

# **OPEN SESSION AGENDA ITEM**

## **SEPTEMBER 2018 AUDIT COMMITTEE ITEM III.B.**

**DATE:** September 13, 2018

**TO:** **Members, Audit Committee**

**FROM:** Kimberly DaSilva, Attorney II, Mission Advancement and Accountability

**SUBJECT:** **Update on Compliance Activities**

---

### **EXECUTIVE SUMMARY**

This item will update the Audit Committee on current compliance related activities.

---

### **BACKGROUND**

Among other responsibilities the Audit Committee (committee) is charged with assisting the Board of Trustees in fulfilling its oversight responsibilities related to compliance. Specifically, the committee is required to monitor, review and evaluate the effectiveness and adequacy of the State Bar's internal control structure on an ongoing basis and to ensure that the State Bar's responses to compliance issues are appropriate and timely. The plan outlined below is intended to aid the committee in fulfilling its oversight duties.

### **DISCUSSION**

During the past two months Mission Advancement and Accountability has worked to develop a plan to evaluate the State Bar's existing compliance systems. The plan entails:

- creating an inventory of statutory and rule requirements;
- categorizing requirements by type and responsible division;
- documenting existing methods of compliance;
- evaluating the effectiveness and adequacy of existing compliance methods; and
- recommending modifications to compliance methods, where needed.

To date the work has focused on legal compliance with statutory and rule-based mandates. Staff has identified approximately 200 statutory and rule based requirements of the State Bar and categorized them by type, including whether the duty relates to a report, an agency operation, or an agency policy. That list is included as an attachment to this item. The operational and policy related items identified flow from the statutory and rule-based requirements. The list also has enabled creation of preliminary assignments to State Bar departments that should be responsible for each of the obligations identified.

Categorizing the compliance requirements in this way enabled staff to understand the scope of the project. For example, 35 of the approximately 200 total statutory requirements necessitate a report. In early 2018, the State Bar put in place a tracking system for ensuring that mandated reports are produced and delivered in compliance with statute.

Approximately 100 items fall into the operational category.<sup>1</sup> After the assignment of responsibility for these requirements is confirmed, this list will be evaluated to establish priorities for further evaluation. Approximately 40 items fall into the policy category. For these, too, staff will confirm the division responsible for the work, and then prioritize the list to ensure that work on the most important compliance elements is completed first.

Finally, the identification of operational compliance requirements provides an opportunity for identifying areas in which to conduct performance audits – another part of the Audit Committee's charge. State Bar staff working on compliance tracking will work with staff in the Office of Research and Institutional Accountability (ORIA) to identify components of the State Bar's operations that are bound by statutory requirements and work to ensure that Performance Audits conducted by ORIA staff align with the priorities identified through this compliance process.

Implementing the overall system is planned to begin in early 2019.

#### **FISCAL/PERSONNEL IMPACT**

None

#### **RULE AMENDMENTS**

None

#### **BOARD BOOK AMENDMENTS**

None

#### **STRATEGIC PLAN GOALS & OBJECTIVES**

Goal: 3. Improve the fiscal and operational management of the State Bar, emphasizing integrity, transparency, accountability, and excellence.

#### **RECOMMENDATION**

None

#### **ATTACHMENT(S) LIST**

A. List of Statutory and Rule-Based Mandates

---

<sup>1</sup> Approximately a dozen items currently have a dual categorization because they contain both operational and policy related components.

### List of Statutory and Rule-Based Mandates

Type	Source	Specifics
Approval	CRC 9.6(a)	State Bar CBE Responsible for Determining Bar Exam Subject to Supreme Court Approval
Operations	CRC 9.2(b)(4)	State Bar Keeps Record of all Fee Scaling and Fee Waivers
Operations	CRC 9.6(b)	State Bar Must Analyze Bar Exam Every Seven Years or When Directed by Supreme Court
Operations	CRC 9.8(a)	State Bar Maintains Roll of Attorneys
Operations	CRC 9.8(b)	State Bar Authorized to Annually Recommend One-time Expungement of Suspension of Attorneys for Nonpayment of Licensing Fee
Operations	CRC 9.8(c)	State Bar Maintains Internal Records on Recommended Expungements for JNE
Operations	CRC 9.8(e)	Board is Authorized to Adopt Rules and Regulations To Comply with Rule
Operations	CRC 9.9(c)	State Bar Prohibited from Using E-Mail for Notice of Disciplinary or Regulatory Proceedings
Operations	CRC 9.9.5(g)	State Bar Must Keep Attorney Fingerprint Information Confidential
Operations	CRC 9.10(a)	State Bar Court Must Impose or Recommend Discipline in Criminal Conviction Matters as in Other Disciplinary Proceedings
Operations	CRC 9.11(a)(2)	State Bar Court Applicant Evaluation and Nomination Committee Composition Requirements
Operations	CRC 9.11.(a)(3)	State Bar Court Applicant Evaluation and Nomination Committee Must Adopt Specified Procedures
Operations	CRC 9.11(a)(4)	Board Must Provide Facilities and Support Staff Needed by State Bar Court Applicant Evaluation and Nomination Committee
Operations	CRC 9.12	State Bar Court Review Department Must Independently Review Appeals
Operations	CRC 9.13(a)	State Bar Serves and Files Supplemental Brief After Licensee Files Petition for Review of Disbarment
Operations	CRC 9.19(a)	State Bar Must Base Conditions of Reapproval on Public Protection
Operations	CRC 9.21(c)	State Bar Must File Resignation of Licensees with Disciplinary Charges Pending
Operations	CRC 9.22(a)	State Bar Annual Recommendation for Suspension of Attorneys for Delinquent Payments
Operations	CRC 9.22(c)	State Bar Authorized to Recommend Suspension of Attorneys Delinquent in Payments of Court Ordered Debt
Operations	CRC 9.23	State Bar Authorized to Enforce Disciplinary Orders as Money Judgments
Operations	CRC 9.31(f)	State Bar Authorized to Expunge Public Record of Inactive Enrollment for Failure to Comply with Continuing Legal Education
Operations	CRC 9.31(g)	State Bar Will Remove Record of Inactive Enrollment for Failure to Comply with Continuing

### List of Statutory and Rule-Based Mandates

Type	Source	Specifics
		Legal Education but Must Maintain for JNE Purposes
Operations	CRC 9.35(d)	State Bar Will Suspend Certification of Specialist Who Fails to Comply with Specialization Program
Operations	CRC 9.42(b)	State Bar Establishes and Administers Certified Law Student Program
Operations	CRC 9.43(b)	State Bar Must Establish and Administer Out of State Attorney Arbitration Counsel Program
Operations	CRC 9.44(b)	State Bar Must Establish and Administer Foreign Attorneys Program
Operations	CRC 9.44(e)	State Bar Will Suspend or Revoke Registration of Foreign Attorney Who Fails to Comply with Program
Operations	CRC 9.45(f)	State Bar May Set Application Fees and Annual Registration Fees for Legal Services Attorneys
Operations	CRC 9.45(g)	State Bar May Establish and Administer Program for Registering California Legal Services
Operations	CRC 9.46(h)	State Bar Must Establish and Administer Program for Registering In-House Counsel
Operations	Bar PR 6.3(A)	State Bar Will Post Candidate Information on its Website
Operations	Bar PR 6.91	State Bar Office Location Requirements
Operations	Bar PR 7.66(c)	State Bar Executive Director Assigns Temporary JNE Reconsideration Review Committee Member When Sitting Member Recuses Her/Himself
Operations	B&P 6001	State Bar Shall Publicize to Licensees that they have right to limit sale or disclosure of Licensee Information not reasonably related to regulatory Purposes
Operations	B&P 6007	Involuntary Enrollment as an Inactive Member
Operations	B&P 6008.6	State Bar Shall Comply with Public Contract Code
Operations	B&P 6008.7	Alignment of Purchasing Policies
Operations	B&P 6009.5	Centralized Mechanism for Reporting Demographics
Operations	B&P 6011	Goal of 13 Person Board
Operations	B&P 6013.1(e)	State Bar Board of Trustees Appointment Administration
Operations	B&P 6013.5	6 Max Public Members on Board
Operations	B&P 6016	Board Attorney Tenure Shall be 4 years and Vacancies Shall be Filled
Operations	B&P 6022	State Bar Secretary Annual Election
Operations	B&P 6023	Officers Continue until Successor Election
Operations	B&P 6024	Duties of Officers

### List of Statutory and Rule-Based Mandates

Type	Source	Specifics
Operations	B&P 6025	Board Annual Meeting and Quorum Setting Requirements
Operations	B&P 6026	Annual Board Meeting Report Requirements
Operations	B&P 6026.7(a)	Board of Trustees Subject to Bagley-Keene Open Meeting Act
Operations	B&P 6026.11	State Bar California Public Records Act Conformity
Operations	B&P 6028	Public Board Member Shall Receive \$50 per Day
Operations	B&P 6031.5(c)	State Bar Collects Fees for Conference of Delegates of California Bar Associations
Operations	B&P 6032	State Bar Collects Voluntary Fees for California Supreme Court Historical Society
Operations	B&P 6033(a)	State Bar Collects Voluntary Fees for Legal Services
Operations	B&P 6033(b)	Contributions of Money for Legal Services Adjusted
Operations	B&P 6034	State Bar Participation in Franchise Tax Board Intercept Collections Program
Operations	B&P 6046.6(b)	Committee of Bar Examiners Must Communicate with Law School Council
Operations	B&P 6054(b)	State Bar Shall Require Applicants to Submit Fingerprints
Operations	B&P 6054(b)	State Bar Shall Notify California DOJ of Licensee Status Change and Applicant Denials
Operations	B&P 6054(c)	State Bar Shall Request Arrest Notifications from California DOJ
Operations	B&P 6074(a)	State Bar Administration of Pro Bono Legal Services for Veterans and Their Families
Operations	T&R 19280	State Bar Participation in Franchise Tax Board Court Ordered Debt Program [2019]
Operations	B&P 6044.5	Disclosure of Information from Investigations or Formal Proceedings
Operations	B&P 6056 (e)	State Bar Ensures that Former Section Staff are Reassigned to Comparable Positions
Operations	B&P 6056.3	State Bar Transfers to California Lawyers Association
Operations	B&P 6060.7(b)	Committee of Bar Examiners Approval, Regulation and Oversight of Law Schools
Operations	B&P 6063	Committee of Bar Examiners Collect Fees for Admission to Practice Law
Operations	B&P 6069	State Bar Annual Notification to Licensees of Authorization for Disclosure of Financial Records
Operations	B&P 6074(a)	State Bar Administers Pro Bono Legal Services to Veterans Program
Operations	B&P 6074(b)	State Bar Engages with Local Bar Associations and Others to Provide Veterans Legal Services Throughout the State
Operations	B&P 6074(c)	State Bar Provides Resources and Educational Materials on Veterans Legal Services
Operations	B&P 6074(c)(1)	State Bar Provides Resources and Educational Materials on Veterans Legal Services, Lists Them on Website

### List of Statutory and Rule-Based Mandates

Type	Source	Specifics
Operations	B&P 6074(c)(1)	State Bar Conducts Survey of Programs Serving Veterans
Operations	B&P 6079.1	State Bar Court Hearing Judges Requirements
Operations	B&P 6080	Board Keep Record of all Discipline Proceedings
Operations	B&P 6081	Board Shall Notify California Supreme Court of Disbarment Recommendation
Operations	B&P 6086.7(c)	State Bar Shall Investigate Court Notifications on Attorney
Operations	B&P 6091	State Bar Shall Investigation and May Audit Client Trust Funds
Operations	B&P 6093.5	Disciplinary Agency Shall Notify Complainant of Status Upon Request
Operations	B&P 6095	Disciplinary Agency Shall Hold Two Public Hearings Annually
Operations	B&P 6106.6	State Bar Shall Investigate Attorneys Sued for Insurance Fraud
Operations	B&P 6126.3	State Bar Authority to Assume Jurisdiction for Unlicensed Practice of Law
Operations	B&P 6126.4	State Bar Authority to Assume Jurisdiction for Unlicensed Practice of Law Relating to Immigration Consultants
Operations	B&P 6140.9	Attorney Diversion and Assistance Program Funded by Licensee Fees of \$10 or \$5
Operations	B&P 6140.37	State Bar Shall have a Preference for In-House Information Technology Projects
Operations	B&P 6140.5	Board Shall Establish and Administer Client Security Fund
Operations	B&P 6141.3	State Bar to Provide Discounts and Benefits for Insurance and Affinity Programs
Operations	B&P 6142	State Bar to Provide Certificates of Annual Fee Payment
Operations	B&P 6144(a)	Annual Fees Become Part of State Bar Treasury
Operations	B&P 6144(b)	Distribution of Annual Fees Paid Pursuant to Voluntary Dues for California Lawyers Association Distributed to the Association
Operations	B&P 6144.1	State Bar Holds Proceeds from Real Property Sales Until Approved by Legislature
Operations	B&P 6155(f)	State Bar Formulate and Enforce Rules on Lawyer Referral Services
Operations	B&P 6156(b)	State Bar Shall Deposit Money Received for Violating Lawyer Referral Service Rules into Special Fund
Operations	B&P 6158.4(h)	State Bar Shall Deposit Money Received for False, Misleading or Deceptive Legal Advertising into Client Security Fund
Operations	B&P 6158.4(j)	State Bar Shall Maintain Records on False, Misleading or Deceptive Legal Advertising Complainants and Complaints for Seven Years
Operations	B&P 6161	State Bar Issues Certificate of Registrations of Law Corporations

### List of Statutory and Rule-Based Mandates

Type	Source	Specifics
Operations	B&P 6161.2	State Bar Deposits Fees for Registration and Renewal of Law Corporations into Treasury to be used for Regulatory and Disciplinary Purposes
Operations	B&P 6163(b)	Chief Executive Officer (or Designee) Shall Suspend Certificate of Registration for Delinquent Law Corporation Reports
Operations	B&P 6174	State Bar Deposits Fees from Limited Liability Partnerships into Treasury to be used for Regulatory and Disciplinary Purposes
Operations	B&P 6180.12	State Bar Reimburses Licensees Required to Resolve Disbarred, Suspended or Inactive Licensee Cases
Operations	B&P 6201	Fee Arbitration Procedure Shall Provide that Licensees Must Provide Clients with Notice of Action Against Client
Operations	B&P 6204.5(a)	State Bar Rule Requirement for Procedure to Disqualify Arbitrator
Operations	B&P 6204.5(b)	State Bar (or Delegate) Notice to Parties of Right to Judicial Review of Arbitration Proceedings
Operations	B&P 6211	State Bar Uses Interest from IOLTA Accounts for Legal Services to Indigent Persons
Operations	B&P 6216	State Bar Shall Distribute Money Received for Legal Services for Provision of Legal Services to Indigent Persons
Operations	B&P 6232	Attorney Diversion and Assistance Committee Establishes Practices and Procedures for Attorney Diversion and Assistance Program
Operations	B&P 6235(b)	State Bar Shall Establish Financial Assistance for Attorney Diversion and Assistance Program
Operations	B&P 6236	State Bar Shall Engage in Public Outreach to Spread Awareness of Attorney Diversion and Assistance Program
Operations	B&P 6243(b)	State Bar Shall Provide Notice of Clients' Right to File Complaint with Executive Office for Immigration Review for the US Department of Justice
Operations	GC 12011.5(b)	Judicial Nominee Evaluation State Bar (JNE Commission) Composition and Training Requirements
Operations	GC 12011.5(c)-(h)	State Bar Judicial Nominee Evaluation (NJE Commission) Procedural Requirements
Operations	GC 12011.5(c)	State Bar Judicial Nominee Evaluation Reports to Governor
Policy	CRC 9.9.5(a)(1)	State Bar Contracts with California DOJ for Arrest Notification Services on Licensees
Policy	CRC 9.9.5(a)(2)	State Bar Required to Consider California DOJ Arrest Notification as Satisfying Attorney Fingerprinting Requirement
Policy	CRC 9.9.5(f)(1)	State Bar Required to Develop a Schedule for Attorney Fingerprint Requirement

### List of Statutory and Rule-Based Mandates

Type	Source	Specifics
Policy	CRC 9.9.5(f)(2)	State Bar Authority to Require Attorney Fingerprints
Policy	CRC 9.9.5(f)(3)	State Bar Authority to Require Special Admissions Attorney Fingerprints
Policy	CRC 9.9.5(h)(2)	State Bar Develops Procedures for Granting Financial Hardship Waivers for Processing Attorney Fingerprints
Policy	CRC 9.9.5(i)	State Bar Evaluates Notification by Attorneys Unable to Submit Fingerprints
Policy	CRC 9.22(d)	Board Authorized to Adopt Rules and Regulations Necessary to Comply with Delinquent Payment Rule
Policy	CRC 9.31(b)	State Bar Establishes and Administers Continuing Legal Education Program
Policy	CRC 9.31(e)	State Bar Authorized to Set and Collect Fees and Penalties for Continuing Legal Education
Policy	CRC 9.35(b)	State Bar Must Establish and Administer Program for Certifying Legal Specialists
Policy	CRC 9.35(e)	State Bar Authorized to Set and Collect Fees and Penalties for Legal Specialization
Policy	CRC 9.40(e)	Board Fixes Fee for Pro Hac Vice
Policy	CRC 9.42(f)	State Bar Authorized to Set and Collect Fees and Penalties for Certified Law Student Program
Policy	CRC 9.90(a)(6)	State Bar Must Provide Support for Supreme Court's State Bar Nominating Committee
Policy	Bar PR 6.20	Board Reserves Authority Over All Matters Pertaining to the State Bar
Policy	Bar PR 6.40	Board President Responsibilities
Policy	Bar PR 6.41	Board Vice-President, Treasurer Responsibilities
Policy	Bar PR 6.42	Board Secretary Responsibilities
Policy	Bar PR, Title 6, Article V.	State Bar Licensee Meeting Requirements
Policy	B&P 6030	Board Charged with Executive Function
Policy	B&P 6031(b)	Board Member Shall Not Evaluate Judges
Policy	B&P 6046	Committee of Bar Examiners Required Composition
Policy	B&P 6046.5	Committee of Bar Examiners Public Member Terms
Policy	B&P 6056 (c)	State Bar May Assist California Lawyers Association with Appointment to ABA's House of Delegates
Policy	B&P 6056(d)	State Bar Supports Partnership of California Lawyers Association with CEB
Policy	B&P 6056 (f)	State Bar Enters MOU with California Lawyers Association

### List of Statutory and Rule-Based Mandates

Type	Source	Specifics
Policy	B&P 6070	State Bar Request to California Supreme Court for Rule of Court to Establish Mandatory Continuing Education Program
Policy	B&P 6071	State Bar Request to California Supreme Court to Amend Cal Rule of Court 9.31 regarding civil rights violations education
Policy	B&P 6086.1	State Bar Disciplinary Hearings and Records Shall be Public
Policy	B&P 6086.5	Board Shall Establish State Bar Court to Act in its Place
Policy	B&P 6086.65	State Bar Court Review Department Requirements
Policy	B&P 6086.13(c)	State Bar Shall Adopt Rules for Collection of Monetary Sanctions against Attorneys
Policy	B&P 6086.14	Board Shall have Authority to Adopt Standards and Guidelines for Alternative Dispute Resolution Discipline Mediation Program
Policy	B&P 6094.5	Goals and Policy of Disciplinary Agency
Policy	B&P 6106.8	State Bar Shall Create Rule of Professional Conduct on Sexual Relations Between Attorneys and Clients
Policy	B&P 6140	Board Shall Fix Annual Membership Fee
Policy	B&P 6141	Board Shall Fix \$75 Annual Fee for Inactive Licensees
Policy	B&P 6140.03	Board Shall Increase Annual Licensee Fees by \$40 for Nonprofits Providing Free Legal Services
Policy	B&P 6224	State Bar Authority to Deny Funding to Legal Service Providers
Policy	B&P 6225	Board Shall Adopt Regulations and Procedures to Implement Program for Provision of Legal Services to Indigent Persons
Policy	B&P 6231(a)	Board Establishes Committee to Oversee Operation of Attorney Diversion and Assistance Program
Policy	Rules of Professional Conduct, Rule 1-600(B)	Board Shall Formulate and Adopt Minimum Standards for Lawyer Referral Services
Policy / Operations	CRC 9.44(f)	State Bar Authorized to Set and Collect Fees and Penalties for Foreign Attorney Program
Policy / Operations	CRC 9.46(g)	State Bar May Set Fees for Application for Registered In-House Counsel
Policy /	B&P 6046.7(b)	Committee of Bar Examiners Fee for Unaccredited Law Schools

### List of Statutory and Rule-Based Mandates

Type	Source	Specifics
Operations		
Policy / Operations	B&P 6078	Board Power to Recommend Disbarment to California Supreme Court
Policy / Operations	B&P 6079.5	Board Shall Appoint State Bar Chief Trial Counsel
Policy / Operations	B&P 6092.5	Duties of Disciplinary Agency
Policy / Operations	B&P 6163(a)	State Bar Fixes Fee for Filing Annual Law Corporation Reports
Policy / Operations	B&P 6171	State Bar Authority (with Supreme Court permission) to Formulate and Enforce Rules for Investigation of Law Corporations
Policy / Operations	B&P 6200	Board Shall Establish, Maintain and Administer Fee Arbitration Procedure
Policy / Operations	B&P 6231(a)	Board Establishes and Administers Attorney Diversion and Assistance Program
Policy / Operations	B&P 6243(d)	State Bar Shall Provide Notice of Right to File Complaints and Post on Website
Report	CRC 9.5	State Bar CBE / Board Rules for Admission to Practice Law Submitted to Supreme Court
Report	CRC 9.6(b)	State Bar Must Analyze Bar Exam Every Seven Years or When Directed by Supreme Court
Report	CRC Rule 9.6(c)	State Bar Provides Supreme Court Report on Each Bar Exam
Report	CRC Rule 9.11(b)	State Bar Court Applicant Evaluation and Nomination Committee Evaluates and Rates Applicants and Submits Confidential Report of Candidates to Supreme Court
Report	B&P 6001.2(b)	Governance in the Public Interest Taskforce Report
Report	B&P 6031.5(b)	State Bar Collects Fees for California Lawyers Association (CLA); State Bar Collects Voluntary Fees for Conference of Delegates
Report	B&P 6046.6(a)	Committee of Bar Examiners Report to Legislature; Notice of Change in Bar Exam
Report	B&P 6046.8	Board of Trustees Evaluation of Bar Exam Report
Report	B&P 6054	State Bar Fingerprinting Report
Report	B&P 6069.5	State Bar Review and Study of Attorney Errors and Omissions Insurance Report
Report	B&P 6070	State Bar Shall Request California Supreme Court to Adopt Rule of Court Authorizing State Bar

### List of Statutory and Rule-Based Mandates

Type	Source	Specifics
		to Establish and Administer Mandatory Continuing Legal Education Program
Report	B&P 6074(c)(2)	State Bar Provides Resources and Educational Materials on Veterans Legal Services, Report and Recommendations on Website
Report	B&P 6086.15	State Bar Annual Discipline Report to Legislature
Report	B&P 6095(b)	Disciplinary Agency Annual Report on Disciplinary Proceedings
Report	B&P 6126.7	Board Report on Funds Collected and Expended under this Section
Report	B&P 6140.1	State Bar Submits Annual Budget (Report)
Report	B&P 6140.1	State Bar Submits Annual Budget and Proposed Next Year's Budget [2019]
Report	B&P 6140.12	State Bar Five-Year Strategic Plan with Two-Year Updates
Report	B&P 6140.2	Goal for Timely Disposition of Complaints
Report	B&P 6140.56	State Bar Analysis and Review of Client Security Fund
Report	B&P 6145(a)	State Bar Annual Financial Statement Report
Report	B&P 6145(b)	State Bar Bi-Annual Performance Audit Report
Report	B&P 6145(c)	State Bar Enhanced Performance Audit Report
Report	B&P 6177	State Bar Reports to Legislature on Complaints Filed and Disciplinary Action Taken
Report	B&P 6222	Board of Trustees Includes Recipients of Funds for Legal Service Providers in Annual Report of State Bar Receipts and Expenditures
Report	B&P 6238	Attorney Diversion and Assistance Committee Annually Reports to Board of Trustees and Legislature
Report	CC 55.32(f)	State Bar Annual Disability Access Report
Report	GC 12011.5(n)(1)(B)	Judicial Nominee Evaluation (JNE Commission) Statewide Demographic Report
Report	GC 86116	Quarterly lobbyist report
Report	GC 8548.9 (c)	Audited Agency Report to State Auditor on Recommendations Not Implemented
Report	Ins. Code 1872.95	State Bar Report on Fraud Investigation Cases
Report	T&R 19528	State Bar Provides Occupational License Information to Franchise Tax Board Upon Request
Report	<i>Keller v. State Bar of</i>	Statement of Expenditures of Mandatory Dues

### List of Statutory and Rule-Based Mandates

Type	Source	Specifics
	<i>California</i> , 496 U.S. 1 (1990)	
Report	GC § 87302	Conflict of Interest Statements
Report	GC § 53051	Amended Statement of Legal Existence