UnclaimedProperty
PROFESSIONALS ORGANIZATION

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December 22, 2014

Charles A. Trost, Esquire
Waller Lansden Dortch & Davis, LLP
Nashville City Center
511 Union St., Suite 2700
Nashville, TN 37219-1760

Sent via email: charlie.trost@wallerlaw.com

Re: Supplement Submissions – 1995 Uniform Unclaimed Property Act Revision

Dear Mr. Trost:

Subsequent to the meeting of the UCL Drafting Committee for the 1995 Uniform Unclaimed Property Act (UUPA) held in Washington D.C., November 7-8, 2014, the Unclaimed Property Professionals Organization ("UPPO") has been developing the attached supplemental documents to address specific issues as outlined below:

UPPO respectfully submits five documents for consideration:

1. **Early Reporting and Remitting:** This document is to supplement and provide additional clarification of UPPO's submission dated October 8, 2014.
2. **Burden of Proof:** This is a letter that was sent to the American Bar Association in support of its position.
3. **Administrative Appeals:** This document replaces UPPO's original submission of June 18, 2014, providing additional [highlighted] detail outlining the appeal process. We respectfully request this version replace our original submission.
4. **529 Plans:** This document reviews the difference between 529 accounts and Coverdells and ESAs. UPPO offers some suggested language regarding the age trigger specific to 529 accounts.
5. **Restricted Stocks:** This document reiterates UPPO's position from its original submission of June 18, 2014 but also provides some additional legal and policy arguments to support UPPO's position.

Thank you for the opportunity to share our additional recommendations on these very specific and important issues related to the revision of the UUPA. Please do not hesitate to contact me with any questions, which I will pass along to the UPPO Board.

Thank you.

Sincerely,

Toni J. Nuernberg, CAE, CBA, CGA
Executive Director
Unclaimed Property Professionals Organization

cc: Katie Robinson, Staff Liaison, Uniform Law Commission (with enclosure)
Debbie L. Zumoff, JD, UPPO President
UPPO Board of Directors