees
25 currently do not get either one.

1 I have had over 20 in-depth phone calls with
2 salaried workers in Colorado, and each individual
3 echoes these same stories of ever-growing hourly
4 expectations with no end in sight. Their families
5 suffer, their health suffers, their communities suffer.
6 They cannot participate in their own lives regularly.
7 They often quit their salaried positions for these
8 reasons and take hourly positions instead.

9 I applaud the CDLE for addressing these
10 issues and recognizing the need to protect salaried
11 workers' time. However, many of these workers make
12 more than \$50,000 or more, and they cannot afford to
13 wait six years for relief.

14 There is no balance to the amount of hours
15 that salaried workers put in. While this change will
16 obviously require businesses to adjust, I urge the CDLE
17 to consider just how imbalanced the current system is
18 against salaried workers and their time when
19 determining how quickly to phase in these protections
20 for these people. We cannot afford to wait.

21 MR. MOSS: Thank you. If I could ask, since
22 it appears you've heard from 500 workers and talked
23 to -- was it 20 of them?

24 MS. FLORA: Just over.

25 MR. MOSS: And have you on other occasions

1 talked to other workers outside of this organizing?
2 MS. FLORA: Sure. Yeah.
3 MR. MOSS: We heard testimony that in
4 hospitality and leisure, in particular, it's often
5 younger workers expecting less pay that don't expect to
6 need to make a career there. Is that consistent with
7 what you've heard from workers or read from their
8 comments?
9 MS. FLORA: That is not, no. I would say
10 that they might make the decision to not keep their
11 career there because they cannot have a life and make
12 more money, but that is not their desire.
13 MR. MOSS: Thank you. Anyone else here to
14 speak?
15 I've waited a minute. Anyone else? Last
16 call. Okay. Thank you all for coming. It's 6:33, and
17 we are closing the record with no one left here to
18 speak. Thank you all very much for coming. I
19 appreciate it.
20 WHEREUPON, the within proceedings were
21 concluded at the approximate hour of 6:33 p.m. on the
22 16th day of December, 2019.
23 * * * * *
24
25

1 REPORTER'S CERTIFICATE
2 STATE OF COLORADO)
3) ss.
4 CITY AND COUNTY OF DENVER)
5 I, Haley L. Bortz, Registered Professional
6 Reporter, Certified Realtime Reporter, and Notary
7 Public, State of Colorado, do hereby certify that the
8 said proceedings were taken in machine shorthand by me
9 at the time and place aforesaid and was thereafter
10 reduced to typewritten form, consisting of 138 pages
11 herein; that the foregoing is a true transcript of the
12 questions asked, testimony given, and proceedings had.
13 I further certify that I am not employed by, related
14 to, nor of counsel for any of the parties herein, nor
15 otherwise interested in the outcome of this litigation.
16 IN WITNESS WHEREOF, I have affixed my
17 signature and seal this 23rd day of December.
18 My commission expires July 21, 2020.
19
20
21 _____
22 Haley L. Bortz, RPR, CRR
23 Commission No. 20164027671
24
25

To the Colorado Department of Labor and Employment:

We are salaried workers, their families and friends, and we urge the CDLE to pass the Colorado Overtime and Minimum Pay Standards Order to protect our time.

Too many of us are working longer hours without seeing any benefit. It undermines our health, relationships, and our ability to enjoy our lives. We are tired of being burnt out, and now in Colorado, we have the opportunity to make a lasting change. This rule would provide an incentive to employers to value our time and would require we either not work overtime or be paid for it when it's necessary.

We need your support to make this change a reality. Our time is valuable, whether we are salaried or not. The current system negates that value and robs us of time with our families and to live our lives. Restore overtime protections for salaried workers in Colorado, so we can get paid for all the work we do!

Signed by:

509 CO Residents

- 424 of which are Salaried Workers
 - 370 of these salaried workers report regularly working more than 40 hours
 - 313 of these salaried workers report regularly working more than 50 hours
- 104 wrote additional comments, some of which are below:

DEPOSITION 12/16
EXHIBIT
A
HANSEN & COMPANY

ANY time worked over 40 hours, salary or not, needs to be accounted for.

Austin Travis, Windsor

As a manager in hospitality I work in hotels and as AGM I am required to cover all shifts anyone misses if Salaried one else can take them. Although we encourage others to take the shifts, I find I'm usually on duty. In addition, I'd like to see salaried members of management get over time for the time they spend on call. I've ruined many family events getting calls in the middle of the time I'm trying to focus on my loved ones.

Amanda Lieser, Greeley

As a manager, almost all positions are salary, underpaid and under appreciated. Pay of a person with Salaried responsibility, overtime expected, and the responsibility of an executive with none of the benefits.

Justin Anzelc, Longmont

As a sous chef I was occasionally required to work 70+ hours a week at a restaurant in Loveland for a salaried compensation which would average out to about \$8 an hour. Which is far less than those I was managing we're making, resulting in burnout and a burgeoning alcohol problem to cope. I now work an hourly and make about \$100 less a month with half the hours. This industry needs far more monitoring and protections from greedy owners.

Nicholas Kalk, Loveland

As an educator I'm eligible for comp time, but my wife works as a web developer and while she is eligible for an end of year bonus, she is not eligible for compensation for extra hours worked.

Alex Chapin, Wheat Ridge

At multiple of my last jobs, I worked tremendous overtime, sometimes 70 hours a week. With the increasing traffic in Denver and Salaried promising solution, this coupled with excessive overtime can seriously diminish quality of life.

Tammy Crynes, Denver

Because I am the salary employee, I have to send the other employees home after they have worked 40 hours to save on overtime, while I stay for hours longer to finish the work. I work thru lunch almost every day. And don't get compensated for it.

Mandi Baxter, Fort Collins

Bk has Salaried over time for salary managers

Robin Cunningham, Denver

Colorado businesses take advantage of their employees. Businesses will mis classify a position that does not qualify to be a salaried employee to steal time from employees paychecks. For instance I am a sales person. My official title is Account Manager. I am not a manager but in order to salary my position the company names me as one.

Elizabeth Apodaca, Denver

Commission work is ridiculous, but not being paid a set amount Salaried matter how much time you put it should be illegal

Nicholas Ernster, Denver

Common practice in retail pharmacy

Brock Jackson, Denver

Depending on the time of year it's either 40 or more depending on emergency calls to get equipment back online if it goes down.

Adam Rapier, Fort Lupton

Enough is enough!!! Sometimes I work so many hours that I make the same amount of money as barista at the restaurant I run.

Ekaterina Alexandrova, Boulder

Even though I am paid at my current job for all OT above 40 hours a week, I believe it is very wrong for a company to not pay their salaried employees overtime. Time is so precious and limited, and people need to have sufficient time for their families/life outside of work as well. Counting the time it takes to get home, to sleep, and get ready in the AM can make it so that people only get a few hours with their families Mon - Fri.

With this scenario getting abused more and more, I believe employers need to face financial repercussions if they are going to ask their workers to do work that requires longer than an 8 hour work day. They need to be paying the employee for every second of their valuable time, especially if that employee is doing a good job.

Ariana Sampen, Arvada

Everyone should be paid fairly.

Lori Phelan, Fort Collins

For the past four years I worked a restaurant/hospitality job where I was salaried at \$35,000 per year. My average work week was roughly 60 hours per week, with that rising to 70 hours per week during our summer busy season; even during our winter slow season, I never worked less than 50 hours per week. Moreover, as a salaried employee, I was required to be 'on call' 24/7 - if any issue arose outside my normal working hours I was required to be available if needed. In this way, denying salaried employees overtime pay results all too often in a complete loss of personal life, as employers basically own all of an employee's time and are legally allowed to make burdensome demands of their employees with Salaried compensation.

Elisha Reichert, Littleton

Have done political organizing, and the way they work you 80-100 hours for next to Salaried pay is abhorrent.

John Furlong, Denver

I am a non-licensed salaried employee of a school district and I work within the Operations Department. I have been told by my Director that because I am salaried, I am expected to work 50 or more hours in a week. That includes days during the winter where I am asked to fill in as a snow plow driver overnight and then show up for work as normal the following day. That also includes driving for close to an hour, one way, to take care of an emergency on the weekend but not being allowed to claim mileage on my personal vehicle or consider drive time as "hours worked".

Brett Dowgin, Fort Collins

I am a recreation manager at a resort. During the season I work 12 hour days six days a week.

Corey Fletcher, Colorado Springs

I am a salary worker that gets paid for 40hrs a week but on average works 50 - 60 hours a week. There is strict policies on flex time and major approval process to flex time.

Megan Wick, Windsor

I am an hourly employee. My fellow salaried employees work anywhere from 50-80 hrs/wk. Most of the work gets piled on them because it is cheaper. They don't have to be paid over 40.

Rebekah Dispoto, Colorado Springs

I am currently an hourly employee but for the first 7 years of my career I was salaried and making less than 35K in a nonprofit in Denver. When I was switched to hourly, I began to see a much better work life balance. We should have more protections for salaried workers.

Heather Crandall, Broomfield

I am filling this out to help change this dumb rule penalizing people for being in a salary position to rob people of there time

Anthony Beltracchi, Avon

I am not salaried but I work with a lot of people who are. It needs to change

Molly Heckman, Lonetree

I am not salaried but would like to move up in my company. However management that is salaried is expected to work 50 hours right away but often work 60 - 70 hours with Salaried pay difference

Victoria Sapp, Englewood

I am on call 24/7 and must be able to report to the facility immediately in case of an emergency. All without extra pay

Victoria Longstrom, Littleton

I am salaried and I am expected to work extended hours once a month for 3 days because it benefits our vendor. I do receive a sales bonus.

Hannah Henderson, Broomfield

I am the Center Manager of an AAMCO Transmissions. The market values my job much, much higher than I am actually getting paid. Usually individuals in my position get salary + commission. I do not. I receive a flat \$663 (after tax) a week while I work anywhere from 60-70 hours a week. I have - use this - support myself, my wife, and our 2 year old daughter. This is not doable, especially in CO, and I am ready to get actually paid for the work and effort I put into my job.

Jalen Newkirk, Arvada

I do get comp time if there is time to use, but didn't have time to use all the comp time I earned last year.

Kate Hegman, Boulder

I don't currently struggle with this issue but I agree that salaried workers often work more hours without less hour days to balance out the unpaid overtime.

Caryn Ranney, Denver

I have been pushed to do more but always push back. I am lucky to be valuable enough that pushing back is an option

Breian Wells, Littleton

I have ROUTINELY been required to work 120 hours in 10 days. I have ROUTINELY had to cancel vacations, not been allowed to use accrued vacation and lost vacation because I reached caps. THIS SHOULD BE ILLEGAL.

Sandra Chalmers, Arvada

I have worked extra in the past and signed an agreement for Salaried overtime in order to have the extra money. I am salary.

Patsy Pate, Littleton

I have zero protections to take breaks, lunch, and can be forced to work any ridiculous amount of hours over 40 with zero compensation.

Lauren Abrahamser, Fort Collins

I just wish I wasn't worked from 60-80 hours and still hurting for money

Cody Boden, Fort Collins

I know people with 12 hour standard days. 5 days a week. Its not fair.

Nicholas Edwin, Denver

I make \$1000 a week, with rent and utilities, in left with \$250 for food and I work 6-7 days a week.

Mary Rozier, Lafayette

I run my own business and am self employed. I believe salary paid workers deserve more pay for working overtime though.

Autumn Ivy, Denver

I see friends that are salaried working upwards of 12 hours most days, and it's not fair for someone in their 20s to be so burnt out when we are expected to work for another 40+ years.

Anneka De La Torre, Broomfield

I should get overtime pay if I work overtime. Period

Kent Steinhaus, Denver

I want the the choice to take overtime, not have it either be forced upon me or never offered to me. Salaried one should have to work more than 40 hours a week to survive. Also workers need better paid time off for FMLA and sick pay.

Alan Hester, Loveland

I was a salaried general manager for a coffee company and would routinely work 60+ hours on salary with Salaried overtime, my regular schedule guaranteed 46 hours per week on

Ben Briel, Denver

I work 50-60 hours in a work week. I'd like to get compensated fairly

William Hodde, Denver

I work 84 hrs per pay period the same salary I was receiving for 80 hrs with the company previous to a recent buyout.

William Wolanski, Denver

I work at the state hospital as a Nurse III. It is much easier to make me work extra hours than it is to pay someone else overtime.

Alyssa Darrow, Pueblo

I work in healthcare and I don't know what a 40 hour work week would look like 3 days???

Daisy Quintana, Longmont

I worked as a legal assistant in litigation. Cases and trial/settlement took all your time. Lawyers too.

Leslie Redd-Preston, Golden

I would work more and get more done if I was compensated.

Jessica Olivas, Denver

I'm an hourly worker. I know the value of overtime, and I refuse to accept a salaried position solely because I wouldn't get paid overtime. Sorry, but I value myself way too much to exploit myself like that. I've seen too many employers put employees on salary, which (for lack of a better term) gives them a loophole to abuse those employees to the point that salaried employees have Salaried work life balance anymore. This practice is absolutely criminal, and there is Salaried excuse for this behavior to take place in the wealthiest nation in the world. Every salaried worker in America earning less than \$125,000/yr deserves to be paid overtime. PERIOD!

Drew Aslin, Denver

I'm not a salaried employee, but that doesn't change my support for those who do make salary being paid more for overtime.

Kimberly Heslin, Aurora

I'm supposedly acquiring "comp time" that I can never use because I can't be gone

Kelli Scharfenberg, Denver

I'm a Sous chef, I work everyday even if I'm scheduled off.

Reginald Dotson, Denver

I'm not salaried, but many in my industry are and work up to 70 hour weeks at a flat rate. I often make more on my check than my chefs.

Anna Taylor, Denver

I'm petitioning for all the people I know who are salaried and are expected to always work in excess of 40 hours per week, but never see that extra income.

Angela Chesson, Colorado Springs

I'm signing as a wife to a manager whose time is more valuable to his family than his work, for which he is not compensated for working additional hours.

Kathleen Rapier, Fort Lupton

I'm signing this in support of a family member who is actually a 20 hour salaried professional local government worker. Her work load however means that she works 30-35. This is wrong!!

Sharon Williams, Louisville

In the accounting industry 40 hours per week is considered part time

Beth Hancock, Arvada

Instructors never receive overtime and are not protected. We are constantly taken advantage of.

Kaitlyn Hendry, Denver

It isn't fair to expect someone to give their lives up for a company to make another buck.

Karl Ford, Longmont

It's very hard to find life balance when you work long days and are on call 24/7

Aric Amore, Westminster

It's unfair when you get paid 48k a year and then you work so much your average is 15 an hour

Scott Hill, Denver

I've seen this ruin the health and well being of my supervisors. I'm signing this for all retail management.

Tanis Smith, Denver

Long overdue, I'm not exempt, I can't hire or fire or make any independent decisions.

Jeff Noble, Denver

Minimum 40 sometimes late calls. It has gotten better. But OT pay should be a thing.

Jacob Barrett, Louisville

Most of the year I work 40 hours. The last three months of the year are closer to 50-60 hours per week.

Ryan Brooks, Broomfield

My boyfriend is a salaried worker who was getting about 40 hours per week in the cannabis industry. He had been doing this at the same salary for years. Recently he was Told by his boss he needed to step up his game and be getting 55 hours per week it's Salaried additional compensation. This is very unfair and seems like it should be illegal.

Allison Kurzka, Rifle

My employer is unique in that we get paid for the hours worked even though they are now obligated to. All employers should do this. It leads to better employee satisfaction and makes us feel appreciated for the work we do.

Kevin Steller, Boulder

My employer says we are exempt workers, but by state law we don't qualify as that. We should be paid overtime.

Amy Bowinski, Broomfield

My husband is a salary employee that regularly works 70 hours per week. If you break down his salary into an hourly rate for 70 hours he makes less than minimum wage. His hourly staff makes more than him when they are allowed overtime.

Sarah Wynn, Denver

My wife is a salaried night manager for a retail store, expected to work 10-12 hours a day, but only get paid for 8 hours a day, it's about time something is done about this wrong doing going on!

Manuel Morales, Denver

My workplace thinks it's implied that you work more than 40 hours because your salaried. This is a long time coming.

Stephen Ward, Broomfield

Now retired, but was used by salaried employment to work long hours with Salaried additional pay. Part of the reason I retired early.

Wayne Boyles, Fort Collins

Often do not take full hour lunch, because there is so much to do, on days I do take full hour I often stay to get things done.

Kimberly Urban, Johnstown

One issue is work travel that is never compensated when you work over a weekend and evenings to comp time or comp pay should be offered

Betsy Wier, Fort Collins

Only get compensated when billable hours exceed 80 in pay period. When I have an average 10 non billable hours a week I'm usually not compensated for my overtime.

Robert Benson, Westminster

Previously salaried, never paid overtime wage for overtime hours

Cody Woodman, Fort Collins

Required to work 50 hour work week 10 hour days when my salary is based upon 40 hr work week at 8 hr days.

Michael Borer, Denver

Restaurant managers are a group that needs this protection.

James Gallaher, Denver

Salaried employees get taken advantage of and it's time to stop. I refuse to work for a salary and I get paid significantly less because of it. There needs to be a middle ground on this issue.

Jeff Zwegardt, Denver

Salaried workers should be paid for overtime

Eleanor Woodward, Wheat Ridge

Salary is based on a 40 hour work week.

Heather Carmickle, Castle Rock

Salary shouldn't be a way to exploit workers and cut their hourly wage

Lauren Roehrkasse, Fort Collins

Technically I'm paid for 37.5 hours per week. But I work about 45 hours a week on average. Some weeks are more and some are less.

Leslie Tremayne, Denver

The company regularly expects staff to come in early, stay late and work on weekends. When complaints are raised that we have lives and need personal time we are regularly informed that we are salary and are expected to work as long as it takes to stay caught up.

Sarah Nasatka, Colorado Springs

Theater backstage manager. I get scheduled 7 days some weeks

Eric Moore, Broomfield

This company will work you seven days a week and are required to work 48 plus hours a week and all holidays. They don't care about your health and what it's doing to our lives

Robin Williams, Brush

This is a change Colorado needs.

Grahm Hanavan, Denver

This is long overdue and will stop unethical practices in employment.

Rajesh Ashtaputre, Fort Collins

This would be nice. Salary is a guaranteed paycheck, but it doesn't cover time spent working outside of 40h a week. Would be nice.

James Beard, Longmont

We all know that putting on some extra hours to meet a looming deadline happens, but the company should also support taking off early during downtimes. If you are constantly working OT and not being compensated that's a problem that needs to be fixed.

Allison Utter, Denver

When working these kinds of hours, I have Salaried life to live outside of work and definitely don't make the money I should at the pay range I was at. I made approximately minimum wage when you factored in all the extra time I was working. Definitely not a fair exchange for a skilled employee.

Jessica Dinkel, Barnegat Light

While my average work week has been 40 hours, the demand for more of my time has increased significantly over the last six months. I have found this to be true at the last 2 firms I worked for. The more trained you become, the more of your time they need due to the current level of development occurring in and around Denver. Salary

compensation is already lacking in comparison to cost of living increases, but I can not accommodate getting a second job without upsetting my primary employer due to their need.

Michael Walton, Arvada

Would love it if accounts could make OT again

Brady Huang, Aurora

Work at a local retailer and they have made it impossible for many salaried managers to have any kind of a personal life. Requiring at all hours to be available without compensation

Brett Petersen, Greeley

	First name	Last name	Email	City	Hours	Industry other	Status
1	Douglas	Jackson		Fort Collins	50	Pharmacist	Salaried
2	Linette	Olson		Longmont	55-60	Retail	Salaried
3	Austin	Travis		Windsor	40	Restaurant	Hourly
4	Amanda	Lieser		Greeley	50	Hospitality	Salaried
5	Justin	Anzelc		Longmont	55	Construction	Salaried
6	Nicholas	Kalk		Loveland	35	Restaurant	Hourly
7	Alex	Chapin		Wheat Ridge	40	Education	Hourly
8	Tammy	Crynes		Denver	43	Oil / engineering	Salaried
9	Mandi	Baxter		Fort Collins	50	Healthcare	Salaried
10	Robin	Cunningham		Denver	50	Restaurant	Salaried
11	Elizabeth	Apodaca		Boulder	45	Sales	Salaried
12	Nicholas	Ernster		Denver	60	Office	Salaried
13	Brock	Jackson		Denver	42	Retail	Salaried
14	Adam	Rapier		Fort Lupton	40-60	Agriculture	Salaried
15	Ekaterina	Alexandrova		Boulder	50	Restaurant	Salaried
16	Ariana	Sampen		Arvada	43	Office	Hourly
17	Iori	Phelan		Fort Collins		Retail	Hourly
18	Elisha	Reichert		Littleton	60	Restaurant	Salaried
19	John	Furlong		Denver	48	Restaurant	Hourly
20	Brett	Dowgin		Fort Collins	50	K-12 Education	Salaried
21	Corey	Fletcher		Colorado Springs	50-80	Hospitality	Salaried
22	Megan	Wick		Windsor	50	Office	Salaried
23	Rebekah	Dispoto		Colorado Springs	45-50	Government Contractor	Hourly
24	Heather	Crandall		Broomfield	40	Nonprofit	Hourly
25	Anthony	Beltracchi		Avon	40 - 50	Restaurant	Hourly
26	Molly	Heckman		Lone Tree	38-40	Restaurant	Hourly
27	Victoria	Sapp		Englewood	40-45	Retail	Hourly
28	Victoria	Longstrom		Littleton	50	Corrections	Salaried
29	Hannah	Henderson		Broomfield	44	Technology Sales and Disturbing	Salaried
30	Jalen	NEWKIRK		Arvada	65	Automotive Repair	Salaried
31	Kate	Hegman		Boulder	50-60		Salaried
32	Caryn	Ranney		Denver	30	Employee Wellness	Salaried
33	Brian	Hirsch		Golden	41	Office	Hourly
34	Brian	Volk		Littleton	40	Aerospace	Hourly
35	Breian	Wells		Littleton	40	Office	Salaried
36	Sandra	Chalmers		Arvada	50	Research	Salaried
37	Patsy	Pate		Littleton	40		Salaried
38	Lauren	Abrahamsen		Fort Collins	55 - 60	Veterinary	Salaried
39	Cody	Boden		Fort Collins	60	Landscape and mowing	Salaried
40	Nicholas	Edwin		Denver	50-55	Restaurant	Salaried
41	Mary	Rozier		Lafayette	50-60	Restaurant	Salaried
42	Autumn	Ivy		Denver	50	Retail	Salaried
43	Anneka	De La Torre		Broomfield	32	Healthcare	Hourly
44	Kent	Steinhaus		Denver	40	Engineer	Salaried

	First name	Last name	Email	City	Hours	Industry other	Status
45	Alan	Hester		Loveland	40	Office	Hourly
46	Ben	Briel		Denver	46	Restaurant	Salaried
47	William	Hodde		Denver	56	Office	Salaried
48	William	Wolanski		Denver	42	Retail	Hourly
49	Alyssa	Darrow		Pueblo	50	Nurse at State Hospital	Salaried
50	Daisy	Quintana		Longmont	60	Office	Salaried
51	Jessica	Hilverding		Rifle	49	Healthcare	Salaried
52	Leslie	Redd-Preston		Golden	60	Retired	Salaried
53	Jessica	Olivas		Denver	45	Research	Salaried
54	Drew	Aslin		Denver	45-50	Solar	Hourly
55	Kimberly	Heslin		Aurora	45	Office	Hourly
56	Kelli	Scharfenberg		Denver	60 - 80	Early childhood education	Salaried
57	Reginald	Dotson		Denver	75	Restaurant	Salaried
58	Anna	Taylor		Denver	47	Restaurant	Hourly
59	Angela	Chesson		Colorado Springs	45-60	Retail	Salaried
60	Kathleen	Rapier		Fort Lupton	50	Facilities	Salaried
61	Sharon	Williams		Louisville	35	Office	Salaried
62	Beth	Hancock		Arvada	50	Accounting	Salaried
63	Kaitlyn	Hendry		Denver	45-50	Cosmetology Instructor	Salaried
64	Karl	Ford		Longmont	40		Hourly
65	Aric	Amore		Westminster	50 - 60	Office	Salaried
66	Scott	Hill		Denver	50	Restaurant	Salaried
67	Tanis	Smith		Denver	40	Retail	Hourly
68	Jeff	Noble		Denver	55	Construction	Hourly
69	Jacob	Barrett		Louisville	40	Technology Manufacturing	Salaried
70	Ryan	Brooks		Broomfield	40	Office	Salaried
71	Allison	Kurzka		Rifle	41	Nonprofit	Hourly
72	KEVIN	STELLER		Boulder	45	IT	Hourly
73	Amy	Bowinski		Broomfield	50	Travel	Salaried
74	Michael	Gregory		Broomfield	40-60		Salaried
75	Sarah	Wynn		Denver	70	Restaurant	Salaried
76	Manuel	Morales		Denver	46-52	Trucking	Hourly
77	Stephen	Ward		Broomfield	50	Office	Salaried
78	Wayne	Boyles		Fort Collins	50		Salaried
79	Kimberly	Urban		Johnstown	55	Retail	Salaried
80	Betsy	Wier		Fort Collins	60	Higher Ed	Salaried
81	Robert	Benson		Westminster	50	Office	Hourly
82	Wendy	Maily		Colorado Springs	60	Education	Salaried
83	Kate (Kathleen)	Goss		Longmont	55-60	Education	Salaried
84	Cody	Woodman		Fort Collins	60	currently unemployed	Salaried
85	Michael	Borer		Denver	50	Transportation	Salaried
86	James	Gallaher		Denver		Restaurant	Salaried

	First name	Last name	Email	City	Hours	Industry other	Status
87	Jeff	Zweygardt		Denver	40	Construction	Hourly
88	Drew	Dickinson		Denver	30	Restaurant	Hourly
89	Eleanor	Woodward		Wheat Ridge		Retired	Salaried
90	Heather	Carmickle		Castle Rock	50	Gas station	Salaried
91	Anthony	Slowey		Denver	55-60	Restaurant	Salaried
92	Lauren	Roehrkasse		Fort Collins	45	Office	Hourly
93	Leslie	Tremayne		Denver	45	Education	Salaried
94	Sarah	Nasatka		Colorado Springs	50	Insurance	Salaried
95	Eric	Moore		Broomfield	70 or 80		Salaried
96	Robin	Williams		Brush	48	Dollar general	Salaried
97	Grahm	Hanavan		Denver	56	Retail	Salaried
98	Rajesh	Ashtaputre		Fort Collins	40-50	Information Technology	Salaried
99	James	Beard		Longmont	55	Software Development	Salaried
100	Allison	Utter		Denver	43	Tech	Salaried
101	Jessica	Dinkel		Barnegat Light	60	Office	Salaried
102	Michael	Walton		Arvada	40	Engineering	Salaried
103	Brett	Petersen		Greeley	60-70	Retail	Salaried
104	Brady	Huang		Aurora	45	Office	Salaried
105	Alisa	Kemberling		Aurora	17		Hourly
106	Devon	Mckenzie		Parker	26	Restaurant	Hourly
107	Derrick	Maese		Denver	32	Retail	Hourly
108	Aimee	Foster		Aurora	38	Healthcare	Hourly
109	Samantha	Quinn		Aurora	40	Nonprofit	Hourly
110	Michael	Margolis		Boulder	40	Retail	Hourly
111	Kimberly	Franks		Littleton	40	Office	Hourly
112	Kimberly	Kerrick		Denver	40	Cannabis warehouse	Hourly
113	Monica	Wright		Aurora	40		Hourly
114	Marcia	Kavey		Fort Collins	40	Computer Engineering	Hourly
115	Ally	Biernat		Fort Collins	40	Health and Wellness	Hourly
116	Donald	Stanley		Broomfield	40	Retail	Hourly
117	Troy	Burbidge		Westminster	40	Nonprofit	Hourly
118	Laura	MacWaters		Fort Collins	40	Govt	Hourly
119	Michelle	Ferrier		Wellington	40	Office	Hourly
120	Jessica	Morse-Leppek		Longmont	40	Office	Hourly
121	Marcia	Kavey		Fort Collins	40	Computer Engineering	Hourly
122	Nick	Alba		Boulder	40	Importing/Exporting	Hourly
123	Nicholas	Ladd		Windsor	40	Retail	Hourly
124	Nicholas	Ladd		Windsor	40	Retail	Hourly
125	Matthew	Norman		Denver	40	Maintenance	Hourly
126	Caleb	mikel		Erie	40	Machining	Hourly
127	Caleb	mikel		Erie	40	Machining	Hourly
128	Caleb	mikel		Erie	40	Machining	Hourly

	First name	Last name	Email	City	Hours	Industry other	Status
129	Aris	Cruson		Denver	40	Manufacturing	Hourly
130	Collin	Marler		Denver	40	Construction	Hourly
131	Devon	Christensen		Omaha	42	Office	Hourly
132	Katrina	Mattia		Englewood	45	Restaurant	Hourly
133	Brad	Tornow		Longmont	45	Retail	Hourly
134	Katrina	Mattia		Englewood	45	Restaurant	Hourly
135	Phillip	Kelly		Denver	45		Hourly
136	Bradly	Hartman		Longmont	45	Restaurant	Hourly
137	Ivan	Baker		Loveland	45	Office	Hourly
138	Roman	Arjona		Lafayette	45	Retail	Hourly
139	Tyler	Richardson		Aurora	50	Office	Hourly
140	Stephanie	Giannino		Broomfield	50	Government	Hourly
141	Spencer	Garrick		Boulder	50		Hourly
142	adam	espinozs		Denver	50	Retail	Hourly
143	adam	espinozs		Denver	50	Retail	Hourly
144	Brenda	Wright		Arvada	55	Retail	Hourly
145	Sarah	Wernecke		Las Vegas	55	Retail	Hourly
146	Luana	Lee		Denver	55	Finance	Hourly
147	Nicholas	Tipton		Denver	60		Hourly
148	Bradley	Anderson		Westminster	60	Education	Hourly
149	John	Taylot		Denver	60	Restaurant	Hourly
150	James	Pyatt		Eaton	60	Oil and gas	Hourly
151	Kari	Snelson		Denver	75	Nonprofit	Hourly
152	Jeremiah	ODea		Loveland	35-45	Beer	Hourly
153	Juan	Campos		Westminster	45-55	Office	Hourly
154	Catherine	Fowler		Evergreen			Hourly
155	Michael	Hernandez		Denver			Hourly
156	nate	chapman		Denver			Hourly
157	Brooke	Medina		Boulder		Retail	Hourly
158	Kenneth	Shafer		Durango			Hourly
159	Alex	Fraser		Denver		Restaurant	Hourly
160	Kelly	Lovely		Denver	36	Health care	Salaried
161	Nicola	Bahr		Longmont	37.5	Education	Salaried
162	Leanne	Brink		Frederick	38	Nonprofit	Salaried
163	Greg	Evans		Castle Rock	40	Construction	Salaried
164	Steve	Headlee		Morrison	40	Entertainment	Salaried
165	Patrick	Goddard		Boulder	40	Engineering	Salaried
166	Jeremy	Hymes-Balsley		Denver	40	Information technology	Salaried
167	Kai	Whitside		Denver	40	Systems Integrator	Salaried
168	Patrick	Goddard		Boulder	40	Engineering	Salaried
169	Adrienne	Schafer		Golden	41	Office	Salaried
170	Adrienne	Schafer		Golden	41	Office	Salaried
171	Peter	Sandak		Westminster	42	Office	Salaried
172	Cassandra	Theisen		Laporte	42	Nonprofit	Salaried
173	Justin	Teitelbaum		Loveland	43	Automotive	Salaried

	First name	Last name	Email	City	Hours	Industry other	Status
174	Clifford	Brice		Littleton	44	Broadcast	Salaried
175	Isabelle	Campanella		Dillon	44	Health care	Salaried
176	Alan	Coon		Longmont	45	Beer	Salaried
177	Ian	Slutzky		Wheat Ridge	45	Retail	Salaried
178	Mitchell	Feehan		Broomfield	45	Office	Salaried
179	Shannon	Sauers		Denver	45	Office	Salaried
180	David	Cohen		Boulder	45	Software	Salaried
181	Lance	Weber		Frederick	45	Trailer supplies	Salaried
182	Kelley	Good		Erie	45	Office	Salaried
183	Benjamin	Shores		Erie	45	Automotive	Salaried
184	Justin	Goldman		Denver	45	Engineering	Salaried
185	Leslie	Tremayne		Denver	45	Education	Salaried
186	Oscar	Chávez Sandoval		Johnstown	45	Retail	Salaried
187	Nicholas	LaCombe		Denver	45	Office	Salaried
188	Michael	Wright		Aurora	45	Nonprofit	Salaried
189	Angie	Hardley		Wellington	45	Sciences	Salaried
190	Bailey	Naas		Loveland	45	Office	Salaried
191	Rachel	Henemann		Parker	45	Nonprofit	Salaried
192	Kelly	Ronan		Littleton	45	Marketing	Salaried
193	Andra	Cirbo		Arvada	45	Restaurant	Salaried
194	Amanda	Lynch		Denver	45	IT	Salaried
195	Crystal	Gimeno		Westminster	45	Office	Salaried
196	Emily	Cervantes		Denver	45	Nonprofit	Salaried
197	Nathan	Hamilton		Denver	45	Teacher	Salaried
198	Ginny	Rowley		Denver	45	Office	Salaried
199	Joshua	Keller		Fort Collins	45	Office	Salaried
200	Stacey	Wiemers		Denver	45	Office	Salaried
201	Amelia	Lammann		Broomfield	45	Retail	Salaried
202	Kate	Borrasca		Boulder	45	Office	Salaried
203	Erin	Boyle		Broomfield	45	Restaurant	Salaried
204	Elizabeth	Sayer		Denver	45	Office	Salaried
205	Robert	Spradlin		Denver	45	Office	Salaried
206	Joseph	Gorrino		Denver	45	Banking	Salaried
207	Dakota	Downey		Longmont	45	Restaurant	Salaried
208	Sarah	Bomgardner		Usaf Academy	45		Salaried
209	Kathryn	Evans		Colorado Springs	46	Education	Salaried
210	Lisa	Nordhauser		Denver	48	Healthcare	Salaried
211	Efrain	Juarez		Wheat Ridge	48	Restaurant	Salaried
212	Lori	Mann		Fort Collins	48	Office	Salaried
213	Sharon	P		Boulder	48	Office	Salaried
214	Jason	McKenzie		Broomfield	48	Engineering	Salaried
215	Bruce	Roth		Denver	48	Aerospace	Salaried
216	Sherry	Sanderson		Fort Collins	48		Salaried
217	Seth	Carvil		Boulder	49	Solar	Salaried
218	Ray	Martin		Aurora	50	Hospitality	Salaried
219	Ray	Martin		Aurora	50	Hospitality	Salaried

	First name	Last name	Email	City	Hours	Industry other	Status
220	Douglas	Miles		Fort Collins	50	Office	Salaried
221	Jessie	Way		Denver	50	Office	Salaried
222	Megan	Murray		Parker	50	Office	Salaried
223	Timothy	Odette		Denver	50	Nonprofit	Salaried
224	Stephanie	Flores		Brighton	50	Retail	Salaried
225	Jason	Davis		Denver	50	Nonprofit	Salaried
226	Sera	Shaw		Arvada	50	Education	Salaried
227	Silas	C		Denver	50	Office	Salaried
228	Tim	Lopez		Denver	50		Salaried
229	Matthew	Comfort		Denver	50	Cannabis	Salaried
230	Katarina	Cruz		Denver	50	Sales	Salaried
231	Willard	Goad		Thornton	50	Retired Civil Service	Salaried
232	Katrina	Picado		Denver	50		Salaried
233	David	Bonds		Denver	50	Automotive	Salaried
234	Kristie	Peroni		Aurora	50	Office	Salaried
235	Cyndi	Morris		Bayfield	50	Retail	Salaried
236	Timothy	Bergman		Lafayette	50	Education	Salaried
237	Keith	Smith		Littleton	50	Office	Salaried
238	Gennica	Petty		Denver	50	Office	Salaried
239	Tammy	Whitaker		Broomfield	50	Nonprofit	Salaried
240	Laura	Keith		Loveland	50	Oil and gas	Salaried
241	Jennifer	Morris		Littleton	50	Healthcare	Salaried
242	Beth	Gallinger		Denver	50	Nonprofit	Salaried
243	Joseph	Pawelski		Fort Collins	50	Manufacturing	Salaried
244	Loretta	Andis		Wheat Ridge	50	Nonprofit	Salaried
245	Nate	Ahrens		Longmont	50	Nonprofit	Salaried
246	Matthew	Rademacher		Longmont	50	Office	Salaried
247	Joseph	Bain		Boulder	50		Salaried
248	Tammy	Steller		Boulder	50	Insurance	Salaried
249	Anja	Semanco		Boulder	50	Nonprofit	Salaried
250	Kelly	McDermott		Wheat Ridge	50	Higher Education	Salaried
251	Ryan	Salber		Fort Collins	50	Construction	Salaried
252	Jacob	Bagwell		Loveland	50	IT	Salaried
253	Graciela	Garcia		Denver	50	Nonprofit	Salaried
254	DJ	Oakes		Littleton	50	Restaurant	Salaried
255	Joseph	Butkovich		Broomfield	50	Restaurant	Salaried
256	Kyle	Regan		Loveland	50	Construction	Salaried
257	Lucas	Sorensen		Longmont	50	Retail	Salaried
258	Erin	Richards		New Castle	50	Education	Salaried
259	Seth	Phillips		Denver	50	Office	Salaried
260	Jasmine	Eppler		Broomfield	50	Office	Salaried
261	Peter	Bullard		Denver	50	Banking	Salaried
262	Claire	Marquess		Denver	50	Marketing	Salaried
263	James	Boyce		Colorado Springs	50	Government	Salaried
264	Sarah	O'Reilly		Greeley	50	Restaurant	Salaried

	First name	Last name	Email	City	Hours	Industry other	Status
265	Rebecca	Hamm		Dacono	50	Information Technology	Salaried
266	Dawn	Rutledge		Colorado Springs	50	Office	Salaried
267	Nikolas	Barnhill		Denver	50	Retail	Salaried
268	Mark	Mills		Fort Collins	50	Construction	Salaried
269	Marcie	Mavreles		Windsor	50		Salaried
270	Terra	Kennedy Meairs		Denver	50	Healthcare	Salaried
271	Brian	Kerr		Broomfield	50	Landscaping	Salaried
272	Jennifer	Allen		Greeley	50	Nursing	Salaried
273	Mag	Equivel		Pueblo	50	Restaurant	Salaried
274	Dawna	Fauver		Canon City	50	Office	Salaried
275	Chris	Bass		Denver	50	Office	Salaried
276	Brooke	Meltzer		Denver	50	Office	Salaried
277	Grace	Garcia		Denver	50	Restaurant	Salaried
278	Michele	Morrisette		Boulder	50	IT	Salaried
279	Robert	Sorrentino			50		Salaried
280	Matt	Paul		Aurora	50	Recreation	Salaried
281	Jerome	Kogovsek		Arvada	50	Technical	Salaried
282	Jared	Green		Broomfield	50		Salaried
283	Luke	Crumb		Boulder	50	Office	Salaried
284	Trey	Feldman		Denver	50	Technology Consulting	Salaried
285	Anthony	Mele		Dillon	50	Restaurant	Salaried
286	Cody	Rainwater		Brighton	50	Office	Salaried
287	Jason	Toepfer		Denver	50	Information Technology	Salaried
288	Anna	Hostetter		Broomfield	50	Office	Salaried
289	Danielle	Wallace		Greeley	50		Salaried
290	Kaitlyn	Donnelly		Colorado Springs	50	Education	Salaried
291	Cassie	Mohr		Denver	50		Salaried
292	Dan	Wurderman		Colorado Springs	50	construction	Salaried
293	Jennifer	Smith		Brighton	50	Retail	Salaried
294	Brian	Smith		Denver	50	Restaurant	Salaried
295	Perry	Johnston		Thornton	50	Automotive	Salaried
296	Meredith	Krasnisky		Arvada	50	Office	Salaried
297	Christine	Dominick		Longmont	50	Office	Salaried
298	Kelly	Boich		Denver	50	Manufacturing	Salaried
299	Steve	Allen		Broomfield	50	IT	Salaried
300	Jessica	Valdez		Commerce City	50	Retail	Salaried
301	Rex	Decker		Black Hawk	50	Staffing and recruiting	Salaried
302	Jessica	Valdez		Commerce City	50	Retail	Salaried
303	Eric	Poulson		Littleton	52	Construction	Salaried
304	Mike	Kocerha		Brighton	52	Satellite tv	Salaried
305	Susan	Cobb		Denver	52	Security management	Salaried
306	Kenneth	Phipps		Broomfield	53	Retail	Salaried

	First name	Last name	Email	City	Hours	Industry other	Status
307	Hildegarde	Hoover		Fort Lupton	53	Retail	Salaried
308	Martin	Hotchkiss		Grand Junction	55	Car dealership	Salaried
309	Lisa	Cerny		Boulder	55	Restaurant	Salaried
310	Luke	McCall		Denver	55	Office	Salaried
311	Grace	Hirt		Golden	55	Nonprofit	Salaried
312	Cotie	Friedman		Colorado Springs	55	Medical-Laboratory	Salaried
313	Anthony	Maderas		Brighton	55	Restaurant	Salaried
314	Christina	Davis		Aurora	55	Restaurant	Salaried
315	Zach	Lowry		Fort Collins	55	Outside sales	Salaried
316	Colin	Kirk		Longmont	55	Software	Salaried
317	Christopher	Spurluk		Colorado Springs	55	Cannabis	Salaried
318	Isaac	Ross		Boulder	55	Restaurant	Salaried
319	Rod	Lopez		Littleton	55		Salaried
320	Bobbi	Miller		Arvada	55		Salaried
321	Ashley	Dancer		Broomfield	55	Office	Salaried
322	Jeffrey	Noble		Denver	55	construction	Salaried
323	Robert	Braidich		Frederick	55	Automotive	Salaried
324	Colleen	Rich		Loveland	55	Restaurant	Salaried
325	Jamie	Truitt		Denver	55	Food manufacturing	Salaried
326	Joe	Wiegand		Loveland	55	Automotive	Salaried
327	Jennie	Campbell		Boulder	55	Office	Salaried
328	Sarah	King		Denver	55	Retail	Salaried
329	Christopher	Hoffman		Milliken	55	Retail	Salaried
330	Ron	Cooper		Fort Collins	55	Restaurant	Salaried
331	Gabriela	Marcial		Monument	55	Restaurant	Salaried
332	Emily	Odom		Denver	55	Restaurant	Salaried
333	Spencer	Hysell		Commerce City	55	Restaurant	Salaried
334	Nicholas	Morgan		Denver	55	Restaurant	Salaried
335	Andrew	Levine		Broomfield	55		Salaried
336	Ashley	Dancer		Broomfield	55	Office	Salaried
337	Katie	Calderone		Denver	55	Restaurant	Salaried
338	Katie	Calderone		Denver	55	Restaurant	Salaried
339	Patrick	Dougan		Aurora	55	Warehouse USDA production facility	Salaried
340	Paula	Hammel		Denver	55	Education	Salaried
341	Gopa	Ross		Loveland	55	Retired teacher	Salaried
342	Nicholas	Joseph		Dacono	55	Nonprofit	Salaried
343	Joel	Nelson		Denver	55	Retail	Salaried
344	Rachel	Woodworth		Berthoud	56	Retail	Salaried
345	Phillip	Beehler		Dacono	56	Fire Dept	Salaried
346	Melissa	Chiquelin		Denver	56	Medical	Salaried
347	Riley	Fraze		Walsh	60	Government	Salaried
348	John	Ryan		Littleton	60	Information Security	Salaried
349	Khaled	Alnajjar		Denver	60	Restaurant	Salaried
350	Christian	McGill		Denver	60	Office	Salaried

	First name	Last name	Email	City	Hours	Industry other	Status
351	John	Brandenburg		Denver	60	Biotech	Salaried
352	Mark	Biesecker		Denver	60	Restaurant	Salaried
353	Joshua	Quitmeyer		Westminster	60	Construction	Salaried
354	Vanessa	Enriquez Krone		Fort Collins	60	Pharmaceutical industry	Salaried
355	Kimberly	Lewis		Denver	60	Education	Salaried
356	Michael	Brashers		Brighton	60	Nonprofit	Salaried
357	Antone	Borkowski		Denver	60	Retail	Salaried
358	Matthew	Gawelko		Conifer	60	Construction	Salaried
359	Sarah	Michael		Aurora	60	Healthcare	Salaried
360	Jeremy	Gant		Arvada	60	Road Construction	Salaried
361	Jeremy	Gant		Arvada	60	Road Construction	Salaried
362	Shannon	Connolly		Aurora	60		Salaried
363	Clarissa	Nielsen		Thornton	60	Technology	Salaried
364	Sean	Kemberling		Aurora	60	Retail	Salaried
365	David	Rimlinger		Loveland	60	Healthcare	Salaried
366	Shauna	Johnson		Windsor	60	Healthcare	Salaried
367	Patrick	Jones		Pueblo	60	Office	Salaried
368	Phil	Bash		Longmont	60		Salaried
369	Christopher	Morgan		Denver	60	Meal Kit	Salaried
370	Dave	Heisch		Denver	60	Restaurant	Salaried
371	Glenn	Mercier		Longmont	60	Retail	Salaried
372	Audrey	Eskridge		Aurora	60	Insurance adjuster	Salaried
373	Christopher	Morgan		Denver	60	Meal Kit	Salaried
374	Jeffrey	Stevenson		Longmont	60	Restaurant	Salaried
375	kelli	kudrick		Denver	60	Restaurant	Salaried
376	Cathleen	Keller		Denver	60	Office	Salaried
377	Nolan	Hector		Denver	60	Construction	Salaried
378	Christian	Hernandez		Denver	60	Restaurant	Salaried
379	Aurora	Bernal		Denver	60	Education	Salaried
380	Tina	Wallace		Colorado Springs	60	Education	Salaried
381	David	Lawles		Brighton	60	Office	Salaried
382	Brandi	Rand		Parker	65	Restaurant	Salaried
383	Kathryn	Adney		Denver	65	Restaurant	Salaried
384	Sidney	Frank		Aurora	65	Restaurant	Salaried
385	Uzair	Khan		Aurora	65	Restaurant	Salaried
386	Andrea	Aiello		Littleton	65	Restaurant	Salaried
387	Kira	Brodie		Colorado Springs	65		Salaried
388	Joe	Noname		Boulder	65		Salaried
389	Richard	Dominiak		Denver	65	Retail	Salaried
390	Eric	Gardunio		Montrose	65		Salaried
391	Tatum	Cochran		Fort Collins	65	Restaurant	Salaried
392	Whitney	Patterson		Westminster	70	Restoration/ Construction	Salaried
393	Kari	Belstra		Parachute	70	Hospitality/ teaching	Salaried

	First name	Last name	Email	City	Hours	Industry other	Status
394	Kari	Belstra		Parachute	70	Hospitality/ teaching	Salaried
395	Trevor	Patch		Denver	70	Office	Salaried
396	Nick	Smith		Arvada	70		Salaried
397	Nyvitaly	Lyons Fraga		Broomfield	70	Office	Salaried
398	Peter	Krawiec		Breckenridge	75	Retail	Salaried
399	Joshua	Harris		Littleton	75	Warehousing	Salaried
400	Michael	Bealer		Erie	75		Salaried
401	Reginald	Dotson		Denver	75	Restaurant	Salaried
402	Korey	Dunaway		Woodland Park	80	Restaurant	Salaried
403	Miles	Wentland		Wellington	80	Oil and Gas	Salaried
404	Kayla	Surber		Englewood	80	Office	Salaried
405	Mark	Dickinson		Denver	80	Office	Salaried
406	Mayra	Brumley		Castle Rock	90	Restaurant	Salaried
407	David	Clark		Longmont	92	Office	Salaried
408	Trine	Warren		Commerce City	100		Salaried
409	Carmen	Flores		Broomfield	112	Commercial Cleaning/Janitorial	Salaried
410	Taylor	Smith		Longmont	35-45	Restaurant	Salaried
411	Tania	Vijarro		Parker	40 - 60		Salaried
412	Allie	Porter		Arvada	40-44	Office	Salaried
413	Leah	Reed		Arvada	40-45	Promotional	Salaried
414	Stephanie	Scott		Denver	40-47	Legal	Salaried
415	Cameron	Braatz		Denver	40-50	Design	Salaried
416	Angela	Coates		Arvada	40-50	Restaurant	Salaried
417	Donald	Kellenbarger		Grand Junction	40-70	Oil/Gas	Salaried
418	Thomas	Bell		Denver	44 - 50	Restaurant	Salaried
419	Kelly	Landrum		Boulder	44-50	Mental Health	Salaried
420	Maite	Benitez		Broomfield	45 - 50	Office	Salaried
421	Robert	Gomez		Longmont	45 - 50	Restaurant	Salaried
422	Rick	Bishop		Arvada	45-48	Retail	Salaried
423	Andrew	LETIZIA		Broomfield	45-50	Construction managment	Salaried
424	Nancy	Evans		Denver	45-50	Office	Salaried
425	Connie	Dixon		Denver	45-50	Office	Salaried
426	Sarah	Horn		Denver	45-50	Urban Planning + Design	Salaried
427	Jon	Murphy		Denver	45-50	Engineering	Salaried
428	DUSTIN	FULFORD		Aurora	45-50	Automotive	Salaried
429	Jessica	Clerkin		Berthoud	45-50	Early childhood education	Salaried
430	Matt	Gustafson		Fort Collins	45-50	Restaurant	Salaried
431	Chelsea	Parraga		Denver	45-50	Nonprofit	Salaried
432	Sidney	Merrill		Fort Collins	45-50	Office	Salaried
433	Emily	Boyd		Berthoud	45-50	Dietary supplement manufacturing/ quality	Salaried
434	Rachael	Sheaffer		Denver	45-50	Nonprofit	Salaried

	First name	Last name	Email	City	Hours	Industry other	Status
435	Mary Jillian	Knapp-Rhodes		Louisville	45-50	Government	Salaried
436	Thomas	O'Donnell		Longmont	45-50	Office	Salaried
437	Sarah	Brooks		Durango	45-50	Nonprofit	Salaried
438	Danielle	Schroeder		Parker	45-50	Social work	Salaried
439	Michael	McMillan		Thornton	45-50	Communications	Salaried
440	Jonathan.	Ley		Broomfield	47-55	Sales	Salaried
441	Barbara	Schleis		Brighton	50 - 60	Nursing	Salaried
442	RyAnne	Scott		Loveland	50-50	Higher Education	Salaried
443	Rhoda	Kues		Wheat Ridge	50-55	Restaurant	Salaried
444	Lona	Smith		Denver	50-55	Restaurant	Salaried
445	Elizabeth	Sugarmann		Loveland	50-55	Office	Salaried
446	Kerrie	Darby		Boulder	50-55	Restaurant	Salaried
447	Kirill	Nirman		Denver	50-55	Restaurant	Salaried
448	Hunter	Morrison		Castle Rock	50-60		Salaried
449	Ethel	Bollinger		Colorado Springs	50-60	Retail	Salaried
450	Ashle	Johnson		Aurora	50-60	Nonprofit	Salaried
451	Shannon	King		Ault	50-60	Education	Salaried
452	Anthony	Casares		Longmont	50-60	Towing	Salaried
453	Jennifer	Sementelli		Denver	50-60	Education research	Salaried
454	Shannon	Farrar		Arvada	50-60	Telecom	Salaried
455	Suzanne	Null		Durango	50-60	College professor	Salaried
456	Grant	Guthrie		Fort Collins	50-60	Cannabis	Salaried
457	Shawna	Zayonc		Arvada	50-60	Government	Salaried
458	Ron	Hamilton		Green Mountain Falls	50-60	Education	Salaried
459	Ethel	Bollinger		Colorado Springs	50-60	Retail	Salaried
460	Ethel	Bollinger		Colorado Springs	50-60	Retail	Salaried
461	Maria	Rodriguez		Colorado Springs	50-60	Restaurant	Salaried
462	Ruth	Dwyer		Aurora	50-60	Education	Salaried
463	MadissaBelle	Kent		Lafayette	50-60		Salaried
464	Susanne	Suyama		Colorado Springs	55 - 75	Restaurant	Salaried
465	Rylan	Macvey		Denver	55-60	Office	Salaried
466	Leon	Frizzell		Aurora	55-60	Restaurant	Salaried
467	Jerimiah	Cobb		Loveland	55-60	Home service	Salaried
468	Deb	Wilken		Golden	55-60	Retail	Salaried
469	Sarah	Eppler		Broomfield	60 - 75	Restaurant	Salaried
470	Greg	Happner		Aurora	60-70	Cannabis irrigation	Salaried
471	Paul	Parsons		Golden	60-80	Transportation	Salaried
472	Jeanette	Craig		Colorado Springs	65-68	Retail	Salaried
473	Alan	Webb		Brighton	65-70	Audiovisual	Salaried
474	Miguel	Ramirez		Longmont	65-80	Restaurant	Salaried
475	Tara	Allman		Gunnison		Outdoor/Higher Education	Salaried
476	Tara	Allman		Gunnison		Outdoor/Higher Education	Salaried
477	Bonita	Sellstrom		Arvada		Retired	Salaried
478	Cinda	Taylor		Louisville		Childcare	Salaried

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479	Jordan	Brewer		Denver		medical device	Salaried
480	Jennifer	Fields		Denver			Salaried
481	Sandra	Cooper		Denver			Salaried
482	Patrick	Porter		Denver			Salaried
483	Katherine	Isaacson		Fort Collins		Office	Salaried
484	Mark	Golembiewski		Lone Tree			Salaried
485	Terri	Wilcox Burke		Broomfield		Nonprofit	Salaried
486	Elliott	Harnagel		Boulder		Office	Salaried
487	Cary	Rutherford		Wellington		Software	Salaried
488	Lucia	Harrop		Louisville			Salaried
489	Anna	Vaughn		Loveland		Office	Salaried
490	Justin	West		Denver			Salaried
491	Svittana	Soltysyak		Broomfield		Office	Salaried
492	Marian	White		Englewood		Office	Salaried
493	Zachary	Manns		Fort Collins		Hospitality	Salaried
494	Sriram	Ravulapati		Longmont		Office	Salaried
495	Ben	Williams		Arvada		Retail	Salaried
496	Denise	Zenier		Avon			Salaried
497	Nathan	BOLLES		Fort Collins			Salaried
498	Chelcie	Britt		Arvada			Salaried
499	Donna	Bonetti		Boulder		Office	Salaried
500	Pamela	Napier		Fort Collins		Transportation	Salaried
501	Suzy	Ringdahl		Fort Collins			Salaried
502	Lawrence	Yuen		Denver		Office	Salaried
503	Amanda	Fletcher		Colorado Springs			Salaried
504	Jamie	Shaw		Denver		Retail	Salaried
505	Elise	Tribby		Denver		Office	Salaried
506	Morgan	Griffin		Denver		Healthcare	Salaried
507	Larissa	Flora		Edgewater			
508	Katherine	Knudson					

Laura Quinto Huarez

Nombre

Medical field

Industria/área de trabajo

El número de teléfono y correo electrónico (requerido)

Comentario:

Nuestros trabajadores merecen

derechos justos. Sin ellos

este mundo no tendría

las facilidades que tenemos.

Dependemos mucho de estos

trabajadores y merecen lo

justo.

Departamento de Trabajo y Empleo de Colorado

**Ya es hora para proteger a todos los
trabajadores**

Aplaudo al Departamento por publicar una regla preliminar (COMPS Order) y le recomiendo que use su autoridad para:



Cubrirles a todos los trabajadores bajo las protecciones del COMPS Order, incluyendo los de la construcción y la agricultura



Instituir un umbral salarial estatal de \$57,500 a comienzos de 2023

To: Scott Moss

Director de la División de Estándares de Labor y Estadísticas

scott.moss@state.co.us

303-318-8172

Amor Felix

First and Last Name (required)

Medic

Industry/Area of Work

[Redacted]

Phone Number and Email (required)

Comment

I believe agriculture workers should have rights to benefits and overtime pay.

COLORADO
DEPARTMENT OF LABOR
AND EMPLOYMENT

**IT'S TIME TO PROTECT ALL
COLORADO WORKERS**

**I applaud the CDLE for its work
on the proposed COMPS Order
and believe they should use
their authority to:**



**Protect all workers, including those
in agriculture and construction**



**Institute a statewide overtime salary
threshold of at least \$57,500 by 2023**

To: Scott Moss
Director Division of Labor Standards and Statistics
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303-318-8172

Davor Cabrera

First and Last Name (required)

Moving

Industry/Area of Work

Phone Number and Email (required)

Comment

Having worked in a plethora of areas, its a must that we expand and protect our rights, not only to improve our quality of life but to ensure future generations see this as the standard and not some dream we hope for.

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Alexxis Sanchez

First and Last Name (required)

Non profit / service

Industry/Area of Work

Phone Number and Email (required)

Comments

I am excited to see what the final ruling will look like from the department as the 1st draft is highly promising. I look forward to seeing the inclusion of coverage of all workers & agricultural workers as well as their testimonies at the first public hearing were enlightening of the many protections they are in grave need of.

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Jillian Coffey

First and Last Name (required)

Nonprofit sector

Industry/Area of Work

Phone Number and Email (required)

Comment

When working @ a nonprofit

I was managing a team + not

making any overtime but

working 70 hours at times.

Protect all workers.

Raise the overtime
threshold.

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Rebecca Galemba

Nombre

University of Denver

Industria/área de trabajo



El número de teléfono y correo electrónico (requirido)

Comentario:

Debemos cuidar a la tecnología

que contribuyen al estado de vivir de todos

en Colorado.

Departamento de Trabajo y Empleo de Colorado

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Cubrirles a todos los trabajadores bajo las protecciones del COMPS Order, incluyendo los de la construcción y la agricultura



Instituir un umbral salarial estatal de \$57,500 a comienzos de 2023

To: Scott Moss

Director de la División de Estándares de Labor y Estadísticas

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303-318-8172



Jesus Loayza

Nombre

non profit

Industria/área de trabajo

El número de teléfono y correo electrónico (requirido)

Comentario:

Debemos incrementar el salario umbral mas rapido que el propuesto 2026 porque demasiada personas que pueden retirarse no van a poder beneficiar del incremento.

No dejes que esto pase. Tienen mucho poder para beneficiar Coloradenses, utilízalo para el bien por favor.

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- Instituir un umbral salarial estatal de \$57,500 a comienzos de 2023**

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scott.moss@state.co.us

303-318-8172

KEVIN

NIKOLAIDES

First and Last Name (required)

Brewing

Industry/Area of Work

Phone Number and Email (required)

Comment

protect all colorado workers!!

COLORADO

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303-318-8172

Miguel Mendez Villalpando

Nombre

Nonprofit

Industria/área de trabajo

El número de teléfono y correo electrónico (requirido)

Comentario:

Deben de hacerlo más rapido
y deben de cubrir a los
trabajadores de la agricultura
para asegurar que tengan
tiempo para comer y sentir
cuando ~~se~~ trabajen.

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scott.moss@state.co.us

303-318-8172

Julia Maisto

First and Last Name (required)

Graduate Student

Industry/Area of Work

Phone Number and Email (required)

Comment

Protect all Colorado workers!

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303-318-8172



Joe Davis

First and Last Name (required)

Print / construction

Industry/Area of Work

Phone Number and Email (required)

Comment

While I worked in construction
I rarely received overtime.
I believe all workers should
be protected by the Comp
order.

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303-318-8172



Emma Bliesener

First and Last Name (required)

advocacy

Industry/Area of Work

Phone Number and Email (required)

Comment

thank you for your work
thus far on the COMPS
order. I previously worked
at a non-profit where I
supervised a team of 15
people often working 60+ hour
weeks for little pay. please
raise the threshold and
move toward a faster
phase in.

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303-318-8172

Elizabeth Sperber

Nombre

Education

Industria/área de trabajo



El número de teléfono y correo electrónico (requirido)

Comentario:

Thank you for your
work, Towards Justice. I
urge all elected officials
& State employees to
support action that reduces
inequality and inequities
in our Society. Thank you

Departamento de Trabajo y Empleo de Colorado

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construcción y la agricultura**



**Instituir un umbral salarial estatal de
\$57,500 a comienzos de 2023**

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303-318-8172



Claudia Aguilar

First and Last Name (required)

Religion / Pastor

Industry/Area of Work

Phone Number and Email (required)

Comment

One of the reasons why I became a US citizen is because of the idea of equality. It is a noble ideal, but we are far from reaching the goal intended by our founding fathers. We can do better.

COLORADO
DEPARTMENT OF LABOR
AND EMPLOYMENT

**IT'S TIME TO PROTECT ALL
COLORADO WORKERS**

**I applaud the CDLE for its work
on the proposed COMPS Order
and believe they should use
their authority to:**



**Protect all workers, including those
in agriculture and construction**



**Institute a statewide overtime salary
threshold of at least \$57,500 by 2023**

To: Scott Moss
Director Division of Labor Standards and Statistics
scott.moss@state.co.us
303-318-8172

Departamento de Trabajo y Empleo de Colorado

**Ya es hora para proteger a todos los
trabajadores**

Aplaudo al Departamento por publicar una regla preliminar (COMPS Order) y le recomiendo que use su autoridad para:



Cubrirles a todos los trabajadores bajo las protecciones del COMPS Order, incluyendo los de la construcción y la agricultura



Instituir un umbral salarial estatal de \$57,500 a comienzos de 2023

To: Scott Moss

Director de la División de Estándares de Labor y Estadísticas

scott.moss@state.co.us

303-318-8172

Mackenzie Liman

First and Last Name (required)

Philanthropy + Finance

Industry/Area of Work

Phone Number and Email (required)

Comment

My family would not have been able to accumulate wealth + meet our family's needs without worker protections ~~needed~~. Please ensure all workers have those protections -- they are rights, not privileges.

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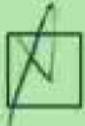
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303-318-8172



Barbara J Quinto thvarez

Nombre

Social Work.

Industria/área de trabajo

El número de teléfono y correo electrónico (requirido)

Comentario:

Yo creo que los trabajadores de agriculturas deben ser valorados por el estado.

Dependemos mucho en su labor.

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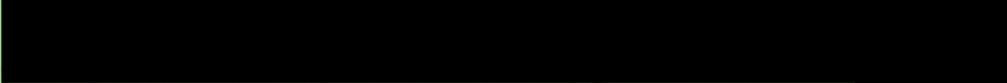
To: Scott Moss
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scott.moss@state.co.us
303-318-8172

TERI KNIGHT

First and Last Name (required)

Mortgage Banker - Denver Co ^{metro}

Industry/Area of Work



Phone Number and Email (required)

Comment

Multiple horizontal lines for writing a comment.

COLORADO

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To: Scott Moss
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scott.moss@state.co.us
303-318-8172



Larissa Flora

First and Last Name (required)

Worker advocacy

Industry/Area of Work



Phone Number and Email (required)

Comment

All workers deserve to be paid for all their time spent working. The current system allows too many to be abused. Employers are not looking at their cost accurately.

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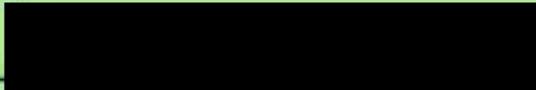


Maggie Jensen

First and Last Name (required)

Education

Industry/Area of Work



Phone Number and Email (required)

Comment

I believe that Salaried
Workers deserve
overtime! Please
value People!

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To: Scott Moss
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Dennis Gallagher

First and Last Name (required)

Teaching

Industry



Phone Number and Email (required)

Comment

Please
support our
workers!

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To: Scott Moss
Director Division of Labor Standards and Statistics
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303-318-8172



SALLY AUGDEN

First and Last Name (required)

RETIRED EDUCATOR

Industry/Area of Work

[REDACTED]

Phone Number and Email (required)

Comment

Decently paid parents
have ~~successful~~ children
who are successful
students —

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To: Scott Moss
Director Division of Labor Standards
scott.moss@state.co.us
303-318-8172

DEPOSITION 12/1/16
EXHIBIT
B
HANSEN & COMPANY

To: Colorado Department of Labor and Employment

From: Justin Ruben, ParentsTogether Action
1875 Connecticut Avenue NW, Suite 650
Washington, DC 20009
202-238-4843

Re: Petition signatures on Colorado Overtime & Minimum Pay Standards (COMPS) Order #36

Please find attached 1,377 petition signatures supporting expanded overtime pay for Colorado workers. The petition text reads as follows:

“A strong, healthy workforce is critical to this economic growth. But as the overtime plan currently stands, 206,000 people will have to wait until 2026 to get the overtime pay they have earned. I encourage you to increase the overtime wage threshold more quickly than in the proposed rule, so that Colorado's salaried workers can save for retirement, for our kids' education, and to afford housing and basic health care.”

DEPOSITION 12/16
EXHIBIT
C
HANSEN & COMPANY

COMPS Order #36
Petition signatures in support of overtime expansion

First Name	Last Name	City
Jennie	Havens	PUEBLO
Shanti	Awatramani	LOUISVILLE
Madi	Cat	LYONS
MaryAnn	DuranGallegos	DENVER
Robin	Laurel	LONGMONT
Frances	Chacon	PUEBLO
Margaret	Quintana-Banuelos	ENGLEWOOD
Lena	Larson	ERIE
Sheila	Epps	DENVER
Soledad	Aguilar	DENVER
Tamie	Carlson	FRUITA
Katelynn Rose	Adams	PLATTEVILLE
Tracy	Frydendall	Denver
Michele	Bolander	FORT LUPTON
Helen	McBain	DENVER
Jonna	Humphries Porter	FOUNTAIN
Gramma	Henry	PAOLI
Kathy	Karr-Fairchild	Loveland
Julio	Moreno	FORT COLLINS
Robyn	McNamara	ENGLEWOOD
Tanya	Romero	AURORA
Carmen	Sacco	COLORADO SPRINGS
Renee	Rojas	COLORADO SPRINGS
Us	Hillwlllls	BROOMFIELD
Brandon	Berry	COLORADO SPRINGS
Bridget	Friel	ENGLEWOOD
Trey	Dunaway	WELLINGTON
Lynn	Harris	COMMERCE CITY
Deidre	Sepulveda	BRIGHTON
Rj	Jones	COLORADO SPRINGS
Joleen	Bolduc	ARVADA
Allison	Vail	AURORA
Veka	Kravets	AURORA
Myra	Griffin	COMMERCE CITY
Misty	Kay	GREELEY
Alicia	McDonnell	COLORADO SPRINGS
Pauli	O'Donnell	LITTLETON
Lizzie	Valverde	DENVER
Destiny	Ortiz	GREELEY
Brenda L.	King	COLORADO SPRINGS

First Name	Last Name	City
Richard	Rew	DENVER
Bo	Deboer	DENVER
Bethany	Simmons	ENGLEWOOD
Wendy	Galaviz	DENVER
Karmen	Paris	DENVER
Janice	Wilkins	DENVER
Omari	Trimble	DENVER
Laura	Prow	DENVER
Mary	Moses	FORT COLLINS
Renv©	Larson	FORT COLLINS
Debbie	Hurd	DENVER
Ray	Sanchez	DENVER
Tricia	Vieth	BOULDER
Vany	Jimenez	DENVER
Stan	Archuleta	AURORA
Kimberly	Robinson	BRIGHTON
Annie	Farris Murphy	CARBONDALE
Rachael	Verlinde	COLORADO SPRINGS
Anne-marie	Land	DENVER
Roger	Cobb	DENVER
Maria	de la Cruz	Aguilar
Amanda	Patrick	CALHAN
Karen	Mills-Cochran	SILT
Stephanie	Berling	FORT COLLINS
Lanae	Eugene	DENVER
Alyssa	O'Donnell	DENVER
Corey	Campana	AURORA
Shelli	Hoyt	DENVER
Devyn	Buggs	COLORADO SPRINGS
Carol	Renee	DENVER
Oralia	Cabrera	FORT COLLINS
Rosa	Jimenez	COMMERCE CITY
Mandy	Green	CANON CITY
Linda	Grimaldo	COLORADO SPRINGS
Melinda	Orr	CRAIG
Stephanie	Norris	COLORADO SPRINGS
Norma	Soto	GYP SUM
Lupie	Recio	GREELEY
Margie	Valdez	PUEBLO
Stephanie	Myers	GRAND JUNCTION

First Name	Last Name	City
Gerald	Grotkier	COLORADO SPRINGS
Kathryn	Benton	COLORADO SPRINGS
Kayla	Udell	AURORA
Bernard	Douthit	DENVER
Bree	Hoffman	MONTROSE
DeRie	Hefter	BRIGHTON
Jacqueline	Zamora	WESTMINSTER
Carlssa	Pascual	DENVER
Suzanne	Vasquez	DENVER
Angelo	Duran	WESTMINSTER
Patricia	Thibedeau Washington	PUEBLO
Robert	Almazan	COLORADO SPRINGS
Sandra	Dee	GREELEY
Jessi	Geist	BOULDER
Eric	Allen	DENVER
Bill	Oliver	LONGMONT
Elsie	Walker	AURORA
John	Longman	AURORA
Nelly	Muniz	DENVER
Debbie	Boggs	COLORADO SPRINGS
Damien	Holman	GRAND JUNCTION
Jaimi	Cloud	CRIPPLE CREEK
Kim	Bolstad	FORT LUPTON
Heather	Baker	COLORADO SPRINGS
Kathy	Robbins	LITTLETON
David	Billings	PUEBLO
Zebulon	Swearingen	ARVADA
Mary	Rodriguez	DENVER
Zap	Licon	COMMERCE CITY
Orlando	Bradford	AURORA
Jehad	Sawaked	Denver
Kimberly	Clark	FORT COLLINS
Rose	Romero	COLORADO SPRINGS
Laura	Roybal	MONTE VISTA
Linda	Flores	DENVER
Aishanette	Brooks	DENVER
Mike	Himlie	LIVERMORE
Anna	Macias	DENVER
Carol	Roybal	AURORA
Shelley	Scott	MONTROSE

First Name	Last Name	City
Cheryl Cher	Givens	LITTLETON
Douchka	Nikolic	LOUISVILLE
Connie	Resley	DENVER
Xerephine	Musica	HOTCHKISS
Shari	Harrison	COLORADO SPRINGS
Judy	Scheig	LITTLETON
Sandunga	Santos	DENVER
Trisha	Trujillo	COLORADO SPRINGS
Mia	Guerra	AURORA
Arthur	De la Rosa	GRAND JUNCTION
Victoria	Mullen	PUEBLO
Rodney	KnowKnox	COLORADO SPRINGS
April	Bailey	DENVER
Lisa	Crockett	DENVER
Danny	Joyner	COLORADO SPRINGS
Brenz	Hernandez	AURORA
Paul	Stembei	DENVER
Rash	Angie	COLORADO SPRINGS
Kelly	Zeller	WESTMINSTER
Emilio	Quintana	DENVER
Joe	Cordova	DENVER
Kristen	Flores	COLORADO SPRINGS
La Toya	Howard	COLORADO SPRINGS
Frances	Garcia	PUEBLO
Angie	Bridges	MONTROSE
Lynda	Tassler	LOG LANE VILLAGE
Patricia	Bennett	AURORA
Emperiss	Love	AURORA
Sonya	Barrera	GREELEY
Mariana	Blair	DENVER
Patricia	Lopez	BRIGHTON
Jeb	Barrett	AURORA
Dianne	Wilkerson	COLORADO SPRINGS
Barbara	Luna	Salida
Wayne	Costa Woodward	COLORADO SPRINGS
Gerald	Garcia	DURANGO
Randi	Williams	STERLING
Andrea	Michel	DURANGO
Mario	Lozano	LONE TREE
Bishop Dwayne	Taylor	DENVER

First Name	Last Name	City
Holly	Solomon	GREELEY
Pattie	Vogt	Grand Junction
Janell	Sutton Zamora	FORT COLLINS
Teresa	Granados	LAMAR
Diana	Abbett	COLORADO SPRINGS
Richard	Schuetz	AURORA
Wickd	Ryda	GREELEY
Trystan	Ortega	COLORADO SPRINGS
Krisi	Forde	LITTLETON
Karen	Cruz	PUEBLO
Janine	Mider	BROOMFIELD
Jeannie	Bueno	BOULDER
Sandy	Anselmo	PUEBLO
Mckayla	Gonzales	LONGMONT
James	Chaney	PUEBLO
Amy	Michelle	LYONS
Robert	Lampert	LOVELAND
Joseph	Vialpando	PUEBLO
Rhonda	Kellerman	LITTLETON
Maira	Lira-Gutierrez	MONTE VISTA
Richard	Tribble	DENVER
Carolyn	Flener	GRAND JUNCTION
Christie	Browne	PUEBLO
Fran	Martinez	DENVER
Wendy	Kelly	GRAND JUNCTION
Jane Marie	Marlowe	COLORADO SPRINGS
Tyrule	Davis	COLORADO SPRINGS
Hazel	Morgan	GRAND JUNCTION
Aranda	Lindsey	COLORADO SPRINGS
Katiana	Dunn	LITTLETON
Anna	Roberts	DENVER
Joseph	Avila	LONGMONT
Brianna	Yakovee	DRAKE
Sherry	Smith	HUDSON
Charles	Johnson	DENVER
Cynthia	Immel	CASTLE ROCK
Leonard	Ernest John	LA VETA
Telly	Quintana	GRAND JUNCTION
Julie	Hobson	PUEBLO
Rachael	Scharfenberg	BRIGHTON

First Name	Last Name	City
Keith	Mcardle	DENVER
Tule	Borunda	COMMERCE CITY
Carolyn	Higgs	GRAND JUNCTION
Aribeth S.	Brockbank	STERLING
Deedee	Pacheco	PUEBLO
Dave	Smiley	GRANBY
Trisha	Archer Sims	BROOMFIELD
Jenny	Odell	LITTLETON
Bryann	Sewald	FORT COLLINS
Ethan	Whitehead	LONGMONT
Kianna	Risdon	BROOMFIELD
Amber	Shostrom	GREELEY
Jane	Stoddart	LITTLETON
Maria	Rodriguez	COLORADO SPRINGS
Robert	Scott	DENVER
Kathy	Schlereth	BOULDER
Will	Marquardt	CASTLE ROCK
Maria	Abeyta	TRINIDAD
Charlene	Romero	GLENWOOD SPRINGS
Nadine	Manzanares	DENVER
Mirj	Muller	AURORA
Anita	Underhile	AULT
Devin	Draken	PUEBLO
Charleen	Mion	STERLING
Jess	Hankins	KERSEY
Bonnie	Lucero-Martinez	COLORADO SPRINGS
Gina	Rivera	LONGMONT
Mariana	Thornton	DENVER
Tamika	Michelle	COLORADO SPRINGS
Annette	Cota	DENVER
Karen	Pena	AURORA
Kandi	Jones	LITTLETON
Ruth	Spivey	COLORADO SPRINGS
Christopher	Smith	DENVER
Lousie	Sisneros	MONTE VISTA
Jason	Valverde	DENVER
Mary	Simpson	AURORA
Rusty	Burton	JOES
Danielle	Perkins	CANON CITY
Cheryl	Westkamp Wurm	WESTMINSTER

First Name	Last Name	City
Angle	Rucker	DENVER
Amy	Sams	COLORADO SPRINGS
Jacquelyn	Southard	PUEBLO
Neaa	Trujillo	ARVADA
Logan	Laurielle	DENVER
Jackie	Boyd	COMMERCE CITY
Nicole	Marie	DEL NORTE
Kalub	Jorgenson	LOVELAND
Marilyn	Newton	DENVER
Elizabeth	BV@cotte	AURORA
Deedee	Gurule	PUEBLO
Gloriane	Olivas	DENVER
Merlina	McCready	LITTLETON
Blanca	Moreno	AURORA
Angela	Lindsay-Aranda	PUEBLO
Ashley	Harris Hopper	AURORA
Michael	Sherburne	RIFLE
Jessica	Garza	COLORADO SPRINGS
Celes	Vallez	FRUITA
Erin	Michelle	FORT COLLINS
Lisa	Dragosh Harris	COLORADO SPRINGS
Marie	Gurule	ARVADA
Karen	Jackson	COLORADO SPRINGS
Rosalyn	Milton	DENVER
Cynthia	Kirker	DENVER
Mikell	Osburn	DENVER
Bernardo	Garcia	DENVER
Vanessa	Ospina	Denver
Hamida	El Mohammadi	DENVER
Becca	Trujillo	DENVER
Ricky	Skaggs	DENVER
Marilyn	Sorensen	DENVER
Norbert	Nagel	DENVER
Mary Lou	Faherty	DENVER
Ken	Strohson	DENVER
Joyce	Romero	DENVER
Heidi	Toporek	DENVER
Tanja	Wiley	DENVER
Michelle	Prentice	DENVER
Steven	Clutts	DENVER

First Name	Last Name	City
Monte	Hollander	DENVER
AnaMaria	Luna	DENVER
Belle	Begonia	DENVER
Bernice	Halbert	DENVER
Craig	Mankin	PUEBLO
Cory	Mitchell	FORT COLLINS
Kalei	Kaawa	DENVER
Sharina	Sasser	DURANGO
Jenna	T	LAFAYETTE
Claudia	Torres	GREELEY
Angel	Caballero	EATON
Rhonda	Romero	WHEAT RIDGE
Daniel	Wilson	DENVER
Jack	Lavino	BOULDER
Brenda	Coover	DENVER
Kenneth	Sortland	EDWARDS
Nancy	Jewett	AURORA
Evelyn	Felix-Andrews	DENVER
Taraz	Martinez	AURORA
Tammy	Earnhart-Hurst	COLORADO SPRINGS
Lupe	Montes	LA SALLE
Patricia	Redin	Greeley
Joel	Quintana	DENVER
Debbie	White	Denver
Lari	Herrera	DENVER
Sharyn	Hathaway	DENVER
John	Johnson	DENVER
Diane	Goddard	NORWOOD
Dee Dee	Bradford	COLORADO SPRINGS
Dave	Manzanares	BROOMFIELD
Richard	Brooks	FORT MORGAN
Angela	Hancock	STERLING
Angela	Nicole	DENVER
Rebecca	Marie	FORT COLLINS
Stephanie	Lape	AURORA
Sah	Love	DENVER
Caroline	Cordova	COLORADO SPRINGS
Christie	Stane	LAMAR
Shelly	Lee	PARKER
Judy	Cortez	WELLINGTON

First Name	Last Name	City
Angela	Zubia	DENVER
Nancy	Leonard	ROCKVALE
Robert	Rivera	COLORADO SPRINGS
Tonya	Cisneros	COLORADO SPRINGS
Fran	Picune	PUEBLO
Christi	Fletcher	LAFAYETTE
Stewart	Suhr	COLORADO SPRINGS
Michelle	Godin	FORT COLLINS
Suzi	Olvera	AURORA
Mark	Stoddard	DELTA
Quinn	Wilson	AURORA
Joel	Cordova	DENVER
Nadia	Benkhail	AURORA
Barbara	Thompson	AURORA
Angela	Burnett	Denver
Dyani	Robinson	COLORADO SPRINGS
Sonia	Crawford	AURORA
Betty	Beasley-Brown	DENVER
Chelsie	Galvez-Estevez	Denver
Robert	Lorenzo	ROCKY FORD
Julian	Flores	DENVER
Shan	Banks	DENVER
Evelyn	Munoz	AURORA
Ashley	Snow	DURANGO
Brenda	Bronson	DENVER
Becky	Wasson	Evans
Vanessa	Ortiz	FORT COLLINS
Crystal	Lucero	Denver
Rodney	Phillips	AURORA
Mary	Ewing	OAK CREEK
Estrella	Sanchez	PUEBLO
Peter	Prince	DENVER
Vernon	Stiltz	FORT COLLINS
Heather	Muller	BOULDER
Eugene	Ingram	BRIGHTON
Claire	Brown	DENVER
Ryan	Wilcox	PUEBLO
Patricia	Denison	LAMAR
Michelle	Navarrete	DENVER
Janelle	Bilyeu	DURANGO

First Name	Last Name	City
Sandie	McBroom	Colorado Springs
Dick	Ebeling Sr.	GREELEY
Mark	Colby	WALSENBURG
Charles	Castor	DENVER
Caitlin	Lopez	FOUNTAIN
Bethany	Halbert	DENVER
Michael	Pedziwiatr	EVERGREEN
Kevin	Snider	PUEBLO
Amalthea	Aelwyn	WHEAT RIDGE
Cyndi	Hartz	COMMERCE CITY
Kav'ta	Gilbert	COLORADO SPRINGS
Sonia	ImMasche	FORT COLLINS
Mary	Wimberly	DENVER
Gail	Lavin	ENGLEWOOD
Faustina	Hooker	COLORADO SPRINGS
Pati	Muth	COLORADO SPRINGS
Karen	Donkie	LAS ANIMAS
Char	Harvey	ARVADA
Aidan	Burns	CRAIG
Mary	Cordova	DENVER
Herman	Schmid	COLORADO SPRINGS
Steve	Tidball	BOULDER
Gopa	Ross	LOVELAND
Tom	Foster	COLORADO SPRINGS
Erica	York	DOLORES
Edgar	Conde	AURORA
Corey	Hietbrink	AURORA
Karen	White	AURORA
Colin	Stokes	ERIE
Brandi	Johns	COLORADO SPRINGS
Amy	Casarez	LITTLETON
Michelle	Tucker	COLORADO SPRINGS
Theda	Goodgaine	AURORA
Dusty	Cordell	PUEBLO
Saunceray	Bolden	DENVER
Kristen	Ray	IGNACIO
Bryan	Sewald	FORT COLLINS
Jeffrey	Ortiz	FORT COLLINS
Joshua	Evans	COLORADO SPRINGS
Valerie	Duball	COLORADO SPRINGS

First Name	Last Name	City
Donovan	Stubbs	DENVER
Kimberly	Ulvestad	FOUNTAIN
Lamont	Edmonds	AURORA
Carlos Julie	Martinez	WHEAT RIDGE
Cass	Rodriguez	AURORA
Tom	Baker Sr.	COLORADO SPRINGS
Cori	White	CASTLE ROCK
Adelina	Rivera	FORT MORGAN
Monique	Trujillo	DENVER
Kellen	Kaye	LITTLETON
Beth	Sanders	WHITEWATER
Lexi	DIPentIno	JOHNSTOWN
Brittney	Cofey	DENVER
Martha	Watanabe	COLORADO SPRINGS
Keith	Dobsch	LOMA
Shaun	Rizk	COLORADO SPRINGS
Debbie	Brown Butkus	COLORADO SPRINGS
Radhika	Nath	DENVER
Helen	Karsh	AURORA
Diana	Munoz	DENVER
Robert	Bullard	STERLING
Christian	Salvador	DENVER
David	Baez	AURORA
Margaret	Lujan	GREELEY
Monica	Trujillo	COMMERCE CITY
Reese	Romines	RUSH
Gary	Green	GRAND JUNCTION
Dawnell	Hall	GRANBY
Phillip	Alvarado	FORT COLLINS
Robert	Ross	MARVEL
Judy	Armijo	AVONDALE
Angel	Ortiz-Bettcher	GRAND JUNCTION
Sarah	Brunner	COLORADO SPRINGS
Shawanna	DeSersa	ARVADA
Stacia	Marie	COLORADO SPRINGS
Jeff	Clafin	DENVER
Elizabet	Palacios	DENVER
Shaylee	Thebeau	AURORA
Brenda	Grundy Davis	COLORADO SPRINGS
Matt	Walton	Aurora

First Name	Last Name	City
Crystal	Miner	Dinosaur
Robin	Aline	LITTLETON
Tessa	June	AURORA
Lu	Wright	LAFAYETTE
Jordan	Castophney Sr.	COLORADO SPRINGS
Marie	Rodriguez	COMMERCE CITY
Jamie	Porter	DENVER
Dana	Davis LeVan	FORT COLLINS
Erika	Garcia	DENVER
Amanda	Lee	PARKER
Emilia	Aleksandra	Boulder
Tracy	Roberts-Raby	BRIGHTON
Jordan	Benson	WESTCLIFFE
Ramona	Thomas	Boulder
Stephanie	Leddington	SALIDA
Buff	Eiting	BOULDER
Rxena	Tafoya	AURORA
Linda	Peterson-Groenewold	BROOMFIELD
Mario	Calderon	AURORA
John	Cardenas	LITTLETON
Tracy	Atkin	LOVELAND
AnnaMay	Smolinsky	LAFAYETTE
Dan	Mauricio	FOUNTAIN
Maria	Rubio	DENVER
Amanda	Lutz	PUEBLO
Kera	Normali-Steele Connour	ESTES PARK
Barbara	Gfeller	FORT COLLINS
Cheryl	Foster	DENVER
Linda	Bartholomew	AURORA
Karen	Taylor	BROOMFIELD
Lorraine	Shaw	COLORADO SPRINGS
Regina	Abeyta Finn	ARVADA
Kelly	Keyes	COLORADO SPRINGS
Tara	Arnold	BOULDER
Kathy	Williams	AURORA
Kimberly	Shupe	PEYTON
Tracy	McNary	DENVER
Sadie	Swartwout	COMMERCE CITY
Adair	Germany	DENVER

First Name	Last Name	City
Randy	Price	BENNETT
Libby	Taylor	LONGMONT
Brendiita	Ortega	RIFLE
Aaron	Severns	DENVER
Moncia	Lopez	DENVER
Russell	Cowger	HESPERUS
Karen	Green	DENVER
Jaime	Katherine	NORWOOD
Becky	Esposito	LOUISVILLE
Tina	Yeckley	HUDSON
Tracey	Privitera	DENVER
Beth	McElroy	COLORADO SPRINGS
Cassandra	Goolsby	COLORADO SPRINGS
Tamara	Thompson	AURORA
Barbara	Taylor	ERIE
Larry	Nowell	CEDAREEDGE
Carole	Levers	BOULDER
Robert	Betray	GRANBY
Velver	Askew	DENVER
Keri Ann	Clark	DENVER
Camille	Ecklund	DENVER
Denise	Dudley	AURORA
Dave	Verrastro	FORT COLLINS
Jamie	Fishencord	AURORA
Brian S	Perkins	PUEBLO
Sharman	Hankins	COLORADO SPRINGS
Lori	Ozzello	GREELEY
Jarrett	Brown	LOVELAND
Carole	Hitti	CORTEZ
Natalie	Kelly	COLORADO SPRINGS
Gary	Vanenburg BenJahmen	COLORADO SPRINGS
Janine	Heyer	DENVER
Bethy	Valverde	Colorado Springs
Bam N Bbyg	P	GREELEY
Zhi	Kimber	LOUISVILLE
Laura	DeLuca	BOULDER
Trisha	Salazar	PUEBLO
Christy	Olson	AURORA
Mary Beth	Thomas-Cooper	AURORA
Gary	Thompson	AURORA

First Name	Last Name	City
Dulce	Suarez	CARBONDALE
Darleen	Schmidt	LAFAYETTE
Brent	Freie	NEW CASTLE
Alecia	Morgan	FOUNTAIN
Clifton	Brown	COLORADO SPRINGS
Tammy	Lobato	PUEBLO
Thomas	Blomster	Pueblo
Paula Ruth	Ochoa	PUEBLO
Jessica	Garcia	DENVER
Paula	Gillespie	PUEBLO
Tamv©	Ramirez	GOLDEN
Scott	De Santis	COLORADO SPRINGS
Nicole	Moore Neff	PARKER
Brenda	Torres	PUEBLO
Elizabeth	Rotter	ENGLEWOOD
Vita	Lantz-Brown	AURORA
Rose	Gonzales	COLORADO SPRINGS
Michael	Gutzait	DENVER
Heriberto	Dominguez	EVANS
Sandy	Briggs	FRISCO
Tiffany	Martinez	DENVER
Toni	Logan	LITTLETON
Rose	Wilson	GRAND JUNCTION
Raquel	Amador	AURORA
Yolanda	Arteaga	AURORA
Kevin	Schumacher	COLORADO SPRINGS
Dan	Hoffman	GRAND JUNCTION
Michael	Zamora	DENVER
Lydia	Beals	CANON CITY
Diana	Carreto	DENVER
Yvette	Pichardo Portz	AURORA
Terri	Kerr Lucero	BAYFIELD
Sara	Paloma	DENVER
Wendy	Dobson	DURANGO
Tammy	Foglia	CORTEZ
Tamar	Taylor	COLORADO SPRINGS
Shelby	Harbin	FORT COLLINS
Britt	Page	DENVER
Virginia	Welch	CALHAN
Janis	Houston	DENVER

First Name	Last Name	City
Mona	Madril	MONTE VISTA
Dorothy	Strickland	DENVER
Penny	Paula-Market	DENVER
Ernesto	Campos	TRINIDAD
James	Warnock	PARKER
Sarah	Weils	ENGLEWOOD
Jessie	Aguirre	COMMERCE CITY
Clarette	Samuels	DENVER
Dayna	Messer-Thelen	AURORA
Yelena	Alvarez-mccoy	Lafayette
Bere	Loya	DENVER
Vanessa	Sandoval	FORT COLLINS
Terri	Holmes	COLORADO SPRINGS
Lynn	Suhr	COLORADO SPRINGS
Paul	Miera Jr.	LOVELAND
Nicola	Morrow	COLORADO SPRINGS
Rose	Quintana	PUEBLO
Brenda	Hammer	CLIFTON
Carlene	Hornyak	LONGMONT
Duke	Vidakovich	ENGLEWOOD
Janet	Gonzales-Black	COLORADO SPRINGS
Darlene	Jackson	COLORADO SPRINGS
Claude	Martinez	DENVER
Lupe	Freire	DENVER
Nancy	Pattison	ARVADA
Maria	Campbell	WESTMINSTER
George	Jaramillo	DENVER
Dolores Diane	Ryan Cole	LA JARA
Kathy	Davison	PUEBLO
Fernando	Martinez	DACONO
Marla	Swanson	DENVER
Kateryna	Gandziy	AURORA
Courtney	Westbrook	LAFAYETTE
Erica	Duran	PUEBLO
Laine	Weinstein Fabijanac	GLENWOOD SPRINGS
Brenda	Biggs	CANON CITY
Susan	Owen	WELLINGTON
Andrea	Archuleta	WESTMINSTER
Mike	Kelly	COLORADO SPRINGS
Brenda	Buckler	COLORADO SPRINGS

First Name	Last Name	City
Ashlea	Armistead	PARACHUTE
Jennifer	Owen	COLORADO SPRINGS
Anna	Martinez	PUEBLO
Yvonne	Holder	GRAND JUNCTION
Charles	Dunnum	FORT COLLINS
Eugene	Cordova	DENVER
Tristen	Wriedt	DENVER
Ron	Coddington	ARVADA
Andres	Pacheco	DENVER
Melanie	Vazquez	COLORADO SPRINGS
Vee	Sancho	AURORA
Dakota	Lopez	LOG LANE VILLAGE
Patricia	Roybal	HENDERSON
Stephanie	Insinna	DENVER
Noemy	Gamboa Pinela	DENVER
Jolene	Stone	LOVELAND
Andrea	Gaugler	COLORADO SPRINGS
Roxanne	LaRose	LOVELAND
Jasmine	Breeden	DENVER
Shawna	Scott	COLORADO SPRINGS
Emily	Mensch	LAFAYETTE
Elv*as	Huerta	AURORA
Jack	Bashor	LOVELAND
Rosine	Espinosa	DENVER
Marla	Montoya	GRAND JUNCTION
Lottie	Day	HUGO
Roxanne	Hall	COLORADO SPRINGS
John	Pike	PEYTON
Stetrakey	Mitchell	AURORA
Condie	Velasquez	DENVER
Xena	Bear	LONGMONT
Chloe	Es	DURANGO
Valarie	Medina	LONE TREE
Melody	White	PUEBLO
Keisha	Garcia-Luna	MONTE VISTA
Jessica	Neurock	HOTCHKISS
AJ	Mansheim	AURORA
Peggy	Riley	DENVER
Scott	Goddard	BOULDER
Mabel N OrlandoSr	Mendoza	EVANS

First Name	Last Name	City
Roderick	Brown	AURORA
Jody	Embleton Wolfe	PENROSE
Michael	Ambrose	Denver
Jodie	Morgan	Denver
Joi	Towner	COLORADO SPRINGS
Amber	Sanchez	AURORA
Ralph	Olivas	BRIGHTON
Kayla	Boggs	DENVER
Mish	Leavitt	GRAND JUNCTION
Marissa	Hernandez	DENVER
David	Brooks	STERLING
RoseMarie	Gevara	WESTMINSTER
Eduardo	Sanchez	AURORA
April	Hedding	CRIPPLE CREEK
Stacey	Necessary	LOVELAND
Celia	Dobbs	COLORADO SPRINGS
Gary	Arellano	DENVER
Dave	Logan	LOVELAND
Kathy	Mays	HOLYOKE
Allison	Westra	Littleton
Patricia	Arcila	FORT COLLINS
Lisa	Anne	BROOMFIELD
Vigil	Fran	DENVER
Richard	Sr	LOVELAND
Tina	Ewing-Boling	GROVER
Natalie	Robbins	CASTLE ROCK
Barbara	Aubuchon	YODER
Marcella	Ramirez	DENVER
Rebecca	Herrera	DENVER
DeeDee	Henson	PUEBLO
Vicky	Thompkins	COLORADO SPRINGS
Jose	Pacheco	DENVER
Judi	Stein	AURORA
Kayla	Clark	DENVER
Joe	Edmunson	WELLINGTON
Debbie	Harris	WHEAT RIDGE
Judy	Garcia	PUEBLO
Antionette	Bellini	LONE TREE
Lindsey	Sterling-Krank	BOULDER
Terri	Cedillo	Denver

First Name	Last Name	City
Erika	Jennings	COLORADO SPRINGS
Asha	Gupta	FORT COLLINS
Leslie	Jacobs	DENVER
Kristi	Teti	WESTMINSTER
Cynthia	Cable	DENVER
Lanese	Martin	DENVER
Tamara	Westmore	DENVER
Tammy	Greene	DENVER
Patty	Overly	DENVER
Rex	Richberger	DENVER
Shirley	Gallegos	DENVER
Sandra	Fritschle	GOLDEN
Theresa Vida	Cardona	WESTMINSTER
Leslie	Armas	DENVER
Janay	Arguello	DENVER
Brenda	Abeyta	DENVER
Mecca	Scott	ERIE
Ronnie	Romero	ENGLEWOOD
Eyes	Ofthebeholder	DENVER
Krystal	Jackson	DENVER
Nae	Martinez	DENVER
Brian	Wright	DENVER
Gale	Lackey	FORT COLLINS
Alice	Baca	DENVER
Jessie	Lee	DENVER
Melissa	Martinez	DENVER
Miranda	Brown	DENVER
Ashley	Edwards	DENVER
Joseph	Powell	DENVER
Deirdre	Farrow	DENVER
Code	Jewell	DENVER
Shana	Adkins	DENVER
Kevin	Perea	DENVER
Julia	Theus	DENVER
Safari	Stl	DENVER
Tanya	Acker	DENVER
Mary	Reynolds	DENVER
Clara	Mascorro	DENVER
Brandi	Benavidez	DENVER
Athena	Jacobo	DENVER

First Name	Last Name	City
Diondre	McBride	DENVER
Catherine	Epps	BLACK HAWK
Zipporah	Arrington	AURORA
Eugene	Martinez	ENGLEWOOD
Heather	Lopez	COLORADO SPRINGS
Vera	Moreno-hamm	BOULDER
Regina	Ramsey	DENVER
Jessica D	Ricks	MONTE VISTA
Shelly	Phillips-Squire	ARVADA
Jentie	Wilkins	DENVER
Sandy	Harris Gard	ENGLEWOOD
Geri	Breaux	ENGLEWOOD
James	Washington	AURORA
Sheana	Johnson	AURORA
Rosendoandshauna	Santacruz	GILL
Susan	Wood	GOLDEN
Sydra	Jones	COLORADO SPRINGS
Deborah	Hawley	FORT COLLINS
Lisa	Sharpe	DENVER
Stephanie	Rivera	THORNTON
Alex	Rogell	GRAND JUNCTION
Marta	Ruiz	COLORADO SPRINGS
Melanie	Bryant	PUEBLO
Monica	Felix	MONTE VISTA
Stephaine	Ashmore	DACONO
Scott	Dutra	GLENWOOD SPRINGS
Rachael	Lind	COLORADO SPRINGS
Evelynn	Guzman	AURORA
Valerie	Banda	MONTE VISTA
Anna	Libby	CENTER
Shannon	Shawmeyer	PUEBLO
Lisa	van Leuwen-Hall	BOULDER
Ruben	Castro	COLORADO SPRINGS
Catherine	Horne Lopez	DENVER
Goldie	Dyerson-Pivta	JOHNSTOWN
Heather	Perez	FORT MORGAN
Todd	Hill	SILT
Deborah	Lind	FORT MORGAN
Bernadette	Sophia	PUEBLO
Toni	Fries	LAFAYETTE

First Name	Last Name	City
Angelo	LaCombe	WESTMINSTER
William	Weinberg	LONGMONT
Eugene	Lopez	DENVER
Tita	Lara	Edwards
Salleen	Sherman	COLORADO SPRINGS
Valerie	Lenk Zwiirn	STERLING
Maritsa	Huerta	RIFLE
Anne	Aragon	DENVER
Joe	Armstrong	WINDSOR
Vicky	Albert	COLORADO SPRINGS
Heather	Gray	ENGLEWOOD
Audrey	Smith	GUNNISON
Joshuah	Boucher	COLORADO SPRINGS
Heather	Tilley	PUEBLO
Andy	Garcia	COLORADO SPRINGS
Carrie	Ann	COLORADO SPRINGS
Susan	Aragon	PUEBLO
Teodora	Alvarez	DENVER
Maria	Castillo	DENVER
DeAndre	Sims	AURORA
Santiago	Reyes	FORT MORGAN
Camille	Depalo	DENVER
Sipriano	Muvtoz	AURORA
Lilly	Tellez-Garcia	FORT COLLINS
Adama	Yocam	GREELEY
Craig	Schultz	LOVELAND
Jory	Miller	DURANGO
Robert	Segura	FORT COLLINS
Deb	Whitmore	PUEBLO
Mayra	Castillo	DENVER
Mandi	Garcia	BLANCA
Jackie	Cano	AURORA
Sara	Rodriguez	EVANS
Robertlee	Salazar	GREELEY
Crystal	Davis	ENGLEWOOD
Karen	Enomoto	DENVER
Wafa	El-ajmi	DENVER
Kelly	Risen Webster	LITTLETON
Connie	Gallegos	MONTE VISTA
Jerry	Hobley	DENVER

First Name	Last Name	City
Antonia	Nolasco	AURORA
Jeffrey	Neering	LONGMONT
Abbey	Tesfazion	ENGLEWOOD
Cynthia	Apodaca	WESTMINSTER
Silvia	Martinez	FORT GARLAND
Josie	Flores	COLORADO SPRINGS
Anna	Cordero	MONTE VISTA
Larry	Walker	AURORA
Dominique	Ausler	AURORA
Bill	McCabe	DENVER
Vercie	Floyd	DENVER
Rita	Araiza	COLORADO SPRINGS
Maria	Heredia Chavez	AURORA
D Renee	Reynolds	ARVADA
David	Winger	LOMA
Kathy	Caassen	ARVADA
Eva	Ortiz	LAMAR
Pearl	Deboer	COLORADO SPRINGS
Patrick	Mccabe	BRIGHTON
Kimberly	Weyrauch	LOVELAND
Tina	Chavez	FORT COLLINS
Emily	Bowdish	LONGMONT
Greg	McGinnis	AURORA
Cilia	Perez	COLORADO SPRINGS
Ollie	Manning	AURORA
Mariale	Walker	DENVER
Ashley	Howard	DENVER
Jason	Torbet	LITTLETON
Walkface	Kempstyle	DENVER
Barbara	Jackson	COLORADO SPRINGS
Syreeta	Bates	PARKER
Howie	Gore	PUEBLO
Kike Y Jessi	Garcia	DENVER
Joe	Gilliland	GREELEY
Frank	Maldonado	DENVER
Andrea	Marquez	COLORADO SPRINGS
Avelina	Marin	DENVER
Carolyn	Wade	FORT COLLINS
Pallas	Reichman Dame	ARVADA
Cheyney	Underwood	PARACHUTE

First Name	Last Name	City
Michelle	Garcia	DENVER
Shanie	Ridge	COLORADO SPRINGS
Jared	Harrisonbar	RIFLE
Nicolas	Donez Jr.	BRUSH
Onetta	Forte	AURORA
Marilee	Mason	PALMER LAKE
Rita	Apodaca	AURORA
Geraldine	Kelly	DURANGO
Jason	Walberer	COLORADO SPRINGS
Jeromy	Beard	GRANBY
Ivan	Ulloa	DENVER
Avis Belinda	Keenan	DENVER
Dorsey	Willison	WINDSOR
Anastasia	Alexander-Weatherford	DENVER
Lucy	Cordova	MANASSA
Carios	Mercado	CLIFTON
Courtney	Rodriguez	GREELEY
Hopewana	Smith	COLORADO SPRINGS
Justin	Rael	PUEBLO
Melissa	Jenkins	COLORADO SPRINGS
Vicki	Moreno	LOVELAND
Summer	Fisher	ENGLEWOOD
Adina	Benavidez	FORT COLLINS
Noreen	Rodriguez	BROOMFIELD
Paul	Calderon Jr.	FOUNTAIN
Melissa	Folsom	TRINIDAD
Lindsey	Norris	ELBERT
Lily	Urbina	DENVER
Brittany	Hall	LITTLETON
Joanne	Gonzales	PUEBLO
Kaylynn	LaGamma	COLORADO SPRINGS
Alicia	Marie	DENVER
Dawn	Bieller-Heaps	COLORADO SPRINGS
Tate	Bedlam	COMMERCE CITY
Megan	Bigley	PUEBLO
Tiana	Anderson	AURORA
Bryan	Flowers	AURORA
Pam	Eckenrod-Prendergast	ARVADA
Tabatha	Wymer	DENVER
Anmarie	Easley	COLORADO SPRINGS

First Name	Last Name	City
Douglas	Crech	LOUISVILLE
Karen	Mariluch	GRAND JUNCTION
Samuel	Niyah	DENVER
Leo	Montes	FORT MORGAN
Kassidy	Carter	COLORADO SPRINGS
Desiree	Magdaleno	FORT COLLINS
Wambli	Johnson	BOULDER
Blanca	Castro	COLORADO SPRINGS
Marcus	Maestas	DENVER
Rebecca	Harris	COLORADO SPRINGS
Hannah	Williams	COLORADO SPRINGS
Tavon	Hunt	WHEAT RIDGE
John	Jarrell	BRUSH
Paul	Rugel	DURANGO
Katrina	Douglas	COLORADO SPRINGS
Sarah	Curtis	COLORADO SPRINGS
Lori	Abitz-West	BROOMFIELD
Denise N Larry	Rivera	BROOMFIELD
Melissa	Benjamin	ENGLEWOOD
Amanda	Martinez	DENVER
Scarlett	Markus	COLORADO SPRINGS
Sean	Mack	PUEBLO
James	Roland	GRAND JUNCTION
Ileea	Gurule	DENVER
Joyce	Burnash	FORT COLLINS
Larry	Lamarr	AURORA
Arshawana	Mack	DENVER
EZ	Fields	COLORADO SPRINGS
Evanny	Thompson	FOUNTAIN
Fablan	Ramirez	COLORADO SPRINGS
Karolyn	Staats	JOHNSTOWN
Nevaeh	Marie	COLORADO SPRINGS
DV©jv5	RV@nee	DENVER
Jasmin	Blanco	DENVER
Brittani	Jean	DENVER
Bob	Garcia	WESTMINSTER
Cindy	Wood	COLORADO SPRINGS
Melissa	Stein	DELTA
Hope	Coon	COLORADO SPRINGS
Amber	Rothrock	FORT COLLINS

First Name	Last Name	City
Lawrence	Littlethunder	LOVELAND
Kelily	Head	WOODLAND PARK
Tanya	Marquez	GRAND JUNCTION
Brenda	Lobato	LOVELAND
Mark	Lindsay	AURORA
Spencer	Crosby	GRAND JUNCTION
Shaye	Champ	DENVER
Lupe	Joyner	COLORADO SPRINGS
Wanda	Padilla	DENVER
Christine	Physicaltherapist	ARVADA
Angel	Vegas	COLORADO SPRINGS
Amy	Burke	WHEAT RIDGE
Sonia	Estrada	DENVER
Valerie	Clark	ECKERT
Tessa	Cooke	DENVER
Jeri	Gaskins-Stevens	HOTCHKISS
Tere	Millv'n-Morphew	PARKER
Keith	Haggerty	DENVER
Patti	Barks	MONTROSE
Rhonda	Smith	DENVER
Linda	Marquez Altamirano	BLANCA
Cha Cha	Williams	DENVER
Melanie	Abel	ARVADA
Stan	Olsen	AURORA
Amy	Grajeda	LA JUNTA
Joanne	Sandoval	MONTE VISTA
Bridget	Gipson-Ojera	ENGLEWOOD
Amit Maat	Khamteye	AURORA
Leilani	Roe-Miller	OLNEY SPRINGS
Sophia	Hall	GRAND JUNCTION
Tony	Vaughns	DENVER
Paula	Muniz	FORT COLLINS
LaDonna	Hargraves	GRAND JUNCTION
Valerie	Chavez Muniz	DENVER
Angela	Andrews	COLORADO SPRINGS
Rhea	Craig	GRAND JUNCTION
EJ	Mack	COLORADO SPRINGS
Krystalynn	Gallegos	DENVER
Christine	Trujillo	ARVADA
Carrie	Stahlberg	DENVER

First Name	Last Name	City
Vinessa	Prager	ARVADA
Robin	Steffen Rippee	FORT COLLINS
Michele	Nadel	DENVER
Silvia	Evans	ALAMOSA
Jordan	Roth	BOULDER
Gloria	Apellaniz	LITTLETON
JG	Bullock	COLORADO SPRINGS
Diana	Mercer	LOUISVILLE
Melissa	Yankton	DENVER
Derica	Connors	AURORA
Traci	Koehler	DENVER
Rose	Cole	COLORADO SPRINGS
Elizabeth	Hoepfner	GREELEY
Lisa	Wasyk	COLORADO SPRINGS
Cathe	Wunkel Proctor	LOVELAND
Cameron	Barela	DENVER
Annette	Galvan	DENVER
Dom	Brown	EVANS
Rebecca	Poulsen Gerstel	COLORADO SPRINGS
Bridget	Stephenson-McKee	DENVER
Samaria	Harris	DENVER
Christina	Aragon	DENVER
Robin	Harmon-Tatum	AURORA
Sabra	Van Dolsen	DENVER
Desi	Archuleta	DENVER
Pat	Joslin	COLORADO SPRINGS
Angela	Duran	LAS ANIMAS
Steven	Darden	COLORADO SPRINGS
Lee	Boone-Nwajei	AURORA
Breannah	Haseman	COLORADO SPRINGS
Randy	Mergler	FORT COLLINS
Claudia	García	IDALIA
John	Saltzman	GRAND JUNCTION
Willie	Page II	COLORADO SPRINGS
Teshara	Chey	RIFLE
John	Klinger	GREELEY
Donna	Guerra	FOUNTAIN
Gayla	Wynn-Charrier	AURORA
Balefire	Glow	PENROSE
Jodi	Esplnoza	PUEBLO

First Name	Last Name	City
Phaedra	Boyden	AURORA
Marcia	Heald	PUEBLO
Jewell	Griffin	Denver
Michael	Smith	AURORA
Milehigh	Rebel	LITTLETON
Gabriela	Guzman	ARVADA
Denise	Good	LITTLETON
Mark	McVay	GOLDEN
Diana	Murray	AURORA
Jessica	Debrick	LITTLETON
Connie	Giarratana	ENGLEWOOD
Leanne	Moyer	AURORA
Brenan	Searain	PUEBLO
Kathy	Lewis	ARVADA
Melissa	Mckissack	DENVER
Ashton	Chapman	GREELEY
Peggy	Toribio Rampa	PUEBLO
Elizabeth	Braden	DENVER
Andrea	Leggett	AURORA
Valerie	Sanchez	Pueblo
Susy	Torres	AURORA
Theresa	Ricci	COLORADO SPRINGS
Shelly	Lynn	DENVER
Nichole	Papin	COLORADO SPRINGS
Dee	Davis	DENVER
Irving	Sylva	GREELEY
Tarius	Derritt	DENVER
Georgelene	Godfrey	DENVER
Bob Susie	Villarreal	COLORADO SPRINGS
Heidi	Lewis	BOULDER
Deryn	Wagner	LAFAYETTE
Susan	Guokas	DENVER
Carlos	Gonzalez	FORT MORGAN
Anita	Gurule	DENVER
Stephanie	Melonakis	DENVER
Sarah	Andaverde	PUEBLO
Susan	Hanley	GRAND JUNCTION
Carol	Caldwell	DENVER
Alisa	Dougherty	Denver
Jessica	Crawford	ELIZABETH

First Name	Last Name	City
Emily	Masterson	LAFAYETTE
Jason	Downing	PEYTON
Randie	McEntire	BUENA VISTA
Charlie	Wilkinson	LONGMONT
Amy	Boos	FORT COLLINS
Ellie	Orchid	LONGMONT
Ross	Montano	PUEBLO
Lisa	Villanueva	COLORADO SPRINGS
Tommy	Wilson	LITTLETON
Linda	Zenon	COLORADO SPRINGS
TonyKay	Ryerson	Fountain
Eloia	Smith	AURORA
Chandra	Yvonne	Colorado Springs
Kenneth	Reed	AURORA
Dee	Venzor	DENVER
Elizabeth	Torres	GREELEY
Larisa	Yancey	ROCKY FORD
Jasmine	Neiderhiser	YUMA
Larry	Jenkins	AURORA
Lanalou	Valente	JOHNSTOWN
Lola	Espinoza	PUEBLO
Serena	Jaques	AURORA
Jeannette	Bolte-Madrigal	COMMERCE CITY
Bekah	Ruge	LITTLETON
Penny	Ramirez	GRANBY
Johnny	Wright	COLORADO SPRINGS
Racheal	Stewart	COLORADO SPRINGS
Thomas	Annable	FREDERICK
Steve	Costigan	AURORA
Sharon	Rowe	FORT LUPTON
Cris	Garcia	DENVER
Margie	Toves	COLORADO SPRINGS
Pat	Cordova	COMMERCE CITY
Doug	Ruffin	Windsor
Tony	Aericko	MC COY
Ashley	Watikai	COLORADO SPRINGS
Melony	Tomberlain	BOONE
Arlene	Lopez	COLORADO SPRINGS
Cece	Ortiz	DENVER
VeronicaandBillie	Hayhurst	COLORADO SPRINGS

First Name	Last Name	City
Teresa	Louis-Tomlinson	CONIFER
Miracle	Peoples	COLORADO SPRINGS
Jessica	Woodriddle	COLORADO SPRINGS
Udip	Pokharel	DENVER
Stephanie	Castaneda	AURORA
Stan	Adamson	Broomfield
Sabrina	Garcia	PUEBLO
Teresa	Garcia	CARBONDALE
Sheri	Taylor	COMMERCE CITY
Doris	Hutton	ENGLEWOOD
Alyssia	Adams	ENGLEWOOD
Cherri	Huff	COLORADO SPRINGS
Abby	Price	CANON CITY
Mary	Frank	COLORADO SPRINGS
Faizuly	Acero	AURORA
Shantel	Alfaro	LONGMONT
Lisa	Pate	MONUMENT
Vickie	Laughlin	COLORADO SPRINGS
Irma	Bermudez	DENVER
Nikki	Sandoval	FOUNTAIN
LaDonna	Hill	DENVER
Myya	Bonner	DENVER
James	Gomez	AURORA
Toni	Aragon	DENVER
Dana	Miller	Denver
Meg	Stone	AURORA
Sean	Baca	PUEBLO
Lynnda	Newcomb	EVANS
Glenda	Gordon	CANON CITY
Sher Bear	Salazar-Carney	DENVER
Aaron	Hough	WALSBURG
Nancy	Leblanc	WIGGINS
Carrie	Lee	AURORA
Beverly	Wadman	LITTLETON
Breezy	Kiefair	LAFAYETTE
Mike	Kusanagi	GYPSUM
Shirley	Clemens Neale	ARVADA
Kylee Tristan	Sparrow	COLORADO SPRINGS
Pamela	Wettstein Bevens	STERLING
Melissa	Luna	CASTLE ROCK

First Name	Last Name	City
Ginabeth	Pearson	DENVER
LouReena	Colton	COLORADO SPRINGS
Manny	Lujan	LONGMONT
Jason	Gulley	FORT COLLINS
Sandra	Norris	GRAND JUNCTION
Phalan	Knight	COLORADO SPRINGS
Angel	Mercy	GRANBY
Beverly	Hill	Commerce City
Elise	Melendez	COLORADO SPRINGS
Francisco	Gallegos	DENVER
Federico	Lopez	BRUSH
Jade	Wood	AURORA
Jeanene	Sullivan	NUCLA
Najja	Allday	DENVER
Misty	Gallegos	DENVER
Joshua	Pacheco	DENVER
Steven	Martinez	COLORADO SPRINGS
Amy	McCallum	COLORADO SPRINGS
Deuce	Blunt	AURORA
Debbie	Szczygiel	Englewood
Andrea	Beltran	PUEBLO
Quiatra	Lucas	PUEBLO
CJ	Morrison	COMMERCE CITY
Jade	Gillpatrick	PUEBLO
JoAnn	Rosales	PUEBLO
David	Connolly	PAONIA
Johnson	Harold	AURORA
Jackie	Clarence Benjamin	DENVER
Gabril	Buster	WILEY
Nicole	Martinez	DENVER
Steven	Mitchell	AURORA
April	Monares	AURORA
Hope	Mackey	DENVER
Anjelica	Lopez	ALAMOSA
Maxine	Gallegos	DENVER
Cheryl	Bogdanow	ASPEN
Melissa	Harris	CRIPPLE CREEK
Jennifer	Sare Smith	NATHROP
Rich	Mann	DENVER
Christina	Romero	WESTMINSTER

First Name	Last Name	City
Suzie	Murphy	DURANGO
Mark	Dillie	COLORADO SPRINGS
Rose	Lucero	NEW CASTLE
Frankie	Lopez	BRUSH
Rhiannon	Wiedeman	WELLINGTON
Jackie	Pacheco	MONTE VISTA
Joyce	Rios	COLORADO SPRINGS
Donna	Duran	COMMERCE CITY
Korben	Koenig	FORT COLLINS
David	Garcv#a	LOUISVILLE
Cleo	Dioletis	DENVER
Cathy	Stewart	RIFLE
Shivon	Herrera	PAGOSA SPRINGS
Jaime	Carden-O'Brien	FORT COLLINS
Norine	Wynne	CASTLE ROCK
Craig	Gauna	PUEBLO
Nikki	Coto	DENVER
Shelbz	Fazio	GRAND JUNCTION
Elena	Klaver	NIWOT
Danelle	Lovelace-Adams	DENVER
Tammy	Thornton	COLORADO SPRINGS
Amy J.	Gallegos	BRIGHTON
Cody	Best	ARVADA
Gabriel	Velasquez	DENVER
Cari	Matthews	COLORADO SPRINGS
Eddie	Howe	FRANKTOWN
Tania	Valdez	RIFLE
Rosalie	Talmadge Cisneros	DENVER
Patty	Edwards	CANON CITY
Marian	Baena	DENVER
Alyssa	Menchue	DENVER
Delfine	Rael	MILLIKEN
Carrie	Howard	SALIDA
Belle	Rebiere	COMMERCE CITY
Deena	Cardinal	LAFAYETTE
George	III	PUEBLO
Melinda	Hernandez	HENDERSON
Cathy	Mordecoi	LONGMONT
Gabriele	Brown III	COLORADO SPRINGS
Shey	Stitt	EVERGREEN

First Name	Last Name	City
Peggy	Buzzeil	AURORA
Pascale	Rocca	PUEBLO
Julie A.	Bauman	ESTES PARK
Georgeann	Valles Sandoval	DENVER
Jill	Alvers	PUEBLO
Michele	Gobell	COLORADO SPRINGS
Joshua	Claydon	DENVER
Mayra	Mendoza de Jasso	DENVER
Lauren	Jano	ARVADA
Tracy	Hepner	ROCKY FORD
Dante	Williams	BRUSH
Andy	Rodriguez	AURORA
Milinda	Long	COLORADO SPRINGS
Laura	Martin	DOLORES
Maranna	Durkee	DENVER
Tonya	Chatten	AURORA
Christian	Christian	BOULDER
Patricia	Ruybol	BRIGHTON
Sarah	Bordeaux	Johnstown
Hai-Life	Nguyen	WESTMINSTER
Tiffany	Null	LOVELAND
Melissa	Benedetti	THORNTON
Jasmine	Duran	DENVER
Katrina	Marina	COLORADO SPRINGS
Crystal	Bernal	PUEBLO
Nadine	Gonzalez	ENGLEWOOD
Richard	Dauenhauer	FOWLER
Duncan	Northrop	CANON CITY
Marva de los Angeles	Villalobos	GREELEY
Leana	Snider	GRAND JUNCTION
Eddie	Christian	AURORA
Sonia	Gonzalez	ENGLEWOOD
Aracely	Gonzales	LOVELAND
Patricia	Rogers	AURORA
Daisy	Sunshine	DENVER
Jerre	Fletcher	STERLING
Sarah	Gardner	DENVER
Traci	Russell	COLORADO SPRINGS
Mariza	Elizondo Rios	Littleton

First Name	Last Name	City
Laura	Freebury	DENVER
Shawn	Swan	DENVER
Diana	Hall	BLANCA
Nakeei	Ishtah	EADS
Alea	May	LOVELAND
Alvzthriskos	Elpvda	LOVELAND
Gerald	Madrid	PUEBLO
Kim	Harpine	COLORADO SPRINGS
Lety	Esparza	PARACHUTE
Ronnie	Wells	DENVER
Stephanie	Preston	DENVER
Margaret	McDonald	LA JUNTA
Norma	Balderas	LITTLETON
Ryan	Wettstein	STERLING
Lucille	Antoinette	TRINIDAD
Pamela	Nash-Ainsworth	COLORADO SPRINGS
Ben	Ortiz	LA JUNTA
Herman	Polen	GRAND JUNCTION
Sheldon	Wallace	DENVER
Donna	Hernandez-Chavez	DENVER
Bryan	Sohn	MONTROSE
Nalene	Yazzie	GREELEY
Pablo	Madrid	GRAND JUNCTION
Steven	Wash	COLORADO SPRINGS
Jamie	Salazar	DENVER
Anastasia	Leon	DENVER
Cynthia	Laney	GREELEY
KJ	VanDyke	COLORADO SPRINGS
Dominique	Hesse	DENVER
Kenneth	Spence	PUEBLO
Janelle	Chavez	DENVER
Cecilia	Hernandez Baulista	FORT MORGAN
Leslie	Clairmont	STERLING
Davine	Lucero	PUEBLO
Jymmetta	Miller	LITTLETON
Zeke	Bustamante	BRIGHTON
Gema	Valles Arambula	ARVADA
Charlotte	Harris	DENVER
Tracy	King	AURORA
Tim	Etter	GRAND JUNCTION

First Name	Last Name	City
LaDonna	Gallegos	PUEBLO
Krista	Caetta	DENVER
Judy	Slymaker	GRAND JUNCTION
Myke	Gerner	LITTLETON
Anja	Ribberheim Rosales	PUEBLO
Rachael	Gonzales	AGUILAR
Melody	Noble	COMMERCE CITY
Kelsey	Pugh	COLORADO SPRINGS
Terrence	Bowman Sr.	AURORA
Phany	Vy	COLORADO SPRINGS
Tim	Stewart	FOUNTAIN
Laurie	Walker	COLORADO SPRINGS
Terry	Brincken	COLORADO SPRINGS
Gina	Dist	TELLURIDE
Rynea	Greathouse-Browning	BLANCA
Rosita	Lobato	DENVER
Dorris	Gallegos	AURORA
Ariey	Dee	DENVER
Tynetta	Jackson	AURORA
Lisa	Wilburn	FORT COLLINS
Krista	Barnes	DURANGO
Emily	Moreno	COMMERCE CITY
Sara	Hutchison	LONGMONT
Andres	Marquez	DENVER
Aspen	Reeder	LONGMONT
Sunnie	Perley	GRAND JUNCTION
Amber	Branecky	LOVELAND
Megan	Royer	LONGMONT
Patrick	Madsen-Williams	DENVER
Rere	Taylor	AURORA
Jay	Ross	MEEKER
Cherry	Thomas	DENVER
Shannon	Peterson	AURORA
Roger K.	Wright	FRUITA
Jessica	Cossaboon	GREELEY
Michael	Hernandez	DENVER
Sandra	Griffin	SEDALIA
Mike	Betterton	WHEAT RIDGE
Linda	Felix	MONUMENT
Theresa	Robinson	LONGMONT

First Name	Last Name	City
Chaundres	Carthan	COLORADO SPRINGS
Julie	Angel	PUEBLO
Brittany	Bush	FORT COLLINS
Anne	Moriarty	LOUISVILLE
Niyea	Jones	COLORADO SPRINGS
Leslie	Grogg-Tafoya	COLORADO SPRINGS
Dawn	Donohue	PUEBLO
Michele	Pierre Griggs	DENVER
Shelby	Gonzales	GREELEY
Cherie	Groulx	EVANS
Brandon	Figueredo	AURORA
Alexis	Coffin	PEYTON
Christine	Singh	ENGLEWOOD
LarryVicki	Waag	AULT
Orrin	Bartlett	COLORADO SPRINGS
Tina	Gallegos	PUEBLO
Jordan	Brock	COLORADO SPRINGS
J ≈á Noel	Andrews	DENVER
Lauren	Brown	DENVER
Sylvia	Duran-Aguilar	CASTLE ROCK
John	Vigil	CANON CITY
Jennifer	Campbell	LITTLETON
Ana	Baca	PAGOSA SPRINGS
Lauren	Mattson	FAIRPLAY
Danielle	Torres	PUEBLO
Eric	Meek	COLORADO SPRINGS
Paula	Rendon	BRIGHTON
Jeremiah	Champion	PUEBLO
Justyce	Gordon	COLORADO SPRINGS
Jenna	Hernandez	COLORADO SPRINGS
Sean	Peretto	DENVER
Dawn	Heller	DENVER
Travis	Morgan	TOWAOC
Anai	Nevarez	DENVER
Cierra	Rose	WELLINGTON
Barbara	Franceschi	COLORADO SPRINGS
Angela Jolie	Manio	LITTLETON
Azima	Muhd	DENVER
Cheri	Vallejos	ARVADA
Cathy	Diaz	DENVER

First Name	Last Name	City
Michelle	Jeffers	LITTLETON
Angelica	Franco	DENVER
Fina	Chavez Diaz	DENVER
Jade	Steely	FORT LUPTON
Angel	Castillo	DENVER
Angelina	Muv:oz	PUEBLO
Korilynn	Lopez	COLORADO SPRINGS
Mekka	Banks	DENVER
Mark	Garcia	DENVER
Rebecca	Archer	COMMERCE CITY
Vikki	Castillo	LONGMONT
Dawn	Quintero	AURORA
Rick	Hiller	AVON
Linda	Gallegos	DENVER
Jessica	Reed	GREELEY
Sheena	Taylor	COLORADO SPRINGS
Chenae	Woodall	LONGMONT
Joseph	Cuzzone	ARVADA
Preston	Harden	LAPORTE

**Testimony in Support of Agricultural Provisions of Draft Proposed
Colorado Overtime & Minimum Pay Standards Order
(COMPS Order) #36, 7 CCR 1103-1 (2020)**

Good afternoon, Director Moss. My name is Chad Vorthmann, Executive Vice President of the Colorado Farm Bureau. I am here today on behalf of the Colorado Agriculture Council and its more than twenty member organizations in support of the agriculture-related provisions in Colorado Overtime & Minimum Pay Standards Order #36. While we understand the intent of the draft rule, we will be submitting written comments, in addition to my testimony today, to suggest language to better clarify the Department's intent regarding the applicability of the new proposed order.

Colorado's agriculture production is diverse. Very diverse, ...ranging from dryland wheat and irrigated corn production in the eastern plains, to alfalfa and potatoes in the San Luis Valley. Livestock grazing occurs across Colorado but dominates the Western Slope; and specialty ag production, including the famous Rocky Ford cantaloupe, Palisade peaches, aquaculture, nurseries and greenhouses as well as our emerging wine industry is spread from the Arkansas River Valley to the Northern Front Range to the Grand Valley of the western slope. With this diversity comes the need for diverse employee skills and talents.

We appreciate the dialogue we have had with the Department in preparation for this rulemaking and are pleased that the draft proposed COMPS Order #36 recognizes the complexity and uniqueness of Colorado's agriculture industry. As well as the need to protect agricultural employees and food producers, and thereby consumers, against the most financially burdensome provisions of the proposed order.

In our prior informal written comments to the Department, not only did we try to demonstrate the uniqueness and diversity of the agriculture industry, we also tried to demonstrate how agricultural producers are price takers, not price makers, and are, with the exception of some specialty sectors of the industry, forced to accept whatever price is being offered for their commodities. Further, we tried to demonstrate how circumstances across the country and around the globe impact those commodity prices and farm income.

This was underscored by the University of Colorado's Leeds School of Business Economic Outlook that has painted a somber picture for Colorado's agriculture industry for several years. Past reports stated that agriculture producers are "weathering a storm of commodity prices, trade uncertainties, and unfavorable economic conditions."¹ And, "Someone is making money in Colorado agriculture and food systems. It just may not be farmers and ranchers..."²

No matter how efficient a farmer's or rancher's operation may be, or how much planning they do, and how much management they employ to control costs, including labor costs, in a low margin, commodity driven business, the potential to be operating at a loss is never far from reality.

¹ Business Research Division, Leeds School of Business, University of Colorado Boulder, Colorado Business Economic Outlook 2019, p. 16 (available at https://www.colorado.edu/business/sites/default/files/attached-files/2019_colorado_business_economic_outlook_011719.pdf)

² Business Research Division, Leeds School of Business, University of Colorado Boulder, Colorado Business Economic Outlook 2020, p. 16 (available at <https://coloradosun.com/wp-content/uploads/sites/15/2019/12/2020-BEOF-Book-FINAL-Printable-Full-Book.pdf>)

Further illustrating this is that more than 85 percent of food costs cover marketing, processing, wholesaling, distribution and retailing with farmers and ranchers taking home just 14.6 cents from every consumer food dollar.

For Colorado's producers -

- A wheat grower receives \$0.11 on two pounds of bread retailing for \$3.79;
- A beef producer gets just \$1.72 for a one-pound top sirloin steak retailing for \$10.49;
- A gallon of fat-free milk that retails at \$4.09 returns just \$1.71 to the dairy farmer.
- And a \$10.99 6-pack of beer returns just \$0.04 to the farmer.³

Avoiding burdensome regulations allows smaller farms to survive market swings and slows the consolidation of agriculture into fewer, larger farms and ranches. Policy proposals should recognize these trends to ensure they are not counter to the interests of consumers, rural communities and policy makers.

In closing, I want to say again, we appreciate the Department's attention and consideration of the concerns we have raised as an industry and we look forward to continued dialogue. I have brought an additional copy of my testimony and ask that it be submitted as part of the record for these proceedings.

Thank you.

³ National Farmers Union, The Farmer's Share, Thanksgiving Special, November 18, 2019 (available at <https://nfu.org/farmers-share/>)



SOUTHWEST REGIONAL COUNCIL OF CARPENTERS

Representing Carpenters in Southern California, Nevada, Arizona, Utah, New Mexico, and Colorado

Pete Rodriguez
President/COO

Dan Langford
Executive Secretary-Treasurer/CEO

Frank Hawk
Vice President/COO

December 13, 2019

Mr. Joseph M. Barela
Executive Director
Colorado Department of Labor and Employment
633 17th St #201,
Denver, CO 80202

Dear Director Barela,

On behalf of more than 1,800 Colorado members of the Southwest Regional Council of Carpenters, I write to applaud the CDLE's proposed Colorado Minimum Pay Standards Order (COMPS Order). The COMPS Order represents a positive step forward that will improve the lives of working people across Colorado and make Colorado more economically competitive.

Thanks to the CDLE's efforts, Colorado construction workers will be guaranteed the same basic protections as other workers including minimum wage requirements, rest and lunch breaks, and overtime. Not only are these the right things to do for workers, they will improve productivity, reduce the threat of wage theft and worker misclassification, boost our economy, and send the message that Colorado is leading the nation in ensuring that an honest day's work deserves an honest day's pay.

The CDLE should reject any efforts to slow down the proposed implementation timeline, create additional carveouts for businesses, or lower the minimum exempt salary threshold. After waiting nearly two decades for any changes to basic worker protections, Colorado's working families deserve timely action. Additional delays and carveouts will only make it harder for Colorado to close the skills gap and recruit needed construction workers for critical projects.

SOUTHWEST REGIONAL COUNCIL
533 S. Fremont Ave., 10th Fl. Los Angeles, CA 90071
(213) 385-1457 Fax: (213) 385-3759

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EXHIBIT
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HANSEN & COMPANY

■ Arizona - 1912 ■ California - 213 562 619 661 714 721 805 909 951 1607 ■ Colorado - 555
■ Nevada - 971 1977 ■ New Mexico - 1319 ■ Utah - 801



SOUTHWEST REGIONAL COUNCIL OF CARPENTERS

Representing Carpenters in Southern California, Nevada, Arizona, Utah, New Mexico, and Colorado

Pete Rodriguez
President/COO

Dan Langford
Executive Secretary-Treasurer/CEO

Frank Hawk
Vice President/COO

The COMPS Order is a productive, reasonable, and measured step forward for the state, and we look forward to continue working with the CDLE to build a stronger Colorado.

Sincerely,

Daniel Langford
Executive Secretary-Treasurer
Southwest Regional Council of Carpenters

cc: Scott Moss, Director, Division of Labor Standards and Statistics, Colorado
Department of Labor & Employment

Jared Polis, Governor of Colorado

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■ Nevada - 971 1977 ■ New Mexico - 1319 ■ Utah - 801