

August 4, 2014

Michigan Supreme Court
Office of Administrative Counsel
PO Box 30052
Lansing, MI 48909

Re: Report of the Task Force on the Role of the State Bar of Michigan

To Whom It May Concern:

The undersigned past presidents of the State Bar of Michigan submit the following comments concerning the Report of the Task Force on the Role of the State Bar of Michigan ("the Report"). This letter is the result of several weeks of discussions and debate among its signatories, who come from diverse backgrounds, practices, political persuasions and experience within the legal profession.

Despite our differences in politics, practice and experience; despite the undeniable fact that some of us favor certain aspects of the Report which others deem unwise or unnecessary; and even though those signing this letter may not agree with each and every word set forth herein, we are unanimous in our belief that while the Report offers many sound ideas regarding the Bar's future operations, the constraints that it would place on the unified Bar's ability to advocate on policy issues arising outside of the judicial branch are overbroad, unduly restrictive and would seriously impair the Bar's ability to fulfill its charge, as set forth in Rule 1 of the *Rules Concerning The State Bar Of Michigan*, to promote improvements in the administration of justice and advancements in jurisprudence, improve relations between the legal profession and the public, and promote the interests of the legal profession in Michigan.

I. THE BAR'S ADVOCACY ON NON-JUDICIAL POLICY ISSUES IS CENTRAL TO ITS MISSION, AND REPRESENTS A COMPELLING INTEREST WORTHY OF PROTECTION, NOT UNWARRANTED RESTRICTION.

The unified Bar's first president, Roberts P. Hudson, famously wrote: "No organization of lawyers shall long prevail which has not as its *primary* object the protection of the public." (Emphasis added). However, Mr. Hudson never asserted that the sole focus of the integrated Bar should be limited to protecting only the public. Rather, in that same column he identified three other core missions of the unified Bar: 1) to benefit the profession; 2) to increase professionalism; and 3) to guard against the unauthorized practice of law. Concurrently, Michigan Supreme Court Justice William W. Potter wrote that, among other things, the unified Bar's purpose is to "benefit ... the profession and ... the public," to make the organization "a working force for good," and to maintain "the influence and importance of the lawyers of Michigan in society and in government." Thus, from its inception, a central purpose of the State Bar of Michigan has been to advocate not only to protect the public and benefit the profession, but to exert its voice as a "working force for good to influence society and government."

The *Keller and Falk* decisions, which the Report was charged with utilizing as the basis of its review of the Bar's operations, support the constitutionality of this role – and *Falk II* explicitly recognized that the Bar had a compelling interest in advocating on what Justice Boyle classified "political activities," and further found that the First Amendment injury suffered by an individual member of the Bar who disagreed with a position taken by the Bar using his compelled dues was "not great." 418 Mich. at 296-297. [Opinion of BOYLE, J.].

The oath that we all took as new lawyers requires us to look out for the “defenseless or oppressed.” And as set forth in the preamble to the Michigan Rules of Professional Conduct, adopted by order of the Michigan Supreme Court effective October 1, 2008, each of us has “special responsibility for the quality of justice” in this State. The preamble continues:

As a public citizen, a lawyer should seek improvement of the law, the administration of justice and the quality of service rendered by the legal profession. As a member of a learned profession, a lawyer should cultivate knowledge of the law beyond its use for clients, **employ that knowledge in reform of the law** and work to strengthen legal education. A lawyer should be mindful of deficiencies in the administration of justice and of the fact that the poor, and sometimes persons who are not poor, cannot afford adequate legal assistance, and should therefore devote professional time and **civic influence** in their behalf. **A lawyer should aid the legal profession in pursuing these objectives** and should help the bar regulate itself in the public interest.

* * *

An independent legal profession is an important force in preserving government under law, for abuse of legal authority is more readily challenged by a profession whose members are not dependent on government for the right to practice. (Emphasis added).

The Rules of Professional Conduct therefore require that the profession seek reform of “the law” when necessary to effectuate justice, acknowledges that it is “the legal profession” that will be pursuing that objective, and emphasizes the profession’s unique ability to act as the voice of and advocate for the Rule of Law.

II. THE TASK FORCE WAS CHARGED WITH ENSURING THAT THE UNIFIED BAR’S ACTIVITIES COMPLIED WITH THE RESTRICTIONS IMPOSED BY KELLER AND FALK, WHICH EXPRESSLY RECOGNIZED THE STATE’S COMPELLING INTEREST IN ALLOWING THE UNIFIED BAR TO ADVOCATE ON ISSUES GERMANE TO ITS CORE MISSION

In *Keller v State Bar of California*, 496 U.S. 1 (1990), the plaintiff successfully argued that the use of his compulsory dues to lobby on issues such as gun control, abortion and public prayer – issues unrelated to the mandatory bar’s purpose – was an unconstitutional abridgment of his individual rights. The United States Supreme Court agreed, but noted the difficulty in determining what issues were germane to the State’s interest in a unified Bar (on which the bar could expend a member’s dues for lobbying) and which issues were “of an ideological nature which falls outside of” the permitted areas. According to the Court:

Precisely where the line falls between those State Bar activities in which the officials and members of the Bar are acting essentially as professional advisers to those ultimately charged with the regulation of the legal profession, on the one hand, and those activities having political or ideological coloration which are not reasonably related to the advancement of such goals, on the other, will not always be easy to discern. But the extreme ends of the spectrum are clear: Compulsory dues may not be expended to endorse or advance a gun control or nuclear weapons freeze initiative; at the other end of the spectrum petitioners have no valid constitutional objection to their compulsory dues being spent for activities connected with disciplining members of the Bar or proposing ethical codes for the profession. (496 U.S. 13-14; 15-16).

Thus, *Keller* expressly allowed a bar association to use compelled dues to advocate on all issues germane to the state's interest in a unified bar. *Keller* did not distinguish between judicial and "non-judicial" sources of policies on which the bar commented, as long as they were germane to the bar's and state's interests.

Likewise, neither of the *Falk* decisions differentiated between judicial and non-judicial advocacy, as does the Report. Instead, those opinions dealt with Mr. Falk's contention that the Bar's involvement in providing technical expertise in drafting legislation; in giving technical advice to the Legislature on substantive content of the law; and in lobbying the Legislature and in appearing before the State Officers Compensation Commission all infringed on his "negative First Amendment interest to remain silent" on those issues. 418 Mich. at 295-296. [opinion of BOYLE, J.]

While Justice Boyle's opinion in *Falk II* acknowledged that Mr. Falk had, in fact, "suffered some cognizable First Amendment related injury" when his dues were used for these purposes, *id.*, at 296, she also concluded that his injuries were minimal.

This is not a case where plaintiff is being forced to personally express his own agreement with the political positions of the bar. ... Plaintiff is also not being forced to display the bar-approved message in his home or on his automobile. ... Plaintiff is free to take a public position which is directly opposed to that taken by the bar. ... Plaintiff is required only

"to contribute dues to a bar association fund which is to be used in part to promote the expression of views in the name of the organization (not in the name of the dues payor), which views when adopted may turn out to be contrary to the views of the dues payor". ...

Thus, although the government action complained of here has in fact infringed upon plaintiff's First Amendment interests, the severity of the injury is not great. Plaintiff is required to support the legislative positions taken by the bar only through indirect financial contributions. Reasonable persons are not likely to associate the bar's expressed position with plaintiff merely because he is forced to pay dues to the bar in order to practice law. Thus, the invasion of plaintiff's freedom of conscience and sphere of intellect occasioned by the bar's political activity is, in reality, not great.

Id., pp. 296-297. (Citations omitted). Thus, it is important to remember that the cases upon which proponents of limiting the Bar's advocacy efforts rely explicitly recognize not only the Bar's right to advocate on issues germane to its core mission, but also acknowledge that the injury to individual member's First Amendment rights resulting from Bar advocacy efforts (even on non-judicial advocacy) is not great.

It is beyond the scope of this letter to provide a detailed history of the Bar's advocacy efforts post-*Keller* and under the various Administrative Orders issued in response to it and the two *Falk* decisions. Suffice it to say that: (1) prior to *Keller*, the Bar was an active participant in a wide range of legislative activity and (2) post-*Keller*, the Bar was able to maintain essential elements of its advocacy while giving appropriate constitutional deference to the First Amendment rights of its members, limited under the most recent iteration of Administrative Order to commenting only on matters "reasonably related" to the following activities:

- (A) the regulation and discipline of attorneys;
- (B) the improvement of the functioning of the courts;
- (C) the availability of legal services to society;
- (D) the regulation of attorney trust accounts; and

(E) the regulation of the legal profession, including the education, the ethics, the competency, and the integrity of the profession.

Then, in response to a single legislator's proposal to make the Bar voluntary, the Bar asked the Supreme Court to review whether the Bar's activities were *Keller*-compliant. This prompted the Court to create the Task Force, pursuant to AO 2014-5, providing (in pertinent part):

The task force is charged with determining whether the State Bar's duties and functions "can[] be accomplished by means less intrusive upon the First Amendment rights of objecting individual attorneys" (*Falk*, 411 Mich at 112 [opinion of RYAN, J.]) under the First Amendment principles articulated in *Keller* and *Falk*. At the same time, the task force should keep in mind the importance of protecting the public through regulating the legal profession, and how this goal can be balanced with attorneys' First Amendment rights.

Thus, AO 2014-5 required the Task Force to balance the unified Bar's constitutionally-compelled duties with individual members' First Amendment rights in a manner consistent with the decisions in *Keller* and *Falk*.

III. THE REPORT'S ADOPTION OF STANDARDS THAT ADMITTEDLY ARE MORE RESTRICTIVE THAN THOSE IMPOSED UPON ANY OTHER UNIFIED BAR THAT ENGAGES IN ADVOCACY IS UNWARRANTED BY THE FACTS.

Our objection to the Task Force Report is not that it calls for additional clarity and structure regarding application of the *Keller* and *Falk* decisions. We support clarity, and if it is determined that a more uniform and formal *Keller* analysis is required, then that is acceptable in theory. However, we believe that adopting standards that admittedly "go beyond the safeguards imposed on any of the mandatory state bars that engage in legislative advocacy" (Report, p. 9) is unwarranted given: a) the relatively few instances cited by the Report's authors in which the Bar even arguably approached the line of *Keller*-impermissibility; and b) the safeguards already in place under existing State Bar policies and procedures, as well as the right to challenge Bar activities under AO 2004-1.

The Report notes that the Task Force reviewed more than four decades' worth of policy positions taken by the Bar. As Past Presidents, we can assure the Court that the Board of Commissioners routinely considers at least a dozen pieces of legislation or proposed Court Rule changes at every one of its meetings. Over the course of 40 years, therefore, it is likely that the Bar has considered more than 10,000 pieces of legislation and/or proposed Court Rule changes, and *extremely* likely that the Bar has advocated its position on at least a thousand of those issues.

Despite this, the Report cites a total of six examples of policy positions adopted by the Bar (including one that the Bar adopted but explicitly did not advocate) as a basis for adopting what would be the most stringent restrictions on non-judicial advocacy among unified bars in the country (other than those which engage in no advocacy). While we believe that individual members' First Amendment rights are not to be trifled with, we respectfully submit that the Report overreacts as the result of what the Report mentions only in passing: the political backlash ensuing from a clearly *Keller*-permissible letter submitted by the Bar seeking to assure transparency in judicial election campaign funding, which saw a single legislator submit a bill that would have abolished the unified bar.

Further, the Report fails to acknowledge that absent unusual or exigent circumstances, under current State Bar policies and procedures every piece of legislation or proposed Court Rule is subjected to at least five different reviews to see whether the legislation falls within the five specific categories to which the State Bar's advocacy efforts are restricted: 1) by Staff and the Bar's outside lobbyist; 2) by each Section and Committee asked to review

the proposed legislation, who must indicate on their submission to the Board the basis of their determination of *Keller* permissibility; 3) by the individual Public Policy Committee member assigned to the legislation; 4) by the Committee as a whole – including the two “*Keller* experts” (Court of Appeals Judge Cynthia Stephens and Richard McLellan) who sit on the Committee despite not being members of the Board in recognition of their expertise on the *Keller* issues; and 5) by the Board of Commissioners as a whole. At any time during that process, any single person can question the *Keller* permissibility of any proposed action, and that issue is subjected to a vote.

The Report also fails to take into consideration that the current rules governing ideological activities provide a mechanism by which members who disagree with a Bar policy position (including those arising in the budgeting process) may challenge that activity directly to the Supreme Court if the Bar and its Board of Commissioners do not agree with the challenge. To our knowledge, only two members of the Bar have utilized that process to challenge positions taken by the Bar since that mechanism was established by the Court.

While we agree that providing additional guidance or instruction may be a good thing – and enthusiastically endorse the Report’s suggestion that members who dissent from any policy position taken by the Bar on matters of judicial or non-judicial origin may have their dissenting opinions forwarded along with the applicable Bar policy statement – we believe that the Report simply tips the balance too far in favor of the relatively few instances in which its dissenting members may suffer injuries that Justice Boyle noted in *Falk II* were “not great,” and proposes restrictions that significantly threaten the Bar’s ability to fulfill its constitutionally-mandated and compelling interest in protecting the public and advocating for the justice system as a whole.

IV. THE REPORT THREATENS THE BAR’S ABILITY TO PROTECT THE PUBLIC.

There is no significant objective evidence that the current Administrative Order has been ineffective in protecting members’ First Amendment rights as clarified in *Keller* and *Falk*. Six instances in which the Bar may have overstepped its bounds – none of which resulted in a successful challenge to the Bar’s position – hardly merit imposing limits upon the Bar’s ability to, by way of example:

- Oppose a ballot initiative that would dramatically downsize the judiciary;
- Weigh in on a proposed constitutional amendment that would subject the Supreme Court to reversal by a super-majority of both houses of the legislature or popular initiative;
- Support legislation to continue or enhance critical resources needed for the support of a healthy judicial branch;
- Propose means, methods and resources to improve the administration of justice; or
- Advocate upon legislation designed to fundamentally alter the relationship between the State Bar and the Supreme Court.

It is worthy of note that on matters of vital interest to the Supreme Court and the judiciary the State Bar has been a consistent and influential ally for decades. We cannot think of a single major policy or funding initiative of the Court that the Bar has failed to support. If the strict limitations on advocacy advanced by the Task Force are to be adopted, the Court will be forced to go it alone on issues of public policy that impact the judiciary, bereft of the voices of 42,000 Michigan lawyers who occupy positions of formal and informal influence in every political subdivision and election district in the state.

Further, the Report suggests forbidding the Bar from advocating on issues that are “perceived” to be associated with one party or candidate, or that are “perceived” to be divisive among the bar membership. This limitation, by itself, could prevent the Bar from taking a position on any issue, since: a) every time a piece of legislation is proposed by any candidate for office or a sitting legislator affiliated with any political party, supporting that position might be perceived by some to support that party or candidate; and b) every position could be “perceived” to be divisive if even a single member of the Bar disagreed. Whose perception counts: members of the Bar, legislators, judges, politicians, the general public, or some fringe affinity group? If the membership of the Bar is the focus, is the subjective perception of a single member sufficient to block the Bar’s ability to comment? Must the perception be rational? If so, what is the test? Who is to decide what the perception of the silent membership might be? What are to be the checks and balances upon those who make such decisions? In its “strictest” reading, a textual position adopted by the Report, the “perception” exclusion could preclude any effort to protect the public.

And how does the “perception” test apply to longstanding Bar initiatives designed to promote improvements in the administration of justice and advancements in jurisprudence, improve relations between the legal profession and the public, and promote the interests of the legal profession in Michigan, such as diversity and inclusion, justice system revision and Access to Justice? Each of these worthy and vital programs may be in jeopardy, because one or more Bar members claim that they are political and divisive. It will not be difficult to identify one member or even a decent percentage of the membership who will voice opposition to spending money to advance women and minorities in the profession, devoting judicial resources to a business or drug or veteran’s court which serves narrow interests, or supporting efforts that encourage poor people to sue landlords who are violating the law.

V. THE REPORT GUTS THE BAR’S ABILITY TO ADVOCATE ON BEHALF OF THE PROFESSION.

The Report also recommends eliminating from Rule 1 of the Supreme Court Rules for the State Bar that language that provides that the Bar “shall aid ... in promoting the interests of the legal profession in this state.” The rationale for this proposed deletion is “to clarify the role of the State Bar by emphasizing that its primary role is to serve the public good;” (Report, p. 6) and that “[a]s a mandatory bar, the State Bar is neither a trade association nor a union, and it is not free to act solely, or even primarily, in the self-interest of its members.”

As stated above, we agree that the Bar’s *primary* object is the protection of the public. But a state bar association must not be hindered in advocating strongly in its members’ interests, provided that those interests also benefit the public.

The State Bar of Michigan is not a union or a trade association. It is an organization comprised of members of a profession established by statute as a “public body corporate”, part of and regulated by the judicial branch of the government and charged with promoting improvements in the administration of justice and advancements in jurisprudence, in improving relations between the legal profession and the public, and in promoting the interests of the legal profession in Michigan. (Rule 1 of the Rules Concerning the State Bar of Michigan).

Unions and trade associations are involved in almost exclusively issues related to their members’ self-interest: negotiating contracts with higher wages and better benefits; protecting its members through the establishment of “tenure” laws or the equivalent, etc. A trade organization is not part of or regulated by the government (other than the fact that it must obey the law and in situations when a union is involved in contract negotiations with a governmental agency). The union/trade organization speaks only for its members. Members are not obligated to serve anyone other than their fellow members. Union leaders are not charged with protecting or serving anyone

other than their union members. When one joins a union and pays union dues, it is with the understanding that the money will be spent solely for the purposes of advancing the unions' interests.

But a lawyer is not a tradesman, whose sole responsibility is to do his or her job and do it well, and whose "trade association's" only purpose is to serve its membership.

Our "professional association" is created by statute, self-regulated and administered pursuant to Rules adopted and Orders issued by the Supreme Court, and is comprised of officers of the Court; members who are charged with far more than looking out for their own self-interest. Members of the Bar must promote improvements in the administration of justice (which cannot be done without speaking out on legislative issues that might threaten the administration of justice); and must promote advancements in jurisprudence (which might also involve reaching out to appropriators who might suggest slashing court budgets as a way to pay for other projects).

A lawyer is an officer of the Court, a guardian of the justice system and one who, as a condition of licensure, takes an oath promising to look out for the "defenseless or oppressed" and to "conduct myself personally and professionally in conformity with the high standards of conduct imposed upon members of the bar as conditions for the privilege to practice law in this State." Lawyers are obligated under the Rules of Professional Conduct to provide pro bono services – an acknowledgement of our role as agents of justice.

Membership in the Bar carries with it duties and obligations far beyond the payment of dues – including the duty to advocate for improvements to the justice system, for equal access to the courts for all members of our society, and to speak out when anyone (particularly someone seeking to pass legislation that threatens issues vital to the administration of justice) attempts to undermine the profession, the court system or our citizens' access to justice.

To fulfill this essential role within the justice system, as officers of the Court and guardians of the Rule of Law, lawyers need to be able to speak up as a unified voice when someone takes action that threatens our ability to fulfill our duties and obligations – whether that threat comes via proposed Court Rule, or legislation, or ballot initiative, and even if that action "primarily" benefits lawyers.¹ The State Bar needs to be able to offer programs that on their face appear to be designed solely to benefit its members – like the Lawyers and Judges Assistance Program (helping law students, lawyers and judges who have dependency or mental health problems) and the Practice Management Resource Center (offering training and consultation regarding how to set up and run a law practice) – in order to fulfill the Bar's mission to protect the public from substandard legal representation or ill-prepared attorneys in whom they have placed their trust.

The Supreme Court should not make changes that even suggest a weakening of the State Bar's advocacy on behalf of its members.

VI. THE REPORT THREATENS THE BAR'S ABILITY TO ADVOCATE ON BEHALF OF THE JUSTICE SYSTEM.

Although the Report cites the Custodial Interrogation Recording Task Force and the Judicial Crossroads Task Force as "recent examples of the State Bar's role as a conduit for innovation and consensus," (Report, p. 11), we

¹ Implicit in this issue is the whole "perception" question discussed above. If a legislator offers a bill that would allow anyone over the age of 12 to practice law, could it not be argued that opposition to that bill was based "primarily" on attorneys' desire to limit access to their client base?

fear that acceptance of the limitation imposed on non-judicial advocacy would have a chilling effect that would impact the Bar's ability to advocate on these issues and others.

Depending on how political winds might be blowing at any given time, an effort like the Judicial Crossroads Task Force might be "perceived" to be associated with one party or candidate. Suppose that a gubernatorial candidate heard about the Crossroads Report and adopted one or more of its suggestions as part of her election platform, and she became known as "the candidate who wants to cut waste in the court system." Or that an incumbent Chief Justice running for re-election and nominated by one of the parties was known to be a proponent of reducing the number of courts in the State, which was a key component of that report. Under the standards espoused by the Report, either of those developments could prevent the Bar from advocating in support of that report.

Throughout history in societies based upon the Rule of Law, lawyers serve an essential purpose as an independent voice. We are not minions of political operatives; we are not mere instruments of governmental policy; we are not restricted in whom and what interests we may represent or in our choice of strategies for advancing social or legal change. While we are associated with the judicial branch and are officers of the court, we are not part of government. Our voices and pens have drafted constitutions, proposed laws, challenged established authority, advanced out-of-favor positions and represented unpopular or marginalized people. One is challenged to think of a major issue in the history of the United States in which lawyers have failed to play a significant role.

Just as it is essential that the Court remain an independent branch within government, it is likewise important that the State Bar remain independent from government. It has been so for 80 years and has well served the public, the profession and the Court. In fact, the Court has much benefitted from State Bar advocacy on issues of mutual concern. Under the rules now proposed by the Task Force, the Court will lose an important ally, perhaps on so fundamental an issue as the Court's own independence.²

Eighty years ago, in the same article in which he wrote the words found in the room bearing his name within the State Bar Building ("No organization of lawyers shall long survive which has not for its primary object the protection of the public"), Roberts P. Hudson offered the following analysis of what a unified bar must be to fulfill its mission:

Your organization is designed not only for the benefit and betterment of its members, but primarily for the public at large who require the services of the profession. It ***must never be subservient to political dictation or intimidation, nor control from outside its membership. It cannot represent the interests of any group or political faith.*** It must not draw distinctions of color, race or creed. It must not submit to politically minded leadership. It must not stand aloof from its membership. It must purge itself of the unfit. It must not recognize geographic boundaries. ***It is now and must remain democratic, independent and representative of the best ideals of citizenship.*** (Emphasis added).

² Imagine a ballot initiative to amend the Michigan Constitution to replace the Supreme Court with a single "Czar of Appeals," who need not have attended law school or be licensed to practice law – and the organized Bar being unable to speak out about how ill-advised such a proposal would be. Or a legislative attempt to divert funds that should go to the judiciary to fund legislators' pensions, and the Bar being forced to sit on the sidelines. Both (hopefully attenuated) hypotheticals could occur if the Report's recommendations are adopted as written.

It is only by remaining the democratic, independent and representative voice advocating on behalf of the interests of the public, profession, judiciary, justice system and the Rule of Law on which it is based that the State Bar of Michigan can effectively fulfill its constitutional, statutory and inherent duty to promote improvements in the administration of justice and advancements in jurisprudence, improve relations between the legal profession and the public, and promote the interests of the legal profession in Michigan.

VII. INDIVIDUAL MEMBERS' RIGHTS CAN BE PROTECTED WITHOUT ADOPTING THE REPORT'S UNDULY RESTRICTIVE PROPOSALS.

The Report contains many sound suggestions, including assuring that every member of the Bar is given the opportunity to file his or her dissent to any State Bar advocacy efforts (although some point out that there is nothing to prevent any member from submitting his or her own comments on any proposed Court Rule or legislation even under the current Rules governing the Bar). Likewise, if the Court believes that it would be wise to codify policies and procedures that are in place but unknown to those who are not active in the Bar's day-to-day activities, that would seem to make sense.

But to implement the strictest, most restrictive rules among any unified bar in the country engaging in non-judicial advocacy based on a handful of positions taken over the past forty years which prompted only two formal complaints by members is akin to using a sledge hammer to kill a mosquito buzzing around one's head: it is likely to cause drastic unintended consequences, the least severe of which is a major headache.

CONCLUSION

Justice Boyle correctly found in *Falk II* that the injury to a dissenting member's constitutional rights caused by the Bar's use of compelled dues to advocate on issues germane to the Bar's core functions was "not great." By contrast, the limitations on the unified Bar's ability to advocate on non-judicial issues would significantly interfere with the organized bar's ability to fulfill its compelling interest in and critical duty to protect the public, promote improvements in the administration of justice and advancements in jurisprudence, improve relations between the legal profession and the public, and promote the interests of the legal profession in Michigan.

The undersigned therefore implore the Court to reject the Task Force Report's far-too-restrictive limits on the Bar's ability to advocate on non-judicial issues that are germane to the Bar's mission and purpose.

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SIGNATURES ON THE NEXT PAGE

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