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July 15, 2014

Michigan Supreme Court
P.O. Box 30052
Lansing, MI 48909

Re: **Recommendations of the Task Force on the Role of the State Bar**

Dear Justices:

I have recently read the report to the Michigan Supreme Court submitted by the Task Force on the role of the State Bar of Michigan. In summary, I am strongly opposed to the adoption of all of the recommendations made by the Task Force.

The reasons for my opposition are many. It must be obvious to anyone who attempts to read through all of the recommendations that if they are to implemented, it would create a massive amount of bureaucracy in the complex decision making process that is not only unwieldy but unnecessary in my view. It reminds me of the old adage "if it ain't broke, don't fix it". The Bar has functioned extremely well with the current rules over many years.

Briefly, I would like to make the following points:

1. I am not opposed to a mandatory State Bar.

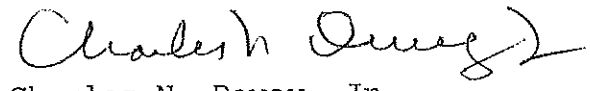
2. There is no need to subject "all State Bar advocacy outside the Judicial Branch to a rigorous Keller process".

3. I don't agree that there is a serious problem with the State Bar advocating issues devoted to attorneys' own economic self-interest or advocating policies that would violate members' first amendment rights. However, if that is deemed to be a serious issue, it can most effectively and simply be solved by adopting the Nebraska method of reducing the mandatory dues to cover only the costs of regulatory functions. Then the State Bar can be prohibited from advocacy activities or from taking politically based positions.
4. Most significantly, the Task Force's position that voluntary section memberships will not be allowed to advocate for positions they believe proper would irrevocably damage a great deal of good that has been accomplished and will in the future be accomplished by those dedicated sections.

   The sole reason for the Task Force's position is a false worry that people will be unable to distinguish between the sections and activities of those of the State Bar itself. Any such concern can, of course, be removed by a simple disclaimer issued by each section that its position is neither endorsed nor opposed by the State Bar of Michigan which is prohibited from taking advocacy positions.
5. With regard to the recommendation that there be better State Bar integration with activities of other attorney regulatory agencies, I do not see that there is any serious problem with the current system. It seems to me that their recommendations create ever more complicated and intrusive rules and regulations.
6. Similarly, I don't see any need to modify the State Bar Governments for greater clarity and efficiency.
7. With regard to Recommendation 5, I agree that the inactive dues can be reduced to an amount that properly reflects the cost to the State Bar of maintaining those inactive members on its rolls.

Very truly yours,

RIZZOBRYAN, P.C.



Charles N. Dewey, Jr.

CND:ks