



The State Bar of California

OPEN SESSION

AGENDA ITEM

50-2 NOVEMBER 2022

FINANCE COMMITTEE III.A

DATE: November 17, 2022

TO: Members, Finance Committee
Members, Board of Trustees

FROM: Dina DiLoreto, Program Director, Attorney Regulation & Consumer Resources

SUBJECT: Approval of 2023 Changes to Schedule of License Fees, Penalties, Charges, and Deadlines

EXECUTIVE SUMMARY

This item recommends the level of fees, costs, and penalties to be set for 2023, consistent with the statutory authority in licensing fee legislation, Assembly Bill (AB) 2958, which will become law effective January 1, 2023. The recommended 2023 annual licensing fee is \$510 for active licensees and \$177.40 for inactive licensees. Staff are recommending updates to the State Bar's Schedule of Charges and Deadlines regarding the associated fees, penalties, and deadlines for licensing fees as well as for other annual compliance requirements (Rules of the State Bar, Appendix A).

The item also seeks the Board's authorization to proceed with a suspension recommendation to the Supreme Court for licensees who have not fully paid fees, penalties, or costs by the final deadline; and to enroll as involuntary inactive those licensees who have not complied with MCLE requirements or with CTAPP requirements, by the final deadline.

BACKGROUND

The California Business and Professions Code requires that each year the Board of Trustees fix the amount of the annual fees for licensed attorneys, not exceeding the amounts specified in

section 6140¹ for those eligible for the active rate, and in section 6141 for those eligible for the inactive rate, plus other specified amounts in related provisions (such as \$40 per active licensee to support the Client Security Fund. (See Business and Professions Code section 6140.55.) Under AB 2958², the total annual fees at the active and inactive rates may not exceed \$510 and \$177.40, respectively.

DISCUSSION

ANNUAL LICENSING FEES

Under AB 2958, effective January 1, 2023, the State Bar will be authorized to assess annual fees of \$510 and \$177.40 for active and inactive licensees respectively, as follows:

Active Fee		
Source	Purpose	\$ Amount
§6140	General	390
§6140.03	Legal Services Assistance	45
§6140.55	Client Security Fund	40
§6140.6	Discipline	25
§6140.9	Lawyer Assistance Program	10
Total Active Fee		510

Inactive Fee		
Source	Purpose	\$ Amount
§6141	General	92.40
§6140.03	Legal Services Assistance	45
§6140.55	Client Security Fund	10
§6140.6	Discipline	25
§6140.9	Lawyer Assistance Program	5
Total Inactive Fee		177.40

¹ All statutory references are to the California Business and Professions Code unless otherwise indicated.

² AB 2958 was approved by the Governor on September 18, 2022, and will become law, effective January 1, 2023. Cal. Const. art. IV, §10(b)(2).

The active and inactive fees may be reduced as follows:

\$2 Deduction for Elimination of Bias Programs

Staff recommends that \$2 of the annual fee continue to be dedicated to funding the State Bar's Elimination of Bias programs, and to be listed on the 2023 invoice as an optional deduction. This amount is unchanged from 2022.

\$45 Legal Services Assistance

Business and Professions Code section 6140.03 provides that \$45 will continue to be added to and allocated from the annual fees for the purposes established pursuant to section 6033, except to the extent that an attorney elects not to support those activities. The financial support is for nonprofit organizations that provide free legal services to persons of limited means. AB 2958 requires \$5 of the \$45 to be allocated, pursuant to a competitive grant process, to qualified legal services projects or qualified support centers to fund law student summer fellowships for purposes of supporting law students interested in pursuing a career in legal services for indigent persons. Attorneys electing not to support this funding may deduct the \$45 from their annual fees.

Waiver of Annual Fees ("Scaling")

Under section 6141.1, an attorney on active status who has a total gross annual individual income from all sources of less than \$60,478.35 may request to scale or reduce annual licensing fees by 25 percent.

Optional Donations Presented on Annual Fee Statement

\$5 Donation for Legislative Activity

AB 2958 amends Business and Professions Code section 6140.05 so that the \$5 per attorney to support State Bar lobbying and related activities, formerly listed as an optional deduction for those who elect not to support such activities, will be listed on the 2023 fee statement as an optional donation. This \$5 will no longer be included in the base licensing fee.

Other donation options presented on the fee statement, and remaining in effect for 2023, include \$100 for the Justice Gap Fund, \$75 for California ChangeLawyers, and \$25 for the California Supreme Court Historical Society.

PENALTIES

Late Payment Penalties

Under section 6143, the Board is authorized to impose penalties on any licensed attorney, active or inactive, for failing to pay any fees, penalties, or costs after they become due. Rule 2.13 of the Rules of the State Bar provides that "[l]ate payment of annual license fees is subject

to the penalties set forth in the Schedule of Charges and Deadlines.” (Attachment A). Rule 2.33(C) further imposes a reinstatement fee—in addition to accrued fees, penalties, and costs—that a suspended attorney must pay to terminate the suspension for nonpayment. By statute, the annual due date is February 1. For 2023, staff recommends that a penalty be assessed in the amount of \$100 for active fees and \$30 for inactive fees if full payment is not received by February 10, 2023. Staff recommends a reinstatement fee to terminate a suspension for nonpayment in the amount of \$100. This timeline and these amounts are unchanged from 2022.

Charge for Returned Payments

No changes are recommended to the charge applied when a payment is returned by the bank due to insufficient funds, or other qualifying reasons. This fee, currently set at \$20, partially defrays costs incurred by the State Bar when handling any returned payment.

Charge for Nonconforming Payments

If the Board approves changes to rule 2.13 as recommended in item 50-8, new for 2023, staff recommends that a charge be applied when a payment in the form of a paper check is submitted without proper processing documentation. Proper processing documentation includes a printed pay-by-mail invoice generated through My State Bar Profile, after having calculated fees, or a printed personalized fee statement. Staff recommends that the fee be set at \$100.

MCLE Noncompliance and Reinstatement from MCLE Inactive Enrollment

Rule 2.71 of the Rules of the State Bar pertaining to attorney compliance with Minimum Continuing Legal Education requirements provides that “[f]ees for noncompliance are set forth in the Schedule of Charges and Deadlines.” These include fees set by the Board for MCLE noncompliance, for failure to prove compliance when selected for MCLE audit, and for reinstatement to terminate MCLE inactive enrollment. For 2023, consistent with the timeline for paying licensing fees, staff recommends that penalties be assessed to those attorneys with a February 1, 2023, due date if they have not reported compliance by February 10, 2023. The amount recommended for the MCLE noncompliance fee is \$75. The amount recommended for the MCLE audit deficiency fee is \$200. The amount recommended for the reinstatement fee is \$200. These fee amounts are unchanged from 2022.

CTAPP Noncompliance and Reinstatement from CTAPP Inactive Enrollment

Rule 2.5 of the Rules of the State Bar pertaining to attorney compliance with the new Client Trust Account Protection Program (CTAPP) requirements, provides that “Fees for noncompliance with any of the requirements..., including a reinstatement fee to terminate CTAPP inactive enrollment, are set forth in the Schedule of Charges and Deadlines.” While rule 2.5 of the Rule of the State Bar, dictates that the CTAPP reporting deadline is the same as the deadline for paying annual license fees, for 2023, staff recommends that CTAPP penalties be assessed to those attorneys subject to the February 1, 2023, due date if they have not

completed their reporting by April 3, 2023. This extended grace period before penalties attach, suggested for this first year only, will allow more time for the learning curve that may be required for licensees and agencies to conform to this new reporting requirement. In addition, an extended grace period is recommended due to a limitation in the CTAPP reporting environment which will result in licensees and agencies being unable to enter CTAPP information prior to January 1, 2023. In future years, we expect that further enhancements to the reporting application will make CTAPP reporting more efficient and will allow licensees to complete significant portions of the reporting requirements at the onset of the billing period. Consistent with MCLE penalties, the amount recommended for the CTAPP noncompliance fee is \$75, and the amount recommended for the reinstatement fee is \$200.

Interest on Client Security Fund Reimbursements

Under section 6140.5(c), the Board is authorized to set an applicable interest rate for Client Security Fund (CSF) reimbursement costs. The Board has set this interest rate at 10 percent and CSF staff requests that the 10 percent annual interest rate be retained and calculated from the date of disbursement in 2023. The CSF reimbursement amount, plus any applicable interest rates and costs, become part of the annual fee. This is unchanged from 2022.

Penalty for Noncompliance with Mandatory Fee Arbitration Awards

Also unchanged, the Board is authorized under section 6203(d)(3) to impose an administrative penalty on an attorney who, in a fee dispute with a client, has failed to comply with a binding arbitration award, judgment, or agreement, not to exceed 20 percent of the amount ordered refunded to the client or \$1,000, whichever is greater. The Board in its discretion may also require an attorney to pay the reasonable costs of the arbitration. The noncompliance penalty and costs become part of the annual fee for the following calendar year.

Fees and Late Payment Penalties for 2023 New Admittees

All newly licensed attorneys, when first admitted to the practice of law, are enrolled on active status. (See section 6004 and Rules of the State Bar, Rule 2.12.) Within 45 days of the invoice date from the State Bar, new admittees must pay initial active fees. Consistent with Rule 2.12, new admittees will be charged full annual fees (\$510) if admitted between January 1 and May 31, 2023; one-half the annual fee (\$255) if admitted between June 1 and November 30, 2023, and that 2023 fees be waived if admitted in December 2023. Late payers will be assessed the same penalty as other licensees (\$100), except for those admitted between June 1 and November 2023, and who are charged only one-half the annual fee. If payment is late for the latter group, they will be assessed a \$50 penalty (one-half the regular late fee). These proposed penalty amounts are unchanged from 2022.

SUSPENSION FOR NONPAYMENT AND INACTIVE ENROLLMENT FOR NONCOMPLIANCE

For the 2023 billing year, initial billing and compliance notice will be emailed to attorneys during the first week of December 2022, setting forth the February 1, 2023, due date for payment of annual fees and MCLE compliance. Several additional reminder notices will be sent

prior to February 1. Monthly email reminders will be sent after late penalties have been assessed, leading up to the final deadline. Notice of CTAPP reporting requirements will be sent with the initial billing and MCLE compliance notices. Additional CTAPP reminders will be sent regularly both before and after the extended penalty assessment deadline of April 3 and will continue through the final compliance deadline of June 30.

Nonpayment of License Fees, Penalties, or Costs

Attorneys whose payments are not received by February 10, 2023, will be assessed the late payment penalty. A final delinquent notice will be mailed in hard copy to all unpaid attorneys on March 17, 2023. Pursuant to section 6143, the Board may recommend to the Supreme Court of California the suspension of licensees who have not fully paid State Bar annual fees, penalties, or costs, two months after sending this delinquency notice. In this item, staff is seeking the authority to proceed with filing the Board's suspension recommendation at the end of May, setting forth a final payment deadline of June 30, 2023.

MCLE Noncompliance

Attorneys in MCLE Group 3 (last names N-Z) are due to report MCLE compliance by February 1, 2023. Any attorneys who have not reported compliance by February 10, 2023, will be assessed a \$75 noncompliance fee. On April 28, 2023, staff will send a 60-Day notice, setting forth the final June 30, 2023, compliance deadline for those Group 3 attorneys who remain noncompliant, as well as to attorneys in any other MCLE Group who had been granted extensions of time and have not complied by their extended deadlines. Pursuant to California Rules of Court, rule 9.31, this item seeks the Board's approval to enroll as involuntarily inactive any attorney subject to the 2023 final deadline who does not bring themselves into compliance by June 30, 2023.

CTAPP Noncompliance

Administration of the new CTAPP requirements will be similar to MCLE timelines and protocols, except for the initial penalty assessment (for this first year only). Attorneys who fail to comply with CTAPP reporting requirements by April 3, 2023, will be assessed a \$75 penalty. They will be sent a noncompliance notice by the end of April, setting forth the June 30, 2023, final deadline. This item seeks the Board's approval to enroll as involuntary inactive any attorney subject to CTAPP reporting requirements who has not brought themselves into compliance by June 30, 2023.

FISCAL/PERSONNEL IMPACT

The 2023 projected budget will be based on active fees set at \$510 (reduced to \$255.00 for those admitted between June 1 and November 30, 2023) and that the inactive fee will be \$177.40. The forecast and budget will take into consideration the \$2 elimination of bias deduction and the \$45 legal services assistance deduction available to attorneys.

AMENDMENTS TO RULES OF THE STATE BAR OF CALIFORNIA

Schedule of Charges and Deadlines, Appendix A of the Rules of the State Bar

AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL

None

STRATEGIC PLAN GOALS & IMPLEMENTATION STEPS

None – core business operations

RECOMMENDATIONS

Should the Finance Committee concur in the proposed action, passage of the following resolution is recommended:

RESOLVED, that the Finance Committee recommends that the Board of Trustees approve and set, subject to AB 2958 becoming law, the annual licensing fee for 2023 at \$510 for active status and at \$177.10 for inactive status; and it is

FURTHER RESOLVED, that, as required by Business and Professions Code section 6140.05, a \$5 deduction from annual fees be available for any attorney who elects not to fund State Bar lobbying and other legislative activity; and it is

FURTHER RESOLVED, that a \$2 deduction from annual fees be available for any attorney who elects not to fund State Bar programs that support the elimination of bias; and it is

FURTHER RESOLVED, that for the Legal Services Assistance Fee under Business and Professions Code section 6140.03, a \$45 deduction from the annual fee be provided to each attorney who elects not to have this amount allocated to support nonprofit organizations that provide free legal services to persons of limited means; and it is

FURTHER RESOLVED, that the 2023 annual fees for new attorneys admitted in 2023 be set as follows: fees of \$510 for those admitted between January 1 and May 31, 2023, and \$255 for those admitted between June 1 and November 30, 2023; and it is

FURTHER RESOLVED, that the deadlines and penalties as proposed on the attached Appendix A: Schedule of Charges and Deadlines for 2023 (Attachment A), be applied to delinquent 2023 annual fees; and it is

FURTHER RESOLVED, that the MCLE noncompliance fee remain set at \$75, the MCLE audit deficiency fee remain set at \$200, and the MCLE reinstatement fee to terminate MCLE inactive enrollment remain set at \$200; and it is

FURTHER RESOLVED, that the CTAPP noncompliance fee be set at \$75, and the CTAPP reinstatement fee to terminate CTAPP noncompliance inactive enrollment be set at \$200; and it is

FURTHER RESOLVED, that the interest on assessed costs for reimbursement to the Client Security Fund be set at 10 percent annually calculated from the date of disbursement as set forth by the Board, pursuant to Business and Professions Code section 6140.5(c); and it is

FURTHER RESOLVED, that the administrative penalty on failure to comply with binding arbitration is charged at a fee not to exceed 20 percent of the amount ordered refunded to the client or \$1,000 whichever is greater; and it is

FURTHER RESOLVED, that the Finance Committee recommend that the Board of Trustees forward to the Supreme Court of California the names of those licensees to be suspended from the practice of law in California for failing to pay State Bar fees, penalties, or costs on or before June 30, 2023, and hereby:

(a) delegates to State Bar staff the ministerial functions for determining that each person who is to be recommended to the Supreme Court of California for suspension due to nonpayment of fees is licensed by the State Bar of California, and that each such person failed to fully pay fees, penalties, and/or costs as established pursuant to the provision of sections 6086.10, 6140, 6140.5(c), 6140.55, 6140.6, 6140.7, 6140.9, and 6141 of the Business and Professions Code;

(b) instructs State Bar staff to send to each such person, at their address of record with the State Bar of California, two months' written notice of their delinquency which included notice of section 6143 of the Business and Professions Code; and

(d) recommends to the Supreme Court of California that each such person's State Bar license be suspended, which would suspend them from the practice of law in the State of California, effective July 1, 2022, until such time as they may be reinstated, upon the payment of the delinquent fees, penalties, or costs and of such additional fees, penalties, or costs as may have accrued at the time of such payment; and it is

FURTHER RESOLVED, that for the purpose of withdrawing the foregoing recommendation for suspension in particular cases, State Bar staff is authorized and directed to notify the Clerk of the Supreme Court of California of the name of any licensee of the State Bar who, by proper remittance and prior to the effective date of the Supreme Court of California order of suspension based hereon, pays to the State Bar fees, penalties, or costs in the amount in which they are delinquent; and to notify the Clerk of the Supreme Court of California of the consequent withdrawal of the Board of Trustees' recommendation for suspension; and it is

FURTHER RESOLVED, that for the purpose of modifying the recommendation to the Supreme Court of California for suspension for nonpayment of fees, penalties, or costs, State Bar staff is authorized and directed to change the data as to status or the amounts of delinquency of any licensee and to notify the Clerk of the Supreme Court of California accordingly of the consequent modification of the Board of Trustees' recommendation for suspension; and it is

FURTHER RESOLVED, pursuant to California Rule of Court 9.31 and the Rules of the State Bar, that the Finance Committee recommend that the Board of Trustees authorizes that those attorneys in MCLE Compliance Groups 1, 2, and 3 who do not bring themselves into compliance with their MCLE requirements by June 30, 2023, be enrolled as inactive and placed on "Not Eligible to Practice" status, effective July 1, 2023; and it is

FURTHER RESOLVED, that staff are authorized to remove individual attorneys from inactive status once they have provided proof of compliance and paid all outstanding noncompliance fees; and it is

FURTHER RESOLVED, pursuant to California Rule of Court 9.8.5 and the Rules of the State Bar, that the Finance Committee recommend that the Board of Trustees authorizes that those attorneys who do not bring themselves into compliance with their CTAPP requirements by June 30, 2023, be enrolled as inactive and placed on "Not Eligible to Practice" status, effective July 1, 2023; and it is

FURTHER RESOLVED, that staff are authorized to remove individual attorneys from inactive status once they have complied and paid all outstanding noncompliance fees.

Should the Board of Trustees concur in the proposed action, passage of the following resolution is recommended:

RESOLVED, that the Board of Trustees, upon recommendation of the Finance Committee and subject to AB 2958 becoming law, approve and set the annual licensing fee for 2023 at \$510 for active status and at \$177.10 for inactive status; and it is

FURTHER RESOLVED, that, as required by Business and Professions Code section 6140.05, a \$5 deduction from annual fees be available for any attorney who elects not to fund State Bar lobbying and other legislative activity; and it is

FURTHER RESOLVED, that a \$2 deduction from annual fees be available for any attorney who elects not to fund State Bar programs that support the elimination of bias; and it is

FURTHER RESOLVED, that for the Legal Services Assistance Fee under Business and Professions Code section 6140.03, a \$45 deduction from the annual fee be provided to

each attorney who elects not to have this amount allocated to support nonprofit organizations that provide free legal services to persons of limited means; and it is

FURTHER RESOLVED, that the 2023 annual fees for new attorneys admitted in 2023 be set as follows: fees of \$510 for those admitted between January 1 and May 31, 2023, and \$255 for those admitted between June 1 and November 30, 2023; and it is

FURTHER RESOLVED, that the deadlines and penalties as proposed on the attached Appendix A: Schedule of Charges and Deadlines for 2023 (Attachment A), be applied to delinquent 2023 annual fees; and it is

FURTHER RESOLVED, that the MCLE noncompliance fee remain set at \$75, the MCLE audit deficiency fee remain set at \$200, and the MCLE reinstatement fee to terminate MCLE inactive enrollment remain set at \$200; and it is

FURTHER RESOLVED, that the CTAPP noncompliance fee be set at \$75, and the CTAPP reinstatement fee to terminate CTAPP noncompliance inactive enrollment be set at \$200; and it is

FURTHER RESOLVED, that the interest on assessed costs for reimbursement to the Client Security Fund be set at 10 percent annually calculated from the date of disbursement as set forth by the Board, pursuant to Business and Professions Code section 6140.5(c); and it is

FURTHER RESOLVED, that the administrative penalty on failure to comply with binding arbitration is charged at a fee not to exceed 20 percent of the amount ordered refunded to the client or \$1,000 whichever is greater.

FURTHER RESOLVED, that the Board of Trustees forward to the Supreme Court of California the names of those licensees to be suspended from the practice of law in California for failing to pay State Bar fees, penalties, or costs on or before June 30, 2023, and hereby:

(a) delegates to State Bar staff the ministerial functions for determining that each person who is to be recommended to the Supreme Court of California for suspension due to nonpayment of fees is licensed by the State Bar of California, and that each such person failed to fully pay fees, penalties, and/or costs as established pursuant to the provision of sections 6086.10, 6140, 6140.5(c), 6140.55, 6140.6, 6140.7, 6140.9, and 6141 of the Business and Professions Code;

(b) instructs State Bar staff to send to each such person, at their address of record with the State Bar of California, two months' written notice of their delinquency which included notice of section 6143 of the Business and Professions Code; and

(d) recommends to the Supreme Court of California that each such person's State Bar license be suspended, which would suspend them from the practice of law in the State of California, effective July 1, 2022, until such time as they may be reinstated, upon the payment of the delinquent fees, penalties, or costs and of such additional fees, penalties, or costs as may have accrued at the time of such payment; and it is

FURTHER RESOLVED, that for the purpose of withdrawing the foregoing recommendation for suspension in particular cases, State Bar staff is authorized and directed to notify the Clerk of the Supreme Court of California of the name of any licensee of the State Bar who, by proper remittance and prior to the effective date of the Supreme Court of California order of suspension based hereon, pays to the State Bar fees, penalties, or costs in the amount in which they are delinquent; and to notify the Clerk of the Supreme Court of California of the consequent withdrawal of the Board of Trustees' recommendation for suspension; and it is

FURTHER RESOLVED, that for the purpose of modifying the recommendation to the Supreme Court of California for suspension for nonpayment of fees, penalties, or costs, State Bar staff is authorized and directed to change the data as to status or the amounts of delinquency of any licensee and to notify the Clerk of the Supreme Court of California accordingly of the consequent modification of the Board of Trustees' recommendation for suspension; and it is

FURTHER RESOLVED, pursuant to California Rule of Court 9.31 and the Rules of the State Bar, that the Board of Trustees authorizes that those attorneys in MCLE Compliance Groups 1, 2, and 3 who do not bring themselves into compliance with their MCLE requirements by June 30, 2023, be enrolled as inactive and placed on "Not Eligible to Practice" status, effective July 1, 2023; and it is

FURTHER RESOLVED, that staff are authorized to remove individual attorneys from inactive status once they have provided proof of compliance and paid all outstanding noncompliance fees; and it is

FURTHER RESOLVED, pursuant to California Rule of Court 9.8.5 and the Rules of the State Bar, that the Board of Trustees authorizes that those attorneys who do not bring themselves into compliance with their CTAPP requirements by June 30, 2023, be enrolled as inactive and placed on "Not Eligible to Practice" status, effective July 1, 2023; and it is

FURTHER RESOLVED, that staff are authorized to remove individual attorneys from inactive status once they have complied and paid all outstanding noncompliance fees.

ATTACHMENT LIST

- A.** Appendix A: Schedule of Charges and Deadlines for 2023

RULES OF THE STATE BAR OF CALIFORNIA
 APPENDIX A: SCHEDULE OF CHARGES AND DEADLINES FOR 2023
 ANNUAL FEES
 Adopted July 2007; Revised November 17, 2022

The Rules of the State Bar provide that “If a rule refers to the Schedule of Charges and Deadlines, the referenced date or amount is part of the rule.”¹ Unrevised rules state such amounts or dates in their text or otherwise indicate what they are.

Charges and deadlines are adopted by the Board of Trustees unless otherwise indicated.

Note: Charges are base amounts that may be increased as specified by rule or otherwise authorized by law.

<i>Rule</i>	<i>Description</i>	<i>Amount</i>	<i>Deadline</i>
2.5 (J)	CTAPP noncompliance	\$75.00	April 3
	Reinstatement fee to terminate CTAPP inactive enrollment	\$200.00	At time reinstatement is requested
2.11	Annual fees at active rate	\$510.00	February 1
	Annual fees at inactive rate	\$177.40	February 1
2.12	(A) Admitted between January 1 and May 31	\$510.00	45 days from invoice date
	(B) Admitted between June 1 and November 30	\$255.00	45 days from invoice date
	(C) Administrative fee for admission in December	None	
2.13	Penalties for late payment of annual fees received at the State Bar <i>after February 10</i> .		
	Billed at active rate	\$100.00	February 10
	Billed at inactive rate	\$30.00	February 10
	Attorneys admitted between Jan. 1 and May 31	\$100.00	45 days from invoice date
	Attorneys admitted between June 1 and Nov. 30	\$50.00	45 days from invoice date
2.15	(A) Scaling deadline for qualified active attorneys (25% reduction of base active fee of \$ 463.00)	\$394.25	Feb. 1 or 45 days from date of invoice if admitted between Jan. 1 and May 31
	(B) Scaling deadline for qualified employers (25% reduction of base active fee of \$ 463.00)	\$394.25	February 1
2.31	(A) Transfer to active status	\$510.00	For transfer at any time
	(B) Transfer to inactive status	\$177.40	February 1
2.33	(C)(2) Reinstatement fee to terminate suspension for nonpayment ²	\$100.00	At time reinstatement is requested
2.71; 2.90	MCLE noncompliance	\$75.00	February 10
2.90	MCLE audit deficiency	\$200.00	
2.71; 2.93	Reinstatement fee to terminate MCLE inactive enrollment	\$200.00	At time reinstatement is requested
	Penalty for returned payment	\$20.00	
2.13	Penalty for nonconforming payment	\$100.00	

¹ State Bar Rule 1.20(L).

² Business and Professions Code section 6143 provides that the reinstatement fee may not exceed double the amount of delinquent dues, penalties, or costs.