

**WASHINGTON STATE
BAR ASSOCIATION**



**Examining the Historical Organization
and Structure of the WSBA
(ETHOS of the WSBA)**

Saturday, March 5, 2022, 9:00 a.m. – 4:00 p.m.

1325 Fourth Avenue, Suite 600

Seattle, Washington 98101-2539

Zoom: <https://wsba.zoom.us/j/86341154271?pwd=cEJMc2RNVmdpL1kwZzN6N2VNUE1vQT09>

Reading Materials:

- ETHOS Charter (attached, p. 3)
- February 5, 2022 ETHOS Meeting Minutes (attached, p. 4)
- Bibliography of Cases, Revised (attached, p. 11)
- WSBA Sections & CLE Funds Overview, Slides (attached, p. 15)
- WSBA Sections History & Activities, Slides (attached, p. 29)
- [GR 12.3](#)
- [WSBA Entities Chart](#)

AGENDA

9:00 AM	Welcome and Approval of Feb. 5, 2022 ETHOS Meeting Minutes	Pres. Brian Tollefson
9:10AM	How is the WSBA Funded?	Chief Regulatory Counsel Renata Garcia Director Advancement Kevin Plachy
10:00AM	BREAK	
10:15AM	Understanding WSBA's Regulatory Functions	Chief Regulatory Counsel Renata Garcia
11:00AM	History and Activities of WSBA Sections	Director of Advancement Kevin Plachy
11:20AM	Relationship Between WSBA and Sections	Nancy Hawkins, Family Law Section Kari Petrasek, Solo and Small Practice Section Kevin Fay, Corporate Counsel Section Randall Winn, World Peace Through Law Section

Examining the Historical Organization and Structure of the WSBA (ETHOS of the WSBA) – Agenda for March 5, 2022

Page 2.

12:00PM	LUNCH	
1:00PM	Understanding Supreme Court Boards Administered by WSBA	Executive Director Terra Nevitt
1:20PM	Relationship Between WSBA and Supreme Court Boards	Michael Cherry, Practice of Law Board Emily Rose Mowrey, Law Clerk Program Board
2:00PM	Keller Deduction/What is Germane?	General Counsel Julie Shankland
2:00PM	Comments from the Membership and Public	
2:45PM	BREAK	
3:00PM	Board of Governors Questions, Comments and Discussion	
3:45PM	Future Agenda Items and Action Item Review	President Brian Tollefson
4:00PM	Adjourn	President Brian Tollefson

Next scheduled meeting: March 25, 2022, 9:00 a.m. – 4:00 p.m.

Examining the Historical Organization and Structure of the WSBA (ETHOS of the WSBA)

Approved by the Board of Governors January 13, 2022

The Washington State Supreme Court has requested that the Washington State Bar Association convene a process to examine the structure of the WSBA. By motion, the Board of Governors has agreed to that request and will schedule eight meetings between January 2022 and August 2022, in which to educate itself on important issues impacting integrated and voluntary bar associations, collect public comment and provide an appropriate recommendation or recommendations to the high court.

CHARTER

The Board of Governors will review and assess the current structure of the WSBA in light of recent case law implicating rights under the First Amendment (Freedom of Speech and Freedom of Association). The process will collect information regarding the experiences of other states that have either recently changed their organizational structure, or are considering whether to do so. The process will also consider the cost of any structural change to its membership and what effect structural change, if any, will have on 1) diversity, equity and inclusion and any impact on marginalized communities, 2) the regulatory division of the bar; 3) WSBA Sections and 4) Washington State Supreme Court Boards, 5) the Access to Justice community, 6) the public, and 7) the membership of the WSBA.

The Board of Governors will invite presentations from those with subject matter expertise or have relevant experience with mandatory or voluntary bar associations in other parts of the country.

The Board of Governors will solicit input and active participation from stakeholders including but not limited to WSBA leadership and staff, WSBA sections, committees, councils, the Access to Justice Community, Supreme Court Boards, minority bar associations and interested members of the public.

The Board of Governors will receive and share knowledge and have open, collaborative, and respectful conversations. The eight meetings will generally be open to the public, except in the rare circumstance in which the Board of Governors must meet in executive session in order to consider legal advice from its attorney.

The Board Governors will make a recommendation or recommendations to the Washington State Supreme Court as to the current or future structure of the Washington State Bar Association.

WASHINGTON STATE BAR ASSOCIATION

BOARD OF GOVERNORS SPECIAL MEETING - ETHOS

Minutes

WSBA Offices, Seattle, WA

February 5, 2022

Call to Order and Welcome ([link](#))

The special meeting of the Board of Governors of the Washington State Bar Association (WSBA) was called to order by President Brian Tollefson on Saturday, February 5, 2022 at 9:08 AM.

Governors in attendance were:

Hunter Abell
Francis Adewale
Sunitha Anjilvel
Lauren Boyd
Pres. Elect Daniel D. Clark
Jordan Couch
Carla Higginson
Tom McBride
Treas. Bryn Peterson
Brett Purtzer
Alec Stephens

Also in attendance were Executive Administrator Shelly Bynum, Michael Cherry (Practice of Law Board), Chief Disciplinary Counsel Doug Ende, Kevin Fay, Chief Regulatory Counsel Renata Garcia, Geoff Gibbs, Nancy Hawkins (Family Law Section), Chief of Staff Ana LaNasa-Selvidge, Rajeev Majumdar, Executive Director Terra Nevitt, Chief Communications & Outreach Officer Sara Niegowski, Broadcast Services Manager Rex Nolte, Webcast Specialist Clayburn Peters, Kari Petrasek, Director of Advancement Kevin Plachy, Parliamentarian G. Kim Risenmay, Immediate Past Pres. Kyle Sciuchetti, General Counsel Julie Shankland, Chief Equity & Justice Officer Diana Singleton, Member Services & Engagement Manager Julianne Unite, and Barnaby Zall.

Pres. Tollefson made opening remarks, including outlining the three questions set forth by Chief Justice Steven González for the Board of Governors to answer through this process: (1) have any changes in the law dictated a change in the structure of the WSBA; (2) even if there are not any changes that need to be made, if relief were granted in the pending cases, what would the new structure look like; and (3) regardless of how questions one and two are answered, are there any

changes that the WSBA thinks should be made for the betterment of the Bar, in the interests of justice. He noted the Court asked that WSBA seek broad input. Pres. Tollefson reviewed the meeting schedule, noted decorum expectations, and reviewed the charter approved by the Board on January 13, 2022. He noted that the charter calls upon the Board to consider the cost and effect of any structural changes, including specifically its impact on diversity, equity and inclusion, and any impact on marginalized communities. Pres. Tollefson noted that no executive sessions are planned, though they may be needed if the Board needs to receive legal advice.

Discussion followed, including perspectives that the most interesting question is what is the ideal structure of the bar; that the plan includes updating some of the topics explored by the last workgroup, as well as robust stakeholder engagement; and a perspective that the Board should not feel limited by the three questions set forth by the Court.

Brief History of the WSBA ([link](#))

Chief Disciplinary Counsel Doug Ende presented on the history of the WSBA. He described the two primary bar models – the unified model and the agency model – noting the prevalence of the unified model in the western part of the United States.

He described the formation of the Washington Bar Association as a voluntary association in 1888 and its renaming to the Washington State Bar Association in 1890 as a result of Washington becoming a state. He explained the history of the Supreme Court enacting rules regulating the practice of law in Washington, noting that the profession was regulated directly by the Court and not by the, still voluntary, WSBA. He also noted that, despite some legislative underpinnings for regulation of the practice of law, it was acknowledged that the Supreme Court had the regulatory power. In 1909 a Board of Law Examiners was legislatively created and authorized by the Court to support the bar application and examination process. Chief Ende noted that this is the first instance in Washington of an entity being created for the express purpose of supporting the Court with a regulatory process. The 1909 legislation was substantially expanded in 1917 to include disciplinary authority.

Chief Ende explained that in 1921, the State Bar Association for North Dakota became the first legislatively created unified bar and nine other states followed suit between 1921 and 1932. He reviewed the history of the State Bar Act in Washington, noting that one of the promoted benefits of the unified bar was the promise that the regulation of the practice of law would be self-funded, rather than by the state's general fund. The Act was adopted in 1933, making membership in the WSBA mandatory in order to engage in the practice of law. The Act also made clear that the regulatory functions were assigned to WSBA, subject to approval of the Washington Supreme Court.

Chief Ende briefly reviewed litigation related to separation of powers that reached an initial apex around 1976, highlighting *Graham v. Washington State Bar Association* and *Bennion, Van Camp, Hagen & Ruhl v. Kassler Escrow, Inc.* The former found that separation of powers prohibited the legislature from authorizing auditing of the WSBA. In the latter case, the Court held that the legislature cannot regulate the practice of law because only the Supreme Court has that authority. Following that case, the Court adopted the Limited Practice Officer Rule in 1983.

General Rule 12 was adopted by the Washington Supreme Court in 1987, setting forth the purposes of the WSBA, as well as specific activities that are authorized and prohibited. Chief Ende speculated that this rule was enacted as a result of litigation leading up to the *Keller v. State Bar of California* decision by the US Supreme Court in 1990.

Chief Ende walked through more recent history. In 2001, the Washington Supreme Court adopted a definition of the practice of law and created the Practice of Law Board. In 2007, GR 12 was amended to deal with the creation of Supreme Court Created Boards administered by the WSBA. In 2009, the Board of Governors voted 7-6 not to recommend separating the lawyer discipline system from the WSBA, following review and recommendations by the ABA, which had long held that discipline systems should be administered directly by state supreme courts. In 2012, the LLLT Rule was adopted and then sunsetted in 2020. In 2013, GR 12 is amended to clarify that the license fee is subject to review by the Supreme Court for reasonableness. That same year, the Nebraska State Bar Association is ordered to semi-deunify following a member's petition. Although the Court rejected total deunification, it did amend its rules to require a mandatory membership assessment to be used exclusively for regulation of the practice of law, with voluntary fees for other activities. The State Bar of California was deunified by the legislature in 2017. In 2014, GR 12 was amended again to include an open records provision because the WSBA is not subject to the Public Records Act as a result of separation of powers issues.

Chief Ende explained that from 2014-15 the Board engaged in a broad review of the WSBA governance structure, noting that the 2014 Task Force recommended that the majority of the State Bar Act be repealed given that it has largely been or could be superseded by court rule. The Board of Governors decided that this was not urgent or necessary, however other recommendations that were adopted, include the creation of an Executive Committee. Others were not, including the proposal to change the name to the State Bar of Washington.

In 2017 GR 12 was amended again, of particular significance is the adopting of introductory language stating the Court's inherent and plenary authority to regulate the practice of law. Chief Ende noted that this was prompted, at least in part, by anti-trust litigation that highlighted the

importance of the actual governmental regulator being engaged in the active supervision of the regulatory activities. The Court also adopted the ABA model regulatory objectives verbatim.

Chief Ende finally noted that, in 2019, a Bar Structure Work Group was convened by the Washington Supreme Court. The purpose was to make recommendations to the Court regarding the structure of the WSBA in light of recent constitutional and antitrust cases. The majority recommended no significant changes.

Case Law Concerning Mandatory Bar Associations, 1961 to 2014 ([link](#))

General Counsel Julie Shankland presented an overview of litigation concerning mandatory bar associations from 1961 to 2014, beginning with an overview of the terminology describing bar associations. She started with *Railway Empl. Dept. v Hanson*, a union case in which members alleged that their dues were being used for political and economic issues they didn't support in violation of state law. She noted that the Supreme Court did not decide the case on constitutional grounds, but did construe the statute to be constitutional.

In *Lathrop v. Donohue* members challenged dues to the State Bar of Wisconsin, alleging that they were being coerced to support political activities. The Supreme Court held in a plurality opinion that compulsory membership in a state bar is constitutional. The court did not take up the freedom of speech question and did not apply a specific level of scrutiny in deciding the case.

In *Keller v. State Bar of CA* the Court unanimously held that lawyers may be required to join the bar and pay dues, but did not agree that they should pay dues that support political or ideological activities. The Court found that compelled association and the integrated bar are justified by the state's interest in regulating the legal profession and improving the quality of legal services. Counsel Shankland noted that the Court used a standard from the union case – *Abood*.

Counsel Shankland also reviewed a Ninth Circuit case from 1999, *Morrow v. State Bar of CA*. She noted that in this case members argue that their first amendment rights are violated by compulsory membership in a state bar association that conducts political activities beyond those for which mandatory support is justified and that *Keller* left this question unanswered. General Counsel noted that the Ninth Circuit disagreed with this argument, finding that *Lathrop* controlled.

Counsel Shankland walked through two union cases – *US v. United Foods Inc* (2001) and *Knox v. Service Employees Intern. Union, Local 1000* (2012) – where the Supreme Court applied exacting scrutiny to the question of compelled fees.

In the final case, *Harris v. Quinn*, decided by the Supreme Court in 2014, General Counsel highlighted the Court upholding and reaffirming its decision in *Keller*.

Case Law Post 1990 ([link](#))

In the second part of her presentation, Counsel Shankland walked through the landmark Supreme Court case, *Janus v. American Federal of State, County, and Municipal Employees* (2018), and the litigation that has followed. She explained that in 2018 the Court explicitly overruled the *Abood* decision finding that the line between germane and non-germane expenditures is an impossible one to draw with precision; and, even germane speech is overwhelmingly of substantive public concern. Counsel Shankland noted that the Court did not decide whether exacting scrutiny was the correct standard. She also noted that the Court did not mention *Keller* in the ruling, a case that rested on *Abood*. Counsel Shankland noted that following this decision, cases have been filed against integrated bar associations in the Fifth, Sixth, Seventh, Eighth, Ninth, and Tenth Circuits and that some bar associations have taken steps to change their structure.

In *Fleck v. Wetch*, a member complained that compelled fees were being used to support legislation that he personally opposed. The Supreme Court granted cert in the case and remanded it to the Eighth Circuit in light of the *Janus* decision. Counsel Shankland noted that the Eighth Circuit found that the Michigan Bar's *Keller* deduction procedures were adequate and the Supreme Court denied cert on appeal in 2020. Similarly, in *Jarchow v. State Bar of Wisconsin* (2019) the Seventh Circuit upheld a federal district court ruling which upheld compulsory fees based on *Keller*. Counsel Shankland walked through the Ninth Circuit case, *Crowe v. Oregon State Bar* (2021), in which members alleged that statements addressing violence related to white nationalism were not germane to the purposes of the state bar association and violated their rights to freedom of association. Counsel Shankland noted that the Ninth Circuit found that *Keller* has not been overruled, but remanded the case on freedom of association claim. The petition for cert was also denied in this case in October 2021. In *Schell v. Chief Justice of the OK Supreme Court* (2021), the Tenth Circuit found that *Keller* is binding, but noted it is unclear how much non-germane activity is tolerated. Counsel Shankland noted that a cert petition in *Schell* is pending before the Court.

In *McDonald v. Longley* (2021), the Fifth Circuit found that compelled membership in bar engaged in any non-germane activity fails exacting scrutiny, noting that less restrictive models exist. Counsel Shankland walked through specific bar activities, noting how the Fifth Circuit addressed them, including continuing legal education, diversity, and access to justice. She noted that the cert petition is pending before the Supreme Court. She also noted the Fifth Circuit's ruling in *Boudreaux v. Louisiana State Bar Assoc.* (2021) that Hudson procedures are a constitutional prerequisite to the Bar's collection of mandatory dues.

Finally, Counsel Shankland noted the decision of the Sixth Circuit in *Taylor v. Buchanan* (2021), which held that *Lathrop* and *Keller* are still binding decisions. She noted that in the petition for cert, the Court is asked to overrule those two cases because they did not use the exacting scrutiny standard.

Discussion of Case Law Concerning Mandatory Bar Associations ([link](#))

Questions and discussion followed Counsel Shankland's presentation, including a suggestion to review Justice Barret's record to see if we can determine her likely position on these issues; clarification of the standard used in *Keller*, which is being referred to as rational basis, and whether there would be a different standard for integrated bar associations; a perspective that one of the challenges is to predict whether *Keller* will be overruled, including on the basis of the standard used; whether a bar association could oppose a move to repeal the Washington Law Against Discrimination, as an example, under the Fifth Circuit's standard; the concept of being 'Keller pure', which is when a bar association does not engage in activities that would implicate the need for a Keller refund; whether having a Keller pure approach would satisfy the Fifth Circuit, which seems to be a question about the remedy for making a mistake in determining what is germane to the purposes of a bar association; whether the case law will impact WSBA's activities under GR 12 beyond any changes to the structure; that there is a potential for the Supreme Court to change the definition of what is germane, which could require changes to GR 12; the potential impact on the speech of members; clarification that WSBA does not engage in any direct political work; whether it would be more appropriate to have a statement on white supremacy behavior that was directly impacting a sense of safety at the courthouse; and the current procedural posture of the relevant cases, which likely puts any decision out about a year.

Supreme Court Workgroup on WSBA Structure/House Bill 1788 ([link](#))

Past Pres. Sciuchetti provided an overview of the work of the prior work group, including his perspective that that process perhaps did not include sufficient opportunity for discussion at the end.

Gov. Abell who also served on the prior work group highlighted the participation and solicitation of feedback from a vast stakeholder group. He encouraged the Board to be disciplined in responding to the three questions posed by the Court to ensure there is sufficient time to fully discuss and make recommendations to them.

Discussion followed, including how the Washington Supreme Court's position may have changed, what the dissenting viewpoints on the Court may have been, and whether having the work group chaired by the Chief Justice may have impacted the ability to have frank discussions; an emphasis on the Court's recommendation to keep the structure "for now"; an inquiry as to whether it would be possible to get additional information from the Court in terms of their areas of interest

or concern; a perspective that there isn't much urgency to the process given that the US Supreme Court will not make any decisions this year; a perspective that the Court has asked the Board to come to its own conclusions without being persuaded by the Court and therefore further inquiries of the Court are not necessary; a perspective that now is the time to move forward and make recommendations with a plan for the future; and question as to whether HB 1788 could be revived.

Member & Public Comments ([link](#), [link](#))

The Board engaged in discussion with members, including a perspective that the benefit of the voluntary bar would allowing sections and entities to amplify attorney voices to be heard more fully; a perspective that even as a voluntary organization there can still be a challenge in determining whether you speak on behalf of the whole group; the importance of getting information out about these meetings and engaging the public; and a perspective that it was surprising to learn about the extent to which we've engaged in these questions previously.

Discussion followed about the opportunity for public comment and the outreach efforts and how Supreme Court created boards factor into these issues.

Future Agenda Items and Action Item Review ([link](#))

Pres. Tollefson reviewed the upcoming meeting schedule and agenda items, noting that the next meeting will be Saturday, March 5. Gov. Couch shared information about an upcoming CLE put on by ABA and suggestion that Janet Welch of Michigan be invited to present. Suggestion to develop some questions and employ other strategies to engage members for the feedback meetings. Suggestion that we bring in folks who would be proponents of a change to the structure. Pres. Tollefson noted that we are planning to reach out to California regarding their decision to bifurcate and suggested we might also invite in some folks from states that do not have an integrated model.

ADJOURNMENT

Gov. Higginson moved to adjourn. Motion passed unanimously. Meeting adjourned at 3:11 PM.

Respectfully submitted,

Terra Nevitt
WSBA Executive Director & Secretary

BIBLIOGRAPHY OF CASES

(Updated Feb. 8, 2022)

1956-2014

Ry. Emps.' Dep't v. Hanson, 351 U.S. 225 (1956).

Int'l Ass'n of Machinists v. Street, 376 U.S. 740 (1961).

Lathrop v. Donohue, 367 U.S. 820 (1961).

Keller v. State Bar of California, 496 U.S. 1 (1990).

Morrow v. State Bar of California, 188 F.3d 1174 (9th Cir. 1999)

United States v. United Foods, Inc., 533 U.S. 405 (2001).

Knox v. Serv. Emps. Int'l Union, Local 1000, 567 U.S. 298 (2012).

Harris v. Quinn, 573 U.S. 616 (2014).

JANUS (2018)-PRESENT

Janus v. Am. Fed'n of State, Cnty., and Mun. Emps., Council 31, 138 S. Ct. 2448 (2018).

Fleck v. Wetch, 868 F.3d 652 (8th Cir. 2017), *cert. granted, judgment vacated*, 139 S. Ct. 590 (2018), *remanded to* 937 F.3d 1112 (8th Cir. 2019), *cert. denied*, 140 S. Ct. 1294 (Mem.).

Case History

868 F.3d 652 (8th Cir. 2017) (original decision)

139 S. Ct. 590 (2018) (Cert. granted, judgment vacated and remanded)

937 F.3d 1112 (8th Cir. 2019) (on remand)

140 S. Ct. 1294 (Mem.) (Cert. denied)

Jarchow v. State Bar of Wisconsin, No. 19-CV-266-BBC, 2019 WL 6728258 (W.D. Wis. Dec. 11, 2019), *aff'd*, No. 19-3444, 2019 WL 8953257 (7th Cir. Dec. 23, 2019), *cert. denied*, 140 S. Ct. 1720 (2020) (Thomas, J., dissenting).



Case History

No. 19-CV-266-BBC, 2019 WL 6728258 (W.D. Wis. Dec. 11, 2019) (not reported)

No. 19-3444, 2019 WL 8953257 (7th Cir. Dec. 23, 2019) (not reported)

140 S. Ct. 1720 (2020) (cert. denied with written dissent)

Crowe v. Oregon State Bar, 989 F.3d 714 (9th Cir. 2021), *cert. denied sub nom. Gruber v. Oregon State Bar*, 142 S. Ct. 78 (2021), and *cert. denied*, 142 S. Ct. 79 (2021).

Case History

No. 3:18-cv-2139-JR, 2019 WL 2251826 (D. Or. Apr. 1, 2019) (not reported)

No. 3:18-cv-2139-JR, 2019 WL 2251282 (D. Or. May 24, 2019) (report and recommendation adopted) (not reported)

989 F.3d 714 (9th Cir. 2021) (aff'd in part, rev'd in part and remanded with *Gruber*)

142 S. Ct. 79 (2021) (cert denied)

No. 3:18-CV-2139- JR (D. Or.) (pending on remand)

Gruber v. Oregon State Bar, *rev'd in part and remanded sub nom. Crowe v. Oregon State Bar*, 989 F.3d 714 (9th Cir. 2021), *cert. denied*, 142 S.Ct. 78 (2021).

Case History

No. 3:18-CV-1591-JR, 2019 WL 2251826 (D. Or. Apr. 1, 2019) (not reported)

No. 3:18-CV-1591-JR, 2019 WL 2251282 (D. Or. May 24, 2019) (report and recommendation adopted) (not reported)

989 F.3d 714 (9th Cir. 2021) (aff'd in part, rev'd in part and remanded as *Crowe*)

142 S. Ct. 78 (2021) (cert denied)

No. 3:18-CV-1591-JR (D. Or.) (pending on remand)

Schell v. Chief Just. & Justs. of Oklahoma Sup. Ct., 11 F.4th 1178 (10th Cir. 2021).

Case History

409 F. Supp. 3d 1290 (W.D. Okla. 2019) (as *Schell v. Gurich*)

2 F.4th 1312 (10th Cir. 2021) (aff'd in part, rev'd in part and remanded sub nom. *Schell v. Chief Just. & Justs. of Oklahoma Supreme Ct.*)

11 F.4th 1178 (10th Cir. 2021) (opinion withdrawn and superseded on reh'g and aff'd in part, rev'd in part and remanded sub nom. *Schell v. Chief Just. & Justs. of Oklahoma Supreme Ct.*)

No. 21-779 (U.S. Nov. 22, 2021) (petition for cert. filed) (pending), available at <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/21-779.html>

McDonald v. Longley, 4 F.4th 229 (5th Cir. 2021).

Case History

No. 1:19-CV-219-LY, 2020 WL 3261061 (W.D. Tex. May 29, 2020) (not reported)

4 F.4th 229 (5th Cir. 2021)

No. 21-800 (U.S. Nov. 30, 2021) (petition for cert. filed as *McDonald v. Longley*) (pending), available at <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/21-800.html#>

No. 1:19-CV-219-LY (W.D. Tex. Dec. 2, 2021) (judgment on remand)

No. 21-974 (U.S. Dec. 30, 2021) (petition for conditional cert. filed as *Firth v. McDonald*) (pending), available at <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/21-974.html>

No. 21-800 (U.S. Feb. 7, 2022) (brief of respondents filed), available at <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/21-800.html#>

Boudreaux v. Louisiana State Bar Ass'n, 3 F.4th 748 (5th Cir. 2021).

Taylor v. Buchanan, 4 F.4th 406 (6th Cir. 2021).

Case History

No. 1:19-CV-670, 2020 WL 10050772 (W.D. Mich. Sept. 8, 2020) (as *Taylor v. Barnes*)

4 F.4th 406 (6th Cir. 2021) (aff'd sub nom. *Taylor v. Buchanan*)

No. 21-357 (U.S. Sept. 1, 2021) (petition for cert. filed) (pending), available at <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/21-357.html>

No. 21-357 (U.S. Dec. 3, 2021) (brief of respondents filed), available at <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/21-357.html>

No. 21-357 (U.S. Dec. 10, 2021) (Reply of petitioner filed, available at <https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/21-357.html>)

WSBA SECTIONS AND CLE FUNDS OVERVIEW

Kevin Plachy

WSBA Advancement Department
Director

March 5, 2022

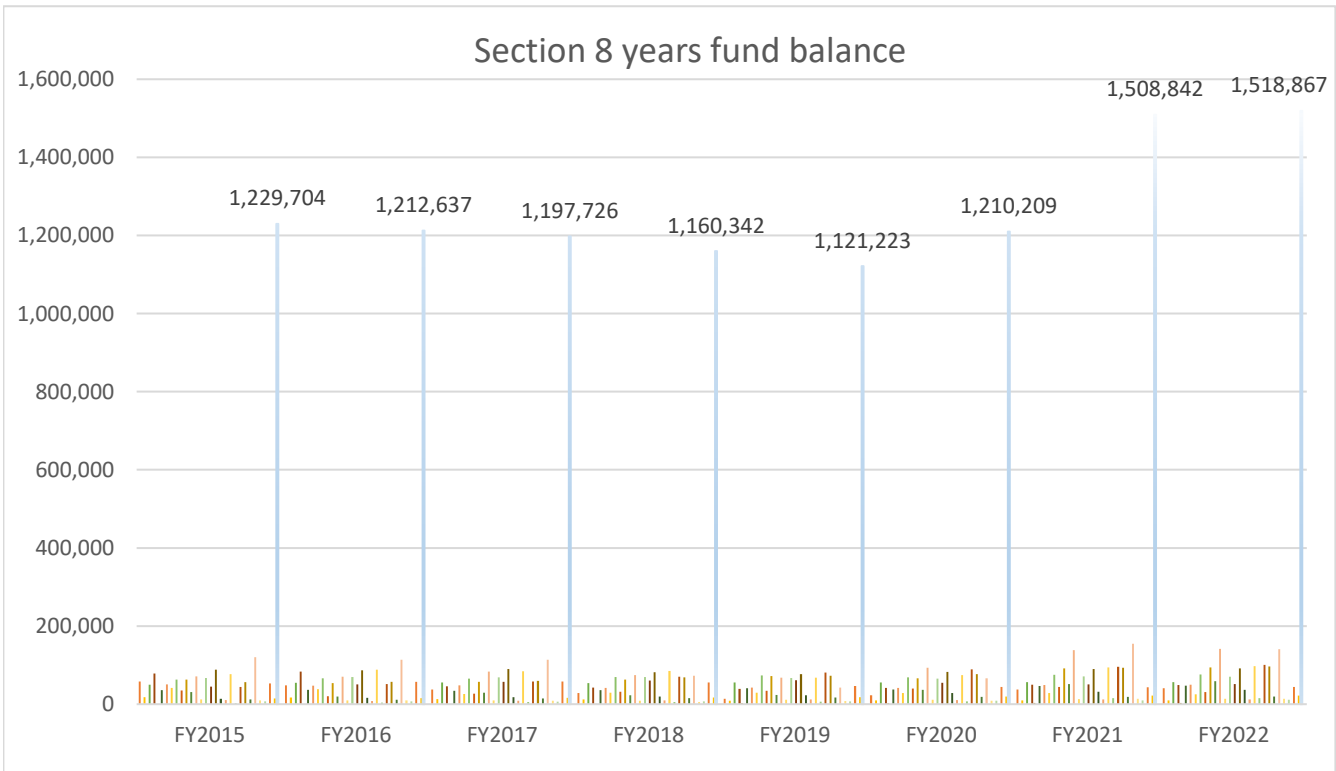


WSBA SECTION FUND OVERVIEW

- The Sections Fund Comprises the Reserve Balances of all 29 WSBA Sections
- The First WSBA Section was formed in 1973
- The Last WSBA Section to be formed was in 2017
- The Sections Pay a Per Member Charge (PMC) to WSBA which covers most of the Direct and Indirect Costs for WSBA Support
- At the End of FY21 there were 16,019 Section Members
- At the End of FY21 there were 144 Section Leaders Serving on Section Executive Committees
- The Section Fund Will Cover \$70,821.00 of WSBA Overhead in FY22

Accounts	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022
Fund Balance History								Thru 12/21
Admin Law	58,298	48,045	37,321	28,471	13,396	22,577	37,858	40,597
Animal Law	18,185	17,063	12,809	12,070	9,120	9,341	9,897	10,046
Antitr, CP, UBP	49,917	55,026	55,150	54,315	55,517	55,191	56,100	56,440
Business Law	78,558	83,675	45,802	42,483	39,256	41,875	49,752	48,749
Cannabis Law	-	-	-	296	1,994	2,647	3,114	3,244
Construction	35,920	37,061	33,849	36,237	40,655	37,157	46,408	47,360
Corporate Law	50,373	47,231	48,424	41,778	42,316	41,854	49,061	49,580
Creditor/Debtor	41,935	38,598	26,247	29,003	29,140	28,776	28,847	25,011
Criminal Law	63,270	66,341	65,126	69,846	73,709	68,890	74,884	76,076
Dispute Resol	34,888	20,475	27,105	31,546	34,065	39,998	43,834	30,761
Elder Law	63,209	53,566	57,505	62,623	71,813	66,537	91,310	93,788
Envir Land Use	30,907	19,164	29,296	23,050	23,220	36,914	51,702	58,879
Family Law	70,818	70,160	83,363	74,450	68,238	93,033	138,085	141,637
Civil Right Sect	12,049	10,071	9,334	9,129	11,239	11,093	12,989	13,529
Health Law	67,227	69,255	69,016	69,756	66,910	65,365	70,738	70,533
Indian Law	44,867	50,698	57,240	60,834	61,365	54,472	50,295	51,306
Intellect Propery	88,483	86,818	89,593	82,060	76,470	82,450	89,974	91,466
Int'l Practice	13,697	16,252	17,474	19,723	22,784	28,199	31,421	36,475
Juvenile Law SE	10,571	8,362	8,471	9,331	11,804	10,306	12,024	12,152
Labor & Employ	76,694	88,149	83,857	85,042	68,183	74,054	94,331	97,300
Low Bono	2,462	4,052	5,268	5,943	6,515	7,097	15,522	15,312
Solo Small Prac	44,073	51,094	57,985	70,575	81,152	89,027	95,353	100,693
Litigation	56,037	56,859	59,704	68,349	72,454	77,214	93,297	96,506

Legal Services AF	12,207	11,579	14,777	15,400	17,057	18,274	18,806	19,343
Real Prop, Prob, Tst	120,154	113,962	113,971	72,826	42,573	66,301	154,641	141,069
Senior Lawyers	9,907	9,357	8,598	5,962	8,348	9,195	13,475	13,940
LGBTQ	7,336	6,936	6,593	6,882	7,581	8,784	9,893	11,114
Taxation Law	52,816	57,160	57,795	55,299	46,590	44,052	43,616	43,916
World Peace Through La	14,845	15,627	16,053	17,065	17,761	19,535	21,618	22,043
Total	1,229,704	1,212,637	1,197,726	1,160,342	1,121,223	1,210,209	1,508,842	1,518,867



Accounts	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022
SECTION REVENUE - FIVE YEAR HISTORY						(Budgeted)
40500 Interest - Investments	10,722	19,838	26,693	11,142	422	910
40800 Publications Revenue	5,390	5,316	3,832	6,380	5,375	4,000
41200 Scholarship Revenue	825	-	-	-		
41450 Sponsorships	-	1,000	-	-		
41500 Annual or Other Meeting Rev	3,540	5,340	1,515	-		2,000
41700 Conferences & Institutes	6,438	3,460	6,297	-		8,000
41800 Seminar Registrations	-	-	-	1,410		
41805 Mini-CLE Revenue	22,283	38,996	33,779	24,618	41,607	36,070
41825 Seminar Revenue-Other	10,057	1,376	-	-		
41850 Seminar Splits w/CLE	89,581	59,597	5,284	71,693	114,811	101,660
41855 CLE Section Splits Projections						
41875 Seminar Splits w/Others	17,160	18,193	23,693	6,627	10,276	8,000
Total Section other revenue	165,996	153,116	101,093	121,870	172,492	160,640
Section Dues revenue	494,682	465,049	447,289	440,688	333,786	439,178
Total	660,677	618,165	548,382	562,558	506,277	599,818
Per Member Charge Total	325,538	305,719	294,638	290,119	213,088	287,423
Actual Per Member Charge (per member)	20.58	20.92	22.44	23.48	18.18	18.92
Applied Per Member Charge (per member)	18.75	18.75	18.75	18.75	18.18	18.75
Difference Between Actual and Applied	1.83	2.17	3.69	4.73	0.00	0.17
Total Difference	31,320	35,382	58,036	71,305	0	2,601
Membership Number	17115	16305	15728	15075	14957	15300

WASHINGTON STATE BAR ASSOCIATION

To: Section Chairs, Chair-Elects, and Treasurers

From: Kevin Plachy, Director of Advancement, Julianne Unite, Member Services and Engagement Manager,
Carolyn MacGregor, Sections Program Coordinator

Re: FY 2022 Section Per-Member Charge

Date: May 5, 2021

The Section Per-Member Charge is calculated as part of the WSBA annual budget process. It is based on the first draft of the budget for costs of the administrative support to WSBA Section leaders and executive committees for the upcoming fiscal year as reflected in the Sections Administration cost center. These costs include: (1) salaries and benefits, (2) overhead, and (3) direct expenses.

The Budget and Audit Committee of the Board of Governors reviewed the PMC charge calculation on May 5, 2021. The committee unanimously agreed not to increase the Per-Member Charge above the historical maximum of \$18.75. The FY2022 PMC will be \$18.75.

FY2022 PER-MEMBER CHARGE CALCULATION

1. SALARIES AND BENEFITS

The PMC includes the salaries and benefits of employees that directly support WSBA Sections: two-and-a-half full-time equivalent (FTE) Sections Team staff and a portion of an FTE in Finance and Administration for processing section financial transactions such as expense reports, invoice payments, and donations. *The PMC does not include any staff salaries or benefits for Mini-CLEs, sections' half-day, full-day, and multi-day CLEs, section membership dues processing, or any other work performed by WSBA employees in support of Sections.* Benefits are calculated as a percentage of total salaries. The percentage is derived from the WSBA's total salaries and benefits budget for the fiscal year. Items included in employee benefits are employer state and federal taxes and insurance, medical coverage, retirement plan contributions, employee bus passes, and employee service awards and assistance plan.

Direct Employee Support	Full Time Equivalent (FTE)
• Sections Administration Employees	2.5
• Administrative Employee Time ¹	0.08
Total FTE	2.58
• Salaries for 2.58 FTEs	\$161,848
• Benefits (29% of estimated salaries)	\$46,936

Total FY22 Salaries and Benefits Budgeted for Sections	\$208,784
---	------------------

¹ Includes cost of employee time for processing accounts payable arising from section activities.

2. OVERHEAD

This charge includes expenses related to general operations attributable to all WSBA employees. Overhead cost is calculated based on a per-FTE dollar amount, which is derived by taking the total cost of overhead divided by the total number of WSBA FTEs. This generates a per-FTE cost, which is multiplied by the total number of FTEs allocated to the Sections Administration cost center. Overhead costs in the FY2021 Reforecasted Budget consist of:

Overhead Category	Cost
• Rent	\$1,975,334
• Furniture, Maintenance & Leasehold Improvements	\$30,000
• Office Supplies & Equipment	\$44,000
• Computer Software Depreciation	\$131,925
• Telephone & Internet	\$63,000
• Production Services	\$18,056
• Workplace Benefits	\$27,748
• HR Expenses	\$211,299
• Personal Property Taxes	\$9,121
• Furniture & Equipment Depreciation	\$52,285
• Computer Hardware Depreciation	\$46,773
• Insurance	\$225,718
• Professional Fees-Audit	\$32,000
• Bank Fees	\$62,251
• Information Technology Department Expenses	\$899,711
Total Overhead Budgeted for FY21	\$3,829,221
• Budgeted WSBA FTEs for FY2021	139.5
• Overhead per FTE = \$3,829,221/139.5	\$27,450

Total Estimated FY22 overhead² to be charged to Sections (\$27,450 x 2.58 FTEs) = \$70,821
--

3. DIRECT EXPENSES

These are out-of-pocket costs for administering WSBA Sections, and include:

- Dues Statements (paper, postage, and printing of annual section membership dues statements)
- Sections Program Events/Meetings Expenses (e.g., fall & spring section leaders meeting costs for food, supplies, and conference calls)
- Employee Travel (costs for staff to attend executive committee meetings and other section events)
- Subscriptions (for the Survey Monkey account used to administer section elections)
- Other (e.g., staff membership dues, unanticipated expenses, etc.)

Direct expenses budgeted for all Sections = \$9,875
--

² Historically, there are small overhead differences between the estimated expenses and the final draft WSBA budget.

<u>FY2022 PER-MEMBER CHARGE CALCULATION BASED ON FY2021 BUDGET</u>	
1. Total Salaries and Benefits	\$208,784
2. Total Overhead	\$70,821
3. Direct Expenses	<u>\$9,875</u>
Total expenses for Sections Administration cost center	\$289,479
Estimated total # of section memberships for FY2022	15,300 members
Total 2022 Cost Per-Member: \$18.92/member	
<u>The FY2022 Per-Member Charge will be capped at \$18.75.</u>	

FY2022 SECTION BUDGETS

As a reminder, Section Budget Requests and Request to Change Dues are due on July 1st. You may make additional changes after the budget has been submitted until August 23rd. Please email all budget documents to your Sections Program Team at: sectionbudgets@wsba.org

If you have any questions about any of the information contained in this memo or need additional information, please feel free to contact your Sections Program Team for assistance.

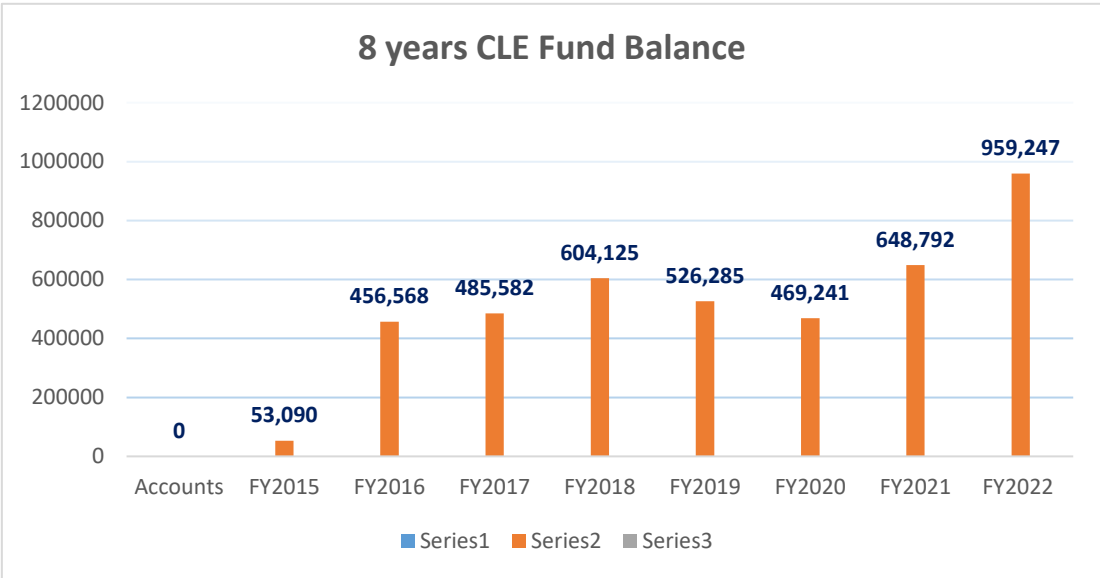
Julianne Unite: julianneu@wsba.org

Carolyn MacGregor: carolynm@wsba.org

WSBA CLE FUND OVERVIEW

- The CLE Operation is self-sustaining
- WSBA Presents & Section CLEs equivalent to ~ 400 CLE credits or 65-75 programs, live
- Most live WSBA CLEs are also available for up to three years, accessible on demand via Mp3 and/or Video
- The WSBA CLE store is home to ~ 652 on demand CLE products
- WSBA Deskbooks are also part of the CLE Fund
- 9.92 WSBA Staff are Allocated into the CLE Fund
- The CLE Fund Will Cover \$282,923.00 of WSBA Overhead in FY22

Accounts	FY2015	FY2016	FY2017	FY2018	FY2019	FY2020	FY2021	FY2022	As of
								(Budgeted)	January, 2022
CLE Fund Balance History	53,090	456,568	485,582	604,125	526,285	469,241	648,792	959,247	1,356,954



SECTION CLE PROGRAM REVENUE AS A PERCENTAGE OF TOTAL CLE REVENUE

CLE Revenue	FY17	FY18	FY19	FY20	FY21	FY22
						(Budgeted)
Section Live Seminars	588,573	596,904	519,755	431,141	306,573	400,000
Total CLE Live Revenue	881,400	960,235	878,683	668,208	819,545	850,000
Section % of Total	0.67	0.62	0.59	0.65	0.37	0.47
Section On-Demand	508,649	454,352	490,302	463,187	351,630	500,000
Total CLE On-Demand Re	961,800	949,389	910,436	774,887	625,320	1,024,985
Section % of Total	53%	48%	54%	60%	56%	49%

Washington State Bar Association

Statement of Activities

For the Period from December 1, 2021 to December 31, 2021

	MONTHLY BUDGET vs. ACTUAL			YEAR TO DATE BUDGET vs. ACTUAL			ANNUAL BUDGET COMPARISON		
	FISCAL 2022 BUDGET CURRENT MONTH	CURRENT MONTH ACTUAL	MONTHLY VARIANCE	YEAR TO DATE BUDGET	YEAR TO DATE ACTUAL	YEAR TO DATE VARIANCE	FISCAL 2022 ANNUAL BUDGET	REMAINING BALANCE OF YEAR	% USED OF ANNUAL BUDGET
CONTINUING LEGAL EDUCATION (CLE)									
REVENUE:									
SEMINAR REGISTRATIONS	70,833	119,434	48,601	212,500	215,204	2,704	850,000	634,797	25.32%
SEMINAR-EXHIB/SPNSR/ETC	1,667	-	(1,667)	5,000	-	(5,000)	20,000	20,000	0.00%
SHIPPING & HANDLING	-	36	36	-	72	72	-	(72)	
COURSEBOOK SALES	833	210	(623)	2,500	490	(2,010)	10,000	9,510	4.90%
MP3 AND VIDEO SALES	85,415	499,794	414,378	256,246	810,606	554,359	1,024,985	214,380	79.08%
TOTAL REVENUE:	158,749	619,474	460,725	476,246	1,026,371	550,125	1,904,985	878,614	53.88%
DIRECT EXPENSES:									
POSTAGE - FLIERS/CATALOGS	667	-	667	2,000	-	2,000	8,000	8,000	0.00%
DISABILITY ACCOMMODATIONS	167	-	167	500	-	500	2,000	2,000	0.00%
SURVEYS	-	-	-	300	-	300	300	300	0.00%
DEPRECIATION	109	109	-	327	331	(4)	1,308	977	25.31%
ONLINE EXPENSES	4,167	4,446	(279)	12,500	12,547	(47)	50,000	37,453	25.09%
ACCREDITATION FEES	3,000	2,166	834	3,000	2,082	918	3,000	918	69.40%
SEMINAR BROCHURES	1,667	-	1,667	5,000	-	5,000	20,000	20,000	0.00%
FACILITIES	15,092	3,200	11,892	49,050	8,400	40,650	196,200	187,800	4.28%
SPEAKERS & PROGRAM DEVELOP	3,846	727	3,119	12,500	777	11,723	50,000	49,223	1.55%
SPLITS TO SECTIONS	-	-	-	-	-	-	110,000	110,000	0.00%
HONORARIA	125	-	125	375	2,700	(2,325)	1,500	(1,200)	180.00%
CLE SEMINAR COMMITTEE	21	-	21	62	-	62	250	250	0.00%
STAFF TRAVEL/PARKING	1,154	-	1,154	3,750	-	3,750	15,000	15,000	0.00%
STAFF TRAINING	58	-	58	175	-	175	700	700	0.00%
STAFF MEMBERSHIP DUES	-	-	-	867	-	867	1,338	1,338	0.00%
COST OF SALES - COURSEBOOKS	125	13	112	375	44	331	1,500	1,456	2.96%
A/V DEVELOP COSTS (RECORDING)	167	-	167	500	-	500	2,000	2,000	0.00%
POSTAGE & DELIVERY-COURSEBOOKS	-	16	(16)	-	50	(50)	-	(50)	
STAFF TRAVEL/PARKING	25	-	25	75	-	75	300	300	0.00%
TOTAL DIRECT EXPENSES:	30,389	10,678	19,711	91,356	26,931	64,426	463,396	436,465	5.81%
INDIRECT EXPENSES:									
SALARY EXPENSE (8.42 FTE)	46,980	46,367	612	140,940	134,084	6,856	563,758	429,673	23.78%
BENEFITS EXPENSE	17,775	17,669	106	53,719	51,944	1,775	213,333	161,389	24.35%
OTHER INDIRECT EXPENSE	19,415	17,023	2,393	60,349	52,084	8,265	239,002	186,918	21.79%
TOTAL INDIRECT EXPENSES:	84,170	81,059	3,111	255,008	238,112	16,896	1,016,093	777,981	23.43%
TOTAL ALL EXPENSES:	114,559	91,737	22,822	346,364	265,043	81,322	1,479,489	1,214,446	17.91%
NET INCOME (LOSS):	44,190	527,737	483,547	129,882	761,328	631,446	425,496	(335,832)	178.93%

Washington State Bar Association

Statement of Activities

For the Period from December 1, 2021 to December 31, 2021

	MONTHLY BUDGET vs. ACTUAL			YEAR TO DATE BUDGET vs. ACTUAL			ANNUAL BUDGET COMPARISON		
	FISCAL 2022 BUDGET CURRENT MONTH	CURRENT MONTH ACTUAL	MONTHLY VARIANCE	YEAR TO DATE BUDGET	YEAR TO DATE ACTUAL	YEAR TO DATE VARIANCE	FISCAL 2022 ANNUAL BUDGET	REMAINING BALANCE OF YEAR	% USED OF ANNUAL BUDGET
DESKBOOKS									
REVENUE:									
LEXIS/NEXIS ROYALTIES	2,633	-	(2,633)	7,900	-	(7,900)	31,600	31,600	0.00%
DESKBOOK SALES	6,833	-	(6,833)	20,500	-	(20,500)	82,000	82,000	0.00%
SECTION PUBLICATION SALES	750	-	(750)	2,250	-	(2,250)	9,000	9,000	0.00%
CASEMAKER ROYALTIES	3,750	-	(3,750)	11,250	3,701	(7,549)	45,000	41,299	8.23%
TOTAL REVENUE:	13,967	-	(13,967)	41,900	3,701	(38,199)	167,600	163,899	2.21%
DIRECT EXPENSES:									
COST OF SALES - DESKBOOKS	5,333	-	5,333	16,000	-	16,000	64,000	64,000	0.00%
COST OF SALES - SECTION PUBLICATION	167	-	167	500	-	500	2,000	2,000	0.00%
SPLITS TO SECTIONS	263	-	263	788	-	788	3,150	3,150	0.00%
STAFF CONFERENCE & TRAINING	29	-	29	88	-	88	350	350	0.00%
DESKBOOK ROYALTIES	17	-	17	50	45	5	200	155	22.67%
ONLINE LEGAL RESEARCH	158	158	(0)	474	312	162	1,895	1,583	16.46%
STAFF MEMBERSHIP DUES	18	-	18	55	-	55	220	220	0.00%
TOTAL DIRECT EXPENSES:	5,985	158	5,826	17,954	357	17,596	71,815	71,458	0.50%
INDIRECT EXPENSES:									
SALARY EXPENSE (1.50 FTE)	10,663	10,309	354	31,989	30,927	1,062	127,954	97,027	24.17%
BENEFITS EXPENSE	3,189	3,205	(17)	9,762	9,556	206	38,951	29,395	24.53%
OTHER INDIRECT EXPENSE	3,567	3,146	422	11,091	9,625	1,466	43,921	34,296	21.91%
TOTAL INDIRECT EXPENSES:	17,419	16,660	759	52,842	50,108	2,734	210,826	160,718	23.77%
TOTAL ALL EXPENSES:	23,403	16,818	6,585	70,796	50,465	20,330	282,641	232,176	17.85%
NET INCOME (LOSS):	(9,437)	(16,818)	(7,382)	(28,896)	(46,764)	(17,869)	(115,041)	(68,277)	40.65%

QUESTIONS?

WSBA SECTIONS HISTORY AND ACTIVITIES

Kevin Plachy, WSBA Advancement
Director and WSBA Section Leaders
Nancy Hawkins, Kari Petrasek, Kevin
Fay and Randall Winn

March 5, 2022



WSBA SECTIONS OVERVIEW

- The Sections Fund Comprises the Reserve Balances of all 29 WSBA Sections
- The First WSBA Section was formed in 1973
- The Last WSBA Section to be formed was in 2017
- At the End of FY21 there were 16,019 Section Members
- At the End of FY21 there were 144 Section Leaders Serving on Section Executive Committees
- The WSBA Sections Provide a Wide Range of Member Benefits

Section	Membership Count (FY21 year-end)	Fund Balance (Sept. 30, 2021)	Section Formed	Annual Member Dues	# of EC Members FY21 ¹	# of EC Members FY22 ¹	Active Web Content ²	CLEs w/W SBA	CLE w/other Entities ³	Deskbook / Manuals /	Law School Outreach	Legislation	Listse rves ⁴	Mini-CLE	News letter	Reception s/ Forums	Recognition Awards	Scholarships & Grants	Social Media ⁵
Administrative Law	242	\$ 37,858	1973	\$ 30	15*	16*	X			X	X	X	X	X	X	X	X		
Health Law	404	\$ 70,738	1973	\$ 20	9	9	X				X		X	X		X			
Intellectual Property	881	\$ 89,974	1973	\$ 25	10*	10*		X					X	X				X	
Antitrust, Consumer Prot	202	\$ 56,100	1974	\$ 25	13*	13*							X				X	X	
Business Law	1,270	\$ 49,752	1974	\$ 25	22*	22*			X	X		X	X	X	X	X			
Creditor Debtor Rights	471	\$ 28,847	1974	\$ 30	13	16		X	X			X	X				X	X	
Environmental Land Use	811	\$ 51,702	1974	\$ 40	10*	13*		X			X	X	X	X		X	X	X	X
Real Property Probate	2,330	\$ 154,641	1974	\$ 25	14*	20*	X	X		X		X	X		X				
Litigation	1,074	\$ 93,297	1975	\$ 30	9*	10*		X			X	X	X					X	
Taxation	634	\$ 43,616	1975	\$ 20	23	25*					X		X	X		X	X	X	
Criminal Law	393	\$ 68,890	1979	\$ 30	13	14		X		X			X						
World Peace Through Law	146	\$ 21,618	1981	\$ 30	8*	6	X	X					X	X		X	X	X	
International Practice	246	\$ 31,421	1984	\$ 40	17*	17*							X	X		X	X	X	
Construction Law	528	\$ 46,408	1986	\$ 25	17*	17*	X	X					X	X	X	X	X	X	
Corporate Counsel	1132	\$ 49,061	1986	\$ 20	19*	19*		X					X	X			X	X	
Indian Law	336	\$ 50,295	1988	\$ 30	14	14		X					X					X	
Solo & Small Practice	914	\$ 95,353	1989	\$ 35	9	15*	X	X					X	X		X	X	X	
Family Law	1,009	\$ 138,085	1990	\$ 35	19	17							X						
Alternative Dispute	327	\$ 43,834	1991	\$ 35	14	16*	X	X	X		X		X	X		X			X
Elder Law	632	\$ 91,310	1994	\$ 35	16*	16*		X				X	X						
Senior Lawyers	240	\$ 13,475	1998	\$ 25	11	12							X	X	X				
Labor and Employment	1002	\$ 94,331	2000	\$ 30	13*	12*		X					X	X		X	X	X	
Animal Law	83	\$ 9,897	2002	\$ 25	7	5			X				X						
LAMP	82	\$ 18,806	2004	\$ 35	9*	11*	X						X	X			X		X
Juvenile Law	148	\$ 12,024	2006	\$ 35	12*	9							X						
LGBTQ	112	\$ 9,893	2006	\$ 30	11*	11*		X					X						
Civil Rights Law	188	\$ 12,989	2008	\$ 30	10*	10	X	X	X		X	X	X	X		X	X		
Low Bono	87	\$ 15,522	2014	\$ 25	5	7						X	X	X	X	X			X
Cannabis Law	95	\$ 3,114	2017	\$ 25	7	8*	X						X	X	X	X			
	16,019	\$ 1,502,849			144	119	10	16	5	4	7	9	29	18	7	14	13	13	4

SECTION LEADERS PRESENTATIONS

Nancy Hawkins – Executive Committee Member/Family Law Section

Kari Petrasek – Executive Committee Member/Solo Small Practice Section

Kevin Fay – Executive Committee Member/Corporate Counsel Section

Randall Winn – Chair-Elect/World Peace Through Law Section

QUESTIONS?