



Public Act 21-167: Real Estate Professionalism and Teams

TEAMS QUESTIONS

CONNECTICUT REAL ESTATE TEAM LAW

1. **What is the new law?** (FAQ 1, Q1)

Answer: Effective January 1, 2022, the Act establishes a legal definition of a “team,” and what is required of all real estate “teams,” including requirements for team names, team advertising, and registering a team with DCP.

TEAMS ARE DEFINED BY STATUTE

2. **What is the statutory definition of a team?** (FAQ 1, Q2)

Answer: A “team” is defined as a group of two or more Connecticut licensed real estate brokers or real estate salespersons affiliated with the same sponsoring real estate broker and engage in advertising as a group using a team name.

3. **How do I count the “two” for the purposes of the minimum requirements for a “team”?** (FAQ 1, Q20)

Answer: A “team” is defined as a group of two or more Connecticut licensed real estate brokers or real estate salespersons affiliated with the same sponsoring real estate broker and engage in advertising as a group using a team name. Therefore, it cannot be (for example), one licensed person and one unlicensed person, and it’s not one Connecticut licensee and one Massachusetts real estate licensee. A team must have two Connecticut real estate licensees who may be two Connecticut real estate salespersons, two Connecticut real estate brokers, or a Connecticut real estate broker and a real estate salesperson.

4. **Are there a maximum number of Connecticut licensees for a team?** (FAQ 1, Q21)

Answer: No.

5. **Can unlicensed persons be on a team?** (FAQ 1, 22)

Answer: Yes, however, they do not count toward the minimum number of licensees and their name may not be used in the name of the team.

6. **If there are only two licensed agents on a team but only one is highly marketed, while the other does the back-end operations, is this still considered a team, given both are licensed?** (FAQ 4, Q9)

Answer: Yes. What triggers a requirement for licensees to register a team is a desire to publicly advertise as a team. Production volume or the role of a licensee who is a team member is not a factor.

TEAM NAMES

7. What are permitted and prohibited as a “team name” when intended to be used in public advertisements? (FAQ 1, Q3)

Answer:

The Department will not pre-approve team names. Make sure your Team name meets the following requirements:

1. The Team name must include the full name of at least one individual (not business entity), licensed real estate broker or real estate salesperson who is part of the team.
 - a. If you don’t use the full name of at least one individual licensee, the Team name must be immediately followed by “at/of [full name of the sponsoring real estate broker]”
 - b. Note: An @ symbol may not be used, “at” or “of” must be spelled out
2. The word ‘Team’ must be included in the Team name
3. Names shall NOT include any abbreviation, term or phrase, including but not limited to:
 - affiliates
 - alliance
 - associates
 - business
 - collective
 - company
 - cooperative
 - corporation
 - division
 - enterprise
 - entity
 - exchange
 - firm
 - group
 - holdings
 - incorporated
 - LLC
 - LP
 - Office
 - Operation
 - Organization
 - Partnership
 - Practice
 - Professionals
 - Proprietor
 - real estate
 - realty
 - supplier
 - trade
 - unit
 - venture
 - Or any words that imply that the team is a business entity
4. Names shall NOT include the name of any individual who is not a licensed real estate broker or real estate salesperson
5. Names shall NOT include the name of a business entity before the “at/of [full name of the sponsoring real estate broker]” language
6. Names MAY include terms related to a service being offered – such as rentals, leasing, property management, commercial and homes

Examples of Team names permitted:

- Jane Doe Team
- Allyson Agent Team
- Jane and Allyson Team at ABCDEFG Real Estate
- Team Smith-Jones at ABCDEFG Real Estate
- Smith/Jones Team of ABCDEFG Real Estate

- Sunrise Team of ABCDEFG Real Estate
 - Important Note: This name is not permitted if the Sunrise Team is the name of a registered business entity. Even if the actual registered business entity is Sunrise Team Inc, or Sunrise Team, LLC.

Examples of Team names NOT permitted:

- Jane Doe Real Estate
 - Uses a prohibited term, implies a business entity, doesn't include the word "team"
- Allyson Agent Associates
 - Uses a prohibited term, implies a business entity, doesn't include the word "team"
- The Jane and Allyson Group at ABCDEFG Real Estate
 - Uses a prohibited term, implies a business entity, doesn't include the word "team"
- Jane Doe Team powered by ABCDEFG Real Estate
 - Must read "at" or "of" [full name of the sponsoring real estate broker]
- Sunrise Team with ABCDEFG Real Estate
 - Must read "at" or "of" [full name of the sponsoring real estate broker]

8. Will existing team names be grandfathered? (FAQ 1, Q12)

Answer: No.

9. Can a team use the word REALTOR® in their team name? (FAQ 2, Q10)

Answer: No. The National Association of REALTORS® establishes the requirements for use of the word REALTOR in registrations and advertisements as it is a trademarked word. The term is used in conjunction with a name, not as part of a legal name.

10. Can the word "team" be at the start of the team name versus the end? (FAQ 3, Q2)

Answer: Yes.

11. Can an ampersand be used within the team name – such as Jane Doe & Team (where Jane Doe is the name of the licensee as licensed)? (FAQ 3, Q3)

Answer: Yes, provided all the rules about the composition of a team and a team name in Section 2(e) of the [Public Act](#) are followed.

12. Can I use a term in a team name that is related to a service being offered – such as rentals, leasing, consulting, property management? (FAQ 3, Q5)

Answer: Possibly, provided the word "team" is included and it follows all the other requirements and prohibitions included in the [Public Act](#). Prohibitions include using any name that implies that the team is a business entity, such as "associates", "company", "corporation", "group", "LLC", "real estate" or "realty".

13. Is there someone I can check with at DCP to confirm the name I am considering is compliant? (FAQ 3, Q6)

Answer: No.

14. When a team name is registered, will DCP review, reject or notify if it's noncompliant? (FAQ 3, Q7)

Answer: Yes.

15. **Can we use the symbol “@”, as opposed to the full word “at” ABCDEFG Real Estate? (FAQ 4, Q1)**

Answer: No.

16. **Can we use “The” in front of a name, such as “The Doe Team of ABCDEFG Real Estate”? (FAQ 4, Q2)**

Answer: Yes.

17. **Can you use Real Estate within a name, such as “The Doe Real Estate Team”? (FAQ 4, Q3)**

Answer: No, prohibited words cannot be used in any part of a team name.

18. **Can I use the abbreviations Co or RE within a team name, such as “The Doe RE Team”? (FAQ 4, Q4)**

Answer: No, abbreviations of prohibited words cannot be used in any part of a team name.

19. **Can I use a plus sign, hyphen, slash or line in a team name? (e.g., Smith-Jones Team at ABCDEFG Real Estate, Smith / Jones Team at ABCDEFG Real Estate or Smith | Jones Team at ABCDEFG Real Estate) (FAQ 4, Q5)**

Answer: Yes, provided all the rules about the composition of a team and a team name in Section 2(e) of the Public Act are followed.

20. **Can I use the word “partners” in my team name? (FAQ 4, Q6)**

Answer: No, DCP has confirmed that term implies a business entity.

21. **Can I use an abbreviation for my company name? Such as, using AT Real Estate for Any Town Real Estate. (FAQ 5, Q 14)**

Answer: No. In addition, RE cannot be used in place of the words Real Estate. You must use the full name of the sponsoring broker as the name of the sponsoring broker.

TEAMS ARE NOT BUSINESS ENTITIES

22. **If I have D/B/A for my team, does that permit it to legally operate in Connecticut under that name regardless of the new requirements? (FAQ 1, Q16)**

Answer: No. A team is not a licensed real estate business and cannot legally provide licensable real estate brokerage services. If a real estate broker business entity operates under a D/B/A, that is legally permitted.

23. **Can I license my team as a real estate business entity rather than register my team name in order to keep using it along with the firm to which I am affiliated? (FAQ 2, Q2)**

Answer: No. Teams do not exist as separate licensed business entities and cannot be formed as a licensed business entity apart from the brokerage firm with which they are affiliated. Accordingly, teams: (a) cannot take a listing in the team name; (b) cannot enter an agency relationship under a team name; and (c) cannot enter into any agreement with a client or customer in the team name.

24. **Can I open my own real estate brokerage agency as a real estate business entity? (FAQ 2, Q4)**

Answer: Yes, provided you meet the requirements to be a real estate business entity. But remember, that is not a “loophole” to then try to use or advertise that separately licensed business entity as a “team” under another licensed real estate business entity.

25. **I have a real estate broker's license and registered an LLC with the Secretary of State. Am I exempt from the team rules when using my LLC name?** (FAQ 2, Q5)

Answer: Registering a LLC with the Secretary of State does not establish a real estate business entity for performing real estate services. Also, those with real estate salesperson licenses cannot establish real estate business entities. Remember, a team is a group of at least two licensed brokers or salespersons and cannot use any term or phrase that would imply a business entity, including the term LLC.

26. **I currently have a real estate broker's license and have established a licensed real estate business entity (as a sole proprietor, LLC, etc.). Am I able to advertise that business entity?** (FAQ 2, Q3)

Answer: Yes. When you are operating as that real estate business entity and providing real estate services **under your own supervision**, you aren't a team, you are a licensed business entity. A real estate business entity cannot use the word "team" in their name, as that implies an affiliated relationship with another real estate business entity. Please remember, a salesperson licensee cannot establish a real estate business entity.

For example: Jane Doe holds a real estate broker's license and has established a licensed real estate business entity named Jane Doe Real Estate, LLC. Jane Doe has signed an independent contractor agreement with John Smith who is the sponsoring broker with ABCDEFG Real Estate, a licensed real estate business entity. Jane will be offering real estate services to the public under the supervision of John Smith. The listings are with ABCDEFG Real Estate, and Jane Doe is operating as an independent contractor affiliated with ABCDEFG Real Estate.

The separate licensed real estate business entity known as Jane Doe Real Estate, LLC has no relationship to the services being provided by Jane Doe in her affiliation with ABCDEFG Real Estate.

TEAM REGISTRATION

27. DCP posted a Notice on the [Do's and Don'ts](#) regarding teams. (Additional)

28. **When do all team applications have to be received by DCP?** (FAQ 5, Q 5)

Answer: The law took effect January 1 requiring a team to register with DCP before a team plans to advertise publicly. If advertisements exist on January 1, 2022, then the team would need to be registered by January 1, 2022 to be in compliance with state law.

29. **What is the team registration process?** (FAQ 1, Q4)

Answer: Effective January 1, 2022, teams are required to register online with DCP.

30. **What is required for registration?** (FAQ 1, Q6)

Answer: Real estate team registrations must include the team name, the name and contact information for each team member, including the name and contact information for the team's sponsoring real estate broker.

31. The registration portal is asking for a Federal ID number. Is that the Social Security? (Additional)

Answer: Potential applicants are reading the questions and relating it to themselves instead of the applicant which is the Team. The Team is brand new and has never done business with the State or any of the agencies listed. When they are creating a new account, they need to select Business and answer "No" and then "Next". They only see the screen for FEIN if they select "Yes" because the system is going to try to match and find their existing account which DCP knows they do not have.

32. Will DCP kick back or reject a team registration application that indicates use of a team name that is noncompliant? If yes, how promptly can we expect it? (FAQ 5, Q 16)

Answer: Yes, DCP licensing staff will reject names that are clearly non-compliant. They do not have a timeline for how long the application review process will take right now. The bulk of the applications will be received upfront and are expected to level out over time. DCP has relayed that their staff is working diligently to get through all of the new applications received.

33. How often does a team need to register and what is the cost? (FAQ 1, Q5)

Answer: Initial registrations are valid for one year and cost \$565. Teams may apply for one-year renewals for \$375. A team must notify DCP about any changes to registration information or team transfers within 12 days of the change in a form and manner the Commissioner prescribes and pays a \$25 fee.

34. Is the initial registration fee prorated if a team registers after January 1 in a calendar year? (FAQ 3, Q9)

Answer: No.

35. When does my first annual registration expire? (FAQ 3, Q8)

Answer: January 31, 2023 and annually thereafter on January 31st.

36. If I don't register my team, can we still operate as a team? (FAQ 1, Q18)

Answer: Operating as a team is separate from advertising as a team. If a group of licensees work together in a company as a department, unit, pod, or team that remains fine. It's when that "team" creates a name to use and advertises with the public that rules apply.

37. For the sponsoring broker to sign the team registration form, can that be done electronically? (FAQ 5, Q 17)

Answer: The broker must sign the PDF form. If a sponsoring broker wants to enter in a PDF digital signature or digital image of their signature on the application form, that is acceptable.

38. If someone else on my team is responsible for team name and registration, not me, and it doesn't get done, can I get penalized for that? What is the penalty? (FAQ 1, Q19)

Answer: It is important to ensure that any team you are a part of is properly registered with the DCP. To verify whether your team is registered, visit the DCP's e-License website. If you advertise as a team without the proper credential, DCP may bring an enforcement case against you for deceptive advertising or other violations of law that may impact the status of your credential.

39. For administrative purposes, who is able to initially register the team and pay the fee? (FAQ 4, Q13)

Answer: A member of the team or their sponsoring broker should apply and pay the fee since an attestation will be required that the information submitted is true and correct.

40. How can I answer that I've never had a team on the DCP registration site when I've advertised one for many years? (FAQ 5, Q 12)

Answer: The answer should be, “no” because the state has not defined or recognized teams until passage of the statute, which is effective January 1, 2022. It would not have been possible to have a “team” as defined in state statute prior to January 1, 2022.

41. Does the team registration form get uploaded somewhere or can it be emailed to DCP? (FAQ 5, Q6)

Answer: The entire process is online. You cannot email or mail information, it must be completed online.

42. Can a licensee affiliated with a real estate brokerage entity register with two separate teams within that entity? (FAQ 4, Q8)

Answer: Yes.

TEAMS AND THE MLS

43. If a team is registered with DCP, must they also be registered with the MLS? (FAQ 5, Q2)

Answer: You would need to check with any MLS where you participate/subscribe to determine the policy.

44. What are the requirements for team names in MLS? (FAQ 2, Q11)

Answer: Any display of a team name in advertisements, including via the MLS, must comply with the team name requirements.

CHANGES TO TEAM REGISTRATION

45. What is the process for dropping or adding a team member? (FAQ 5, Q 3)

Answer: You’d handle that on DCP’s online website. [Here](#) are the change of member instructions DCP provided. There is a \$25 fee to make a change after the initial registration. However, a team must at all times have a minimum of two members.

46. Is the \$25 fee to make a change per licensee or per change? For example, if I add three licensees to an existing team, is the fee \$25 to make all three at the same time or is it \$25 per licensee who is added/removed (3 X \$25)? (FAQ 5, Q 4)

Answer: The \$25 is per change with the team roster, per licensee.

47. Are there other changes to the team registration that can be made? (Additional)

Answer: Yes. DCP has provided information on all the services and changes the registration portal has, and the cost. That can be found [here](#).

TEAMS MARKETING, ADVERTISING, SWAG AND SIGNAGE

48. Are there specific regulations about how I advertise my team, including the size of the display of the real estate company name? (FAQ 1, Q8)

Answer: The Real Estate Commissioners have recommended regulations regarding additional requirements for advertising that must go through a regulatory process for adoption. That action could not start until there was a statute that permitted teams to legally exist in the first place. Since there is now a statute, advertising regulations

are expected in the future. For example, the regulations are expected to require that the company name be the same size and as prominent as any “team name.”

49. Can I use the marketing materials I have now until they are used up? (FAQ 1, Q15)

Answer: Any materials that include a team name being advertised to the public are possibly non-compliant. To determine whether your materials currently comply with state law, review the Regulations of Connecticut State Agencies Section 20-328-5a.

50. If I need to change all my signs, advertising materials, letterhead, etc. and all of that is going to take time and money to do, when will know what is correct or not correct? (FAQ 1, Q14)

Answer: DCP will provide that information when it’s available.

51. When the revised advertising regulations are adopted, how much time is typically provided from when they are final until compliance with those final regulations must occur? (FAQ 3, Q11)

Answer: Regulations are effective once published with the Secretary of the State’s office. That being said, the regulation making process takes many months and involves a month long public comment period. CTR will notify members prior to the effective date of the revised advertising regulations.

52. Since revised advertising regulations are not completed, how do I know my advertising is compliant? (FAQ 3, Q10)

Answer: Until the revised advertising regulations are published by the Secretary of the State, teams must comply with the current advertising regulations for salespersons and brokers found here.

53. Does advertising include the listing agreement, for example where two agents co-list a property? (FAQ 2, Q7)

Answer: No. That is a contract provision and is not considered advertising to the public.

54. What does “prominent” mean for advertising and display of the sponsoring broker and contact information with a team name? (FAQ 4, Q14)

Answer: The statute requires the name of and contact information of the sponsoring real estate broker to be included at a prominent location in all of the team’s advertisements. “Prominent” in this context means that the name and contact information is: easily readable in font, color and size; pronounced so that it stands out from other font and graphics; and placed in a clearly visible location within the advertisement.

55. What is considered broker contact information? (FAQ 5, Q 1)

Answer: A method regularly used by the public for communication that directly reaches the sponsoring broker such as an email address, phone number or web address.

56. Are slogans or taglines permitted for salespeople, teams and real estate companies? (FAQ 3, Q12)

Answer: Yes, provided there isn’t a conflict with real estate statutes and regulations.

57. Can I use my team or personal logo in advertisements and on signs? (FAQ 2, Q9)

Answer: Those answers are anticipated to be part of future regulations.

58. I purchase give-away items (such as pens and golf tees) for marketing where there is not enough space to include the full team name and contact information. Can I still use give-aways printed with shortened versions of the information to fit in the very limited space? (FAQ 5, Q 8)

Answer: No, your advertising must include the full team name in any team advertisements. Make sure that whenever your team name is listed somewhere, it is the full registered team name. Also, remember to include the name of the team's sponsoring real estate broker at a location in all of the team's advertisements, including on give-away items.

59. I have non-compliant give-aways in storage that I have not yet distributed, can I still use those until they run out? The environmentalist in me has a hard time just throwing them away. (FAQ 5, Q 11)

Answer: No. See the response to the previous question (FAQ 5 question #8).

60. For items that are not being distributed to the public, but instead worn by licensees, such as hats or fleece vests with limited ability to customize, can I still wear those? (FAQ 5, Q 10)

Answer: Yes. However, if at any time you plan to make such items available to the public, see the response to FAQ 5 question #8.

61. There are existing purchased advertisements that cannot be edited because it is featured along with other paid advertising for many other businesses, such as restaurant placemats, local maps and shopping cart riders. How can I comply with those? (FAQ 5, Q 9)

Answer: You should contact the advertising company and relay that your ad is no longer able to be used, and ask that future printing be replaced or discontinued from that non-compliant use. Keep the communication in your files.

URLs, EMAIL AND SOCIAL MEDIA

62. Does the URL need to comply with the team name requirements? (FAQ 2, Q6)

Answer: No, real estate licensees use many URLs as part of practice that may or may not include any portion of their name.

63. An earlier FAQ noted that URLs do not need to match the team name, but do email addresses? (FAQ 5, Q 7)

Answer: A URL is part of an email address, so the answer is the same. However, the word team may not be used if there is not a registered team.

64. Are there restrictions on the use of the word team in social media handles? (FAQ 4, Q10)

Answer: Yes, the use of the word "team" in any advertising is limited to those registered as a team.

65. Can I use the word team in an email address if I have not registered a team? (FAQ 4, Q11)

Answer: No.

NO EXEMPTIONS OR GRANDFATHERING

66. Are currently existing teams exempt from the new rules? (FAQ 3, Q1)

Answer: No.

67. If I'm licensed in Connecticut through reciprocity, am I exempt from Connecticut advertising laws and regulations, including with teams? (FAQ 4, Q12)

Answer: No, reciprocity is only related to the path to be licensed in Connecticut, but licensees must then follow all the state statutes and regulations in their Connecticut real estate practice, including advertising.

68. What's the penalty for non-compliance with real estate broker and salesperson laws (including non-compliance with teams requirements)? (FAQ 2, Q1)

Answer: The penalties for non-compliance with statutory requirements for agents and brokers include monetary civil penalties, conditions imposed on the agent/broker license, and suspension, denial or **revocation of a real estate license**.

INDIVIDUAL LICENSEE ADVERTISING

69. My wife and I co-list properties together and our signs include our legal names together, such as John and Jane Smith. Are we able to continue to advertise with a same last name in that manner? (FAQ 2, Q8)

Answer: Yes.

70. Is an individual licensee who is not on a team able to use branding language along with their individual name, such as, Jane Doe Homes? (FAQ 3, Q4)

Answer: No.

71. If a word is acceptable for team branding, is it acceptable for individual branding? Such as, "Jane Doe Homes", where Jane Doe is a salesperson licensee who is not a team. (FAQ 5, Q 13)

Answer: No, an individual cannot brand using any word that implies more than an individual. "Homes" is permitted along with the word Team for team names, but not for individual branding.

72. Is a team member able to continue to advertise as an individual salesperson licensee in social media and other forms of advertisement, even if separately that licensee is also part of a registered team? (FAQ 5, Q 15)

Answer: Yes, a licensee can still maintain the ability to advertise as an individual, provided you follow the advertising guidelines for salesperson licensees and do not mention the team. However, if you plan to include any information about the team in social media or other advertisements, there needs to be compliance with how the team name is displayed.

OTHER MISCELLANEOUS TEAMS QUESTIONS

73. What is the responsibility of the sponsoring broker for the team? (FAQ 1, Q7)

Answer: The sponsoring real estate broker serves as the team's primary contact and must ensure the team complies with all existing laws and regulations and accurately and timely files registration forms and updates.

74. How does a sub-team of a team work? (FAQ 4, Q7)

Answer: The statute does not permit sub-teams, only teams. A sub-team would need to be registered as a team and comply with the team composition, team name, and advertising requirements.

CONTEXT FOR THE CHANGE REGARDING TEAMS

75. Who created these rules and why? (FAQ 1, Q9)

Answer: There has been a workgroup at DCP considering concerns of the public, industry and DCP staff. There were concerns about a lack of transparency as to what was being advertised to the public as a real estate entity. Concerns included the creation of names without a legal authority to operate without a business license or any visual or apparent relationship between what was being advertised and its connection to the real estate brokerage agency.

76. How did CTR advocate for the industry? (FAQ 1, Q10)

Answer: The legal interpretation from the state was that teams could not advertise to provide real estate brokerage services since they were not licensed businesses. The primary issue for CTR was to permit teams to be able to advertise to the public. The statute requirements were crafted to provide what DCP, legislative leaders and others stated would be necessary to provide transparency.

77. What notice did CTR provide to the membership about this? (FAQ 1, Q11)

Answer: CTR provided updates in our newsletters.

This was the first Advisory we sent on Feb. 12, 2021:

CT REALTORS® Advisory on "Teams" and Advertisements to the Public

The Connecticut Department of Consumer Protection (DCP) and the Real Estate Commission have ongoing concerns about the transparency of advertising by real estate licensees in Connecticut. In addition, teams are not defined in Connecticut statute, regulations or any advisory ruling; and yet those trade names or DBAs, which are neither licensed with DCP nor exist as legal real estate business entities, are being advertised as though they are legal entities.

DCP, with the unanimous support of the Real Estate Commissioners, has submitted proposed amendments to advertising regulations for how salespersons and brokers may advertise to the public. As there is no statutory, regulatory or advisory language that permits teams to exist for the purpose of advertisement to the public, it will take a statutory change to define such entities. The statute should include how teams may then be named and advertised to the public. CTR is presently working with DCP to craft language that could define a team. This would eliminate confusion as to the team's relationship to the real estate brokerage agency by disallowing teams to use terminology commonly used by real estate brokerage agencies.

CTR is providing this guidance to our members in the event that you are considering establishing a "team," trade name or DBA to advertise to the public. Until decisions about what may be legally permitted with names and advertising in the future are clearly established in statute or regulations, you may wish to delay additional advertising expenditures.

This update was sent to the membership on April 13, 2021:

Update on Teams

CTR continues to work to ensure that teams may be permitted to advertise in Connecticut. CTR has worked with DCP and legislative committee leaders/members to craft what would be necessary to provide the transparency necessary to permit the future legal existence of teams in CT. As reported earlier, there is presently not a statute, rule or advisory that permits a group of real estate licensees to advertise as a team. The transparency features would include a registration (that is not a license) with DCP including annual/change fees, defining a team as having at least two licensees, and not permitting words in the name of a team (other than the word team) that are the same or similar as those used by real estate brokerage agencies. Should CTR be unsuccessful

in our efforts, then the outcome would be that teams cannot advertise publicly. As cautioned earlier, you may wish to not spend funds to further a name that may not be permitted in the future. CTR will advise when a determination is made.

Additional Questions? Send to Jen on CTR staff (jen@ctrealtors.com) and we will continue to connect with DCP to provide whatever answers may be available. This FAQ will be regularly updated as more answers are known.

INFORMATION COORDINATED WITH THE DEPARTMENT OF CONSUMER PROTECTION ON JANUARY 25, 2022. SUBJECT TO CHANGE AS ADDITIONAL INFORMATION IS AVAILABLE.
