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# CAPA

FALL 2024

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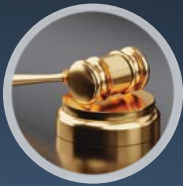


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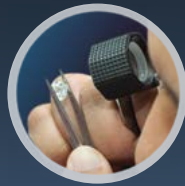
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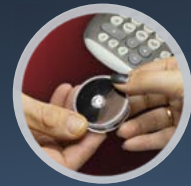
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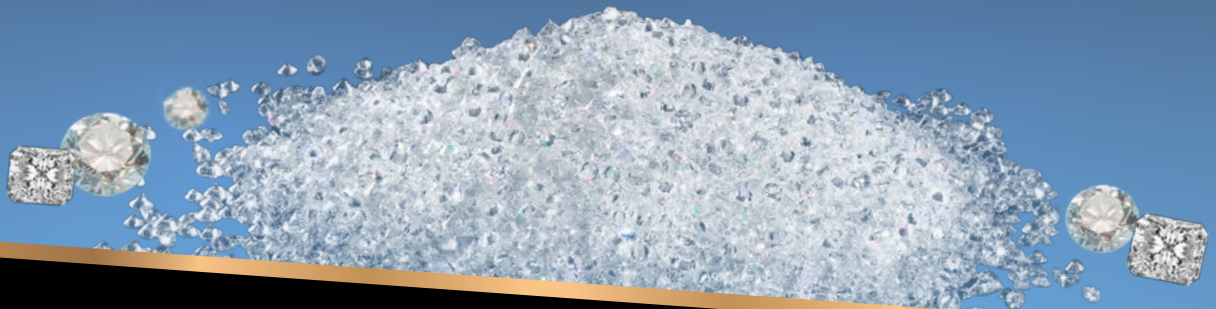
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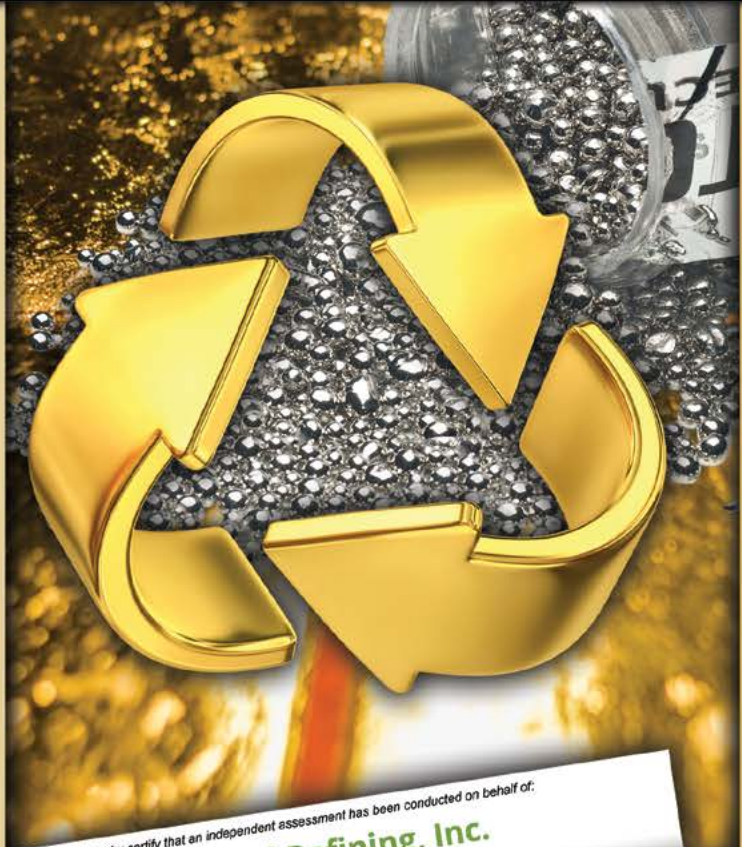
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Jan Schneider

## President's Message

**H**ello CAPA Family. I am once again addressing you as CAPA President. It is my honor to finish the term of President Stan Lukowicz as he attends to personal and family matters. Please thank him for his leadership for the last two years.

In the 2024 legislative session, over 2300 bills were introduced. At least 1300 of those bills have been or will be vetoed by the governor or die in committee and never make it to his desk. Of the only 1,000 or so bills that make it all the way and are signed into law, two of them were CAPA bills!

In this issue you will read about the two very significant pieces of legislation that CAPA sponsored this year. One is a revenue increase that will help all of us keep up with the ever-increasing cost of doing business in California. The other is the California Pawnbrokers Continuing Education Bill. This, the CE bill, was a major effort representing almost 20 years of research and development. It will ensure the future of our industry and association, and that we survive and flourish in this state.

And now, we need your support!

The California Pawnbrokers Association (CAPA) constantly faces significant legal and legislative challenges that threaten the livelihood of pawnbrokers across our

state. All of this effort is on YOUR behalf!

The CAPA Defense Fund, our war chest, has been hit hard this year with the passage of our two major pieces of legislation. So, we ask each of you to reach deep into your pockets and donate to the Fund. Our future as Pawnbrokers and business owners in California depends on it. With your additional assistance, we will replenish our resources to fight...and win...on your behalf.

We need your donation to ensure we have the resources to continue this fight. Your donation, no matter the size, will go directly to legal and legislative efforts to protect the future of pawnbroking in California. Together, we can ensure that this vital industry continues to thrive, providing essential services to families, small businesses, and individuals in our communities.

I hope to see you all in Indian Wells at our CAPA Convention. We will be disseminating the details of our legislation and the changes that you will need to make in your businesses in 2025, but there is nothing like getting the information firsthand. Even if you can only make it for one day, the trip will be well worth it.

Please feel free to contact me with any questions or concerns. My contact information is in your CAPA Handbook.

*Jan Schneider*  
President ■



Alberto Torrico



Cathleen Galgiani

## Capitol Report

### CAPA SPONSORED BILLS AVOID END-OF-SESSION CHAOS – SIGNED BY GOVERNOR

Both of CAPA's sponsored bills avoided the end of session chaos and gamesmanship that resulted in the death of a dozen or so bills at the stroke of midnight on the last day - Saturday, August 31<sup>st</sup>. SB 1198 passed

both the Senate and Assembly and was signed by the Governor well before the close of session. But AB 2231, CAPA's continuing education legislation, passed the Senate and was sent back for concurrence in the Assembly only days before the last night of session, narrowly avoiding inter-house tensions and a late-night struggle over whether to convene a special session to address rising gasoline prices.

During the final hours of the session, things appeared to be at a standstill and Legislators panicked over whether their bills would be held hostage or transferred to the other house

for concurrence in time to meet the midnight deadline. Senate and Assembly leadership finally agreed to a "bill swap" around eleven pm causing a massive rush to beat the clock. Inter-party tensions grew in the Assembly as Republican Legislators were accused of trying to run out the clock by throwing up their microphones to speak on every bill. Despite attempts by Democrats to limit debate, a dozen or so bills met their death at the stroke of midnight.

### REVENUE BILL TO ADJUST FEES

Senate Bill 1198, authored by terming out Senator, Richard Roth, was signed by the Governor on

August 19th. SB 1198 adjusts the amount of fees we are able to collect during pawn transactions by allowing for the collection of a new remote transaction fee as well as increases to two already existing fees.

Our revenue bill moved through both houses without any major hurdles in large part due to the high regard members in both houses have had for Senator Roth who has presided over pawn related legislation for many years as Chair of the Senate Business & Professions Committee.

SB 1198 passed the Senate Floor with only two abstention votes on May 2<sup>nd</sup>. Members of the Assembly Banking and Finance Committee passed it with a eight aye votes and one abstention on June 17<sup>th</sup>. SB 1198 escaped the Assembly Appropriations suspense file and was passed by the full Assembly on concurrence with 72 aye votes and no opposition on August 8<sup>th</sup>.

SB 1198 revised the definition of the “handling and stor-

age fee” to the “handling, storage and security fee” to account for the increase in retail theft to our members.

Second, SB 1198 allows for a new remote transaction fee of up to 3% of the transaction amount if a customer elects to request a replacement loan or to redeem a loan through electronic means. This new fee can be charged to cover the recurring costs associated with software applications.

Finally, if a pledgor fails to redeem any pawned item during the loan period, SB 1198 increases the allowable fee for services and costs pertaining to the preparation and mailing or electronic transmission of the “loan expiration notice”. Pawnbrokers may now charge up to seven dollars (\$7) (up from \$5).

## CONTINUING EDUCATION LEGISLATION

Governor Newsom signed CAPA's

continuing education bill, Assembly Bill 2231 by Assemblymember Mike Gipson, on September 12<sup>th</sup>. AB 2231 was able to escape both the Assembly and Senate Appropriations Committee Suspense files, where hundreds of bills meet their deaths. But surprisingly, it faced multiple policy challenges as it proceeded through the legislative process.

CAPA's legislation creates the Pawnbroker Education Act which requires mandatory education for pawnbrokers prior to licensure, and continuing education every two years coinciding with the pawnbroker's license renewal. In-lieu of governmental oversight, continuing education will be overseen by the California Pawnbroker Education Council created by AB 2231. The Council will be governed by a board of directors which includes four licensed pawnbrokers from CAPA. Responsibility for creating the education curriculum, approving providers and instructors,





tracking completion of courses, and issuing certificates of completion shall lie with the Council.

In the Assembly Banking and Finance Committee we faced push-back from lawmakers who wanted to assign greater control over the curriculum to the DOJ. We anticipated this concern early on which is why we proposed that Council membership would include representatives from the DOJ and local licensing authorities. We made the case that the Council, including these representatives from law enforcement, would then establish by-laws to oversee the program.

CAPA dodged a bullet in the Assembly Business & Professions Committee where committee staff raised concerns over the fact that our "education council" would be a private council unlike most others traditionally administered by government agencies. First, committee staff questioned whether the Pawn-

broker Education Council should be required to comply with the California Public Records Act (CPRA) which would have required that our records be open to inspection by the public.

Second, staff suggested that the Council be subject to the Bagley-Keene Open Meeting Act which would have required meetings of our Council to be noticed in order to allow for participation by public. Committee staff pointed out that our Council would be the only non-governmental council NOT required to have public participation.

Other questions raised in the Assembly Business & Professions Committee were whether our Council should be subject to audits by the Office of State Audits and Investigations, and whether we should be subject to the State's whistleblower laws.

Our lobbyists successfully made the case that unlike other governmental and private education entities in statute, we had one goal and

one goal only – to provide education for pawnbrokers. We escaped these regulatory burdens by taking amendments to clarify that the Council would have no enforcement authority. Therefore, if a pawnbroker fails to meet the education requirements, only the local licensing entity will have authority to deny or suspend a license.

CAPA faced a "catch-22" situation in the Assembly Appropriations Committee. While legislators expected the DOJ to have a role in our Council, the DOJ claimed that including a representative from the DOJ Secondhand Dealer and Pawnbroker Unit would cost the DOJ \$109,000 for the first year, and \$201,000 annually thereafter. This cost landed our bill on the Appropriations suspense file where hundreds of bills die each year.

After meeting with eight representatives from the DOJ, our lobbyists negotiated amendments with



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the DOJ which resulted in Appropriations Committee staff flagging the costs as “minor and absorbable” and releasing our bill from the suspense file. AB 2231 passed the Committee and headed to the Assembly Floor where it won sixty-six aye votes and fourteen abstentions.

Although we successfully lowered the costs for AB 2231 to minor and absorbable in the Assembly, Senate Appropriations Committee staff reviewed our bill as if they were establishing a new state entity, hiked up the costs, and forced our bill into limbo once again on the

Senate’s suspense file. In the analysis prepared for Legislators, staff claimed that because there would be a delay before the Council could collect fees for classes, the State would have to front the costs which could be significant. Furthermore, because CAPA did not want to define a fee amount in statute, committee staff argued that “the Council will likely need to do so through regulation, a process that may take up to 18 months to complete.” After conversations between our lobbyists and Committee Chair, Senator Anna Caballero, AB 2231 was released

from the suspense file and approved by the Committee two weeks before the end of session.

AB 2231 passed the Senate Floor on August 26th with thirty-five aye votes, and passed on “concurrence” in the Assembly on August 27th – four days before the deadline.

Now CAPA’s Continuing Education (CE) Committee can begin the process of initiating the creation of the Council and outlining the curriculum to meet the goal established by the Senate Business & Professions Committee of having course content established by January 1, 2026. ■



Tony DeMarco



Jan Schneider

## Legislative Chairs Update

a handling, storage, and security charge for pawned articles. The maximum amount that may be charged pursuant to this section is in accordance with the following schedule:

(1) Five dollars (\$5) or 2.5 percent of the loan amount for any article that can be contained within one cubic foot.

Example: For a \$1,000 loan that fits within one cubic foot, a pawnbroker, at their discretion, may charge \$5 or \$25

In addition to the storage fee increase, for many years we have been talking about recouping costs that we pay to program and process remote transactions. It costs money to provide this convenience for our customers. And our customers are used to convenience with other payment platforms they use. In fact, that we all use. We came up with the Remote Electronic Transaction Fee. This fee is only meant to recoup those fees incurred by a pawnbroker when a customer pays online or through an application. It costs us to remotely receive money from our clients for replacement loans and redemptions. This fee is capped at 3%. Let me stress that this is for transactions done outside of the store. We will be talking about exactly what that means at our convention.

Lastly, we asked for an increase on our notification fee from five dollars to seven dollars.

CAPA WAS SUCCESSFUL! We passed SB1198 (Roth) out of both houses and Governor Newsom signed it into law. A huge accomplishment for our organization, for you our members, and for our industry.

*CAPA Legislative Committee Co-Chairs  
Jan Schneider and Tony DeMarco* ■

With costs skyrocketing out of control over the past several years, running a business in California has probably been the hardest in decades. As many of you remember, CAPA goes back to Sacramento and asks for a fee increase every 5 years in order to attempt to catch up on cost-of-living adjustments. This year was our cycle year.

Both Jan and I, and the entire board, knew how important this bill would be to our members and our industry. We had an idea that due to the high costs of insuring, protecting, and otherwise safeguarding our clients’ property that the timing was right to raise the storage charges. This year we saw an enormous amount of retail theft which affected what we all paid to protect and insure our customers’ collateral.

These costs have skyrocketed, especially security and insurance from smash and grabs and break ins. The raise that we devised was increasing not just the storage fee, but also adding a handling and security fee. We were confident that we could sell this to the legislators.

Here is the language for the smallest increment as an example:

In addition to other allowed charges, at the time property is redeemed or a replacement loan is issued pursuant to Section 21201.5, the pawnbroker may collect



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— Jan Schneider, CAPA President

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# PAWNBROKERS: FEES AND CHARGES

## Dear CAPA Members:

The CAPA Board of Directors is proud to announce that on August 19, 2024, the Governor signed into law SB 1198, Pawnbrokers: Fees and Charges, CAPA's revenue Bill, which updates and increases certain pawnbroker storage fees and charges, as well as, adds a new ***“Remote Transaction Fee.”***

## What Is the New Law?

SB 1198 amends Cal. Financial Code §21200.9 introducing a new ***“Remote Transaction Fee”*** as an optional fee for customers wishing to redeem or replace a loan without going into the pawnshop.

Cal. Financial Code § 21200.9 is added to the Financial Code, to read:

“In addition to other allowed charges, a pawnbroker may collect ***a remote transaction fee***, if the pledgor elects to request a replacement loan or to redeem a loan through electronic means, ***of up to 3.0 percent of the transaction amount*** to cover the recurring costs associated with software applications.” (emphasis added).”

The new fee is called a ***“Remote Transaction Fee.”*** I have underlined, bolded and italicized certain key provisions of the law above, to draw your attention to the purpose and function of those provisions in the new law. As set forth below, the emphasized provisions and legal terms above have very specific meanings and functions, which help explain how the new law is intended to be used. Keep in mind that the law is brand new, and there is no court interpretation of the law. That being said, we look to the legislative intent (what the legislature understood the law to mean and its purpose when passed) and at the general legal and plain meaning of the text and legislative interpretations principles.

## Why Does It Matter If the New Fee is Optional?

I have underlined and emphasized the terms may, elects, and through electronic means above, because these terms are important to understanding how the law is intended for use. May and elects signify that the remote transaction fee is optional at the customer's election. Also, it signifies that the pawnbroker doesn't have to charge the fee, and the pawnbroker can choose to charge a fee anywhere from no fee at all up to 3% of the transaction amount. So, the fee is entirely optional, and the amount charge can be negotiated up to 3% of the transaction amount of the redemption or the replacement loan.

## Is the New Fee Part of the APR?

No. Because the fee is optional and is outside the pawn transaction, it's not part of the APR. It's an elective fee meaning it's the customer's choice. The customer can take it or leave it, meaning they can choose to come into the store and redeem or receive a replacement loan without incurring the fee. The “Remote Transaction Fee” is a convenience fee of sorts, for the convenience of paying remotely and avoiding the burden of having to go into the shop. Incurring the fee is the customer's choice for their convenience of doing a remote transaction through electronic means, meaning NOT in the pawnshop.

## What Does It Mean “Through Electronic Means?”

“Through electronic means” has purposefully been left broad and open ended, to encompass future possibilities and technology. We don't know what the future holds for new electronic means to accomplish a remote transaction, so the new law is broad enough to cover future technological advances. So, what does “through electronic means” encompass today? Certainly, the remote transaction fee can be charged when a replacement loan or redemption is done via: 1) a telephone system; 2) online pawn software or a web-



site; and 3) a mobile Pawn Application. All those options are through electronic means.

### Why Is It Called A “A Remote Transaction Fee?”

This should be obvious, but sometimes it’s necessary to state the obvious. It must be a **remote** transaction, i.e. **NOT IN THE PAWNSHOP**. Further, as explained in the paragraph above, it must be via some electronic means, such as a phone system, online pawnshop website, or mobile pawn Application (Think Bravo, Pawnmate, ect...). Many of the existing online pawn platforms, websites, and mobile applications already charge you, the pawnbroker, a fee per transaction (or per contract), now you can pass that along to the customer and get up to 3% of the transaction amount as a fee. This is not meant to be used in the store, hence the term “remote.” Please **do not** charge customers the “**Remote Transaction Fee**” while they are in the pawnshop.

### What is the 3% Fee for?

The fee is meant to offset the pawnbroker’s costs related to acquiring an electronic remote transaction system, whether software, an app, a phone system, website, or online platform. It’s also meant to capture the cost of each individual transaction, as some vendors charge per transaction. But the fee is meant to do more than pass along the individual transactions fee charged by the vendors. The fee is also meant to cover overall electronic systems sunk costs (i.e. cost of building a website or an application, or purchasing one from a vendor), cyber security, and infrastructure to set up remote electronic pawn to enable such transactions in the first place. Whether you build from scratch, purchase off the shelf from a vendor, or customize an off the shelf system, the fee is meant to help recoup the sunk cost of that new electronic infrastructure for doing remote transactions. This is why the fee can be ***up to 3%*** and was not limited to the cost per transaction. The new fee is more than just the one-time transaction fee the vendor charges you, it’s the entire ecosystem (including sunk costs for building a platform, app, and/or website), ongoing maintenance and upgrades of such systems. You do not have to charge the fee, and you don’t have to charge the full 3%, that is negotiable with the customer and/or up to your business judgment as to whether to charge it or not. However, we all know that offering the customer the convenience of a remote electronic option to redeem or secure a replacement contract is costly, so this is an opportunity to recoup some of those costs. Again, one does not have to offer remote electronic transactions at all, the new law is entirely optional.

### Practical Concerns in Implementation

This is a new fee, so it will need to be incorporated into your contract, into your software, application, website, mobile pawn systems, and their respective terms and conditions. You will need to post the new fee in the shop, so the customer is aware ahead of time when doing the originating pawn loan. The bottom line is, the new fee is allowable by law, but you need to incorporate it into your paperwork, signage, and remote pawn systems to put the

customer on notice that the fee exists and is optional. You do not want to be accused of having a surprise fee or hidden fee, even if authorized by law. So full disclosure of the new fee is advisable.

What happens if a customer redeems online? This is uncharted territory. That is for each pawnbroker to decide and clearly indicate in the store signage, contract, and terms and conditions for mobile pawn systems. There is no law on this, so however you set this up, it’s simply a matter of contract with the customer. This would be outside the APR, as it’s up to the pawnbroker to make a policy regarding handling of the item after redeemed. Again, offering remote redemption is strictly optional. You can choose to only offer remote replacement loans, or no remote options at all.

If the customer redeems online, one could imagine via contract after the fact charges for storage if they don’t pick it up within a certain time frame, and/or shipping and handling fees (I would recommend insurance as well) to send it to the customer. Those would all be after the fact transactions, meaning the item is redeemed and no longer in pawn, as to any deals made about storage, shipping, handling, insurance, and what happens if the item is not picked up after a certain date, those matters are to be determined by the pawnbroker and customer. I say after the fact, meaning it’s not in the APR, and it’s about what to do with the item once redeemed. But it’s very important to have the terms of how the item is dealt with decided before the customer redeems online. You don’t want to be stuck storing something forever without a binding written agreement about how to deal with the item once redeemed remotely.

It’s best to have those additional non-pawn fees and terms and conditions laid out ahead of time, posted in the store, in the terms and conditions of any remote system, and/or added to the contract or an addendum signed before the remote redemption takes place. Additional terms, conditions, and fees related to what happens with an item after redeemed remotely should be included in the online and/or mobile app terms and conditions. You don’t want to offer remote redemption, then be stuck sitting on a customer’s item for years with no way to get the item back to the customer and/or take ownership of the item to offset storage costs if it’s not picked up within a certain time frame. Importantly, there is no specific law on this subject, and it’s up to the pawnbroker to define the terms and conditions of a remote redemption. The future hold endless opportunities for remote and online transactions, and you can shape your own terms and conditions to fit your business’ needs.

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# THE PAWNBROKER EDUCATION ACT – A NEW ERA FOR CALIFORNIA PAWNBROKERS

## Dear CAPA Members and California Pawnbrokers,

We are thrilled to announce the passage of the Pawnbroker Education Act, a landmark bill that promises to elevate the standards and practices within our industry. This legislation is not just a regulatory milestone but a significant opportunity for growth and professional development for all pawnbrokers in California.

## Benefits to the California Pawnbroker Industry

- 1. Enhanced Professional Standards:** The Pawnbroker Education Act mandates comprehensive education for all licensed pawnbrokers, ensuring that everyone in our industry is well-versed in both state and federal laws. This will lead to higher standards of conduct and compliance, ultimately benefiting consumers and enhancing the reputation of pawnbrokers across the state.
- 2. Increased Membership:** With the implementation of this Act, we anticipate a surge in CAPA membership. The California Pawnbroker Education Council, established by the Act, will oversee the educational requirements. CAPA members will enjoy the benefit of accessing these courses at a nominal fee, making membership more valuable than ever. Non-members will be charged an appropriate fee, providing an incentive for more pawnbrokers to join our association and take advantage of the member benefits.
- 3. Accessible Education:** Education will be more accessible than ever, with courses available through multiple channels:
  - **CAPA Conventions:** Attend in-person sessions at our annual conventions, where you can network with peers and industry leaders.
  - **Online Portal:** Access courses conveniently from anywhere, allowing you to balance professional development with your busy schedule.
  - **Regular In-Person Seminars:** Participate in seminars held throughout the year at various locations, providing flexible options to meet your educational needs.

## Educational Requirements

- 1. Standard Course and Curriculum:** By January 1, 2026, the California Pawnbroker Education Council will develop a standard course and curriculum for pawnbrokers. This curriculum will include:

- **Pre-Licensing Education:** At least eight hours of education for applicants seeking licensure.
  - **Continuing Education:** Eight hours of ongoing education over a two-year period, coinciding with license renewal, for current licensees or their designated representatives.
- 2. Comprehensive Coverage:** The education will cover essential topics such as:
    - Compliance with federal and state laws relevant to pawnbroker businesses, including anti-money laundering and lending laws.
    - Best practices in the industry.
    - Security measures and authentication processes.

## Member Benefits

**Tuition Benefits:** As a CAPA member, you will benefit from significantly reduced tuition fees for the required educational courses. This member benefit underscores our commitment to supporting your professional growth while ensuring compliance with the new regulations.

**Non-Member Fees:** Non-members will be required to pay a higher fee for the same courses, highlighting the value of CAPA membership. This structure not only encourages more pawnbrokers to join CAPA but also helps fund the development and delivery of high-quality educational content.

## Looking Ahead

The Pawnbroker Education Act is set to take effect on January 1, 2026. By then, the California Pawnbroker Education Council will have developed a robust curriculum covering essential topics such as compliance with anti-money laundering laws, lending laws, and other federal and state regulations. This education will ensure that all pawnbrokers are equipped with the knowledge and skills necessary to operate efficiently and lawfully.

We are excited about the positive impact this Act will have on our industry and look forward to working together to implement these changes. Stay tuned for more updates on course availability and how you can take advantage of these new educational opportunities.

Sincerely,  
*Patrick Rogers*  
*Continuation Education Committee*

Feel free to reach out if you need any more details or further assistance! ■



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# WHAT WE LEARNED FROM THE IRS IN CALIFORNIA RECENTLY

In May, I flew to California three times in eight days to assist clients with '8300 exams' performed by the IRS. These are a first for pawnbrokers and there is a learning curve for all parties including the IRS. The following are my takeaways for us all to learn from.

## 1. The agents were unfamiliar with how pawnshops operate

The agents showed up in pairs. One asked most of the questions and both took copious notes. It was obvious quickly that neither of them knew how the business runs so I spent time with the managers and owners giving tours and testing gold and diamonds for them so they could learn some of the finer points of what we do. We walked them through the process from beginning to end of a loan and what happens if it defaults along with the difference between a redemption and a renewal (or in CA a 'replacement' loan).

The tour gave the agents a chance to actually SEE the processes employed and not just HEAR us talk about them. Most people are visual people and benefit from seeing things. Think how hard it is for many potential employees to grasp the concept of pawn over the period of several weeks and we need the IRS folks to figure it out in a couple of hours.

## 2. The onsite meeting consisted of a several hour interview process

This consisted of a Q&A session where most of the questions centered around cash. They wanted to know every process surrounding cash transactions, who could perform them, who tracked them, who filed 8300 forms and how the software helped, or didn't, in the process. Most of the data the agents asked for ahead of the meeting onsite so the face to face was more about asking questions.

In all three cases, the agents did stick around and do some data work after the Q&A, but this was limited to the amount of time in their 8-hour work day which included their travel time. Be prepared for a full day with them!

## 3. The agents zeroed in on related transactions fairly quickly.

Single transactions that require 8300 filings are fairly simple to identify. These are the single or multiple loan redemptions that happen all at once or a large retail sale. What is not so easy, and quite frankly where we trip up, is the related transactions. These are the ones like a large layaway that brings in over \$10,000 in cash in a rolling 365-day period. The same concept applies to loans.

For some reason, there is still confusion as to how re-

lated transactions work. These are large loans that pay back over \$10,000 in a rolling 365-day period. Think of it as a lay-away and you will be fine. Most software programs have a mechanism in place that calculates these transactions so one can validate whether a form truly needs to be filed. The more cumbersome programs consider all transactions performed by a customer in a year to be related and they just make an aggregated list for the company to sort through. This is time-consuming and in the vast majority of cases is a waste of paper, ink, and your time.

In the majority of cases, transactions must occur in a 24-hour period to be related.

This means that if 5 loans are done all at one time, those loans are related. If a customer comes in on five consecutive Fridays and gets loans those are NOT related.

In all three 'exams', the agents requested a list of ALL transactions performed in 2023 that involved cash coming IN. Stores that use their POS program to perform all transactions had less problems than stores that used the POS just for loans and buys and used a different system for sales and layaways. In many ways, the latter approach is dangerous and invites a full tax audit from the agents as they have a legitimate reason to wonder how the inventory is managed and whether or not the number you apply as a cost of inventory is accurate.

Remember that this is the IRS. Revenue is in their name. An 8300 'exam' is a perfect excuse to take a good look at your processes. If those processes create more questions than answers, you may be looking at a full blown tax audit.

## 4. The agents spent a fair amount of time explaining the penalties and fines

In the past, a missed 8300 form never incurred a fine or penalty. It would seem now that this is changing. 8300 forms have a 15-day filing window. Forms filed from day 16-45 receive a \$60 penalty, while forms filed after day 45 can cost you \$310.

## 5. In one case, the agents did not fully know the instructions for 8300's and made mistakes

It is important to remember that agents can be new at this and it is appropriate to push back in a respectful way but you had better know what you are talking about and you have to be able to back it up. It is a good idea to download a copy of the newest (12/2023) version of the instructions and read them several times over. Feel free to contact us if you have questions before it becomes a problem.

Dave Griffiths ■



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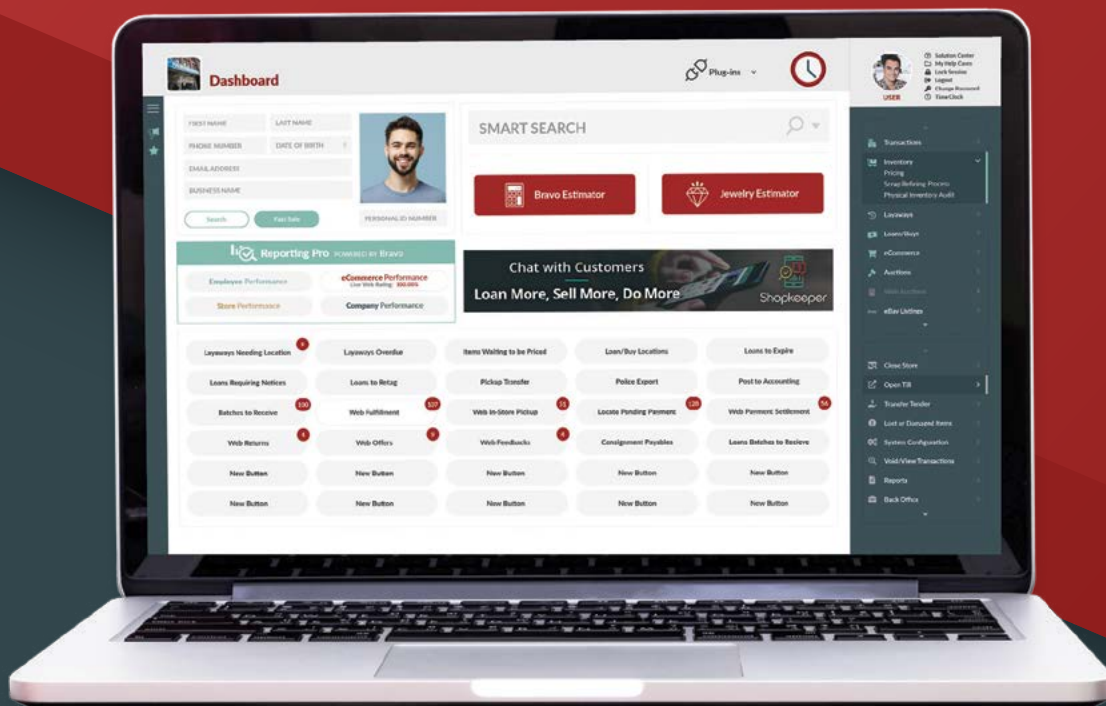
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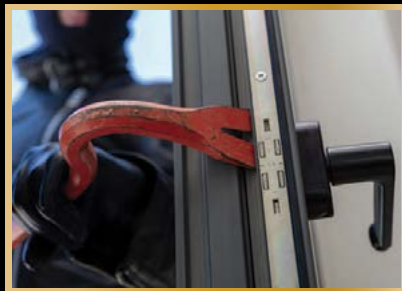
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