

NORFOLK COUNTY OPERATIONAL REVIEW INFORMATION TECHNOLOGY



There will not be a modern functioning Registry of Deeds delivering quality services if the IT Information Technology recommendations affecting the Norfolk Registry of Deeds IT Technology Department are adopted. These unsound policy recommendations as to the Norfolk Registry of Deeds would lead to a loss of efficiency and negative impacts on Registry operations. This would be a disservice to the residents, Registry users, businesses and taxpayers of Norfolk County and the Commonwealth of Massachusetts.

William P. O'Donnell
Norfolk Registry of Deeds
Norfolk County Registry of Deeds
649 High Street Dedham, MA 02026
registerodonnell@norfolkdeeds.org

POINTS OF AGREEMENT WITH REPORT

POINTS OF AGREEMENT

1. "WE FEEL THAT FROM A MANAGEMENT PERSPECTIVE, THE IT OPERATIONS ARE BEING WELL RUN CONSIDERING THE LIMITED STAFF."
See page 10.5 of Information Technology per Mark Abrahams Report previously dated 9-22-2021 now dated 10-6-2021

This quote alone should end this debate and lead to a vote NOT to implement the Registry IT Technology recommendations. There are too many negative impacts and bad outcomes that could take place. Why change up part of an operation that is "being well run" and has been "well run" for over 20 years?

2. "... IT MAY BE PROBLEMATIC TO COMBINE THE TWO NETWORKS..."
See page 10.5 of Information Technology per Mark Abrahams Report previously dated 9-22-2021 now dated 10-6-2021

"WE WERE TOLD THAT CONSOLIDATING THESE TWO NETWORKS WOULD BE PROBLEMATIC."
See page 10.4 of Information Technology per Mark Abrahams Report previously dated 9-22-2021 now dated 10-6-2021

The Register of Deeds has the statutory authority and fiduciary duty of running the Registry of Deeds. The Norfolk Register of Deeds has had concerns about problems arising from converting systems. These concerns are noted by the consultant offering the IT Technology recommendations to the Norfolk County Commissioners. This concern shows up at a couple of different points in the Abrahams study. Why would you gamble and jeopardize the operations and services of the Registry of Deeds?

POINTS OF AGREEMENT WITH REPORT

3. "IT SECURITY IS NOT PART OF OUR SCOPE, AND WE ARE NOT SECURITY EXPERTS..."

See page 10.5 of Information Technology per Mark Abrahams Report previously dated 9-22-2021 now dated 10-6-2021

There are articles being written of the title to real estate property being stolen from homeowners. There are increased cybersecurity risks and ransomware taking place. It is absolutely incredible that recommendations made by a consultant that does not appear to have expertise in today's world of technology would be followed.

4. "THOSE WE INTERVIEWED AND MET WITH OFTEN MENTIONED THEIR CONCERNS ABOUT CYBER SECURITY AND DISASTER RECOVERY PLANS."

See page 10.6 of Information Technology per Mark Abrahams Report previously dated 9-22-2021 now dated 10-6-2021

With almost daily reports of security breaches at major enterprises, it may seem like it's just a matter of time until cybercrime affects you. According to the FBI, in 2020 there were more than 790,000 complaints of suspected internet crime, with reported losses exceeding \$4.2 billion. See FBI Release the Internet Crime Complaint Center 2020 Internet Crime Report, Including COVID-19 Scan Statistics, March 2021, [fbi.gov](https://www.fbi.gov)

5. "GIVEN THE MINIMAL STAFF, THERE MAY NOT BE ANY SIGNIFICANT STAFF REDUCTIONS POSSIBLE..."

See page 10.3 of Information Technology per Mark Abrahams Report previously dated 9-22-2021 now dated 10-6-2021

One of the purported rationales of the Abrahams Study was to develop efficiencies and cut staff and/or costs. As to Information and Technology you are doing neither if the recommendations are adopted. The Registry IT Technology Department is made up of 2 permanent positions. The paid consultant acknowledges there will not be staff reductions. In fact, later in the Abrahams Study on page 10.6 it is written, "The County may, at some time in the future, consider hiring an IT Security Officer." This is a recommendation to hire more staff not less. If the Information Technology (IT) vote is not about reducing staff what is it about?

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

Please evaluate the following issues when you vote NOT to have an on-site Registry Chief Information Officer and an on-site Registry IT Technology Department working for and with the Registry staff, for and with the Register of Deeds, for and with Registry stakeholders and users, for and with municipal governments and for and with the general public.

1. MISTAKEN AND WRONG FACTS-MISTAKEN AND WRONG RECOMMENDATIONS AND CONCLUSIONS

A. LETTER FROM JOHN BUCKLEY PLYMOUTH
COUNTY REGISTER OF DEEDS DATED 10-1-2021.
See Exhibit # 1 attached

B. LETTER FROM BARRY AMARAL BRISTOL COUNTY
REGISTER OF DEEDS DATED 10-6-2021
See Exhibit # 2 attached

These letters speak to the fact that Mark Abrahams as part of his benchmarking study got his facts wrong. There are IT Technology Departments at the Registries in Plymouth and Bristol County. This fact Mark Abrahams got wrong when he delivered his report dated 9-22-2021. This wrong fact led to a very bad as well as mistaken conclusion by Mark Abrahams- the Norfolk Registry of Deeds should not have an IT Technology Department.

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

WRONG FACT

“OUR BENCHMARKING STUDY INDICATED THAT THE BRISTOL AND PLYMOUTH COUNTY REGISTRIES DO NOT HAVE AN IT DEPARTMENT.”

See page 10.3 of Information Technology per Mark Abrahams
Report previously dated 9-22-2021
See Exhibit # 3 attached

ANOTHER WRONG FACT

“NEITHER (BRISTOL AND PLYMOUTH COUNTY REGISTRIES) HAS A CHIEF INFORMATION OFFICER.”

See page 10.3 of Information Technology per Mark Abrahams
Report previously dated 9-22-2021
See Exhibit # 3 attached

Mark Abrahams had wrong facts when he delivered his 9-22-2021 report. Mark Abrahams had wrong conclusions and recommendations as to the Norfolk Registry of Deeds and its IT Department when he delivered his 9-22-2021 report. Other benchmarked Registries have IT and Technology Departments. Doesn't this logically lead to the conclusion that the Norfolk Registry of Deeds should keep its on-site Registry IT Technology Department like the other Registries?

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

2. QUESTIONABLE METHODOLOGY AND A FLAWED PROCESS BY CONSULTANTS

A. NO REGISTRY VISIT

Mark Abrahams was engaged since September of 2020 to do a job. Between September of 2020 and the delivery of the results of his study in the Fall of 2021 neither Mark Abrahams nor anyone from his team came by the Norfolk Registry of Deeds to observe any operations let alone that of the Norfolk Registry of Deeds IT Technology Department. There was no visit despite the fact that even during the COVID-19 pandemic the Norfolk Registry of Deeds was open for business and operational every work day.

B. NOT FAMILIAR WITH REGISTRY OPERATIONS

This paid consultant Mark Abrahams and his team never studied a Registry of Deeds in Massachusetts or anywhere else. Mark Abrahams as a consultant deals mainly with schools. Since September of 2020 when Mr. Abrahams was engaged by the Norfolk County Commissioners neither him nor his team ever even visited the Norfolk Registry of Deeds to investigate and observe Registry operations. This lack of familiarity and knowledge with Registry of Deeds operations should be concerning given Mr. Abrahams' troubling recommendation to eliminate the established Norfolk Registry IT Technology Department and the dangerous negative impacts of that recommendation.

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

C. SLOPPY AND UNPROFESSIONAL METHODOLOGY

There is so much as to the Norfolk Registry of Deeds and the Norfolk Registry of Deeds IT Technology Department that is incorrect in the Abrahams Study.

Now the Abrahams Report which is dated October 6, 2021 on page 10.3 was changed to read as follows:

“OUR BENCHMARKING STUDY INDICATES THAT THE BRISTOL AND PLYMOUTH REGISTRIES HAVE THE FOLLOWING STAFF. BRISTOL HAS TWO DATA PROCESSING MANAGERS, A TECHNICAL SERVICES DIRECTOR AND AN MIS OPERATOR. THE PLYMOUTH REGISTRY HAS AN INFORMATION SYSTEMS DEPARTMENT HEAD AND STAFF.”

See Exhibit # 4 attached

Later in the Abrahams Report which is dated October 6, 2021 on page 10.3 there was another change from the September 22, 2021 report which now reads as follows:

“OUR BENCHMARKING STUDY INDICATED THAT BRISTOL COUNTY HAS AN IT DEPARTMENT CONSISTING OF A FULL-TIME IT ADMINISTRATOR AND A PART-TIME INDIVIDUAL SPECIALIZING IN NETWORKING AND SECURITY. PLYMOUTH COUNTY HAS AN IT DEPARTMENT AND STAFF.”

See Exhibit # 4 attached

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

Can we agree Mark Abrahams got this part of his IT Report wrong in his initial 9-22-2021 Abrahams Report?

Are you not bothered that Mr. Abrahams writes his benchmarking study found or discovered the Plymouth and Bristol Registries of Deeds have on-site IT Departments when it was actually two letters from the Plymouth and Bristol Registers of Deeds that did?

This is another example of why the recommendations of Mark Abrahams as to the Norfolk Registry of Deeds and the Registry of Deeds IT Technology Department should be disqualified. The fact is that Exhibit # 3 and 4 show that there were deletions and additions made to the Abrahams Report. This goes to the methodology, scholarship and integrity of the Abrahams Report and its conclusions.

Furthermore, please note what Plymouth Register of Deeds John Buckley wrote in his October 1, 2021 letter to Joseph P. Shea as Chair and the Norfolk County Commissioners.

**"I REQUEST THAT YOU STRIKE THAT
INACCURATE LANGUAGE FROM YOUR
NOW PUBLIC DOCUMENT. IT WAS
UNPROFESSIONAL FOR YOUR VENDOR
TO INCLUDE AN UNVERIFIED,
NEGATIVE COMMENT ABOUT OUR
OPERATION, WITHOUT HAVING A
CONVERSATION WITH ME OR WITH MY
ASSISTANT REGISTER."**

See Exhibit # 1 attached

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

The takeaway from the letters of the Plymouth and Bristol County Registries of Deeds is that an on-site IT Department is crucial "to analyze and integrate technologies to improve services, increase staff efficiency and reduce costs." The Norfolk Registry IT Technology Department should not be altered or changed because to do so would negatively impact operations and services.

If the Registries in the chosen benchmarked counties of Plymouth and Bristol have an on-site Registry IT Technology Department, why wouldn't the Norfolk County Commissioners put an end to any recommendation to eliminate the on-site Registry IT Technology Department at the Norfolk Registry of Deeds?

If the County governments of the chosen benchmarked counties of Plymouth and Bristol do not have any IT structure, then why wouldn't the Norfolk County Commissioners put an end to the Abrahams consolidation proposal?

Put another way if the Registries in the chosen benchmarks counties of Plymouth and Bristol have an on-site Registry IT Technology Department then the Norfolk Registry of Deeds should have its own on-site Registry IT Technology Department. Please note the Norfolk Registry of Deeds has had an on-site Registry IT Technology Department dating back to the 1970's under the tenure of the 9th Register of Deeds Barry Hannon that was also continued during the tenure of the 10th Register of Deeds Paul Harold.

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

3. LISTEN TO INFORMATION TECHNOLOGY (IT) AND CYBER SECURITY PROFESSIONALS

IntraSystems a technology and cybersecurity company is familiar with both the general government County IT system and the Norfolk Registry of Deeds IT system. IntraSystems has done work for both Norfolk County and the Norfolk Registry of Deeds. IntraSystems performed an IT Staffing Assessment dated July 2021 that was previously delivered to the Norfolk County Commission. Compare the credentials of IntraSystems to Mark Abrahams and David King of the Abrahams Group when assessing best practices as to this very important Information Technology decision.

A. INTRASYSTEMS LETTER DATED SEPTEMBER 27, 2021

See Exhibit # 5 attached

“The modern Registry of Deeds is a highly technical operation that relies on a variety of hardware and software components that interact in advanced ways.”

“During the COVID-19 pandemic where organizations faced lockdowns across the country, many organizations struggled to survive during this period; however, the Norfolk County Registry of Deeds was able to maintain and improve operations without risking the health of their employees or the public.”

“Achieving this track record of operation stability and excellence required a dedicated and experienced Registry of Deeds’ IT team to provide specialized skills to keep the Registry’s infrastructure environment running at peak performance. The Registry of Deeds IT staff should be commended for their innovative approach in servicing the Commonwealth.”

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

“In reviewing the Abrahams IT report, the interviewer states, ‘no security measures were taken into consideration for the study.’ However, recent published studies have shown IT staff are spending as much as 35% of their time responding to cyber threats and risk mitigation.”

“Moreover, regarding shared staffing, we feel that not taking security measures into consideration is a flawed report when determining staffing requirements.”

“The Registry of Deeds, similar to other agencies, typically operate with a limited staff due to budget constraints. However, we have found that the Registry has done an exemplary job with the number of IT staff members over the past years.”

“As the Registry of Deeds currently has a successful process in place, IntraSystems recommends that you continue with this process and not make any changes.”

Does anyone question the qualifications of an information technology and cybersecurity company, IntraSystems? How could you compare Mark Abrahams and/or the experience of his IT person David King to make IT technology assessments and recommendations to that of this company IntraSystems?

Founded in 1996, IntraSystems is a highly respected IT consulting company, managed services provider, and systems integrator that specializes in the deployment and delivery of IT infrastructure, virtualization services, security and cloud solutions.

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

B. INTRASYSTEMS IT STAFFING ASSESSMENT OF THE NORFOLK REGISTRY OF DEEDS DATED JULY 2021 AND HIGHLIGHTED ASSESSMENT OBSERVATIONS. See Exhibit # 6

This document was part of a package previously delivered to the Norfolk County Commissioners.

The IT Assessment done by IntraSystems is more in depth and accurate than that done by Mark Abrahams. The IT recommendations of Mark Abrahams do not compare in terms of methodology, process, qualifications and substance with that of IntraSystems. The Norfolk County Commissioners should rely on the report of an Information Technology Specialist, IntraSystems, in making their decision.

Why would the assessment, conclusions and recommendations of IntraSystems be ignored?

4. FACTUAL MISTAKES AS TO INFORMATION AND TECHNOLOGY

On page 10.6 of the Abrahams Report dated 9-22-2021 now dated 10-6-2021 there is a mistake in the number of desktop systems for the County and Registry. There are other mistakes. However, the failure to get the number of desktops correct illustrates the lack of investigation and failure to pay attention to basic detail by Mark Abrahams and his team when it comes to the Norfolk Registry of Deeds. It is not just the mistakes it is also the lack of Information Technology credentials especially when compared to IntraSystems that should cast doubt on the Abrahams IT Information Technology recommendations.

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

Another example of the shortcomings of Mark Abrahams and his report as it relates to the Norfolk Registry of Deeds is the failure to quantify the relatively large foot print of the Registry IT Technology System and infrastructure relative to that of the general government side of Norfolk County. The Norfolk Registry IT Technology footprint as well as its use and demands made upon it are so much larger and greater than that of the IT technology footprint of Norfolk County. Some data to illustrate this can be found in the attached graphs in Exhibit # 7. Please keep in mind the chosen benchmarked Bristol and Plymouth County offices do NOT have an IT department or any IT employees. This is not to say that Norfolk general County government should not have an IT department. However, why would you adopt a recommendation that tears down and harms the Norfolk Registry IT Technology Department? How can you justify eliminating the Norfolk Registry IT Technology Department when the benchmarked counties of Bristol and Plymouth general County government chosen by the Norfolk County Commissioners, "DO NOT HAVE AN IT DEPARTMENT OR ANY IT EMPLOYEES"

See page 10.2 Information Technology per Mark Abrahams Report dated 9-22-2021

See Exhibit # 3 attached

5. ABRAHAM'S DISMISSES CONTRARY OPINIONS AS BIASED

Most documents of scholarship and study cite their sources of information. It has been pointed out as to IT Technology recommendations if this was a court of law Mark Abrahams may not be qualified as an expert to give an opinion on IT technology. Mark Abrahams in many aspects of the Information Technology section of his report just references unnamed individuals and sources. In a court of law this would be rank hearsay with unidentified declarants.

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

Even a high school book report is judged by citing sources of the writer's information. There are no cited sources by Mark Abrahams as it relates to "IT consolidation" which is a nice way of saying "Registry IT Technology Department elimination". Furthermore, anyone that articulates a position contrary to the Abrahams IT recommendation is dismissed as bias.

"TWO INTERVIEWEES STRONGLY SUPPORT HAVING THE DEPARTMENT FALL UNDER THE REGISTER, GIVEN THE IMPORTANCE OF THE BROWNTech SYSTEM AND THE REVENUE IT GENERATES FOR THE COUNTY. IT SHOULD BE NOTED THAT BOTH INTERVIEWEES HAVE WORKED FOR THE REGISTRY IN THE PAST AND THEREFORE HAVE PRACTICAL KNOWLEDGE OF THE OPERATIONS, BUT THEY SHOULD ALSO BE CONSIDERED TO BE BIASED."

See page 10.8 Information Technology per Mark Abrahams Report dated 9-22-2021 now dated 10-6-2021

The Registry of Deeds is informed and believe these two interviewees are former Registry Chief Information Officer Chuck Phelan (2002 to 2008) and recently retired Registry Chief Information Officer James Limbey (2008 to 2021). The services of both these gentlemen to the Norfolk County should be applauded. If these are the two interviewees both individuals are experienced in technology and cybersecurity, are accomplished in their field and are very knowledgeable. If these are the two interviewees, each have demonstrated integrity and professionalism in executing their duties in serving Norfolk County. Instead of being summarily dismissed as biased it might behoove County decision makers to listen to what each of these individuals has to say. At least the two gentlemen named above have Information Technology expertise.

POINTS OF CONTENTION IF ASSESSED LEAD TO REJECTING IT TECHNOLOGY RECOMMENDATIONS

Much of the Abrahams Report is unnamed individuals who are not identified who may or may not have any Information Technology skills, knowledge or expertise.

VOTE DOWN THE ABRAHAMS IT TECHNOLOGY RECOMMENDATIONS

CONCLUSION

The Norfolk Registry of Deeds needs to get on with its business and not be distracted dealing with these bad public policy recommendations. Vote immediately to keep the on-site Registry Chief Information Officer (CIO) and the on-site Registry IT Technology Department. The Registry CIO has been voted as a "temporary employee". The continuation of this designation as a temporary employee as opposed to a permanent employee with all the benefits of a permanent employee is anti-worker. The "temporary employee" designation does not help in retaining or attracting qualified information technology employees and job candidates. It is reckless not to bring this issue to a final and definitive close immediately.

The Abrahams recommendations fail to recognize that the Registry IT Technology Department has been instrumental in implementing numerous modernization initiatives at the Norfolk Registry of Deeds. Technology drives services to registry users and also protects the security of the data and land records that are used to authenticate the legal real estate title to your home and property. The solid foundation of technology at the Norfolk Registry of Deeds will crumble without a permanent on-site Registry CIO and without an on-site Registry IT Technology Department. The Abrahams recommendation fails to recognize how essential and critical to the functioning of an independent and modern Registry of Deeds that an on-site Registry CIO and on-site Registry IT Department that has been working at the Registry of Deeds Building for decades are.

This recommendation is an attack on the on-site Registry IT Technology Department and the operations of the Norfolk Registry of Deeds. The decision to vote for this recommendation is unimaginable in this day and age of technology as well as cybersecurity risks and ransomware. It just makes absolutely no sense and lacks any appropriate rationale to implement. A vote to accept the Information Technology

VOTE DOWN THE ABRAHAM'S IT TECHNOLOGY RECOMMENDATIONS

recommendation that removes or eliminates in any way the on-site Registry CIO and the on-site Registry IT Technology department at the Registry of Deeds Building that works with and for the Registry staff, that works with and for the elected Register of Deeds, that works with and for Registry users, that works with and for the municipal governments of Norfolk County and that works with and for the general public as has been done for decades is an unsound public policy decision. A vote to adopt this Information Technology recommendation has so many possibly bad outcomes but in essence harms the operations of the Norfolk Registry of Deeds and all who rely on its services.

Thank you for your consideration.

EXHIBIT LIST

EXHIBIT # 1 – LETTER FROM JOHN BUCKLEY PLYMOUTH COUNTY REGISTER OF DEEDS DATED 10-1-2021

EXHIBIT # 2 – LETTER FROM BARRY AMARAL BRISTOL COUNTY REGISTER OF DEEDS DATED 10-6-2021

EXHIBIT # 3 – WRONG FACTS AS TO IT DEPARTMENTS AT THE BRISTOL AND PLYMOUTH REGISTRIES IN INFORMATION TECHNOLOGY SECTION PER MARK ABRAHAMS REPORT DATED 9-22-2021 NOW DATED 10-6-2021

EXHIBIT # 4 – COMPARE THE PAGES IN THE 9-22-2021 DATED REPORT TO THE PAGES IN THE 10-6-2021 DATED REPORT OF MARK ABRAHAMS

EXHIBIT # 5 – INTRASYSTEMS LETTER DATED SEPTEMBER 27, 2021 IN RESPONSE TO THE CONSULTANT STUDY BY ABRAHAMS IT

EXHIBIT # 6 – INTRASYSTEMS IT STAFFING ASSESSMENT OF THE NORFOLK REGISTRY OF DEEDS DATED JULY 2021 AND ACCOMPANYING DOCUMENTATION

EXHIBIT # 7 – TECHNOLOGY USER COMPARISION AND WEBSITE VISITS- NORFOLK COUNTY GENERAL GOVERNMENT VS. NORFOLK REGISTRY OF DEEDS

EXHIBIT # 1 – LETTER FROM JOHN BUCKLEY
PLYMOUTH COUNTY REGISTER OF DEEDS
DATED 10-1-2021



PLYMOUTH COUNTY REGISTRY OF DEEDS

50 OBERY STREET, PLYMOUTH, MA 02360

(508) 830-9200

FAX (508) 830-9221

www.plymouthdeeds.org

JOHN R. BUCKLEY, JR., Esquire
REGISTER

TIMOTHY H. WHITE, Esquire
ASSISTANT REGISTER

MARILYN L. MARVILL
CHIEF EXECUTIVE ASSISTANT

JOHN ZIGOURAS II
DIRECTOR OF OPERATIONS

Mr. Joseph P. Shea, Chairman
Norfolk County Commissioners
614 High Street
Dedham, Massachusetts 02026

October 1, 2021

Re: Abraham Report

By Regular Mail & Email

Dear Chairman Shea:

I am writing to you and your other commissioners about a matter that is of great concern to me. I have been following with interest the development and subsequent release of portions of your contracted Best Practices Review by the Abrahams Group. I recently read on your website the release of the Phase II portion of the final report relating to information technology. On page 10.3 Registry of Deeds IT, the report states that the Plymouth County Registry of Deeds does "not have an IT Department" and clearly implies we have no IT staff. These statements are totally inaccurate and in my opinion negatively reflect on all the great work that my predecessor in this office and that I have tried to continue over the last forty (40) years. I request that you strike that inaccurate language from your now public document. It was unprofessional for your vendor to include an unverified, negative comment about our operation, without having a conversation with me or with my Assistant Register.

The Plymouth County Registry of Deeds has had an IT Department and staffing since the late 1970s. We have weekly meetings with our IT Department head, who operates as our Chief Information Officer. With the support of our IT Department our records are available to the world from the arrival of the Mayflower to current. None of this would have been accomplished without our IT staff. In addition, we have had online internet research of our records in place since 1995. This IT contribution generates significant funding towards the county budget. The servicing of those accounts would not be possible without an in-house IT Department.

However, the main point of this correspondence is that if you or anyone publishes a report on your behalf references the Plymouth County Registry of Deeds operation, I request that you give us the courtesy of a phone call. My direct number is (508) 830-9298.

Sincerely,

John R. Buckley, Jr.
Plymouth County Register of Deeds

EXHIBIT # 2 – LETTER FROM BARRY AMARAL
BRISTOL COUNTY REGISTER OF DEEDS
DATED 10-6-2021



ERRY J. AMARAL
Register

Commonwealth of Massachusetts
BRISTOL COUNTY REGISTRY OF DEEDS

NORTHERN DISTRICT
11 COURT STREET - TAUNTON, MA 02780

Tel. (508) 822-0802
Fax (508) 880-4076
Admin. Fax (508) 821-2182
www.tauntondeeds.com

October 6, 2021

Joseph P. Shea, Chairman
Norfolk County Commissioners
614 High Street
Dedham, MA 02027

Re: Norfolk County Operational Review – Information Technology

Dear Chairman Shea,

After reviewing the Information Technology section of the Norfolk County Operational Review submitted by the Abrahams Group dated September 22, 2021, I would like to make you aware of a discrepancy in the statements regarding the IT department in Bristol County Registries. The Northern Bristol County Registry of Deeds has an IT department consisting of a full-time IT Administrator (equivalent to a CIO) and a part-time individual specializing in networking and security. The department sets modernization goals, maintains technology policies and procedures, monitors all systems, and reviews and recommends new technology for the Registry's specific needs.

The IT Administrator reports directly to the Register of Deeds and oversees multiple complex programs and technologies that seamlessly work together to provide services to the general public, other public agencies, lawyers, and real estate professionals. Their expertise allows them to assess technical issues quickly and contact the appropriate vendor or resolve the situation in-house. The IT Administrator's considerable knowledge of Registry operations was crucial in minimizing interruption in service and was instrumental in the Registry providing uninterrupted service during the height of the COVID epidemic. In addition, having the IT department at the Registry has allowed us to analyze and integrate technologies to improve services, increase staff efficiency, and reduce costs.

Sincerely,

Barry J. Amaral
Register of Deeds

EXHIBIT # 3 – WRONG FACTS AS TO IT
DEPARTMENTS AT THE BRISTOL AND
PLYMOUTH REGISTRIES IN INFORMATION
TECHNOLOGY SECTION PER MARK ABRAHAMS
REPORT DATED 9-22-2021 NOW DATED 10-6-2021

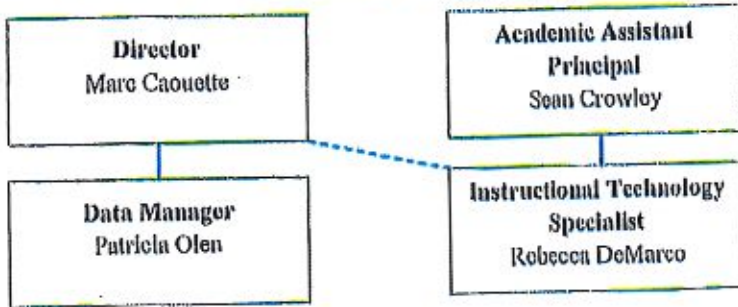
9-22-2021

2. Staffing

Findings

NCAHS

The current NCAHS IT related staff consists of two positions, an IT director, and a data manager, as shown on the following table. On the academic side, working collaboratively with the IT Director, is an Instructional Technology Specialist.

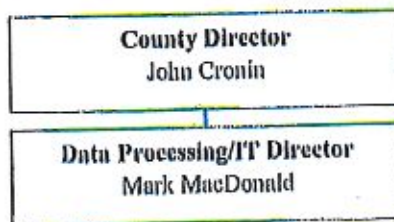


The director is responsible for the entire non-instructional operation. The data manager is primarily responsible for the student information system, I-PASS and related tasks and reports. She does provide some technical support to the IT operation. There is also an instructional technology specialist primarily works with the teachers and students on instructional technology systems and provides some technical support to the IT operation. However, the instructional technology specialist is not part of the IT organization.

It should be noted that it is very difficult to compare school technology staffs due to the different titles and organizations used in different school systems. Some staff may have duties that are part educational and part technical. Those staffers may show up as technical in one district and educational in another district. From the data we have been able to collect it appears that, in most cases, each agricultural and regional vocational school has a technology director. The agricultural high schools have minimal staff, one or two positions, such as NCAHS. The regional vocational schools seem to have more IT staff, anywhere from 4 to 11 positions.

County IT

The County IT department has one position, IT director who is a direct report to the County Director as shown on the following table.



*I see how you
one IT Dept
Do NOT run regularly*

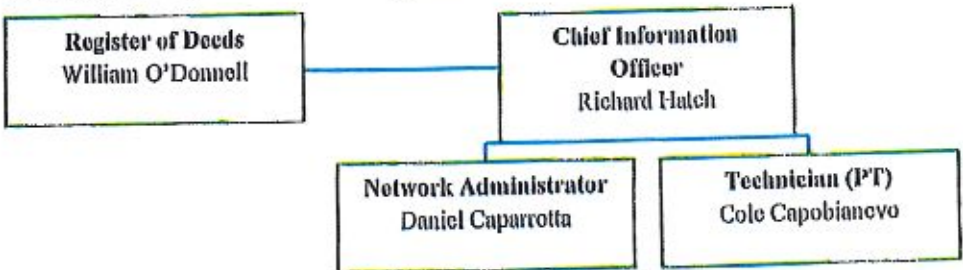
Our benchmarking study of the Bristol and Plymouth County offices indicated that do not have an IT department or any IT employees. The County Directors perform these functions.

** got changed why? '6 Benchmarking counties
Do NOT have IT in
what other why should
talk?*

9-22-2021

Registry of Deeds IT

The Registry has a Chief Information Officer (CIO), along with a network administrator and a part time technician as shown on the following table.



buyed
2nd

Our benchmarking study indicated that the Bristol and Plymouth County Registries do not have an IT department. Bristol has two Data Processing Managers, a Technical Services Director, and an MIS operator. Neither has a Chief Information Officer.

Recommendation

Given the minimal staff, there may not be any significant staff reductions possible. In the Consolidation section below, we will discuss possible options for changing the staffing to create efficiencies.

3. Software

This section focuses on the deployment and support of software that is used to manage the County. It is important that this software be appropriate, up to date, and supported by the technology staff.

Findings

NCAHS

The high school uses Google for Education, a free suite of educational applications, for many of its functions including email. Google is also used for legally mandated email retention.

They use I-PASS for their state mandated student information system and some of their human resource functions. They are considering replacing this software with a newer system.

They use TeachPoint for their mandated teacher evaluation system.

NCAHS is connected through a VPN to the County's Infinite Vision software for financial operations.

County IT

Other than operating Infinite Visions, the County IT department operates a standard suite of Microsoft products. The County is working on a major cloud-based upgrade to Infinite Visions outline elsewhere in our report. They are also upgrading their Microsoft softwares and expanding the utilization of the iVisions software.

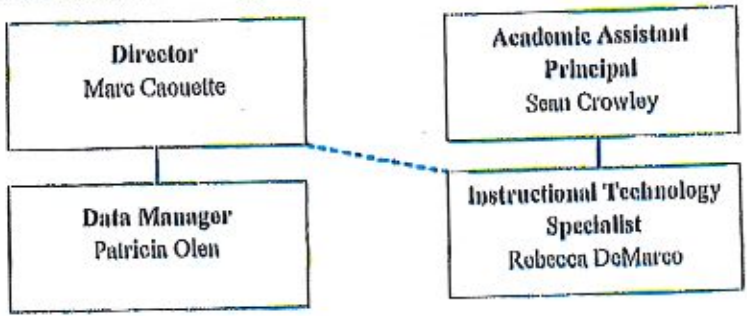
9-22-2021
Abruhani Study

2. Staffing

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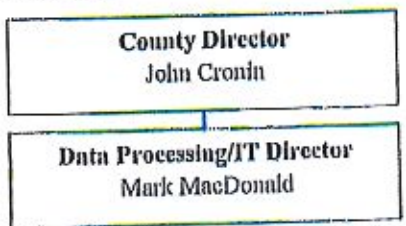


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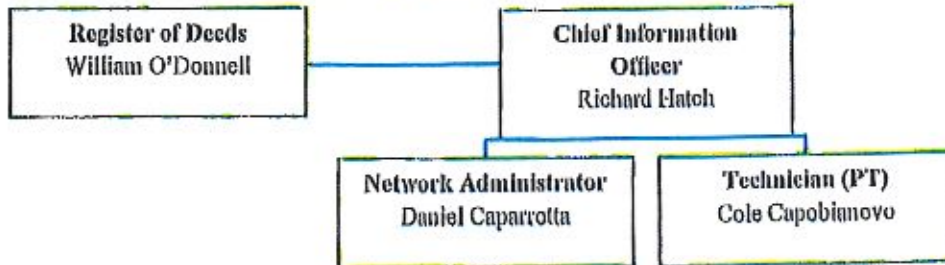


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9-22-2021
Benchmark Study

Registry of Deeds IT

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Recommendation

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3. Software

This section focuses on the deployment and support of software that is used to manage the County. It is important that this software be appropriate, up to date, and supported by the technology staff.

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NCAHS is connected through a VPN to the County's Infinite Vision software for financial operations.

County IT

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EXHIBIT # 4 – COMPARE THE PAGES IN THE 9-22-
2021 DATED REPORT TO THE PAGES IN THE 10-6-
2021 DATED REPORT OF MARK ABRAHAMS

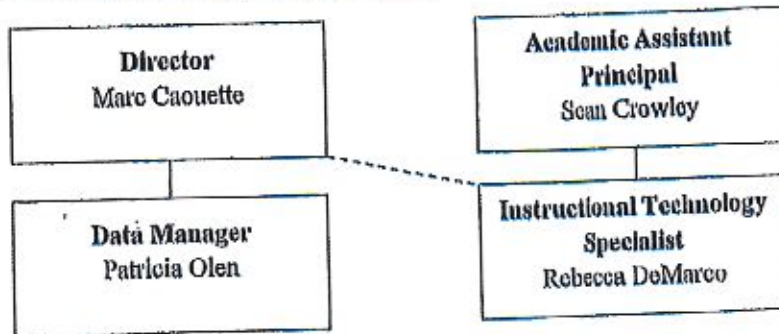
10-6-2021
Report

2. Staffing

Findings

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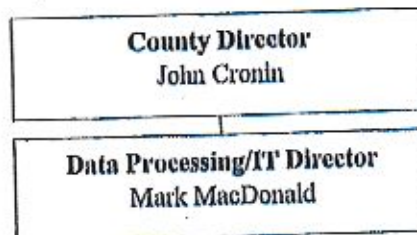


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Statement from 9-22-2021 report deleted from here

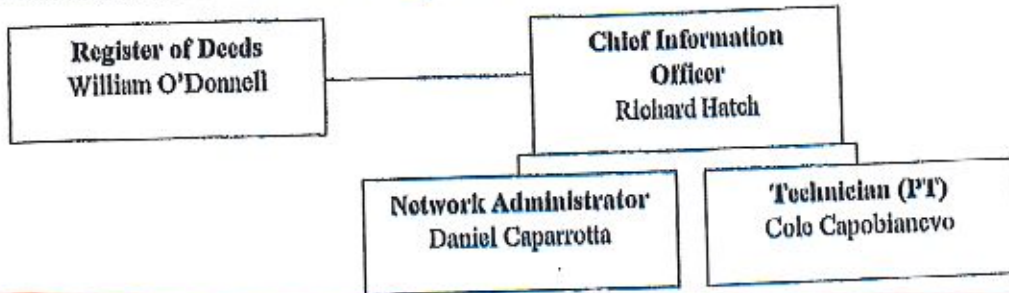
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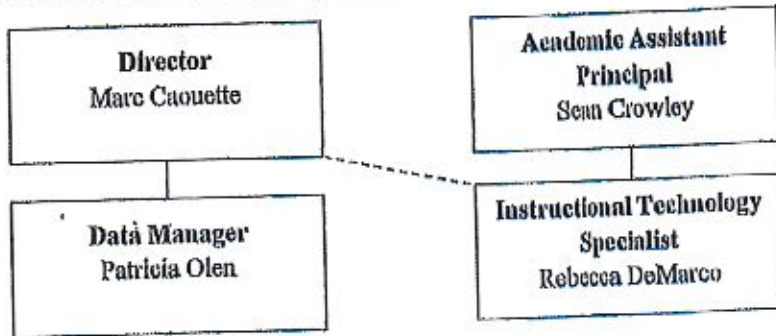
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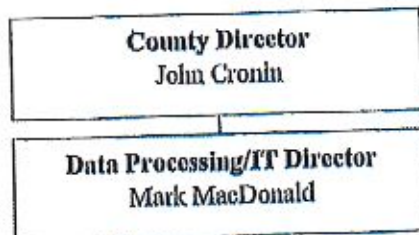


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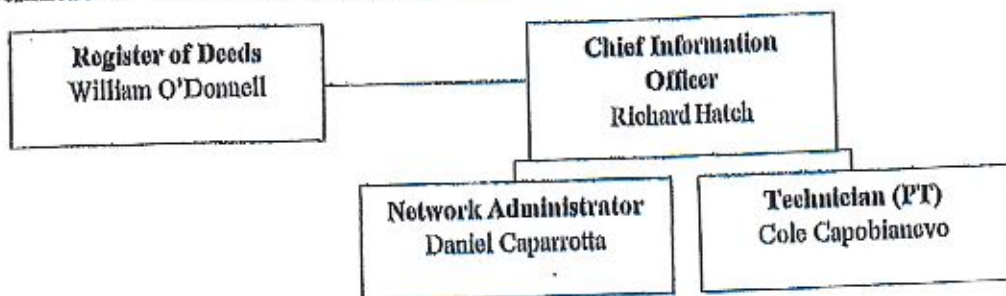
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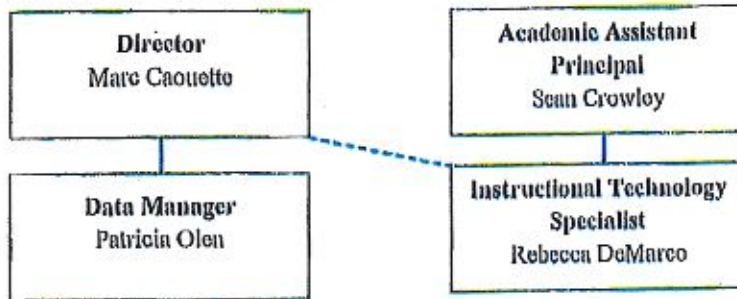
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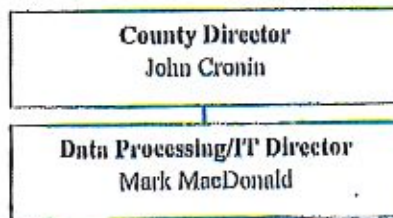


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*I say how you
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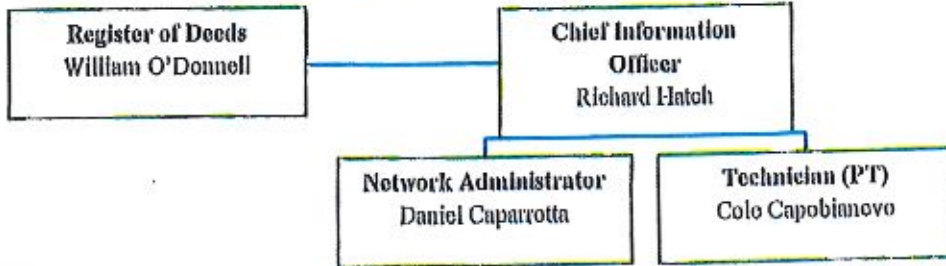
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** got changed why? '6 Benchmarking Counties
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9-22-2021

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copy
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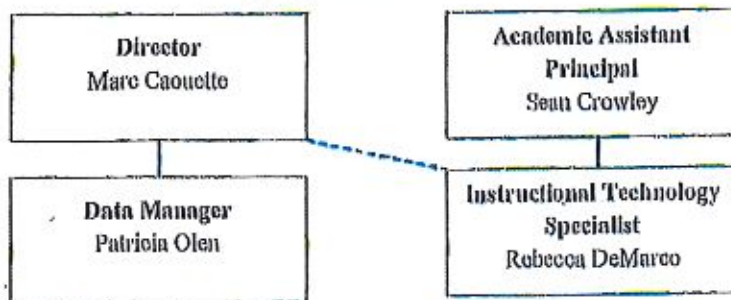
9-22-2021
Abraham Study

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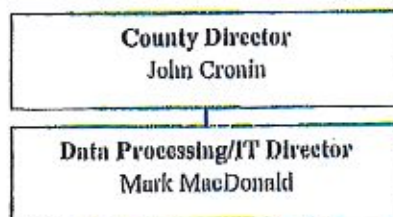


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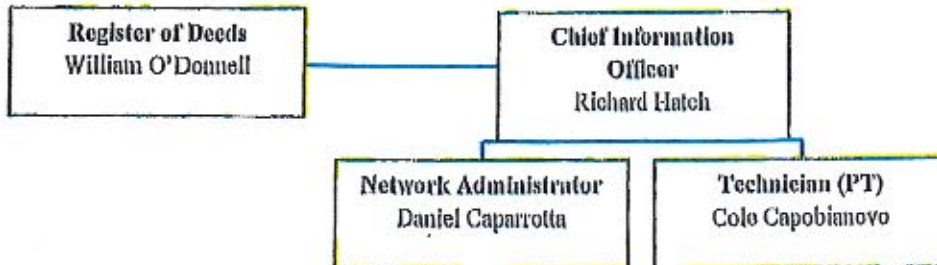


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EXHIBIT # 5 – INTRASYSTEMS LETTER DATED
SEPTEMBER 27, 2021 IN RESPONSE TO THE
CONSULTANT STUDY BY ABRAHAMS IT



September 27, 2021

Mr. William O'Donnell
Registrar
Norfolk County Registry of Deeds
649 High Street
Dedham, MA 02026

Dear Bill,

In response to the consultant study provided by Abrahams IT, IntraSystems feels it is imperative to restate our concerns and recommendations as it relates to having a dedicated IT staff at the Norfolk Registry of Deeds. As concluded in our consulting engagement, below are three (3) key critical factors uncovered:

1. **Dramatic increase of technical operation and the impact of COVID-19** | The modern Registry of Deeds is a highly technical operation that relies on a variety of hardware and software components that interact in advanced ways. There is an expectation that the services of the Registry will always be available when officially stated - with a further expectation that the online data is available around the clock. During the COVID-19 pandemic where organizations faced lockdowns across the country, many organizations struggled to survive during this period; however, the Norfolk County Registry of Deeds was able to maintain and improve operations without risking the health of their employees or the public.

Achieving this track record of operation stability and excellence required a dedicated and experienced Registry of Deeds' IT team to provide specialized skills to keep the Registry's Infrastructure environment running at peak performance. The Registry of Deeds IT staff should be commended for their innovative approach in servicing the Commonwealth.

2. **Impact of Cybersecurity threats** | Cybersecurity threats and ransomware are running rampant within many organizations, cities, towns, and agencies throughout the Commonwealth. Many of the cyber threats are targeted at organizations with limited staff who are required to protect critical data. ***The Registry of Deeds certainly falls under these critical areas.***

In reviewing the Abrahams IT report, the Interviewer states, "no security measures were taken into consideration for the study." However, recent published studies have shown IT staffs are spending as much as 35% of their time responding to cyber threats and risk mitigation. ***It's important to note that IntraSystems has been providing solutions for cybersecurity for over 25 years. IntraSystems' experienced and highly certified team of dedicated engineers understand the time burden that organizations' IT staff face in performing security tasks. Typically, these functions are performed in a manual process as they have limited budget for security automation. Moreover, regarding shared staffing, we feel that not taking security measures into consideration is a flawed report when determining staffing requirements.***

Mr. William O'Donnell

Page 2

3. Backup of IT Duties and Training | The Registry of Deeds, similar to other agencies, typically operate with a limited staff due to budget constraints. However, we have found that the Registry has done an exemplary job with the number of IT staff members over the past years. Additionally, the Registry of Deeds has a successful process in place for continued training and internal backup duties and responsibilities during vacation and personal days as well as general time constraints of staffing. Changing the current dedicated, successful model could expose the Registry to unwarranted disruption of services to the Commonwealth. ***As the Registry of Deeds currently has a successful process in place, IntraSystems recommends that you continue with this process and not make any changes.***

Bill, if you would like to further discuss, please do not hesitate to contact me at 617.549.8011 or via email at pkunze@intrasystems.com. IntraSystems values our partnership with the Norfolk County Registry of Deeds and is here to assist in any way.

Best wishes,



Paul E. Kunze
Vice President, Sales & Marketing

PEK/

EXHIBIT # 6 – INTRASYSTEMS IT STAFFING
ASSESSMENT OF THE NORFOLK REGISTRY OF
DEEDS DATED JULY 2021 AND ACCOMPANYING
DOCUMENTATION



COUNTY OF NORFOLK
COUNTY OF PRESIDENTS
REGISTRY OF DEEDS

NORFOLK REGISTRY DISTRICT OF THE LAND COURT

WILLIAM P. O'DONNELL
REGISTER OF DEEDS
ASSISTANT RECORDER OF THE
LAND COURT

REASONS TO SIGN THE REGISTRY CHIEF INFORMATION OFFICER PERSONNEL
PAPER JULY 21, 2021

*On behalf of the staff at the Norfolk Registry of Deeds and those that use and depend on the services of the Registry of Deeds we do not seek confrontation. We seek resolution. At so many levels the good policy, the right decision, the most beneficial outcome is to immediately hire the Registry CIO. Well intentioned administrative proposals can produce undesirable situations.

*The on-site Registry CIO needs to be immediately hired. It is getting more urgent since June 30th. I will not repeat all the arguments from that date. It was established that the Registry CIO is an essential employee.

*Back on June 30th one of the opposing commissioners said from the minutes....."there are only a few weeks to view the Abrahams Group findings..."

*Here we are 3 weeks later and there is no appointed Registry CIO and no Abrahams Report. The on-site Registry CIO position has been in existence for 20 years. The on-site Registry CIO position went through the budget process between February to May and is funded. The Registry of Deeds pays for the CIO position. It is a position and as someone that is tasked with running the Registry of Deeds we need the Registry CIO filled immediately with a positive vote today.

*An outside IT Specialist Company did an assessment of Registry IT staffing. This report and assessment was sent to you.

Intrasystems' Report says many things but here are two:

1. At present the Registry of Deeds (IT) is understaffed.
2. Immediately a new on-site Registry CIO should be brought in. This "would alleviate the current understaffing situation and help insure that the Registry operations continue smoothly and without incident".

649 HIGH STREET, DEDHAM, MASSACHUSETTS 02026
TELEPHONE: 781-461-6116 FAX: 781-326-4246
EMAIL: registerodonnell@norfolkdeeds.org

www.norfolkdeeds.org



 facebook.com/NorfolkDeeds

 twitter.com/NorfolkDeeds

 youtube.com/NorfolkDeeds

 [@NorfolkDeeds](https://instagram.com/NorfolkDeeds)

If we are going to rely on reports rely on the IT Specialist Report – The Intrasystems Report on making your decision today.

*A vote today to have the Registry CIO resolves the dispute we find ourselves in. A hired on-site Registry CIO benefits Norfolk County, it is beneficial to Registry users and stakeholders REBA wanted to make sure I put on the record their letter which I understand was sent to you. A hired on-site Registry CIO benefits the Commonwealth of Massachusetts who get 90% of the 54 million in Deeds Excise collected in 2021. A hired CIO is beneficial for the delivery of Registry services. A vote today to hire the Registry CIO benefits the public and those who rely on the Registry of Deeds to establish title to the biggest asset most of us own - -our homes.

*There is a person behind this “blue personnel paper” A qualified person who was offered a job. He has a family to support. The confidence of the Registry IT staff. This candidate is willing to bring his talents to the job – give him that opportunity.



Access. Security. Trust.

IT STAFFING ASSESSMENT

PREPARED FOR:
Norfolk County Registry of Deeds

PREPARED BY:
Walter Moran
Principal Infrastructure Engineer
IntraSystems, Inc.
July 2021



Norfolk County Registry of Deeds IT Staffing Assessment

Revisions

Date	Resource	Version	Change Reference
7/19/2021	Walter Moran	1.0	First Draft
7/21/2021	Walter Moran	1.1	Updated
7/21/2021	Donna Cash	1.2	Updated formatting



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Project Overview

In July of 2021 IntraSystems Inc. of Braintree Massachusetts was retained by the Norfolk County Registry of Deeds to perform an assessment of the current IT Staffing and IT Operations at the Registry of Deeds and the impact on the proper functioning of the business of the Registry of those elements.

IntraSystems has been retained in the past to work on various projects for both the Norfolk County Registry of Deeds and for Norfolk County itself therefore, as an organization, IntraSystems has a familiarity with the IT infrastructure and IT staff of both organizations.

Since 2008 any IT work accomplished by IntraSystems for the Registry or the County, excluding the Norfolk County Sheriff, had been procured and coordinated by the Chief Information Officer of the Norfolk County Registry of Deeds, James Limbey. From the period 2002 to 2008, the previous CIO for the Registry of Deeds, Chuck Phelan, performed and accomplished this same role. This dual responsibility for the CIO in the overseeing of both the Registry and the County IT infrastructure was a cost-effective way to utilize a resource that could provide IT planning, guidance, and direction for both organizations. Under this previous structure the County Data Processing Manager fell under the direction of the CIO and as constructed was able to leverage the advice and guidance that this relationship provided.

Starting in 2002 the Norfolk County Registry of Deeds undertook a modernization effort for their day-to-day operations. These modernization efforts focused on the implementation of a top-of-the-line platform from Browntech that has helped the Registry to Streamline every aspect of the recording process. To supplement this, the ability for e-filing, online access to documents, and the ability to transfer documents to and from the constituent communities was also implemented. The foresight of these efforts became extremely evident during the Covid-19 pandemic lockdowns that were experienced across many organizations. Some organizations struggled to survive during this period, but the Norfolk County Registry of Deeds was able to maintain their operations without risking the health of their employees or the public.

Over the past 13 years the amount of technology involved in Registry operations has increased dramatically. A modern Registry of Deeds is a highly technical operation that relies on a variety of hardware and software components that interact in advanced ways. There is an expectation that the services of the Registry will always be available when officially stated, with a further expectation that the online data is available around the clock. To date the Norfolk County Registry of Deeds has been successfully meeting both expectations using less common but highly reliable IBM iSeries server technology and specialized Browntech software. This innovative combination has consistently provided excellent response time and expanded functionality which has exceeded those provided by other registries across the state. To achieve this track record of operation stability and excellence has required a Registry IT team with specialized skills and experience consisting of two employees dedicated to that mission.



Project Contacts

Contact Information

Norfolk County Registry of Deeds

649 High Street

Dedham, MA 02026

Name	Position	Contact #	Email
Bill O'Donnell	Register of Deeds	(781) 461-6101	registerodonnell@norfolkdeeds.org
Marguerite Lee	First Register	(781) 461-6143	mlee@norfolkdeeds.org
Dan Caparrotta	Network Administrator	(781) 461-6142	dcaparrotta@norfolkdeeds.org

IntraSystems, Inc.

35 Braintree Hill Office Park, Suite 302

Braintree MA 02184

Name	Position	Contact #	Email
Gray Saunders	Account Representative	781-986-1700	gsaunders@IntraSystems.com
Donna Cash, PMP	Project Manager	781-986-1700 x243	dcash@IntraSystems.com
Walter Moran	Principal Infrastructure Engineer	781-986-1700	wmoran@IntraSystems.com



IT Environment and Staffing

From the experience of IntraSystems, the IT infrastructure at the Norfolk County Registry of Deeds has been well designed and segmented in such a way as to minimize risk in the event of a network breach on any single segment. This includes the shared systems with the County such as the phone system and building security.

Up until recently, the Registry CIO was also the County of Norfolk CIO and had overseen both organizations with an eye towards maintaining the security and stability of the IT infrastructure. This administration of the organizations is an important function to help prevent inadvertent breaches or changes that could be caused by events, such as the introduction of unauthorized equipment or the execution of work performed without the coordination with the appropriate personnel.

The past effectiveness of the supervision and planning on the security and stability of the networks is a good reflection on the guidance and direction that had been provided for both organizations by the Registry CIO position.

The datacenter, which is located at 649 High Street, houses equipment from both the County and Registry in a secure, climate-controlled space. While some infrastructure for both organizations is housed in the same datacenter, there is a logical separation of the networks utilizing Zyxel firewall technology and is maintained by the Registry IT staff. The Avaya phone system infrastructure that is common to both the Registry and County offices takes advantage of the proximity of the two systems to provide redundancy of incoming calls should there be a disruption to either of the Primary Rate Interface (PRI) leased lines into the Registry offices or the County offices. Both organizations leverage Microsoft Hyper-V Virtualization technology to provide system flexibility and redundancy. The switching infrastructure is standard and mainly HP ProCurve. Firewalling technology is Fortinet and Zyxel.

The IT Staffing at the Registry consists of two main positions, the Registry CIO and the Registry Network Administrator. The Registry CIO is the position that has primary responsibility for the proper functioning of the main Registry systems and software, future planning, and is the position that handles most of the vendor coordination as well as project planning functions. The Network Administrator reports to the CIO. Both positions are hands-on positions and share in the duties required to maintain the proper functioning at the Registry. As currently constituted the CIO position has the main responsibility for the IBM/Browntech main applications and the associated websites and other functionality. The Network Administrator is mainly focused on Active Directory, Security – through firewalling and end-point protections, backups, and the proactive monitoring of the health of these assets. These positions require an element of cross-training to allow for vacation schedules to be accommodated.

To maintain the proper functioning of the Registry systems the Registry IT staff is required to perform daily, weekly, monthly, and yearly tasks in addition to multiple identified ad hoc tasks. The performance of these tasks falls on both the CIO and Network Administrator.

Importance of IT Systems and Staffing to Registry Operations

Since the modernization efforts began in 2002 the Registry has experienced a steady increase in the amount of business that is performed electronically and has come to rely on the systems that have been implemented to maintain that business. The implementation of these systems has allowed the Registry to effectively continue operations during the Covid-19 lockdowns.

Prior to the Covid-19 lockdowns the Registry typically processed around 53% of Recorded Land documents electronically and around 38% of Land Court documents electronically. During the Covid-19 lockdowns these percentages increased to about 80% for Recorded Land documents and around 66% for Land Court documents. Today, while many of the Covid-19 restrictions have been lifted, the Registry is still seeing Recorded Land documents running at about 76% electronic and Land Court documents running at about 63% electronic. These percentages are still expected to climb as the years progress.

The Registry has been well served by the Registry IT Staff but with the retirement of the current CIO it is imperative that the Registry fill the void left by this departure.

As with most organizations the Registry of Deeds has hardware and software that is unique to the mission and operational objectives of the organization. This would include the IBM server, operating systems, and peripherals, the Browntech software, database and associated utilities including that which services the in-house Registry operations and that also provides external access via the online research website. Additionally, there are numerous dedicated Windows servers, firewalls, switches, printers, large scale plotters, scanners, microfilming equipment, imprinters, postal equipment, and a large capacity UPS that works in conjunction with a generator that all contribute to the proper functioning of the Registry. Add to this mix the phone system and the building security system both of which are shared with the County but that are maintained by the Registry IT staff. The Registry also has a DR facility which houses workstations, printers and scanners which can remotely connect to the IBM server or a server at Browntech. In addition, there are multiple cyber security products and supporting utilities specific to the equipment. The Network Administrator is responsible for the proper operation of a network that provides connectivity for internal and external clients.

At present the Registry of Deeds is understaffed. Immediately a new on-site Registry CIO should be brought in and ramped up by the former CIO to supervise and work with the Registry Network Administrator which would alleviate the current understaffing situation and help ensure that the Registry operations continue smoothly and without incident.



COUNTY OF NORFOLK
COUNTY OF PRESIDENTS
REGISTRY OF DEEDS

NORFOLK REGISTRY DISTRICT OF THE LAND COURT

WILLIAM F. O'DONNELL
REGISTER OF DEEDS
ASSISTANT RECORDER OF THE
LAND COURT

Intrasystems

Norfolk County Registry of Deeds IT Staffing Assessment

July 21, 2021

Highlighted Assessment Observations

1. Intrasystems has been retained to work on various projects by both the Norfolk County Registry of Deeds and Norfolk County itself (page 4)
2. Starting in 2002 the Norfolk County Registry of Deeds undertook a modernization effort for their day to day operations (page 4)
3. The foresight of these (modernization) efforts became extremely evident during the Covid-19 pandemic lockdown that were experienced across many organizations. Some organizations struggled to survive during this period but the Norfolk County Registry of Deeds was able to maintain their operations without risking the health of their employees or to the public (page 4)
4. Over the past 13 years the amount of technology involved in Registry operations has increased dramatically (page 4)
5. A modern Registry of Deeds is a highly technical operation that relies on a variety of hardware and software components that interact in advanced ways (page 4)
6. This innovative combination has consistently provided excellent response time and expanded functionality which has exceeded those provide by other registries across the state (page 4)
7. To achieve this track record of operation stability and excellence has required a Registry IT team with specialized skills and experience consisting of two employees dedicated to that mission (pages 4)

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8. The IT staffing at the Registry consists of two main positions, the Registry CIO and the Registry Network Administrator (page 6)
9. The Registry CIO is the position that has primary responsibility for the proper functioning of the main Registry systems and software, future planning and is the position that handles most of the vendor coordination as well as planning functions. The Network Administrator reports to the CIO. (page 6)

IMPORTANCE OF IT SYSTEMS AND STAFFING TO REGISTRY OPERATIONS

10. To maintain the proper functioning of the Registry systems the Registry IT staff is required to perform daily, weekly, monthly and yearly tasks in addition to multiple identified adhoc tasks. The performance of these tasks fall on both the CIO and Network Administrator. (page 6)
11. The Registry has been well served by the Registry IT staff but with the retirement of the current CIO it is imperative that the Registry fill the void left by his departure (page 8)
12. At present the Registry of Deeds is understaffed (page 8)
13. Immediately a new on-site Registry CIO should be brought in and ramped up by the former CIO to supervise and work with the Registry Network Administrator which would alleviate the current understaffing situation and help insure that the Registry operations continue smoothly and without incident. (page 7)

REBA

THE REAL ESTATE BAR ASSOCIATION
for Massachusetts

July 20, 2021

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Re: Norfolk County Registry of Deeds Chief Information Officer

Dear Commissioners:

The Real Estate Bar Association for Massachusetts (REBA) endorses hiring of a dedicated Registry Chief Information Officer (CIO) at the Norfolk Registry of Deeds. This appointment is necessary with the retirement of the incumbent on June 30th. This on-site Registry CIO position reporting to the Register is a funded position that has been in existence at the Norfolk Registry of Deeds for over 20 years. The Norfolk Registry needs a full-time CIO.

Technology has been the foundation of the modernization initiatives that have been implemented over the years at the Norfolk Registry of Deeds. Technology overseen by the Registry CIO is essential and critical for services to the users and stakeholders of the Norfolk Registry of Deeds.

REBA has been a long-time supporter and partner of the continuing technology improvements at the Norfolk Registry, which are essential to a modern land records system. The need for professional expert oversight, as provided by the CIO, seems essential to us. Without commenting on the importance of other county budget priorities, please note that the Registry contributes significant funds – well in excess of its own operating costs. With over \$81 million dollars in Fiscal Year 2021 collected at the Norfolk Registry, these revenues support other important county functions, as well as state programs. The Norfolk Registry is one of the few registries still operated by county government. Real estate professionals and their clients – homeowners, lenders and other business entities – have come to rely on the Norfolk Registry staff for their professionalism and service.

Thank you for your consideration of this very important issue to our organization and its members.

Very truly yours,


Peter Wittenborg


Neil D. Golden

Cc: REBA Board of Directors

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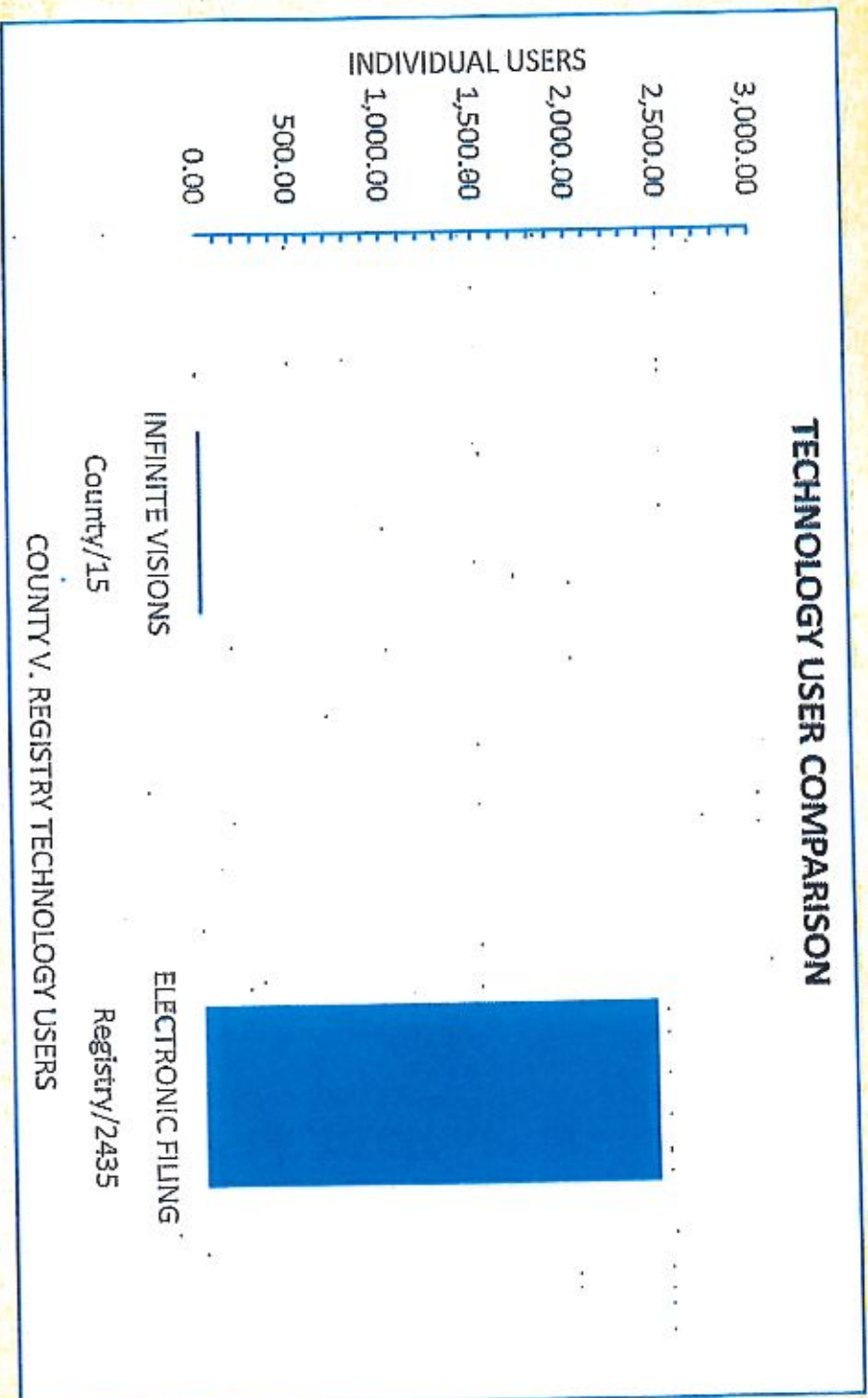
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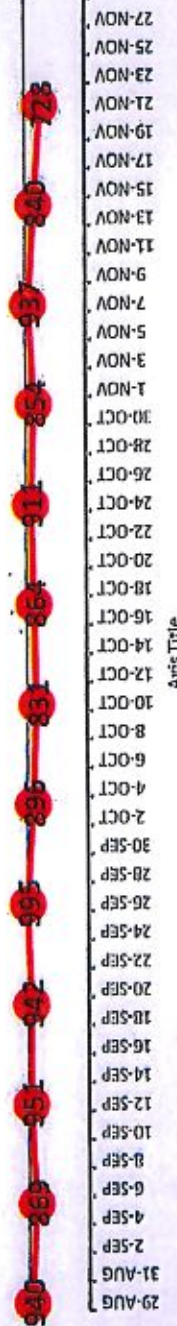
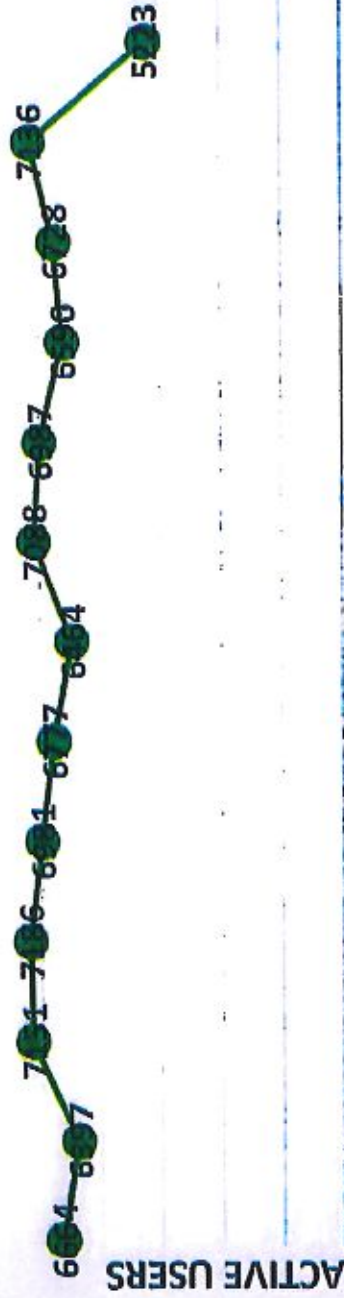
J. Smith

EXHIBIT # 7 – TECHNOLOGY USER COMPARISION
AND WEBSITE VISITS- NORFOLK COUNTY
GENERAL GOVERNMENT VS. NORFOLK
REGISTRY OF DEEDS

TECHNOLOGY USER COMPARISON



WEBSITE VISITS



- 7 DAY ACTIVE USERS visits Norfolk County
- 7 DAY ACTIVE USERS visits Norfolk Deeds*