



The State Bar of California

OPEN SESSION AGENDA ITEM 706 JULY 2023

DATE: July 20, 2023

TO: Members, Board of Trustees

FROM: Catherine Ongiri, Managing Attorney, Office of Professional Competence
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SUBJECT: Proposed Amendments to Rules Governing Minimum Continuing Legal Education – Attorney Required Activities and Rules for Providers: Return from Public Comment and Request for Adoption

EXECUTIVE SUMMARY

This item requests approval of the proposed amendments to the State Bar rules governing Minimum Continuing Legal Education (MCLE). If adopted, the proposed amendments would revise the required MCLE subject requirements that licensees must complete to add one hour on civility in the legal profession, one hour on technology in the practice of law, and to change the competence requirement from one to two hours to allow for a second hour on attorney wellness. The proposed amendments would also allow for up to two hours of participatory MCLE credit for coaching or scoring mock trial, moot court, or similar activities. Finally, proposed changes to the MCLE provider rules would allow for improved program administration, reduce duplicative language in the existing rules, and facilitate compliance with the requirements by licensees and providers.

On May 18, 2023, the Board of Trustees authorized a second public comment period for revised proposed amendments to certain State Bar rules, including State Bar Rule 2.84¹ to expand the types of activity that would qualify for MCLE credit and several rules applicable to MCLE providers. This item presents a comprehensive package of rule changes addressing MCLE for Board approval and adoption, including those with no changes following the initial public comment period and those that were issued for a second public comment period.

¹ All further references to rules are to the State Bar Rules unless otherwise stated.

BACKGROUND

At the [November 17, 2022, meeting \(Item 705\)](#), the Board authorized for public comment proposed amendments to the MCLE rules that would add three subject requirements to licensees' required MCLE courses. Specifically, the changes would add one hour on civility in the legal profession, one hour on technology in the practice of law, and change the competence requirement from one to two hours to allow for a second hour on attorney wellness. The proposed amendments would not change the existing 25 credit hours per 36-month compliance period. Additionally, the Board authorized for public comment proposed amendments to permit MCLE credit for coaching, scoring, and serving as a presiding judge in mock trial and moot court programs. The Board also authorized for public comment proposed changes to the existing MCLE compliance and provider rules.

At the [May 18, 2023, meeting \(Item 60-5\)](#), staff provided the Board with a summary of the public comments received, and in response to public comment, proposed a set of revised proposed amendments that required a second public comment period.

The Board accepted staff's recommendation and authorized an additional 30-day public comment period for revised proposed amendments to:

- Rule 2.84 (Mock Trial, Moot Court, and Other Competition Activity);
- Rule 3.601 (Standards for MCLE activity approval);
- Rule 3.602 (Responsibilities of every provider);
- Rule 3.609(Renewing Multiple Activity Provider status);
- Rule 3.610 (Applying for legal specialty provider status); and
- Rule 3.611 (MCLE provider fees).

Staff advised the Board that following the return of the second public comment period, it would present a comprehensive set of proposed amendments pertaining to MCLE.

DISCUSSION

OVERVIEW OF PUBLIC COMMENTS RECEIVED

During the second public comment period, 57 individuals and organizations submitted public comments, of whom 75 percent were attorneys, and 23 percent were not attorneys. Twenty-one percent of the comments received came from organizations, while 78 percent were individuals.² The comments are described in more detail in the sections addressing the

² [Agenda Item 60-1](#) addresses the public comment and proposed changes based on the California Civility Task Force's other recommendations addressing civility, including proposed amendments to attorney civility oath set forth in Rule of Court 9.7 and changes to the Rules of Professional Conduct. In those public comments, four comments indicated support for a new, one-hour of MCLE addressing civility in the legal profession, even though that this proposal was not out for a second public comment period. These commenters include Justice Currey in his capacity as Chair of the California Civility Task Force, the California Access to Justice Commission, Consumer Attorneys Association of California, and California Employment Lawyers Association jointly, and attorney Thomas Hutchinson. Additionally, six commenters indicated endorsement of Justice Currey's public comments. These

MCLE attorney compliance rules and the MCLE provider rules, below. The full text of the comments is provided in Attachment E.

PROPOSED AMENDMENTS TO CREDIT HOUR REQUIREMENTS AND ACTIVITIES ELIGIBLE FOR CREDIT

Proposed New Activity Eligible for Participatory MCLE Credit – Mock Trial, Moot Court, and Other Activities

Following the initial public comment period, staff revised proposed amendments to rule 2.84 to expand MCLE credit eligibility to permit other negotiation, arbitration, and mediation competition activities, as well as to allow for credit for middle school and graduate level participation in these activities. The comments overwhelmingly support the inclusion of these revised proposed amendments; 55 commenters agree with the proposed amendments, one agrees if modified³, and 1 took no position.

The commenters generally note that participating in such activities supports attorney professional development. Attorneys engage in legal analysis and critical thinking, and review of rules of evidence, trial procedures, and legal strategies. These activities require similar learning and preparation by an attorney as speaking and teaching on MCLE, for which the State Bar already offers MCLE credit.⁴ Based on consideration of the comments and based on the educational value that attorneys receive from these activities, staff recommends that proposed amendments to rule 2.84 be adopted.

Proposed New MCLE Course Requirements

At the November 17, 2022, meeting, the Board issued proposed amendments to the MCLE rules affecting attorneys that would expand the MCLE required courses under rule 2.72. If adopted, licensees would be required to complete new courses as part of their required 25 hours of MCLE credit in a 36-month compliance period, including courses on the following subjects:

- four hours of legal ethics;
- two hours dealing with the recognition and elimination of bias, including one hour of implicit bias;
- two hours of competence, including one hour of prevention and detection (revised to include a second hour);
- one hour of technology in the practice of law (new); and
- one hour of civility in the legal profession (new).

These changes would provide for licensees to have 10 hours of required courses and 15 hours of general credits devoted to general practice.

commenters include Multicultural Bar Alliance of Southern California (attorney organization), Irish American Bar Association of Los Angeles (attorney organization), Japanese American Bar Association (attorney organization), LACBA Litigation Section (attorney organization), Monisha Coelho (attorney, individual capacity), and Mike Madokoro (attorney, individual capacity).

³ One commenter indicated that they agreed with the proposed changes if modified; however, the substantive comment addressed the MCLE provider rules and is discussed below.

⁴ State Bar Rules 2.81 and 2.82

As described in the May 18, 2023, Board item, the comments overwhelmingly support the changes. These additional requirements will ensure that licensees are keeping abreast of changes that impact their duties to their clients and the profession. The expansion of the competency credit to two hours and to allow for attorney wellness topics will help to address the high levels of mental health and substance use issues amongst attorneys as documented in several recent findings and reports. A one-hour required course on technology in the practice of law will promote competency as required by Rule of Professional Conduct 1.1. A one-hour required course on civility in the legal profession, as recommended by the California Civility Task Force, will promote civility and will reach licensees who typically opt out of civility courses that are currently offered as general or ethics MCLE credit. Based on the public comments and for the reasons described, staff recommends that the proposed amendments to rule 2.72, providing the additional required MCLE courses, be adopted as substantively proposed.⁵

PROPOSED AMENDMENTS TO THE MCLE COMPLIANCE AND PROVIDER RULES

At the November 17, 2022, meeting, staff proposed amendments to the MCLE provider rules to improve the existing framework of MCLE provider regulation and administration of the MCLE program.

In response to public comment and as described in the May 18, 2023, Board item, many of the proposed amendments were withdrawn, including the proposed amendments to rules 2.83, 3.600(K), 3.601(O) & (P), 3.602(C). Other proposed revisions were not substantively addressed during the initial public comment period and, as such, no additional revisions were recommended. These rules were held over during the second public comment period so that the MCLE rules could be considered by the Board in their entirety for adoption, including rules 2.51 (Definitions), 2.52 (MCLE Activities), 3.600 (Definitions), 3.603 (State Bar MCLE activity auditors), 3.604 (Suspension or revocation of provider approval), 3.606 (MCLE providers), 3.607 (Applying for Single Activity Provider status), and 3.608 (Applying for Multiple Activity Provider status).

There were some rules that required additional revisions in response the public comments. Staff requested a second, 30-day public comment period for certain State Bar rules concerning MCLE providers, including:

- Rule 3.601 (Standards for MCLE Activity Approval);
- Rule 3.602 (Responsibilities of Every Provider);
- Rule 3.609 (Renewing Multiple Activity Provider status);
- Rule 3.610 (Applying for Legal Specialty Provider status); and
- Rule 3.611 (MCLE Provider Fees).

⁵ As presented for adoption, staff revised the proposed amendments to rule 2.72(C)(1) to clarify that a licensee must comply with paragraphs (B)(1) and (B)(2) of that same rule for the compliance period ending January 31, 2024. As issued for public comment, the rule indicated that a licensee must comply with paragraphs (B)(1)–(B)(4); however, there are no paragraphs (B)(3) or (B)(4). Staff believes that additional public comment is not required for these clarifying revisions, as it is a nonsubstantive change. (See State Bar Rule 1.10 [Public comment is not required “to modify a proposal that has been circulated for public comment when the board deems the modification nonsubstantive or reasonably implicit in the proposal.”].)

Generally, the public comment was favorable to the revised proposed amendments. Of the 57 public comments, 38 agree with the proposed revised amendments, 18 indicate no position, and one comment agrees if modified from the California Lawyers Association (CLA). Only CLA substantively addressed the proposed revised amendments in the public comment; the other commenters only indicated agreement or no position by checking the applicable box.

CLA's specific comments were limited to rule 3.602 (Responsibilities of Every Provider). CLA commented that the proposed amendments, like the current rule, imply that providers must take attendance for all MCLE activities, including self-study activities. CLA recommended that the rule be revised to eliminate any inconsistency with the requirements of rules 2.51 (Definitions) and 2.83 (Self-study) of the State Bar rules concerning MCLE compliance. In addition, CLA indicated that providers should not be required to indicate whether an activity is self-study on the Record of Attendance because if the activity were self-study, the provider would not be required to take attendance. Staff agrees with this comment and recommends changes to rule 3.602(B) to clarify that providers are only required to take attendance for participatory activities. Similarly, staff recommends that rule 3.602(C) be revised to clarify that electronic attendance records are only required for participatory activities.⁶

CLA also commented on the revised proposed amendments to rule 3.602(D). Specifically, CLA commented that requiring providers to provide Certificates of Completion to self-study participants is infeasible since providers are not required to verify or take attendance for such activities. Staff does not recommend changes based on this comment. There are many ways to provide the licensee with a Certificate of Completion via a link, mail, or email. For example, a provider may offer a Certificate of Completion through a hyperlink within written or digital online content, such as a YouTube video, that can be clicked or downloaded. Although providers are not required to verify attendance, issuing Certificates of Completion for self-study activities benefit both participants and providers by simplifying tracking and reporting in the event that a licensee's MCLE compliance is audited, and enhancing the transparency and credibility of self-study MCLE programs offered by providers.

The proposed amendments to the MCLE compliance and provider rules will improve the existing framework, and represent a comprehensive effort to enhance the effectiveness and operation of the program. In addition to facilitating compliance, improving efficiency, reducing duplicative language in the rules, and ensuring that licensees keep abreast of changes that impact their duties to their clients and the profession, these changes will also contribute to a more effective and robust MCLE system.

Based on the public comments received during the first and second round of public comments, staff recommends Board approval of proposed amendments to the following rules:

⁶ Staff believes that additional public comment is not required for these clarifying revisions. State Bar Rule 1.10 does not require public comment "to modify a proposal that has been circulated for public comment when the board deems the modification nonsubstantive or reasonably implicit in the proposal."

- Rule 2.51 (Definitions);
- Rule 2.52 (MCLE Activities);
- Rule 2.72 (Requirements);
- Rule 2.84 (Mock Trial, Moot Court, and Other Competition Activity);⁷
- Rule 3.600 (Definitions);
- Rule 3.601 (Standards for MCLE activity approval);
- Rule 3.602 (Responsibilities of every provider);
- Rule 3.603 (State Bar MCLE activity auditors);
- Rule 3.604 (Suspension or revocation of provider approval);
- Rule 3.606 (MCLE providers);
- Rule 3.607 (Applying for Single Activity Provider status);
- Rule 3.608 (Applying for Multiple Activity Provider status);
- Rule 3.609 (Renewing Multiple Activity Provider status);
- Rule 3.610 (Applying for Legal Specialty Provider status); and
- Rule 3.611 (MCLE Provider Fees).⁸

The public comments received during both rounds of public comment are in overall support of the proposed amendments and are in alignment with the staff's recommendations.

STAFF RECOMMENDS OCTOBER 1, 2023, EFFECTIVE DATE, IF ADOPTED

Staff recommends that the Board adopt the proposed amendments with an effective date of October 1, 2023. This effective date would allow staff to implement necessary changes and provide notice to MCLE providers, and would also give providers ample time to familiarize themselves with the revised rules and the new fee schedule. It is important to note, however, that these rule changes will not impact the 2023 MCLE reporting cycle, which ended on February 1, 2023, or the Multiple Activity Provider renewals until 2024, as the 2023 renewal cycle concluded on June 30, 2023.

FISCAL/PERSONNEL IMPACT

If the Board adopts the proposed changes, there will be an initial increased workload for State Bar staff. These changes would primarily impact the Office of Information Technology (IT), the Office of Strategic Communications & Stakeholder Engagement, the Office of Professional Competence (OPC), and the Division of Regulation. For example, IT and OPC would work together to revise the MCLE provider forms and Communications and OPC would work together to update website content to reflect these rule changes and to allow for the fee changes. IT and Regulation would work together to determine whether changes are needed to track MCLE compliance with the new credit hour requirements. The staff and resource needs associated with implementing these changes will be fully offset by changes to the MCLE provider fees that

⁷ Clean and redline versions of the proposed amendments to Title 2, Division 4 of the rules of the State Bar, including rules 2.51, 2.52, 2.72, and 2.84, are provided in Attachments A and B, respectively.

⁸ Clean and redline versions of the proposed amendments to Title 3, Division 5, Chapter 1 of the rules of the State Bar, including rules 3.600–3.604 and 3.606–3.611, are provided in Attachments C and D, respectively.

will go into effect following adoption of these rules, including the new late fees and different fee amounts for for-profit providers. As described in the [May 18, 2023, item](#) and approved by the Board, staff anticipates that the proposed changes to the MCLE provider fees will result in an annual increase of \$535,000 in General Fund revenue, an amount in excess of any implementation costs.

AMENDMENTS TO RULES OF THE STATE BAR OF CALIFORNIA

Title 2, Division 4 and Title 3, Division 5, Chapter 1 of the rules of the State Bar

AMENDMENTS TO BOARD OF TRUSTEES POLICY MANUAL

None

STRATEGIC PLAN GOALS & IMPLEMENTATION STEPS

Goal 3. Protect the Public by Regulating the Legal Profession

b. 2. Position the State Bar as a trusted resource and increase interactions with licensees beyond admitting attorneys into the profession, collecting fees, and monitoring MCLE compliance.

RECOMMENDATIONS

Should the Board of Trustees, sitting as the Regulation and Discipline Committee, concur in the proposed action, passage of the following resolution is recommended:

RESOLVED, that the Board of Trustees adopt the proposed amendments to Title 2, Division 4 of the rules of the State Bar attached hereto as Attachment A to be effective on October 1, 2023; and it is

FURTHER RESOLVED, that the Board of Trustees adopt the proposed amendments to Title 3, Division 5, Chapter 1 of the rules of the State Bar attached hereto as Attachment C to be effective on October 1, 2023.

ATTACHMENTS LIST

- A. Proposed Rules of the State Bar, Title 2, Division 4 (clean)
- B. Proposed Rules of the State Bar, Title 2, Division 4 (redline)
- C. Proposed Rules of the State Bar, Title 3, Division 5 (clean)
- D. Proposed Rules of the State Bar, Title 3, Division 5 (redline)
- E. Full Text of Public Comments

TITLE 2. RIGHTS AND RESPONSIBILITIES OF LICENSEES

DIVISION 4. MINIMUM CONTINUING LEGAL EDUCATION

Chapter 1. Purpose and scope

Rule 2.50 Purpose of MCLE

Rules for Minimum Continuing Legal Education (MCLE) require active licensees of the State Bar of California to remain current regarding the law, the obligations and standards of the legal profession, and the management of their practices. A licensee's involuntary enrollment as inactive for failing to comply with these rules is public information available on the State Bar Web site.

Rule 2.51 Definitions

- (A) An "MCLE activity" is minimum continuing legal education that is accredited by the State Bar as meeting the standards for MCLE credit.
- (B) An "LSMCLE" activity is legal specialty minimum continuing legal education that is accredited by the State Bar as meeting the standards for LSMCLE and MCLE credit as set forth in rule 3.114. Any requirements for an MCLE activity as set forth in these rules apply to an LSMCLE activity.
- (C) A "provider" is an individual or entity approved by the State Bar to grant MCLE or LSMCLE credit for MCLE or LSMCLE activity.
- (D) "MCLE credit" is the number of credit hours that a licensee may claim to meet the requirements of these rules.
- (E) A "credit hour" is sixty minutes actually spent in an MCLE activity. A credit hour is reported to the nearest quarter hour in decimals, and includes time for introductory and concluding remarks and for questions and answers. Time spent in breaks or lunch periods, and participating in any nonlegal education functions, including but not limited to networking, business meetings, tours, or demonstrations is not activity that may be applied to a credit hour or receive MCLE credit.
- (F) An "approved jurisdiction" is recognized by the State Bar as having MCLE requirements that substantially meet State Bar standards for MCLE activities and computing MCLE credit hours in a manner acceptable to the State Bar. Approved jurisdictions are listed on the State Bar Web site.

- (G) A “participatory activity” is an MCLE or LSMCLE activity for which the provider must verify attendance. Participatory activities may be presented in person or delivered by electronic means.
- (H) A “self-study activity” is any MCLE activity identified in Rule 2.83. Self-study activities may be presented in person or delivered by electronic means.
- (I) State Bar New Attorney Training is MCLE that is developed and made available directly from the State Bar and is focused on law practice competency for newly admitted licensees.

Rule 2.52 MCLE Activities

To receive MCLE credit, a licensee must complete an MCLE activity that meets State Bar standards set forth in rule 3.601.

Rule 2.53 New licensees

- (A) A new licensee is permanently assigned to a compliance group on the date of admission.
- (B) The initial compliance period for a new licensee begins on the first day of the month in which the licensee was admitted. It ends when the period ends for the compliance group. If the initial period is less than the period for the compliance group, the required credit hours may be reduced as provided in these rules.¹
- (C) A new licensee may not claim credit for education taken before the initial compliance period.
- (D) A new licensee is required to complete a State Bar New Attorney Training program during the first year of admission. New licensees who have completed any portion of the New Attorney Training program while enrolled in the State Bar’s Provisional Licensure Program² are deemed to have satisfied that portion of the requirement and, therefore, do not have to retake that portion of the New Attorney Training program.
- (E) New licensees can also apply New Attorney Training hours to their regular MCLE requirement, provided that the hours are completed within the licensee’s MCLE compliance period.

Rule 2.54 Exemptions

- (A) The following active licensees are exempt from MCLE requirements, provided they claim the exemption in their assigned compliance periods using My State Bar Profile online or

¹ Rule 2.72 (C).

² California Rule of Court, Rule 9.49

an MCLE Compliance Form:

- (1) officers and elected officials of the State of California;
 - (2) full-time professors at law schools accredited by the State Bar of California or the American Bar Association;
 - (3) those employed full-time by the State of California on a permanent or probationary basis, regardless of their working hours, who do not otherwise practice law; and
 - (4) those employed full-time by the United States government on a permanent or probationary basis, regardless of their working hours, who do not otherwise practice law.
- (B) Licensees whom this rule exempts by reason of their employment with the State of California or the United States government may provide pro bono legal services through a California qualified legal services project or a qualified support center³, or through a legal services project or support center that primarily provides legal services without charge to indigent persons in another jurisdiction and is funded by the Legal Services Corporation or the Older Americans Act or receives funding administered by the jurisdiction's interest on lawyers trust accounts program.

Rule 2.55 Modifications

A licensee prevented from fulfilling the MCLE requirement for a substantial part of a compliance period because of a physical or mental condition, natural disaster, family emergency, financial hardship, or other good cause may apply for modification of MCLE compliance requirements. The State Bar must approve any modification.

Chapter 2. Compliance

Rule 2.70 Compliance groups

A licensee is permanently assigned to one of three compliance groups on the basis of the first letter of the licensee's last name at the date of admission.⁴ The three groups are A-G, H-M, and N-Z. The licensee remains in the compliance group despite any subsequent change of last name.

Rule 2.71 Compliance periods

- (A) A compliance period consists of thirty-six months. It begins on the first day of February

³ Business & Professions Code § 6213.

⁴ A historical exception exists. When the MCLE program was established in 1992, licensees were permanently assigned to compliance groups on the basis of their last names at the time, regardless of any different last names they might have used previously.

and ends three years later on the last day of January. The three compliance groups begin and end their compliance periods in different years. A licensee must report MCLE compliance no later than the day following the end of the compliance period. The report must be made online using My State Bar Profile or with an MCLE Compliance Form. Fees for noncompliance are set forth in the Schedule of Charges and Deadlines.

- (B) Compliance with State Bar New Attorney Training must be effectuated and reported completed, in a manner established by the State Bar, by the last day of the month of an attorney's one-year anniversary as a State Bar licensee. Fees for noncompliance are set forth in the Schedule of Charges and Deadlines.

Rule 2.72 Requirements

- (A) Until December 31, 2021, all licensees shall be subject to the following:
 - (1) Unless these rules indicate otherwise, a licensee who has been active throughout a thirty-six-month compliance period must complete twenty-five credit hours of MCLE activities. No more than twelve and a half credit hours may be self-study.⁵ Total hours must include no less than 6 hours as follows:
 - (a) at least four hours of legal ethics;
 - (b) at least one hour dealing with the recognition and elimination of bias in the legal profession and society by reason of, but not limited to, sex, color, race, religion, ancestry, national origin, physical disability, age, or sexual orientation; and
 - (c) at least one hour of education addressing substance abuse or other mental or physical issues that impair a licensee's ability to perform legal services with competence.
 - (2) Required education in legal ethics, elimination of bias, or competence issues may be a component of an approved MCLE activity that deals with another topic.
 - (3) A licensee may reduce the required twenty-five hours in proportion to the number of full months the licensee was inactive or exempt in the thirty-six-month compliance period. Up to half the reduced hours may be self-study.⁶ A tool for applying this formula is available at the State Bar Web site.
 - (4) Excess credit hours may not be applied to the next compliance period.⁷
- (B) On and after January 1, 2022, all licensees shall be subject to the following:

⁵ Rule 2.83.

⁶ Rule 2.83.

⁷ But see Rule 2.93.

- (1) Licensees reporting for the compliance periods ending January 31, 2022, shall be subject to the requirements set forth in paragraphs (A)(1), (A)(2), (A)(3), and (A)(4) for the compliance period ending January 31, 2022.
- (2) Beginning with the compliance period ending January 31, 2023, all licensees shall comply with the following:
 - (a) Unless these rules indicate otherwise, a licensee who has been active throughout a thirty-six-month compliance period must complete twenty-five credit hours of MCLE activities. No more than twelve and a half credit hours may be self-study.⁸ Total hours must include no less than 7 hours as follows:
 - (i) at least four hours of legal ethics;
 - (ii) at least two hours dealing with the recognition and elimination of bias in the legal profession and society by reason of, but not limited to, sex, color, race, religion, ancestry, national origin, physical disability, age, or sexual orientation;
 1. Of those two hours, at least one hour must focus on implicit bias and the promotion of bias-reducing strategies to address how unintended biases regarding race, ethnicity, gender identity, sexual orientation, socioeconomic status, or other characteristics undermine confidence in the legal system; and
 - (iii) at least one hour of education addressing substance abuse or other mental or physical issues that impair a licensee's ability to perform legal services with competence.
 - (b) Required education in legal ethics, elimination of bias, or competence issues may be a component of an approved MCLE activity that deals with another topic, consistent with the requirements of Rule 2.52(F).
 - (c) A licensee may reduce the required twenty-five hours in proportion to the number of full months the licensee was inactive or exempt in the thirty-six-month compliance period, except that the requirements of paragraphs (B)(2)(a)(ii) and (B)(2)(a)(iii) may not be reduced to less than one hour each. Up to half the reduced hours may be self-study.⁹ A tool for applying this formula is available at the State Bar website.

⁸ Rule 2.83.

⁹ Rule 2.83.

- (d) Excess credit hours may not be applied to the next compliance period.¹⁰
- (C) On and after January 1, 2024, all licensees shall be subject to the following:
 - (1) Licensees reporting for the compliance period ending January 31, 2024, shall be subject to the requirements set forth in paragraphs (B)(1) and (B)(2) for the compliance period ending January 31, 2024.
 - (2) Beginning with the compliance period ending January 31, 2025, all licensees shall comply with the following:
 - (a) Unless these rules indicate otherwise, a licensee who has been active throughout a thirty-six-month compliance period must complete twenty-five credit hours of MCLE activities. No more than twelve and a half credit hours may be self-study.¹¹ Total hours must include no less than 10 hours as follows:
 - (i) at least four hours of legal ethics;
 - (ii) at least two hours dealing with the recognition and elimination of bias, one hour of which must focus on implicit bias and the promotion of bias-reducing strategies;
 - (iii) at least two hours of education addressing competence, one hour of which must focus on prevention and detection;
 - (iv) at least one hour of education addressing technology in the practice of law; and
 - (v) at least one hour of education addressing civility in the legal profession.¹²
 - (b) Required education in legal ethics, elimination of bias, or competence, technology in the practice of law, and civility in the legal profession may be a component of an approved MCLE activity that deals with another topic, consistent with the requirements of Rule 2.52(F).
 - (c) A licensee may reduce the required twenty-five hours in proportion to the number of full months the licensee was inactive or exempt in the thirty-six-month compliance period, except that the requirements of

¹⁰ But see Rule 2.93.

¹¹ Rule 2.83.

¹² See rule 3.601 regarding the content requirements for these credit hours.

paragraphs (C)(2)(a)(ii) and (C)(2)(a)(iii) may not be reduced to less than one hour each. Up to half the reduced hours may be self-study.¹³ A tool for applying this formula is available at the State Bar website.

- (d) Excess credit hours may not be applied to the next compliance period.¹⁴

Rule 2.73 Record of MCLE

For a year after reporting MCLE compliance, a licensee must retain and provide upon demand and to the satisfaction of the State Bar

- (A) a provider's certificate of attendance;
- (B) a record of self-study that includes the title, provider, credit hours, and date of each MCLE activity; or
- (C) proof of exempt status.

Chapter 3. MCLE Activities approved for MCLE credit

Rule 2.80 Attending programs and classes

A licensee may claim MCLE credit for attending a MCLE activity, such as a lecture, panel discussion, or law school class, in person or by technological means.

Rule 2.81 Speaking

A licensee may claim participatory MCLE credit for speaking at an approved MCLE activity.

- (A) A principal speaker, who is responsible for preparing and delivering a program or class and its related materials, may claim
 - (1) actual speaking time multiplied by four for the first presentation; or
 - (2) actual speaking time only for each time a presentation is repeated without significant change.
- (B) A panelist may claim
 - (1) either of the following for the first panel presentation:
 - (a) scheduled individual speaking time multiplied by four, plus the actual time spent in attendance at the remainder of the presentation; or

¹³ Rule 2.83.

¹⁴But see Rule 2.93.

- (b) when times have not been scheduled for individual speakers, an equal share of the total time for all speakers multiplied by four plus the actual time spent in attendance at the remainder of the presentation.
- (2) actual speaking time only for each time a presentation is repeated without significant change.
- (C) A licensee who introduces speakers or serves as a moderator may claim only the MCLE credit available to any attendee.

Rule 2.82 Teaching

A licensee may claim participatory MCLE credit for teaching a law school course.

- (A) A licensee assigned to teach a course may claim no more than the credit hours granted by the law school multiplied by twelve or actual speaking time for required MCLE in legal ethics, elimination of bias, or competence issues.
- (B) A guest lecturer or substitute teacher may claim
 - (1) actual speaking time multiplied by four for the first presentation; or
 - (2) actual speaking time only for each time a presentation is repeated without significant change.

Rule 2.83 Self-study

A licensee may claim up to half the credit hours required in a compliance period for

- (A) completing MCLE activities for which attendance is not verified by a provider and the MCLE activities were prepared within the preceding five years;
- (B) taking an open- or closed-book self-test and submitting it to a provider who returns it with a grade and explanations of correct answers; or
- (C) authoring or co-authoring written materials that
 - (1) have contributed to the licensee's legal education;
 - (2) have been published or accepted for publication; and
 - (3) were not prepared in the ordinary course of employment or in connection with an oral presentation at an approved MCLE activity.

Rule 2.84 Mock Trial, Moot Court, and Other Competition Activity

- (A) A licensee may claim up to two hours of participatory MCLE credit for serving as an attorney coach or scorer or presiding judge for mock trials, moot court arguments, negotiation competitions, arbitration competitions, and mediation competitions involving substantive and procedural law at the middle, high school, college, graduate, and law school levels.
- (B) MCLE credit hours are not available for grading written briefs or other written papers in connection with this type of MCLE activity.
- (C) Additional hours cannot be claimed for preparation time.
- (D) A licensee may not claim MCLE credit for legal ethics, elimination of bias, competence, technology in the practice of law, or civility in the legal profession as required by rule 2.72 for participation in this type of activity.

Rule 2.85 Education taken while physically out of state

- (A) A licensee may claim MCLE credit for an MCLE activity authorized by an approved jurisdiction if it meets the requirements of these rules and if the licensee attends or does the MCLE activity outside California. A licensee may not claim credit for such an activity, including self-study, when physically present in California unless the State Bar has specifically approved it.
- (B) A licensee who qualifies for an MCLE activity authorized by an approved jurisdiction may claim the amount of credit authorized by the jurisdiction. No special procedure is required to claim the credit.

Rule 2.86 Licensee credit request

A licensee may apply for MCLE credit for an educational activity directly relevant to the licensee's practice but not otherwise approved if the activity substantially meets State Bar standards. The application must be submitted with the appropriate fee.

Rule 2.87 Bar examinations and MPRE

A licensee may not claim MCLE credit for preparing for or taking a bar examination or the Multistate Professional Responsibility Examination (MPRE).

Chapter 4. Noncompliance

Rule 2.90 Definition

Noncompliance is failure to

- (A) complete the required education during the compliance period or an extension of it;
- (B) report compliance or claim exemption from MCLE requirements;
- (C) keep a record of MCLE compliance¹⁵; or
- (D) pay fees for noncompliance.

Rule 2.91 Notice of noncompliance

- (A) A licensee who is sent a notice of noncompliance must comply with its terms or be involuntarily enrolled as inactive. An inactive licensee is not eligible to practice law.
- (B) If the notice requires the licensee to complete credit hours for the previous compliance period, any excess credit hours may be counted toward the current compliance period.

Rule 2.91 adopted effective January 1, 2008; amended effective January 25, 2019.

Rule 2.92 Enrollment as inactive for MCLE noncompliance

A licensee who fails to comply with a notice of noncompliance is enrolled as inactive and is not eligible to practice law. The enrollment is administrative and no hearing is required.

Rule 2.93 Reinstatement following MCLE noncompliance

Enrollment as inactive for MCLE noncompliance terminates when a licensee submits proof of compliance and pays noncompliance fees. Credit hours that exceed those required for compliance may be counted toward the current period.

¹⁵ Rule 2.73.

TITLE 2. RIGHTS AND RESPONSIBILITIES OF LICENSEES

DIVISION 4. MINIMUM CONTINUING LEGAL EDUCATION

Chapter 1. Purpose and scope

Rule 2.50 Purpose of MCLE

Rules for Minimum Continuing Legal Education (MCLE) require active licensees of the State Bar of California to remain current regarding the law, the obligations and standards of the legal profession, and the management of their practices. A licensee's involuntary enrollment as inactive for failing to comply with these rules is public information available on the State Bar Web site.

Rule 2.51 Definitions

- (A) An "MCLE activity" is minimum continuing legal education that is accredited by the State Bar ~~approves~~ as meeting the standards for MCLE credit.
- (B) An "LSMCLE" activity is legal specialty minimum continuing legal education that is accredited by the State Bar as meeting the standards for LSMCLE and MCLE credit as set forth in rule 3.114. Any requirements for an MCLE activity as set forth in these rules apply to an LSMCLE activity.
- ~~(B)(C)~~ A "provider" is an individual or entity approved by the State Bar to grant MCLE or LSMCLE credit for ~~an~~ MCLE or LSMCLE activity.
- ~~(C)(D)~~ "MCLE credit" is the number of credit hours that a licensee may claim to meet the requirements of these rules.
- ~~(D)(E)~~ A "credit hour" is sixty minutes actually spent in an MCLE activity. A credit hour is reported to the nearest quarter hour in decimals, and includes time for introductory and concluding remarks and for questions and answers. Time spent in breaks or lunch periods, and participating in any nonlegal education functions, including but not limited to networking, business meetings, tours, or demonstrations is not activity that may be applied to a credit hour or receive MCLE credit, less any time for breaks or other activities that lack educational content. A credit hour is reported to the nearest quarter hour in decimals.
- ~~(E)(F)~~ An "approved jurisdiction" is recognized by the State Bar as having MCLE requirements that substantially meet State Bar standards for MCLE activities and computing MCLE

credit hours in a manner acceptable to the State Bar. Approved jurisdictions are listed on the State Bar Web site.

~~(F)(G)~~ A “participatory activity” is an MCLE or LSMCLE activity for which the provider must verify attendance. Participatory activities may be presented in person or delivered by electronic means. ~~Methods for verification include sign in writing or electronically at the start of the course.~~

~~(G)(H)~~ A “self-study activity” is any MCLE activity identified in Rule 2.83. Self-study activities may be presented in person or delivered by electronic means.

~~(H)(I)~~ State Bar New Attorney Training is MCLE that is developed and made available directly from the State Bar and is focused on law practice competency for newly admitted licensees.

Rule 2.52 MCLE Activities

To receive MCLE credit, a licensee must complete an MCLE activity that meets State Bar standards set forth in rule 3.601.

~~(A) — The MCLE activity must relate to legal subjects directly relevant to licensees of the State Bar or have significant current professional and practical content.~~

~~(B) — The presenter of the MCLE activity must have significant professional or academic experience related to its content.~~

~~(C) — Promotional material must state that the MCLE activity is approved for MCLE credit or that a request for approval is pending; specify the amount of credit offered; and indicate whether any of the credit may be claimed for required MCLE in legal ethics, elimination of bias, or competence issues.~~

~~(D) — If the activity lasts one hour or more, the provider must make substantive written materials relevant to the MCLE activity available either before or during every MCLE activity. Any materials provided online must remain online for at least thirty calendar days following the MCLE activity.~~

~~(E) — Programs and classes must be scheduled so that participants are free of interruptions.~~

~~(F)(A) — On and after January 1, 2022, for all training dealing with, or including a component dealing with, implicit bias and the promotion of bias-reducing strategies, the MCLE provider must meet the requirements of Business and Professions Code section 6070.5.~~

Rule 2.53 New licensees

(A) A new licensee is permanently assigned to a compliance group on the date of admission.

- (B) The initial compliance period for a new licensee begins on the first day of the month in which the licensee was admitted. It ends when the period ends for the compliance group. If the initial period is less than the period for the compliance group, the required credit hours may be reduced as provided in these rules.¹
- (C) A new licensee may not claim credit for education taken before the initial compliance period.
- (D) A new licensee is required to complete a State Bar New Attorney Training program during the first year of admission. New licensees who have completed any portion of the New Attorney Training program while enrolled in the State Bar's Provisional Licensure Program² are deemed to have satisfied that portion of the requirement and, therefore, do not have to retake that portion of the New Attorney Training program.
- (E) New licensees can also apply New Attorney Training hours to their regular MCLE requirement, provided that the hours are completed within the licensee's MCLE compliance period.

Rule 2.54 Exemptions

- (A) The following active licensees are exempt from MCLE requirements, provided they claim the exemption in their assigned compliance periods using My State Bar Profile online or an MCLE Compliance Form:
 - (1) officers and elected officials of the State of California;
 - (2) full-time professors at law schools accredited by the State Bar of California or the American Bar Association;
 - (3) those employed full-time by the State of California on a permanent or probationary basis, regardless of their working hours, who do not otherwise practice law; and
 - (4) those employed full-time by the United States government on a permanent or probationary basis, regardless of their working hours, who do not otherwise practice law.
- (B) Licensees whom this rule exempts by reason of their employment with the State of California or the United States government may provide pro bono legal services through a California qualified legal services project or a qualified support center³, or through a legal services project or support center that primarily provides legal services without charge to indigent persons in another jurisdiction and is funded by the Legal Services Corporation or

¹ Rule 2.72 (C).

² California Rule of Court, Rule 9.49

³ Business & Professions Code § 6213.

the Older Americans Act or receives funding administered by the jurisdiction's interest on lawyers trust accounts program.

Rule 2.55 Modifications

A licensee prevented from fulfilling the MCLE requirement for a substantial part of a compliance period because of a physical or mental condition, natural disaster, family emergency, financial hardship, or other good cause may apply for modification of MCLE compliance requirements. The State Bar must approve any modification.

Chapter 2. Compliance

Rule 2.70 Compliance groups

A licensee is permanently assigned to one of three compliance groups on the basis of the first letter of the licensee's last name at the date of admission.⁴ The three groups are A-G, H-M, and N-Z. The licensee remains in the compliance group despite any subsequent change of last name.

Rule 2.71 Compliance periods

- (A) A compliance period consists of thirty-six months. It begins on the first day of February and ends three years later on the last day of January. The three compliance groups begin and end their compliance periods in different years. A licensee must report MCLE compliance no later than the day following the end of the compliance period. The report must be made online using My State Bar Profile or with an MCLE Compliance Form. Fees for noncompliance are set forth in the Schedule of Charges and Deadlines.
- (B) Compliance with State Bar New Attorney Training must be effectuated and reported completed, in a manner established by the State Bar, by the last day of the month of an attorney's one-year anniversary as a State Bar licensee. Fees for noncompliance are set forth in the Schedule of Charges and Deadlines.

Rule 2.72 Requirements

- (A) Until December 31, 2021, all licensees shall be subject to the following:
 - (1) Unless these rules indicate otherwise, a licensee who has been active throughout a thirty-six-month compliance period must complete twenty-five credit hours of MCLE activities. No more than twelve and a half credit hours may be self-study.⁵ Total hours must include no less than 6 hours as follows:

⁴ A historical exception exists. When the MCLE program was established in 1992, licensees were permanently assigned to compliance groups on the basis of their last names at the time, regardless of any different last names they might have used previously.

⁵ Rule 2.83.

- (a) at least four hours of legal ethics;
 - (b) at least one hour dealing with the recognition and elimination of bias in the legal profession and society by reason of, but not limited to, sex, color, race, religion, ancestry, national origin, physical disability, age, or sexual orientation; and
 - (c) at least one hour of education addressing substance abuse or other mental or physical issues that impair a licensee's ability to perform legal services with competence.
 - (2) Required education in legal ethics, elimination of bias, or competence issues may be a component of an approved MCLE activity that deals with another topic.
 - (3) A licensee may reduce the required twenty-five hours in proportion to the number of full months the licensee was inactive or exempt in the thirty-six-month compliance period. Up to half the reduced hours may be self-study.⁶ A tool for applying this formula is available at the State Bar Web site.
 - (4) Excess credit hours may not be applied to the next compliance period.⁷
- (B) On and after January 1, 2022, all licensees shall be subject to the following:
- (1) Licensees reporting for the compliance periods ending January 31, 2022, shall be subject to the requirements set forth in paragraphs (A)(1), (A)(2), (A)(3), and (A)(4) for the compliance period ending January 31, 2022.
 - (2) Beginning with the compliance period ending January 31, 2023, all licensees shall comply with the following:
 - (a) Unless these rules indicate otherwise, a licensee who has been active throughout a thirty-six-month compliance period must complete twenty-five credit hours of MCLE activities. No more than twelve and a half credit hours may be self-study.⁸ Total hours must include no less than 7 hours as follows:
 - (i) at least four hours of legal ethics;
 - (ii) at least two hours dealing with the recognition and elimination of bias in the legal profession and society by reason of, but not limited to, sex, color, race, religion, ancestry, national origin,

⁶ Rule 2.83.

⁷ But see Rule 2.93.

⁸ Rule 2.83.

physical disability, age, or sexual orientation;

1. Of those two hours, at least one hour must focus on implicit bias and the promotion of bias-reducing strategies to address how unintended biases regarding race, ethnicity, gender identity, sexual orientation, socioeconomic status, or other characteristics undermine confidence in the legal system; and
- (iii) at least one hour of education addressing substance abuse or other mental or physical issues that impair a licensee's ability to perform legal services with competence.
- (b) Required education in legal ethics, elimination of bias, or competence issues may be a component of an approved MCLE activity that deals with another topic, consistent with the requirements of Rule 2.52(F).
- (c) A licensee may reduce the required twenty-five hours in proportion to the number of full months the licensee was inactive or exempt in the thirty-six-month compliance period, except that the requirements of paragraphs (B)(2)(a)(ii) and (B)(2)(a)(iii) may not be reduced to less than one hour each. Up to half the reduced hours may be self-study.⁹ A tool for applying this formula is available at the State Bar website.
- (d) Excess credit hours may not be applied to the next compliance period.¹⁰

(C) On and after January 1, 2024, all licensees shall be subject to the following:

- (1) Licensees reporting for the compliance period ending January 31, 2024, shall be subject to the requirements set forth in paragraphs (B)(1) and (B)(2) for the compliance period ending January 31, 2024.
- (2) Beginning with the compliance period ending January 31, 2025, all licensees shall comply with the following:
 - (a) Unless these rules indicate otherwise, a licensee who has been active throughout a thirty-six-month compliance period must complete twenty-five credit hours of MCLE activities. No more than twelve and a half credit hours may be self-study.¹¹ Total hours must include no less than 10 hours as follows:
 - (i) at least four hours of legal ethics;

⁹ Rule 2.83.

¹⁰ But see Rule 2.93.

¹¹ Rule 2.83.

(ii) at least two hours dealing with the recognition and elimination of bias, one hour of which must focus on implicit bias and the promotion of bias-reducing strategies;

(iii) at least two hours of education addressing competence, one hour of which must focus on prevention and detection;

(iv) at least one hour of education addressing technology in the practice of law; and

(v) at least one hour of education addressing civility in the legal profession.¹²

(b) Required education in legal ethics, elimination of bias, or competence, technology in the practice of law, and civility in the legal profession may be a component of an approved MCLE activity that deals with another topic, consistent with the requirements of Rule 2.52(F).

(c) A licensee may reduce the required twenty-five hours in proportion to the number of full months the licensee was inactive or exempt in the thirty-six-month compliance period, except that the requirements of paragraphs (C)(2)(a)(ii) and (C)(2)(a)(iii) may not be reduced to less than one hour each. Up to half the reduced hours may be self-study.¹³ A tool for applying this formula is available at the State Bar website.

(d) Excess credit hours may not be applied to the next compliance period.¹⁴

Rule 2.73 Record of MCLE

For a year after reporting MCLE compliance, a licensee must retain and provide upon demand and to the satisfaction of the State Bar

- (A) a provider's certificate of attendance;
- (B) a record of self-study that includes the title, provider, credit hours, and date of each MCLE activity; or
- (C) proof of exempt status.

Chapter 3. MCLE Activities approved for MCLE credit

¹² See rule 3.601 regarding the content requirements for these credit hours.

¹³ Rule 2.83.

¹⁴ But see Rule 2.93.

Rule 2.80 Attending programs and classes

A licensee may claim MCLE credit for attending a MCLE activity, such as a lecture, panel discussion, or law school class, in person or by technological means.

Rule 2.81 Speaking

A licensee may claim participatory MCLE credit for speaking at an approved MCLE activity.

(A) A principal speaker, who is responsible for preparing and delivering a program or class and its related materials, may claim

- (1) actual speaking time multiplied by four for the first presentation; or
- (2) actual speaking time only for each time a presentation is repeated without significant change.

(B) A panelist may claim

- (1) either of the following for the first panel presentation:
 - (a) scheduled individual speaking time multiplied by four, plus the actual time spent in attendance at the remainder of the presentation; or
 - (b) when times have not been scheduled for individual speakers, an equal share of the total time for all speakers multiplied by four plus the actual time spent in attendance at the remainder of the presentation.
- (2) actual speaking time only for each time a presentation is repeated without significant change.

(C) A licensee who introduces speakers or serves as a moderator may claim only the MCLE credit available to any attendee.

Rule 2.82 Teaching

A licensee may claim participatory MCLE credit for teaching a law school course.

(A) A licensee assigned to teach a course may claim no more than the credit hours granted by the law school multiplied by twelve or actual speaking time for required MCLE in legal ethics, elimination of bias, or competence issues.

(B) A guest lecturer or substitute teacher may claim

- (1) actual speaking time multiplied by four for the first presentation; or

- (2) actual speaking time only for each time a presentation is repeated without significant change.

Rule 2.83 Self-study

A licensee may claim up to half the credit hours required in a compliance period for

- (A) completing MCLE activities for which attendance is not verified by a provider and the MCLE activities were prepared within the preceding five years;
- (B) taking an open- or closed-book self-test and submitting it to a provider who returns it with a grade and explanations of correct answers; or
- (C) authoring or co-authoring written materials that
 - (1) have contributed to the licensee's legal education;
 - (2) have been published or accepted for publication; and
 - (3) were not prepared in the ordinary course of employment or in connection with an oral presentation at an approved MCLE activity.

Rule 2.84 ~~Legal specialization~~ Mock Trial, and Moot Court, and Other Competition Activity

- (A) A licensee may claim up to two hours of participatory MCLE credit for serving as an attorney coach or scorer or presiding judge for mock trials, and moot court arguments, negotiation competitions, arbitration competitions, and mediation competitions involving substantive and procedural law at the middle, high school, college, graduate, and law school levels.
- (B) MCLE credit hours are not available for grading written briefs or other written papers in connection with this type of MCLE activity.
- (C) Additional hours cannot be claimed for preparation time.
- (D) A licensee may not claim MCLE credit for legal ethics, elimination of bias, competence, technology in the practice of law, or civility in the legal profession as required by rule 2.72 for participation in this type of activity.

~~A licensee may claim MCLE credit for educational activities that the California Board of Legal Specialization approves for certification or recertification.~~

Rule 2.85 Education taken while physically out of state

- (A) A licensee may claim MCLE credit for an MCLE activity authorized by an approved jurisdiction if it meets the requirements of these rules and if the licensee attends or

does the MCLE activity outside California. A licensee may not claim credit for such an activity, including self-study, when physically present in California unless the State Bar has specifically approved it.

- (B) A licensee who qualifies for an MCLE activity authorized by an approved jurisdiction may claim the amount of credit authorized by the jurisdiction. No special procedure is required to claim the credit.

Rule 2.86 Licensee credit request

A licensee may apply for MCLE credit for an educational activity directly relevant to the licensee's practice but not otherwise approved if the activity substantially meets State Bar standards. The application must be submitted with the appropriate fee.

Rule 2.87 Bar examinations and MPRE

A licensee may not claim MCLE credit for preparing for or taking a bar examination or the Multistate Professional Responsibility Examination (MPRE).

Chapter 4. Noncompliance

Rule 2.90 Definition

Noncompliance is failure to

- (A) complete the required education during the compliance period or an extension of it;
- (B) report compliance or claim exemption from MCLE requirements;
- (C) keep a record of MCLE compliance¹⁵; or
- (D) pay fees for noncompliance.

Rule 2.91 Notice of noncompliance

- (A) A licensee who is sent a notice of noncompliance must comply with its terms or be involuntarily enrolled as inactive. An inactive licensee is not eligible to practice law.
- (B) If the notice requires the licensee to complete credit hours for the previous compliance period, any excess credit hours may be counted toward the current compliance period.

Rule 2.91 adopted effective January 1, 2008; amended effective January 25, 2019.

Rule 2.92 Enrollment as inactive for MCLE noncompliance

¹⁵ Rule 2.73.

A licensee who fails to comply with a notice of noncompliance is enrolled as inactive and is not eligible to practice law. The enrollment is administrative and no hearing is required.

Rule 2.93 Reinstatement following MCLE noncompliance

Enrollment as inactive for MCLE noncompliance terminates when a licensee submits proof of compliance and pays noncompliance fees. Credit hours that exceed those required for compliance may be counted toward the current period.

TITLE 3. PROGRAMS AND SERVICES

DIVISION 5. PROVIDERS OF PROGRAMS AND SERVICES

Chapter 1. Providers of Continuing Legal Education

Article 1. Global provisions

Rule 3.600 Definitions

- (A) An “MCLE activity” is minimum continuing legal education that is accredited by the State Bar as meeting standards for MCLE credit.¹
- (B) An “LSMCLE” activity is legal specialty minimum continuing legal education that is accredited by the State Bar as meeting the standards for LSMCLE and MCLE credit as set forth in rule 3.114.
- (C) A “provider” is an individual or entity approved by the State Bar to grant MCLE or LSMCLE credit for MCLE or LSMCLE activity.
- (D) A “Single Activity Provider” is a provider approved to grant credit for a single MCLE activity after applying for and receiving approval of the activity in accordance with State Bar procedures and paying the appropriate fee(s).
- (E) A “Multiple Activity Provider” is a provider approved to grant credit for any MCLE activity after applying for and receiving approval for Multiple Activity Provider status in accordance with State Bar procedures and paying the appropriate fee(s).
- (F) A “Legal Specialty Credit Provider” is approved to grant credit for a single LSMCLE activity designed to attain and maintain proficiency in a specialty area of law or is an approved Multiple Activity Provider in a specialty area of law as set forth in rule 3.114.
- (G) “MCLE credit” is the number of credit hours that a licensee may claim to meet the requirements of these rules.
- (H) A “credit hour” is sixty minutes actually spent in an MCLE activity. A credit hour is reported to the nearest quarter hour in decimals, and includes time for introductory and concluding remarks and for questions and answers. Time spent in breaks or lunch

¹ Business & Professions Code § 6070 (b) provides that programs offered by the California District Attorneys Association and the California Public Defenders Association are deemed to be approved MCLE.

periods, and participating in any nonlegal education functions, including networking, business meetings, tours, or demonstrations is not activity that may be applied to a credit hour or receive MCLE credit.

- (I) A “participatory activity” is an MCLE or LSMCLE activity that qualifies for participatory MCLE or LSMCLE credit and for which the provider must verify attendance. Participatory activities may be presented in person or delivered by electronic means.
- (J) A “self-study activity” is any MCLE activity identified in Rule 2.83. Self-study activities may be presented in person or delivered by electronic means.

Rule 3.601 Standards for MCLE activity approval

To be eligible for MCLE accreditation, an MCLE activity must meet State Bar standards.

- (A) General MCLE activity must relate to legal subjects directly relevant to licensees of the State Bar and have current significant educational professional, or practical content, with an objective to increase each participant’s professional competency as an attorney. Activities designed for non-attorney participants will not be approved for general MCLE credit. MCLE activities that may be eligible for general MCLE credit include those that provide education or practical instructions in:
 - (1) The practice of law;
 - (2) Litigation;
 - (3) Management of a solo law practice;
 - (4) Management of a law firm or corporate legal department;
 - (5) The management of client trust accounts;
 - (6) Law firm finances;
 - (7) Attorney-client communications;
 - (8) Case management;
 - (9) Effective calendaring;
 - (10) The avoidance of malpractice; or
 - (11) Opportunities to participate in pro bono legal services.
- (B) Legal ethics MCLE activity must focus on attorneys' professional responsibility, including education on and citation to the California Rules of Professional Conduct and the State Bar Act, and related authorities such as the professional conduct rules of a tribunal. Activities that focus on the ethics of business, corporate or government affairs, or society, in general, do not qualify for MCLE credit.
- (C) Recognition and elimination of bias MCLE activity must focus on education in the recognition and elimination of impermissible bias in the courtroom and law offices; attorney-client relationships and relationships with other attorneys; legal and nonlegal employment and workplaces, including hiring, managing, and terminating employees; and in housing, including accommodations and services. Courses required by Government Code section 12950.1 also qualify for recognition and elimination of bias

credit.

- (D) Implicit bias and the promotion of bias-reducing strategies MCLE activity must meet the requirements of Business and Professions Code section 6070.5 and must focus on implicit bias and the promotion of bias-reducing strategies to address how unintended biases regarding race, ethnicity, gender identity, sexual orientation, socioeconomic status, or other characteristics undermine confidence in the legal system.
- (E) Prevention and detection competence MCLE activity must consist of education that relates to the prevention and detection of substances use disorders, mental illness, and other mental or physical issues that impair an attorney's ability to perform legal services with competence.
- (F) Wellness competence MCLE activity may include physical and mental wellness and well-being or stress management so long as the activity addresses these topics in the context of the practice of law and the impact these issues can have on an attorney's ability to perform legal services with competence.
- (G) Technology MCLE activity must consist of education that addresses technology in the practice of law. This includes education on technology tools, programs, or applications to assist attorneys in their law practice. Credit will not be awarded for course content consisting of marketing of a technology product or service. Examples of courses that would qualify for this credit include:
 - (1) Cybersecurity, privacy, and data protection;
 - (2) Use of technology to create, receive, transmit, store, analyze, or delete client documents or client information;
 - (3) Law practice management technology tools, including technology for virtual appearances before a tribunal;
 - (4) Use of applications to assist attorneys in advising clients, including artificial intelligence technology; and
 - (5) Electronic discovery.
- (H) Civility MCLE activity must consist of education that addresses civility in the legal profession. This includes education that discusses the link between civility and bias, incivility that is directed at opposing parties or counsel, and incivility aimed at the judiciary.
- (I) Legal Specialist MCLE activity must provide high-quality legal education in one or more of the areas of the law eligible for LSMCLE credit as set forth in Title 3, Division 2, Chapter 2 of the State Bar Rules.
- (J) A presenter or presenters of an MCLE activity must have significant professional or academic experience related to its content.
- (K) Any information regarding an approved MCLE activity, including all promotional

materials, must state that the activity is approved for California MCLE credit, specify the amount of credit hours offered, and indicate whether any of the credit may be claimed for required MCLE in legal ethics, recognition and elimination of bias, implicit bias, prevention and detection competence, wellness competence, technology in the practice of law, civility in the legal profession, or legal specialization.

- (L) If an MCLE activity is submitted for accreditation, but the provider has not received a determination on approval of the activity, any information regarding the proposed MCLE activity, including all promotional materials, must state that an application for California MCLE credit is pending approval.
- (M) If an MCLE activity is not approved, the provider must promptly provide written notice of the State Bar's denial to any registrant seeking California MCLE credit for the course or program.
- (N) If an MCLE activity lasts one hour or more, the provider must provide participants with substantive written materials relevant to the MCLE activity either before or during the activity. Any materials provided online must remain online for at least thirty (30) calendar days following the MCLE activity.

Rule 3.602 Responsibilities of every provider

Every provider must:

- (A) Comply with any State Bar rules, standards, and terms applicable to an approved MCLE activity;
- (B) For MCLE that is offered as participatory activity, take attendance using the State Bar's Record of Attendance form or its equivalent and retain the form for four years from the date of the MCLE activity. The form must include the following:
 - (1) title of the MCLE activity;
 - (2) date of the MCLE activity;
 - (3) total hours awarded, including any credit hours or partial credit hours awarded for legal ethics, recognition and elimination of bias, prevention and detection competence, wellness competence, technology in the practice of law, civility in the legal profession, or legal specialization as a component of the activity; and
 - (4) the name and State Bar number of each California licensee.
- (C) Provide the State Bar of California with electronic attendance records for any MCLE participatory activity in a form acceptable to the State Bar of California within 60 days of completion of the activity.
- (D) Provide participants who have met the requirements of a participatory activity with a Certificate of Attendance or provide participants who have met the requirement of a self-study activity with a Certificate of Completion. Certificates may be issued in

written or electronic form. Each certificate must include the following:

- (1) provider name;
 - (2) title of the MCLE activity;
 - (3) date the MCLE activity ;
 - (4) total hours awarded, including any credit hours awarded for legal ethics, recognition and elimination of bias, implicit bias, prevention and detection competence, wellness competence, technology in the practice of law, civility in the legal profession, or legal specialization as a component of the topic of the activity;
 - (5) whether the activity is participatory or self-study; and
 - (6) name and license number of the California licensee, if available. This section may be left blank by the provider for completion by the licensee.
- (E) Provide each participant who completes an MCLE activity a State Bar MCLE Activity Evaluation Form or its equivalent, retain the completed form for at least one year, and submit it to the State Bar upon request.
- (F) Notify the State Bar in writing of any change -to the provider's name, address, contact person, or other contact information required by the State Bar including those of its affiliates, within thirty (30) days of the effective date of the change.

3.603 State Bar MCLE activity auditors

A State Bar MCLE Activity Auditor is a State Bar staff member, Board of Trustees member, California Board of Legal Specialization member, or other person designated by the State Bar to conduct an audit of an MCLE activity on behalf of the State Bar for the purpose of evaluating compliance by providers with these rules and to inform determinations regarding suspension or revocation of provider approval or status under rule 3.604. A State Bar MCLE Activity Auditor may not have a business, financial or personal relationship with or oversight responsibility for the provider of the MCLE activity being audited. A State Bar MCLE Activity Auditor may audit the MCLE activity at no cost. Such attendance shall not qualify for MCLE credit.

Rule 3.604 Suspension or revocation of provider approval

The State Bar may suspend or revoke a provider's approval for failure to comply with these rules or a State Bar determination of the following:

- (A) Failure of the content of the course, the program materials, the quality of the MCLE activity or activities, or the provider's performance to meet the standards set forth in these rules;
- (B) Misuse of a Record of Attendance, Certificate of Attendance, activity evaluation form, or any other form given to a provider by the State Bar;
- (C) Failure to pay appropriate processing fees, late filing fees, or any other applicable

- fees; and
- (D) Substantiated complaint(s) documented against the provider or against an activity offered by the provider.

Rule 3.605 Complaints about Providers

The State Bar does not intervene in disputes between a provider and an attendee or potential attendee, but complaints the State Bar receives regarding a provider are considered in assessing the provider's compliance with these rules.

Rule 3.606 MCLE providers

- (A) Providers of MCLE or LSMCLE are categorized as either Single Activity or Multiple Activity Providers. Single Activity Providers are approved providers permitted to hold and grant MCLE or LSMCLE credit for a single MCLE or LSMCLE activity for a period of two years from the date of the activity, provided that no substantive changes are made to the program.
- (B) Multiple Activity Providers are approved providers authorized to hold and grant MCLE credit for any MCLE or LSMCLE activity that complies with these rules without having to submit separate applications to request approval for each program.

Rule 3.607 Applying for Single Activity Provider status

- (A) To be considered for Single Activity Provider status, a provider must:
- (1) Apply using the State Bar's Single Activity Provider application form for each activity the provider plans to provide;
 - (2) Submit the completed form in the manner prescribed by the State Bar, the appropriate processing fee, and the required supporting materials no less than sixty (60) days prior to the date for which the course or activity is scheduled;
 - (3) Submit a separate application for each activity that is offered as part of an on-demand, multiday or multitrack, subscription based, bundled activity, or multiple sessions within a bundled activity.

Incomplete applications or applications that do not include the required supporting materials or the appropriate processing fee will not be considered for approval.

- (B) A Single Activity Provider application that requests retroactive approval of an activity is subject to late fees as set forth in the State Bar's Schedule of Fees. Retroactive approval may only be granted for an activity occurring within the past two years.

Rule 3.608 Applying for Multiple Activity Provider status

- (A) To be considered for Multiple Activity Provider status, a provider must:

- (1) Within a two-year period prior to submitting an application for Multiple Activity Provider status, receive State Bar approval for six different MCLE activities that are different and not repeat presentations of the same activity and held on six different dates;
- (2) Apply using the State Bar's Multiple Activity Provider application; and
- (3) Submit the completed application in the manner prescribed by the State Bar, the appropriate processing fee, and the required supporting materials for the six activities described in subparagraph (A)(1).

Incomplete applications or applications that do not include the required supporting materials or the appropriate processing fee will not be considered for approval.

- (B) Any activity that is held prior to approval of Multiple Activity Provider status must be submitted for Single Activity Provider approval under rule 3.607.

Rule 3.609 Renewing Multiple Activity Provider status

- (A) To be eligible for renewal of up to two years, a Multiple Activity Provider must:

- (1) Apply for renewal using the State Bar's Multiple Activity Provider renewal application;
- (2) Submit evidence that it has offered six different MCLE activities that meet the requirements of these rules within the two years preceding its application for renewal;
- (3) Submit the completed application in the manner prescribed by the State Bar, the required supporting materials for the six activities, and the appropriate processing fee on or before the deadline set by the State Bar;
- (4) Certify that all self-study activities offered have been reviewed within the 12 months preceding an application for renewal, and that all self-study activities continue to meet the requirements of rule 3.601; and
- (5) Submit any complaints it may have received regarding compliance with these rules.

Incomplete applications or applications that do not include the required supporting materials or the appropriate processing fee will not be considered for approval.

- (B) A Multiple Activity Provider renewal application that is received after the renewal deadline set by the State Bar is subject to late fees as set forth in the State Bar's Schedule of Fees. A Multiple Activity Provider renewal application that is received two years or more after the renewal deadline set by the State Bar is ineligible for renewal under this rule. A Multiple Activity Provider who fails to renew their status within the two-year timeframe must submit any MCLE or LSMCLE activity offered during that timeframe for retroactive approval under rule 3.607.

Rule 3.610 Applying for Legal Specialty Provider Status

- (A) The State Bar certifies attorneys as specialists in certain areas of law. Certified specialists must take and report LSMCLE specific to the area(s) of their specialty, in addition to MCLE credit to maintain their certification. The State Bar may accredit specialty education as meeting the standards for LSMCLE activity. LSMCLE activity may also qualify as approved MCLE activity for legal ethics, recognition and elimination of bias, implicit bias, prevention and detection competence, wellness competence, technology in the practice of law, or civility in the profession.
- (B) A provider intending to offer LSMCLE must be approved by the State Bar as a Multiple Activity Provider in a specialty area of law in the manner set forth in rule 3.608 or must file an application for Single Activity Provider status for a single education activity designed to attain or maintain proficiency in a specialty area of law in the manner set forth in rule 3.607. A separate Multiple Activity Provider Application is required for each specialty area.
- (C) Any requirements for an MCLE activity as set forth in these rules apply to an LSMCLE activity.²

Rule 3.611 MCLE Provider Fees

- (A) Providers are subject to application processing fees when seeking approval to grant credit for a single MCLE activity as a Single Activity Provider or applying for or seeking to renew their Multiple Activity Provider Status. Providers are also subject to applicable late fees and reinstatement fees as set forth in these rules and the State Bar's Schedule of Fees.
- (B) Government Agency and Nonprofit Fees: Providers that are courts, government agencies, or granted tax-exempt 501(c)(3) status from the United States Internal Revenue Service (IRS) qualify for lower application processing and renewal fees. Proof of a provider's nonprofit status is required and must be submitted with the provider's application. A provider that is unable to provide proof of their registered nonprofit status with the IRS does not qualify for the lower application processing or renewal fee.

² See State Bar Rule 3.114.

TITLE 3. PROGRAMS AND SERVICES

DIVISION 5. PROVIDERS OF PROGRAMS AND SERVICES

Chapter 1. Providers of Continuing Legal Education

Article 1. Global provisions

Rule 3.600 Definitions

- (A) An “MCLE activity” is minimum continuing legal education that is accredited by the State Bar ~~approves~~ as meeting standards for MCLE credit.¹
- ~~(A)~~(B) An “LSMCLE” activity is legal specialty minimum continuing legal education that is accredited by the State Bar as meeting the standards for LSMCLE and MCLE credit as set forth in rule 3.114.
- ~~(B)~~(C) A “provider” is an individual or entity approved by the State Bar to grant MCLE or LSMCLE credit for ~~an~~ MCLE or LSMCLE activity.
- (D) A “Single Activity Provider” is a provider approved to grant credit for a single MCLE activity after ~~submitting an application applying for~~ and receiving approval of the activity in accordance with State Bar procedures and paying the appropriate ~~processing fee(s).~~
- ~~(C)~~(E) A “Multiple Activity Provider” is a provider approved to grant credit for any MCLE activity after applying for and receiving approval for Multiple Activity Provider status in accordance with State Bar procedures and paying the appropriate fee(s). ~~that complies with the terms of the Multiple Activity Provider Agreement.~~¹
- ~~(D)~~(F) A “Legal Specialty Credit Provider” is approved to grant credit for a single LSMCLE activity designed to attain and maintain proficiency in a specialty area of law or is an approved Multiple Activity Provider in a specialty area of law as set forth in rule 3.114.
- ~~(E)~~(G) “MCLE credit” is the number of credit hours that a licensee may claim to meet the requirements of these rules.

¹ Business & Professions Code § 6070 (b) provides that programs offered by the California District Attorneys Association and the California Public Defenders Association are deemed to be approved MCLE.

~~(F)(H)~~ A “credit hour” is sixty minutes actually spent in an MCLE activity, ~~less any time for breaks or other activities that lack educational content.~~ A credit hour is reported to the nearest quarter hour in decimals, ~~and MCLE credit~~ includes time for introductory and concluding remarks and for questions and answers. Time spent in breaks or lunch periods, and participating in any nonlegal education functions, including networking, business meetings, tours, or demonstrations is not activity that may be applied to a credit hour or receive MCLE credit.

~~An “approved jurisdiction” is recognized by the State Bar as having MCLE requirements that substantially meet State Bar standards for MCLE activities and computing MCLE credit hours in a manner acceptable to the State Bar. Approved jurisdictions are listed on the State Bar Web site.~~

~~(G)(I)~~ A “participatory activity” is an MCLE or LSMCLE activity that qualifies for participatory MCLE or LSMCLE credit and for which the provider must verify attendance. Participatory activities may be presented in person or delivered by electronic means. ~~Methods for verification include sign in in writing or electronically at the state of the course.~~

~~(H)(J)~~ A “self-study activity” is any MCLE activity identified in Rule 2.83. Self-study activities may be presented in person or delivered by electronic means.

~~(H)(K)~~ ~~“State Bar MCLE Activity Auditors” are individuals designated by the State Bar to conduct audits of MCLE activities on behalf of the State Bar for the purpose of evaluating compliance by providers with these rules.~~

Rule 3.601 Standards for MCLE Activity approval

To be eligible for approved for MCLE accreditation credit, an MCLE activity must meet State Bar standards.²

(A) The General MCLE activity must relate to legal subjects directly relevant to licensees of the State Bar ~~or and~~ have current significant educational ~~current~~ professional, ~~or and~~ practical content, with an objective to increase each participant’s professional competency as an attorney. Activities designed for non-attorney participants will not be approved for general MCLE credit. MCLE activities that may be eligible for general MCLE credit include those that provide education or practical instructions in:

- (1) The practice of law;
- (2) Litigation;
- (3) Management of a solo law practice;
- (4) Management of a law firm or corporate legal department;
- (5) The management of client trust accounts;
- (6) Law firm finances;
- (7) Attorney-client communications;
- (8) Case management;
- (9) Effective calendaring;

- (10) The avoidance of malpractice; or
- (11) Opportunities to participate in pro bono legal services.

- (B) Legal ethics MCLE activity must focus on attorneys' professional responsibility, including education on and citation to the California Rules of Professional Conduct and the State Bar Act, and related authorities such as the professional conduct rules of a tribunal. Activities that focus on the ethics of business, corporate or government affairs, or society, in general, do not qualify for MCLE credit.
- (C) Recognition and elimination of bias MCLE activity must focus on education in the recognition and elimination of impermissible bias in the courtroom and law offices; attorney-client relationships and relationships with other attorneys; legal and nonlegal employment and workplaces, including hiring, managing, and terminating employees; and in housing, including accommodations and services. Courses required by Government Code section 12950.1 also qualify for recognition and elimination of bias credit.
- (D) Implicit bias and the promotion of bias-reducing strategies MCLE activity must meet the requirements of Business and Professions Code section 6070.5 and must focus on implicit bias and the promotion of bias-reducing strategies to address how unintended biases regarding race, ethnicity, gender identity, sexual orientation, socioeconomic status, or other characteristics undermine confidence in the legal system.
- (E) Prevention and detection competence MCLE activity must consist of education that relates to the prevention and detection of substances use disorders, mental illness, and other mental or physical issues that impair an attorney's ability to perform legal services with competence.
- (F) Wellness competence MCLE activity may include physical and mental wellness and well-being or stress management so long as the activity addresses these topics in the context of the practice of law and the impact these issues can have on an attorney's ability to perform legal services with competence.
- (G) Technology MCLE activity must consist of education that addresses technology in the practice of law. This includes education on technology tools, programs, or applications to assist attorneys in their law practice. Credit will not be awarded for course content consisting of marketing of a technology product or service. Examples of courses that would qualify for this credit include:
 - (1) Cybersecurity, privacy, and data protection;
 - (2) Use of technology to create, receive, transmit, store, analyze, or delete client documents or client information;
 - (3) Law practice management technology tools, including technology for virtual appearances before a tribunal;

- (4) Use of applications to assist attorneys in advising clients, including artificial intelligence technology; and
- (5) Electronic discovery.

(H) Civility MCLE activity must consist of education that addresses civility in the legal profession. This includes education that discusses the link between civility and bias, incivility that is directed at opposing parties or counsel, and incivility aimed at the judiciary.

(I) Legal Specialist MCLE activity must provide high-quality legal education in one or more of the areas of the law eligible for LSMCLE credit as set forth in Title 3, Division 2, Chapter 2 of the State Bar Rules.

~~(A)(J)~~ The A presenter or presenters of the an MCLE activity must have significant professional or academic experience related to its content.

(K) Any information regarding an approved MCLE activity, including all promotional materials, must state that the MCLE activity is approved for California MCLE credit, or that a request for approval is pending; specify the amount of credit hours offered; and indicate whether any of the credit may be claimed for required MCLE in legal ethics, recognition and elimination of bias, implicit bias, prevention and detection competence, or wellness competence, technology in the practice of law, civility in the legal profession, or legal specialization. issues.³

(L) If an MCLE activity is submitted for accreditation, but the provider has not received a determination on approval of the activity, any information regarding the proposed MCLE activity, including all promotional materials, must state that an application for California MCLE credit is pending approval.

~~(B)(M)~~ If an MCLE activity is not approved, the provider must promptly provide written notice of the State Bar's denial to any registrant seeking California MCLE credit for the course or program.

~~(C)(N)~~ If the an MCLE activity lasts one hour or more, the provider must provide participants with make substantive written materials relevant to the MCLE activity available either before or during the activity. Any materials provided online must remain online for at least thirty (30) calendar days following the MCLE activity.

~~(D) — Programs and classes must be scheduled so that participants are free of interruptions.~~

³ Business & Professions Code § 6070(b) provides that programs offered by the California District Attorneys Association and the California Public Defenders Association are deemed to be approved MCLE. State Bar Rule 2.84 provides that "A licensee may claim MCLE credit for educational activities that the California Board of Legal Specialization approves for certification or recertification."

² See State Bar Rule 2.72 for a description of competence issues and elimination of bias.

~~(E) On and after January 1, 2022, for all training dealing with, or including a component dealing with, implicit bias and the promotion of bias-reducing strategies, an MCLE provider must meet the requirements of Business and Professions Code section 6070.5.~~

Rule 3.601 adopted as Rule 3.501 effective January 1, 2008; renumbered as Rule 3.601 effective November 4, 2011; amended effective January 1, 2013; amended effective July 1, 2014; amended effective January 25, 2019; amended effective September 24, 2020.

Rule 3.602 Responsibilities of every provider

Every provider must:

(A) ~~Comply~~ Comply with any State Bar rules, standards, and terms applicable to an approved MCLE activity;

~~(B) retain~~ For MCLE that is offered as participatory activity, take attendance using the State Bar's Record of Attendance form or its equivalent and retain the form for an MCLE activity for four years from the date of the MCLE activity ~~and submit it to the State Bar upon request.~~ The ~~record form~~ must include the following:

(1) title of the MCLE activity;

(2) date of the MCLE activity;

(3) total hours awarded, including any credits hours or partial credit hours awarded for legal ethics, recognition and elimination of bias, or prevention and detection competence issues, wellness competence, technology in the practice of law, civility in the legal profession, or legal specialization as a component of the topic of the activity; and

~~, and whether the activity is participatory or self-study~~

~~(4) and~~ the name and State Bar number of each attendee California licensee;

~~(B)(C)~~ Provide the State Bar of California with electronic attendance records for any MCLE participatory activity in a form acceptable to the State Bar of California within 60 days of completion of the activity;

~~(D) furnish an MCLE Certificate of Attendance upon completion of the program to each attendee~~ Provide participants who have met the requirements of a participatory activity with a Certificate of Attendance or provide participants who have met the requirement of a self-study activity with a Certificate of Completion. Certificates may be issued in written or electronic form. for the MCLE activity. The Each certificate must include the following:

(1) provider name;

- (2) title of the MCLE activity;
- (3) date the MCLE activity ~~course was completed;~~
- (4) total hours awarded, including any credits hours awarded for legal ethics, recognition and elimination of bias, implicit bias, prevention and detection ~~or~~ competence ~~issues~~, wellness competence, technology in the practice of law, civility in the legal profession, or legal specialization as a component of the topic of the activity; ~~and~~
- (5) whether the activity is participatory or self-study; and
- ~~(4)~~(6) name and license number of the California licensee, if available. This section may be left blank by the provider for completion by the licensee.

~~(C)~~(E) Provide ~~give~~ each attendee-participant who completes an MCLE activity a State Bar MCLE Activity Evaluation Form or its equivalent; ~~retain the completed form for at least one year;~~ and submit it to the State Bar upon request.

~~(D)~~(F) Notify the State Bar in writing of any change ~~in~~ to the provider's name, address, contact person, or other contact information required by the State Bar including those of its affiliates, within thirty (30) days of the effective date of the change; ~~and~~

~~(E)~~(G) beginning January 1, 2022, if providing training dealing with, or including a component dealing with, implicit bias and the promotion of bias-reducing strategies to address how unintended biases regarding race, ethnicity, gender identity, sexual orientation, socioeconomic status, or other characteristics undermine confidence in the legal system, attest to the following:

- ~~(1) — The provider makes reasonable efforts to recruit and hire trainers who are representative of the diversity of persons that California's legal system serves.~~
- ~~(2) — The trainers have either academic training in implicit bias or experience educating legal professionals about implicit bias and its effects on people accessing and interacting with the legal system.~~
- ~~(3) — The training includes a component regarding the impact of implicit bias, explicit bias, and systemic bias on the legal system and the effect this can have on people accessing and interacting with the legal system.~~
- ~~(4) — The training includes actionable steps licensees can take to recognize and address their own implicit biases.~~

Rule 3.602 adopted as Rule 3.502 effective January 1, 2008; renumbered as Rule 3.602 effective November 4, 2011; amended effective July 1, 2014; amended effective September 24, 2020; amended effective December 1, 2020

3.603 State Bar MCLE ~~A~~activity ~~A~~auditors

A State Bar MCLE Activity Auditor ~~may be~~ is a State Bar staff member, Board of Trustees member, California Board of Legal Specialization member, or other person designated by the State Bar to conduct an audit of ~~an particular MCLE activity program or class~~ on behalf of the State Bar for the purpose of evaluating compliance by providers with these rules and to inform determinations regarding suspension or revocation of provider approval or status under rule 3.604. A State Bar MCLE Activity Auditor may not have a business, financial or personal relationship with or oversight responsibility for the provider of the ~~program or class MCLE activity~~ being audited. A State Bar MCLE Activity Auditor may audit the ~~particular MCLE program or class activity~~ at no cost. Such attendance shall not qualify for MCLE credit.

Rule 3.603 adopted effective July 1, 2014; amended effective September 24, 2020

Rule 3.604 Suspension or revocation of provider approval

The State Bar may suspend or revoke a provider's approval for failure to comply with these rules or a State Bar determination of the following: the terms of any applicable State Bar agreement only by majority vote of the Board of Trustees, after notice and hearing, and for good cause shown.

- (A) Failure of the content of the course, the program materials, the quality of the MCLE activity or activities, or the provider's performance to meet the standards set forth in these rules;
- (B) Misuse of a Record of Attendance, Certificate of Attendance, activity evaluation form, or any other form given to a provider by the State Bar;
- (C) Failure to pay appropriate processing fees, late filing fees, or any other applicable fees; and
- (D) Substantiated complaint(s) documented against the provider or against an activity offered by the provider.

Rule 3.604 adopted as Rule 3.503 effective January 1, 2008; renumbered as Rule 3.603 effective November 4, 2011; renumbered as Rule 3.604 effective July 1, 2014; amended effective March 10, 2017; amended effective September 24, 2020

Rule 3.605 Complaints about Providers

The State Bar does not intervene in disputes between a provider and an attendee or potential attendee, but complaints the State Bar receives regarding a provider are considered in assessing the provider's compliance with these rules.

Rule 3.605 adopted effective July 1, 2014.

Rule 3.606 MCLE providers

- (A) Providers of MCLE or LSMCLE are categorized as either Single Activity or Multiple Activity Providers. Single Activity Providers are approved providers permitted to hold and grant MCLE or LSMCLE credit for a single MCLE or LSMCLE activity for a period of two years from the date of the activity, provided that no substantive changes are made to the program.
- (B) Multiple Activity Providers are approved providers authorized to hold and grant MCLE credit for any MCLE or LSMCLE activity that complies with these rules without having to submit separate applications to request approval for each program.

Article 2. ~~Multiple Activity Providers~~

Rule 3.607 Applying for Single Activity Provider status

- (A) To be considered for Single Activity Provider status, a provider must:
- (1) Apply using the State Bar's Single Activity Provider application form for each activity the provider plans to provide;
 - (2) Submit the completed form in the manner prescribed by the State Bar, the appropriate processing fee, and the required supporting materials no less than sixty (60) days prior to the date for which the course or activity is scheduled;
 - (3) Submit a separate application for each activity that is offered as part of an on-demand, multiday or multitrack, subscription based, bundled activity, or multiple sessions within a bundled activity.
- Incomplete applications or applications that do not include the required supporting materials or the appropriate processing fee will not be considered for approval.
- (B) A Single Activity Provider application that requests retroactive approval of an activity is subject to late fees as set forth in the State Bar's Schedule of Fees. Retroactive approval may only be granted for an activity occurring within the past two years.

Rule 3.60820 Applying for Multiple Activity Provider status

- (A) To be considered for Multiple Activity Provider status, a provider must:
- (1) ~~Within a two-year period prior to submitting an application for Multiple Activity Provider status,~~ receive State Bar approval for ~~four~~six different MCLE activities ~~that are different and not repeat presentations of the same activity and hold them on four~~held on six different dates; and
 - (2) Apply using the State Bar's Multiple Activity Provider application; and
 - (3) ~~Submit the completed an application in the manner prescribed by the State Bar, and the appropriate processing fee, for Multiple Activity Provider status within the same period and the required supporting materials for the six activities described in subparagraph (A)(1).~~

Incomplete applications or applications that do not include the required supporting materials or the appropriate processing fee will not be considered for approval.

(B) Any activity that is held prior to approval of Multiple Activity Provider status must be submitted for Single Activity Provider approval under rule 3.607.

Rule 3.620 adopted as Rule 3.520 effective January 1, 2008; renumbered as Rule 3.620 effective November 4, 2011.

Rule 3.60921 Renewing Multiple Activity Provider status

(A) To be eligible for renewal of up to ~~three~~two years, a Multiple Activity Provider must:

(1) ~~a~~Apply for renewal using the State Bar's ~~form for~~ Multiple Activity Provider ~~renewal~~ application;

(2) ~~s~~Submit evidence that it has offered ~~four~~six different MCLE activities that meet the requirements of these rules within the two years preceding its application for renewal;

(3) ~~s~~Submit the completed ~~form~~application in the manner prescribed by the State Bar, the and any required documentation by supporting materials for the six activities, and the appropriate processing fee on or before the deadline set by the State Bar;

~~(3)~~(4) ~~Certify that all self-study activities offered have been reviewed within the 12 months preceding an application for renewal, and that all self-study activities continue to meet the requirements of rule 3.601; and~~

~~(4)~~(5) ~~s~~Submit any complaints it may have received regarding compliance with these rules; ~~and~~

~~pay the appropriate fees.~~ Incomplete applications or applications that do not include the required supporting materials or the appropriate processing fee will not be considered for approval.

(B) A Multiple Activity Provider renewal application that is received after the renewal deadline set by the State Bar is subject to late fees as set forth in the State Bar's Schedule of Fees. A Multiple Activity Provider renewal application that is received two years or more after the renewal deadline set by the State Bar is ineligible for renewal under this rule. A Multiple Activity Provider who fails to renew their status within the two-year timeframe must submit any MCLE or LSMCLE activity offered during that timeframe for retroactive approval under rule 3.607.

Rule 3.621 adopted as Rule 3.521 effective January 1, 2008; renumbered as Rule 3.621 effective November 4, 2011; amended effective July 1, 2014.

Rule 3.610 Applying for Legal Specialty Provider Status

- (A) The State Bar certifies attorneys as specialists in certain areas of law. Certified specialists must take and report LSMCLE specific to the area(s) of their specialty, in addition to MCLE credit to maintain their certification. The State Bar may accredit specialty education as meeting the standards for LSMCLE activity. LSMCLE activity may also qualify as approved MCLE activity for legal ethics, recognition and elimination of bias, implicit bias, prevention and detection competence, wellness competence, technology in the practice of law, or civility in the profession.
- (B) A provider intending to offer LSMCLE must be approved by the State Bar as a Multiple Activity Provider in a specialty area of law in the manner set forth in rule 3.608 or must file an application for Single Activity Provider status for a single education activity designed to attain or maintain proficiency in a specialty area of law in the manner set forth in rule 3.607. A separate Multiple Activity Provider Application is required for each specialty area.
- (C) Any requirements for an MCLE activity as set forth in these rules apply to an LSMCLE activity.²

Rule 3.611 MCLE Provider Fees

- (A) Providers are subject to application processing fees when seeking approval to grant credit for a single MCLE activity as a Single Activity Provider or applying for or seeking to renew their Multiple Activity Provider Status. Providers are also subject to applicable late fees and reinstatement fees as set forth in these rules and the State Bar's Schedule of Fees.
- (B) Government Agency and Nonprofit Fees: Providers that are courts, government agencies, or granted tax-exempt 501(c)(3) status from the United States Internal Revenue Service (IRS) qualify for lower application processing and renewal fees. Proof of a provider's nonprofit status is required and must be submitted with the provider's application. A provider that is unable to provide proof of their registered nonprofit status with the IRS does not qualify for the lower application processing or renewal fee.

² See State Bar Rule 3.114.

RULE 2.84 TOTAL = 57 A = 55 AM = 1 D = 0 NP = 1		Prov. Rules TOTAL = 57 A = 38 AM = 1 D = 0 NP = 18		Proposed Amendments to the MCLE Rules Synopsis of Public Comments			
File No.	Commenter/Signatory	Org ¹	Atty/ Nonatt ²	Pos. Rule 2.84 ³	Comment on Rule 2.84 (MCLE Credit Rule)	Pos. Rules ⁴	Comment on Rules 3.602(D) & (E), 3.609, 3.610, and 3.611 (MCLE Provider Rules)
25007982	Agnes Sullivan	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	A	
25007869	Alexander Farrell	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include	NP	

¹ Are you commenting on behalf of an organization?

² Are you an attorney or nonattorney? A = Attorney NA = Nonattorney DS = Decline to State

³ What is your position on the proposed rule 2.84? A = Agree D = Disagree AM = Agree if Modified NP = No Position

⁴ What is your position proposed rules 3.602(D) and (E), 3.609, 3.610, and 3.6311? A = Agree D = Disagree AM = Agree if Modified NP = No Position

RULE 2.84 TOTAL = 57A = 55 AM = 1
D = 0 NP = 1**Prov. Rules TOTAL = 57**A = 38 AM = 1
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Synopsis of Public Comments**

File No.	Commenter/Signatory	Org ¹	Atty/ Nona tty ²	Pos. Rule 2.84 ³	Comment on Rule 2.84 (MCLE Credit Rule)	Pos. Rules ⁴	Comment on Rules 3.602(D) & (E), 3.609, 3.610, and 3.611 (MCLE Provider Rules)
					middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		
25010238	Alois Phillips	No	A	A	This is a very rewarding activity and the students learn so much from being exposed to all that the attorneys contribute. The coaches learn a lot also about areas of law they may not regularly practice.	A	
24927710	Anonymous	No	A	A		A	
25010941	Anonymous	No	NA	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional	NP	

RULE 2.84 TOTAL = 57A = 55 AM = 1
D = 0 NP = 1**Prov. Rules TOTAL = 57**A = 38 AM = 1
D = 0 NP = 18**Proposed Amendments to the MCLE Rules
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					development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		
25007599	Aren Kavcioglu	No	A	A		A	
25010120	Barry Edwards	No	A	A	Acting as a scorer or judge for mock trial competitions sponsored by recognized organizations such as Constitutions Rights Foundation should qualify under state bar laws for MCLE credit since there is a learning curve for the attorney and benefit for the middle and senior school students from this participation	A	
24931662	Brian Chien	No	A	A		A	
25011076	Brian Crone		A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate

RULE 2.84 TOTAL = 57A = 55 AM = 1
D = 0 NP = 1**Prov. Rules TOTAL = 57**A = 38 AM = 1
D = 0 NP = 18**Proposed Amendments to the MCLE Rules
Synopsis of Public Comments**

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					programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
25079064	California Access to Justice Commission (Londen)	Yes	A	NP	Please see attachment. See attachment.	NP	Please see attachment. See attachment.
Email	California Lawyers Association (Evans)	Yes	A	AM	See attachment.	AM	See attachment.
25015664	Christine Fenech	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and	A	

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					legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit		
25017044	Constitutional Rights Foundation (Anonymous)	Yes	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	NP	
25029312	Constitutional Rights Foundation (Keiter)	Yes	A	A	I am no longer practicing law, but one of the most egregious and absurd parts of law practice was MCLE. It's a joke designed to prop up the financial interests of MCLE purveyors. A solo practitioner, it was a significant burden. I would much	NP	

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					rather see attorneys donating their time and effort to good causes like educating students in Mock Trial programs than waste their time and money on nonsense MCLE courses that achieve very little in the way of improving legal education or guaranteeing the quality of of the members of the state bar. This rule change will create far greater good for the community and the attorneys involved.		
24930397	Constitutional Rights Foundation Orange County (Witkin)	Yes	A	A	See attachment.	NP	
24992845	CRF (Wesley)	Yes	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of volunteering for mock trial at the middle school, high school, college, and graduate levels to be	A	

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					included in the list of activities acceptable to receive MCLE credit.		
25033387	Darin Beffa	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	NP	
25007597	DEEPAK K JAIN	No	NA	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional

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					development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
25007510	Diane Evans	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.

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25028559	Donald Lester Davis	No	A	A	I have served as a mock trial judge for a number of years. Preparation for the events requires many hours of study with regards to law, issues, and procedures.	A	
25016364	Dr. Victor Anderson	No	NA	A	As a supporter of mock trial, as a current faculty advisor and attorney coach well into my second decade, I can tell you first hand of its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	NP	
24954420	EJ Renner	No	NA	A	Proposed State Bar rule 2.84, as revised following initial public comment, would allow attorneys to receive MCLE credit for coaching students, servings as an attorney scorer, and/or presiding as judge over mock trial, moot court, arbitration, and	A	

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					mediation competitions at the middle school, high school, collegiate level, graduate, and law school level. Attorneys would be able to claim up to 2 hours of general credit during a compliance period. Change "servings" as an attorney scorer ** to "serving"		
25010092	Eric Gene Young		A	A	I volunteer each year as a presiding judge for an organization called Empire Mock Trials, which gives high school kids an opportunity to prepare a mock case for trial. The program is quite rigorous, and I am dumbfounded by how sharp and prepared the students are who participate. The format is also every bit as challenging and realistic as law school mock trial formats, including calling live lay and expert witnesses, making and responding to objections, and citing to statutory and decisional law to the court. I have thought for some time that CLE credit should be considered for presiding over a mock trial through this program because it would incentivize more attorneys to participate. Empire has been providing this program across the country for about 15 years, and they struggle to get enough attorneys to participate as judges for the many students who participate. This is a shame because at the conclusion of the mock trial proceedings, there is an opportunity to	A	Anything the Bar can do to improve the quality of MCLE courses is desirable. My niche interest is legal technology, and there are some providers who are still charging for courses that are 6,7, and 8 years old now. Courses in technology that are that old have no relevance whatsoever. These rules changes will encourage providers to offer more current content, which is what attorneys need.

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					interact with the students and discuss our experiences as attorneys with them. Attorneys should be encouraged to engage in more activities like this that target an even younger population than law students.		
25011292	Erika Johnson-Brooks		A	A	As a regular volunteer and supporter of mock trial and its positive impact on youth, I support amending the proposed rule to allow MCLE credit to attorneys who coach or score mock trial at the all levels (middle school, high school, college). Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. It's also extremely beneficial for the profession by serving as mentors to these students. We create a positive experience for those who may eventually decide to become lawyers.	A	
25011827	Ethan Feng	No	A	A	As a long time participant of mock trial as a student and as a coach of mock trial teams, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional	NP	

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					development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. In particular, it is difficult to learn the nuances of the rules of evidence from a classroom setting, and the constant exposure to issues of evidence through coaching and judging mock trial has been extremely helpful in my practice. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		
25028238	Fresno County Superintendent of Schools (Aaron)	Yes	NA	A	I urge you to vote on allowing attorneys to receive MCLE credit for serving our students and community for mock trial.	A	
25024554	Jeffrey Winter	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including

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					rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
25008951	Jeni Boulanger	No	NA	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	A	
25007941	Jennifer Keller	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high	NP	

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					school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		
25019215	john holly	No	A	A	I have coached High School Mock Trial teams for 16 years. Helping students prepare the case includes studying the facts and the law, preparing pretrial motions, direct and cross examinations, objections and responses to objections, and opening and closing statements. I have been a criminal defense attorney for twenty years, litigating both trials and appeals. Mock Trial helps litigation skills stay sharp.	A	
24931689	John W. Fricks	No	A	A	Thank you for considering including of mock trial coaches and scoring attorneys' efforts to be rewarded with MCLE credit. Thank you also for including all age ranges. As an attorney and MT proponent for nearly 35 years, I can attest that teaching	NP	

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					and scoring mock trial and related rules of evidence are an invaluable educational tool for the attorney (and not just the student). In addition, as something that supports attorney participation in mock trial, it is a great program to educate the public about the "rule of law" and is a great way to shed some light/publicity on the good that attorneys do in the community. BIG THUMBS UP!		
25070866	Joshua Hanks	No	A	A	I have participated in the local high school mock trial program for over 20 years. I participated as a student and have coached and/or scored every year since my graduation. The kids participating in this program put in so much time and effort. There is nothing more disheartening for the kids than to show up and only have one scorer. Anything that can be done to encourage more participation would be beneficial and I know, from years of informal polling, that offering MCLE credits would definitely cause some attorneys who don't ordinarily participate to give it a try. Therefore, I am wholeheartedly in favor of this proposition.	A	
25015915	Karen BOBROW	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high	NP	

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					school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		
25049456	Kathy Graber	No	NA	A	As a 30+ year coach of high school mock trial I can testify to its positive impact on my students. I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I	A	

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					support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		
25009862	Kelly Sutherland		A	A	I agree that MCLE hours should be granted to attorneys who coach a mock trial team and to those who score or preside over a mock trial competition. Those attorneys are sharpening their critical analysis skills, their evidence knowledge, and their trial procedure skills.	NP	
25009751	Kevin S. Blum	No	NA	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate	NP	

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					levels to be included in the list of activities acceptable to receive MCLE credit.		
25049352	Laura Beers-Dannerth	No	NA	A	As a school advisor of mock trial, I believe in its positive impact on youth. I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	A	
25007526	Lauren Gafa	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional	NP	

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					development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		
25017499	Lauretta Komlos	No	A	A	As a high schooler, I was inspired to pursue the profession in law as a result of participating in a Law Day, Mock Trial competition. I had incredible appreciation for the local District Attorney who mentored me and my classmates as well as for the judge who presided over the trial. Years later, after practicing Criminal Law for 20 years, I transitioned into teaching High Schoolers. I am now so very lucky to be a Mock Trial coach at my school site, becoming the mentor who I once admired. These programs have an impact on young adults and create a respect and passion for the practice of law. They enrich both the young adults who participate as well as the lawyers, judges, and teachers who coach, mentor, and officiate. I believe that practicing attorneys would greatly benefit by receiving MCLE credit. I have seen over and over, attorneys who participate in	A	

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					some fashion with Mock Trial are reinvigorated and grateful for their participation. It fosters a continued love of the law and is both educational (especially for those who need to brush up on rules of evidence ;) as well as purposeful. Please seriously considering affirming proposed amendments that would allow for MCLE credit for Mock Trial participation.		
24931649	Law Office of Susan Kang Gordon (Gordon)	Yes	A	A		A	
24934732	Maggie Reeves	No	DS	A	This amendment is win-win. It's a "win" to allow attorneys to earn MCLE credits for this activity, and it's a "win" for the participants in these mock trial programs. Attorneys who participate in this program can learn some good caselaw, refresh their memories about rules of evidence, and have to give good counsel to the participants. The participants will benefit from having a greater variety and number of attorney-scorers. I truly hope this passes.	NP	
25009838	Marysa Lin	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level	NP	

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25016750	Monterey County Bar Association (Des Roches)	Yes	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	A	

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25038425	Natasha Mehta	No	A	A		A	
25012137	NESTOR BARRERO	No	A	A	I am a supporter of mock trial and its positive impact on youth and have served for many years as an attorney scorer in mock trial competitions. I support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Middle school program are just as intensive and rigorous as high school and college level activities. Lawyers who participate in mock trial efforts, whether as coaches, scorers or judges engage in attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	A	

RULE 2.84 TOTAL = 57

A = 55 AM = 1
D = 0 NP = 1

Prov. Rules TOTAL = 57

A = 38 AM = 1
D = 0 NP = 18

RULE 2.84 TOTAL = 57A = 55 AM = 1
D = 0 NP = 1**Prov. Rules TOTAL = 57**A = 38 AM = 1
D = 0 NP = 18**Proposed Amendments to the MCLE Rules
Synopsis of Public Comments**

File No.	Commenter/Signatory	Org ¹	Atty/ Nona tty ²	Pos. Rule 2.84 ³	Comment on Rule 2.84 (MCLE Credit Rule)	Pos. Rules ⁴	Comment on Rules 3.602(D) & (E), 3.609, 3.610, and 3.611 (MCLE Provider Rules)
25009285	Patricia Fullinwider	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	A	
25007818	Rebecca Charlesworth		A	A		A	
25016525	Rina R. Tringali, CPA, CFE	No	NA	A	Agree with proposal to offer MCLE Credit for Mock Trial Volunteers. A certain amount of preparation goes into this work, as well as reinforcement when training students. Well earned in my opinion.	A	
24934207	Robert B. Ewing	No	A	A	I have worked for many years as an attorney scorer for our local high school mock trial competition and have found it to be a great experience, that does involve	NP	

Proposed Amendments to the MCLE Rules Synopsis of Public Comments							
File No.	Commenter/Signatory	Org ¹	Atty/ Nonatt ²	Pos. Rule 2.84 ³	Comment on Rule 2.84 (MCLE Credit Rule)	Pos. Rules ⁴	Comment on Rules 3.602(D) & (E), 3.609, 3.610, and 3.611 (MCLE Provider Rules)
					having to both read all the materials as well as do some additional research on cases cited in the packet so that I can do my job. I know that the county office of education struggles every year to attract enough attorneys to volunteer their time, particularly when they learn that they must put in time to prepare. Hopefully this change in the rules would make it easier to encourage attorney participation and make for a stronger program.		
25060101	Ron Nessim	No	A	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	A	

RULE 2.84 TOTAL = 57

A = 55 AM = 1
D = 0 NP = 1

Prov. Rules TOTAL = 57

A = 38 AM = 1
D = 0 NP = 18

RULE 2.84 TOTAL = 57A = 55 AM = 1
D = 0 NP = 1**Prov. Rules TOTAL = 57**A = 38 AM = 1
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Synopsis of Public Comments**

File No.	Commenter/Signatory	Org ¹	Atty/ Nona tty ²	Pos. Rule 2.84 ³	Comment on Rule 2.84 (MCLE Credit Rule)	Pos. Rules ⁴	Comment on Rules 3.602(D) & (E), 3.609, 3.610, and 3.611 (MCLE Provider Rules)
25010481	Safia Gray Hussain	No	A	A	As a supporter of mock trial and its positive impact on youth, I support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.	A	
25052497	Sandra J. McManus	No	A	A	As a supporter of mock trial, since 1996, and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including	A	

RULE 2.84 TOTAL = 57A = 55 AM = 1
D = 0 NP = 1**Prov. Rules TOTAL = 57**A = 38 AM = 1
D = 0 NP = 18**Proposed Amendments to the MCLE Rules
Synopsis of Public Comments**

File No.	Commenter/Signatory	Org ¹	Atty/ Nonatt ²	Pos. Rule 2.84 ³	Comment on Rule 2.84 (MCLE Credit Rule)	Pos. Rules ⁴	Comment on Rules 3.602(D) & (E), 3.609, 3.610, and 3.611 (MCLE Provider Rules)
					<p>rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.</p> <p>I believe that by offering scorers and coaches MCLE credits for the time they spend with the teams that it will encourage more participation from the attorney benches of the local Bar Associations.</p>		
25009125	School District Computer Technician (Russell)	Yes	NA	A		A	
25009293	Sherry Patterson	No	A	A	As a participant of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and	A	

RULE 2.84 TOTAL = 57A = 55 AM = 1
D = 0 NP = 1**Prov. Rules TOTAL = 57**A = 38 AM = 1
D = 0 NP = 18**Proposed Amendments to the MCLE Rules
Synopsis of Public Comments**

File No.	Commenter/Signatory	Org ¹	Atty/ Nona tty ²	Pos. Rule 2.84 ³	Comment on Rule 2.84 (MCLE Credit Rule)	Pos. Rules ⁴	Comment on Rules 3.602(D) & (E), 3.609, 3.610, and 3.611 (MCLE Provider Rules)
					volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		
25014384	Teacher Coach (Carmen)	Yes	NA	A	As a public high school teacher, I've lost count of the hours personally spent working with students outside of school hours, planning, and otherwise working beyond contracted expectations. That said, the attorney coaches affiliated with my mock trial team humble me even more with the dedication they show, year in and year out. There are the weekly hours spent in person with students at our practices, but also the review of student work on shared documents, the attendance and feedback provided at multiple scrimmages throughout the year, and of course, the weeks-long dedication to competition season, itself. My students mention our attorney coaches among the most-influential people in their high school careers. That speaks volumes to the consideration that should be given to this issue.	A	
25010028	Teacher Coach MT (Montgomery)	Yes	NA	A	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include	A	

RULE 2.84 TOTAL = 57A = 55 AM = 1
D = 0 NP = 1**Prov. Rules TOTAL = 57**A = 38 AM = 1
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Synopsis of Public Comments**

File No.	Commenter/Signatory	Org ¹	Atty/ Nonatt ²	Pos. Rule 2.84 ³	Comment on Rule 2.84 (MCLE Credit Rule)	Pos. Rules ⁴	Comment on Rules 3.602(D) & (E), 3.609, 3.610, and 3.611 (MCLE Provider Rules)
					middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.		
25010536	Virginia Hazarian		A	A		A	

Proposed Amendments to MCLE Rules

Reference #	25007982
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Agnes Sullivan
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25007869
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Alexander Farrell
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25010238
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Alois Phillips
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	This is a very rewarding activity and the students learn so much from being exposed to all that the attorneys contribute. The coaches learn a lot also about areas of law they may not regularly practice.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	24927710
Are you an attorney?	Yes
Commenting on behalf of an organization	No
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25010941
Are you an attorney?	No
Commenting on behalf of an organization	No
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25007599
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Aren Kavcioglu
Professional Affiliation	Pierce Kavcioglu Espinosa & Cesar LLP
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25010120
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Barry Edwards
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	Acting as a scorer or judge for mock trial competitions sponsored by recognized organizations such as Constitutions Rights Foundation should qualify under state bar laws for MCLE credit since there is a learning curve for the attorney and benefit for the middle and senior school students from this participation
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	24931662
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Brian Chien
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25011076
Are you an attorney?	Yes
Name	Brian Crone
Professional Affiliation	The Law Office of Brian Crone
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Providers" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate

level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.

Proposed Amendments to MCLE Rules

Reference #	25079064
Are you an attorney?	Yes
Commenting on behalf of an organization	Yes
Name	Jack Londen
Professional Affiliation	California Access to Justice Commission
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	NO POSITION
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION
ATTACHMENTSYou may upload your comment as an attachment. Only one attachment will be accepted per comment submission. We accept the following file types: text (.txt), Microsoft Word (.doc), WordPerfect (.wpd), Rich Text Format (.rtf) and Adobe Acrobat PDF (.pdf). We do not accept any other file types. Please DO NOT submit scanned documents. Files must be less than 4 megabytes in size.	6.23.23_SB_Comments_R9.7_R2.3_R1.2_R8.4_R8.4.2_MCLE.pdf (185 KB)

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First District Court of Appeal

ELICA VAFAIE
Lawyers' Comm. for Civil Rights

EMILIO VARANINI
California Department of Justice

HON. MONICA WILEY
San Francisco County Superior
Court

HON. ERICA R. YEW
Santa Clara County Superior Court

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Executive Director

JASMINE KADDOURA
Communications and Program
Manager

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Director of Administration



June 23, 2023

Board of Trustees
The State Bar of California
180 Howard Street
San Francisco, CA 94105

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Re: Support for Proposed Amendments to the Rules of Court (9.7), the State Bar Rules (2.3), the Rules of Professional Conduct (1.2, 8.4, 8.4.2), and MCLE Requirements Related to Promoting Civility in the Legal Profession

To the State Bar Board of Trustees:

The California Access to Justice Commission writes again in support of three of the recommendations of the California Civility Task Force, a joint project of the California Judges Association (CJA) and the California Lawyers Association (CLA). Specifically, the Access Commission supports the revised proposed amendments to California Rule of Court 9.7 requiring all licensees to submit an initial declaration containing the civility language on a one-time basis, all licensees to take an annual civility pledge, and that the State Bar develop a schedule for implementation; proposed new State Bar Rule 2.3 to implement the proposed changes to California Rule of Court 9.7; and revisions to Rules of Professional Conduct 1.2, 8.4, and 8.4.2 addressing civility. Separately, the Access Commission supports requiring one hour of MCLE for training related to civility in the profession. As noted in our February 22, 2023, comment, we believe focus on increasing and improving civility in the profession will, in particular, promote the needs and experiences of self-represented parties who often face significant barriers to court access and incivility by attorneys.

The California Access to Justice Commission advances access to civil justice for all Californians, expands civil justice resources for low and moderate-income people, and develops innovations that reduce barriers to civil justice for Californians from diverse backgrounds. To do so, the Access Commission facilitates collaboration among the courts, the Bar, and the public—including all three branches of government and stakeholders throughout the state.

Click [here](#) to return to the public comment synopsis table.

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Phone: 510-893-3000 ext 107
Email: info@CalATJ.org
Website: www.CalATJ.org

We Support the Revised Proposed Amendments to California Rule of Court 9.7 Requiring All Licensees to Submit an Initial Declaration Containing the Civility Language, All Licensees to Take an Annual Civility Pledge, That the State Bar Develop a Schedule for Implementation, and Proposed State Bar Rule 2.3 to Implement the Proposed Changes.

The attorney oath in California was modified in 2014 to include a civility pledge that provides “As an officer of the court, I will strive to conduct myself at all times with dignity, courtesy and integrity.” However, only attorneys who were admitted to practice after May 2014 have taken an attorney oath that includes a civility pledge, which means the majority of practicing California attorneys have not taken a civility pledge.

The proposed amendments to California Rule of Court 9.7 would address this by requiring all licensees to submit a one-time declaration to the State Bar affirming that they will conduct themselves with civility, and by requiring all licensees to reaffirm their commitment to civility on an annual basis. We agree with the proposed revisions based on concerns with implementation of a requirement that only applies to a portion of licensees and that a universal approach will put all attorneys on equal footing regarding the civility pledge. We also agree that Proposed State Bar Rule 2.3 is necessary to implement the proposed changes.

Attorneys acting with civility promotes access to justice in ways including the respectful treatment of self-represented parties. While there are many reasons to support civility in the profession, the impact on access to justice motivates the Access Commission to support the proposed required civility pledge for all active California attorneys.

Every attorney’s conduct should reflect well on the judicial system, the profession, and the fair administration of justice. Attorneys should avoid frivolous disputes and inspire public regard for the profession and for the judicial system. Rude, abusive, or disrespectful tactics neither reflect well on the legal profession nor inspire the public’s confidence. Moreover, civility improves the ability of self-represented parties to navigate the judicial system. This includes when attorneys communicate in a professional manner; respond to communications within a reasonable time and in a reasonable manner; avoid personal attacks, demeaning comments, and misleading characterizations; agree to reasonable requests and honor commitments; and behave professionally. Self-represented parties already are disadvantaged and stressed. Unprofessional, abusive, and disrespectful conduct by attorneys towards people who are unrepresented creates unnecessary and inappropriate additional stresses and barriers. Incivility also can be a manifestation of bias. Incivility related to bias further undermines efforts around racial justice and diversity, equity, and inclusion in the legal profession.

We appreciate the State Bar’s consideration of the Access Commissions recommendation to consider modifying the civility oath to be more specific in acknowledging and addressing why public respect for the judicial process is essential to sustaining the rule of law as well as our democratic institutions, civility need not be at odds with zealous advocacy, and each individual

attorney has a role. We understand the State Bar's position that this type of education can be included in the new, proposed requirement for one hour of MCLE regarding civility.

We again thank the California Civility Task Force, the CJA, the CLA, and the State Bar for moving forward with focus on the importance of civility in the legal profession. We support the updated proposed amendments to California Rule of Court 9.7 and the proposed State Bar Rule 2.3 to implement the proposed changes.

We Support the Revised Proposed Amendments to California Rules of Professional Conduct 1.2 and 8.4, and Creation of New Rule 8.4.2, Addressing Civility.

The proposed amendments to California Rules of Professional Conduct will further support civility in the legal profession.

As explained in our February 22, 2023, comment, the proposed amendment to Rule of Professional Conduct 1.2 would add language in comment [1] regarding the allocation of authority between a client and a lawyer. This amended comment appropriately clarifies that while the client controls the decisions concerning the objectives of representation, the attorney retains the authority and professional responsibility to act with civility in pursuing those objectives. We thank the State Bar for accepting the Access Commission's recommendation that the language in comment [1] not unnecessarily be limited to "requests of opposing counsel" but also include requests by self-represented parties. We believe calling attention to the professional responsibility of attorneys to agree to reasonable requests by self-represented parties will further the objectives of increasing civility in the profession, supporting access to justice, and reducing barriers to justice for those that do not have counsel.

We also thank the State Bar for accepting the Access Commission's recommended edits to Rule of Professional Conduct 8.4, comment [4] clarifying that there is a separate basis for discipline in rules 8.4(d) and 8.4.2 for incivility. We also agree with the changes to comment [6] narrowing the proposed civility disciplinary rules to apply only to attorney speech and conduct when an attorney is practicing law, as well as the other proposed changes. Clarifying that civility is a professional responsibility of attorneys and significantly unprofessional conduct in the practice of law that is abusive or harassing can be a basis for a finding of attorney misconduct and discipline will further the objectives of increasing civility in the profession and, as noted, reduce barriers to justice for those that do not have counsel. In addition, we expect this may help reduce bias-based incivility and, therefore, further promote racial justice and diversity, equity, and inclusion in the legal profession.

We further support the proposed revisions to new standalone rule, rule 8.4.2. Separating prohibited incivility in a new separate rule has several benefits including highlighting the importance of civility; providing further explanation, references, and examples of misconduct; and assisting in interpretation, education, and enforcement of civility guidelines and potential

misconduct and discipline related to abusive or harassing misconduct. We agree with the proposed revisions and thank the State Bar for considering all comments submitted.

We again thank the California Civility Task Force, the CJA, the CLA, and the State Bar for moving forward with proposed amendments to the Rules of Professional Conduct focused on the importance of civility in the legal profession and clarifying the possibility of findings of misconduct and discipline for significantly unprofessional conduct in the practice of law that is abusive or harassing. We support the proposed amendments to California Rules of Professional Conduct 1.2 and 8.4, and creation of a new rule 8.4.2.

We Support the Proposed Revisions to MCLE Requirements Adding Civility in the Legal Profession.

We take this opportunity to again voice our support of the recommendations of the California Civility Task Force and State Bar staff regarding the addition of civility in the legal profession as a subfield of required mandatory continued legal education. It continues to be our understanding that this would not increase the existing requirement of 25 hours of legal education every three years. Instead, it would add one hour of civility in the practice of law as one of the required areas of education, supplementing existing required areas. This addition of one hour of civility as a required area of legal education will support the goals of actively educating and promoting attorneys about the importance and impact of civility in the profession.

In particular, the Access Commission agrees with the California Civility Task Force that a civility MCLE requirement would “educate attorneys about the economic and human costs of incivility; provide lawyers with reasons and tools to change their own behavior if they are uncivil; teach lawyers how to help those who are uncivil change their behavior; help lawyers deal with stress and dissatisfaction caused by toxic uncivil behavior; and reduce bias-driven incivility.” (CCTF report, pp. 8-9.) We further agree with the California Civility Task Force that a civility MCLE requirement should highlight the link between bias and incivility and urge lawyers to eliminate bias-driven incivility, especially bias-based incivility that is abusive or harassing. The Access Commission further encourages civility training to include the impact of civility on self-represented parties and access to justice, as well as public respect for the judiciary and the judicial process as important in sustaining the Rule of Law and our democracy.

The California Access to Justice Commission appreciates the State Bar’s implementation of the recommendations of the California Civility Task Force. The Access Commission supports the proposed changes.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Juhas", with a long horizontal flourish extending to the right.

Judge Mark Juhas
Chair

CALIFORNIA LAWYERS ASSOCIATION

June 26, 2023

Board of Trustees
The State Bar of California
180 Howard Street
San Francisco, CA 94105

Re: Proposed Amendments to Rules Governing Minimum Continuing Legal Education

Dear Trustees of the State Bar of California:

The California Lawyers Association (CLA) submits these comments in response to the revised proposed amendments to the rules governing minimum continuing legal education (MCLE). CLA's comments are limited to the proposed amendments to the MCLE provider rules relating to self-study activities.

CLA notes at the outset that there is some ambiguity in the existing rules, and what appears to be an inconsistency.

Existing rule 2.51(F) defines a "participatory activity" as "an MCLE activity for which the provider must verify attendance..." (emphasis added.)

Existing rule 2.51(G) defines a "self-study activity" as "any MCLE activity identified in Rule 2.83..."

Existing rule 2.83 (self-study) provides in paragraph (A) that a licensee may claim up to half the credit hours required in a compliance period for "completing MCLE activities for which attendance is not verified by a provider and the MCLE activities were prepared within the preceding five years;" (emphasis added.)

Existing rule 3.602(B) provides that "[e]very provider must...(B) retain the Record of Attendance for an MCLE activity for four years from the date of the activity and submit it to the State Bar upon request. The record must include the title of the MCLE activity, date, total hours awarded, any credits awarded for legal ethics, elimination of bias, or competence issues as a component of the topic of the activity, and whether the activity is participatory or self-study and the name and State Bar number of each attendee;" (emphasis added.)

Existing rule 3.602(D) provides that “[e]very provider must...(D) furnish an MCLE Certificate of Attendance upon completion of the program to each attendee who has met the requirements for the MCLE activity. The certificate must include the provider name, title of the MCLE activity, date the course was completed, total hours awarded, any credits awarded for legal ethics, elimination of bias, or competence issues as a component of the topic of the activity, and whether the activity is participatory or self-study,” (emphasis added.)

Existing rules 2.51 and 2.83 therefore draw a clear distinction between a “participatory activity” (for which the provider must verify attendance) and a “self-study activity” (for which attendance is not verified by a provider). At the same time, rule 3.602 appears to require a Record of Attendance and Certificate of Attendance for both participatory and self-study activities, even though self-study activities include those for which attendance is not verified by a provider.

The proposed amendments to the MCLE rules would not resolve the current inconsistencies and would create one new issue. Specifically, under proposed rule 3.602(B) a provider would be required to “[t]ake attendance” for all activities, whether participatory or self-study. This is not a workable requirement. Self-study MCLE activities exist in a variety of forms, such as YouTube videos and other recorded programs. These activities are readily accessed by individual attorneys at their convenience. With self-study activities, providers do not and—in most cases—cannot take attendance.

Under the proposed revisions to rule 3.602, the inconsistencies that exist under the current rules would remain. Specifically, under paragraph (B), a provider would be required to use and retain a Record of Attendance form or its equivalent, and the form must include “whether the activity is participatory or self-study” as under the existing rule. Under paragraph (D) a provider would be required to provide participants who have met the requirements of a participatory activity with a “Certificate of Attendance” or provide participants who have met the requirements of a self-study activity with a “Certificate of Completion.” As discussed above, MCLE providers are not required to verify attendance at self-study activities and in most cases do not take attendance, so providing a Certificate of Completion is not a workable requirement.

By definition, self-study activities are treated differently than participatory activities. Since the inception of the MCLE program, lawyers have been required to certify completion of their own MCLE requirements at the end of each three-year reporting cycle, whether participatory or self-study. Providers do not monitor individual lawyer participation in self-study activities and cannot realistically be required to do so.

For these reasons, CLA recommends that (1) the proposed amendments to the MCLE provider rules be revised so they do not require a provider to take attendance in connection with self-study activities; and (2) the State Bar re-examine the existing MCLE provider rules and revise those rules to avoid the inconsistencies discussed above relating to a Record of Attendance or Certificate of Attendance for self-study activities.

We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Evans', with a large loop at the start and a trailing flourish.

Jeremy M. Evans
President

Proposed Amendments to MCLE Rules

Reference #	25015664
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Christine Fenech
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25017044
Are you an attorney?	Yes
Commenting on behalf of an organization	Yes
Name	Anonymous
Professional Affiliation	Constitutional Rights Foundation
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25029312
Are you an attorney?	Yes
Commenting on behalf of an organization	Yes
Name	Sheila Keiter
Professional Affiliation	Constitutional Rights Foundation
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	I am no longer practicing law, but one of the most egregious and absurd parts of law practice was MCLE. It's a joke designed to prop up the financial interests of MCLE purveyors. As a solo practitioner, it was a significant burden. I would much rather see attorneys donating their time and effort to good causes like educating students in Mock Trial programs than waste their time and money on nonsense MCLE courses that achieve very little in the way of improving legal education or guaranteeing the quality of the members of the state bar. This rule change will create far greater good for the community and the attorneys involved.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	24930397
Are you an attorney?	Yes
Commenting on behalf of an organization	Yes
Name	Shara Witkin
Professional Affiliation	Constitutional Rights Foundation Orange County
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION
ATTACHMENTSYou may upload your comment as an attachment. Only one attachment will be accepted per comment submission. We accept the following file types: text (.txt), Microsoft Word (.doc), WordPerfect (.wpd), Rich Text Format (.rtf) and Adobe Acrobat PDF (.pdf). We do not accept any other file types. Please DO NOT submit scanned documents. Files must be less than 4 megabytes in size.	CRF-OC_letter_re_MCLE_credit.pdf (752 KB)



Click [here](#) to return to the public comment synopsis table.

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October 25, 2022

Leah Wilson

Executive Director

State Bar of California

180 Howard Street

San Francisco, CA 90017

Re: Proposal to Modify State Bar MCLE Policies to Allow MCLE Credit for Scoring/Coaching High School Mock Trial

Dear Ms. Wilson:

On behalf of the Board of Directors of the Constitutional Rights Foundation of Orange County (CRF-OC), I respectfully request the State Bar Board of Trustees modify the MCLE policies to allow attorneys who volunteer as coaches and scorers for the CRF High School Mock Trial Competition to earn MCLE credits for doing so.

CRF-OC has held the High School Mock Trial Competition in Orange County every year since 1981. Each year, between 35-45 high schools participate in the competition, with between 700-900 students taking part.

Orange County attorneys volunteer to serve as coaches for the high school teams. In addition to over 50 attorney coaches each year, almost 150 additional attorneys volunteer to serve as scorers for one or more of the eight rounds of the Mock Trial competition each year. Judges and Justices from the Orange County Superior Court, the Court of Appeal for the 4th Appellate District, Division 3, and the United States District Court volunteer to serve as the judges for the competition.

The competition uses a closed packet of materials in a fictional criminal case. The case materials are written, edited, reviewed and published each year by a panel of experts working with the Constitutional Rights Foundation-USA in Los Angeles. All participating counties in California use the same case materials.

The case packet includes a fact pattern, a pretrial motion, witness statements, a summary of relevant legal authority for the pretrial motion, exhibits, a list of allowed evidentiary objections, and a simplified version of the California Rules of Evidence.

During each round of the competition, the students conduct a trial of the criminal case, competing against another high school. The students are the attorneys, the witnesses, clerks and bailiffs. Each side presents their case, including arguing the pretrial motion, presenting opening statements and closing arguments, direct examination of their side's witnesses and cross-examination of the opposing side's witnesses.

Students spend two months with the case packet, preparing for the trials by learning about the law, court procedures, the Rules of Evidence, the facts of the case, and practicing their trial skills. They do so with their attorney coaches teaching and guiding them through the entire process.

The attorney coaches spend numerous hours teaching their students and assisting them with the trial preparation. In order to effectively coach the students, the attorneys must review, study, understand and explain trial procedure, criminal burdens of proof, effective trial strategy and story-telling, witness preparation, witness cross-examination, the rules of evidence, proper use of evidentiary objections and effective argument of evidentiary objections. In doing so, the attorneys must review and improve their own knowledge in all of these areas of substantive and procedural law.

For attorneys who are scoring the competition, they must become familiar with the substantial case packet, including the pretrial motion and relevant legal authorities. They also must review and refresh their knowledge regarding the rules of evidence and proper trial procedure so they can assess, evaluate, and score the student competitors. As part of this process, attorney scorers participate in a scorer orientation which provides a brief refresher course on the relevant law and procedures in addition to the mock trial rules and scoring criteria. By observing and scoring the proceedings, scoring attorneys learn what trial presentation strategies are effective or ineffective, which they can subsequently use in presenting their own cases or motions to a court.

The tasks required of a mock trial scorer or coach further their own knowledge of the law, as any MCLE program should. These attorneys not only become better advocates in the process, but they also help our next generation of citizens understand how our legal system works, all while improving the students' public speaking and analytical skills. CRF-OC has collected feedback from attorney coaches and scorers for many years and there is a strong consensus their experience volunteering for mock trial provides them with an important legal education benefit, helping improve their own legal knowledge and skills as any MCLE program would.

In conclusion, we respectfully request the staff and the Board of Trustees of the State Bar of California modify the MCLE Rules to permit attorneys who volunteer to serve as coaches and scorers in the CRF High School Mock Trial Competition to receive MCLE credit for doing so.

Sincerely,

The image shows three handwritten signatures in black ink. The first signature is a stylized, cursive 'S' followed by a horizontal line. The second signature is 'BL' in a cursive script. The third signature is a cursive 'W' followed by a horizontal line.

Shara Beral Witkin, Esq.
Executive Director

cc: Randall Difuntorum

Proposed Amendments to MCLE Rules

Reference #	24992845
Are you an attorney?	Yes
Commenting on behalf of an organization	Yes
Name	Laura Wesley
Professional Affiliation	CRF
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25033387
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Darin Beffa
Professional Affiliation	Beffa Law
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25007597
Are you an attorney?	No
Commenting on behalf of an organization	No
Name	DEEPAK K JAIN
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Providers" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate

level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.

Proposed Amendments to MCLE Rules

Reference #	25007510
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Diane Evans
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Providers" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate

level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.

Proposed Amendments to MCLE Rules

Reference #	25028559
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Donald Lester Davis
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	I have served as a mock trial judge for a number of years. Preparation for the events requires many hours of study with regards to law, issues, and procedures.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25016364
Are you an attorney?	No
Commenting on behalf of an organization	No
Name	Dr. Victor Anderson
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial, as a current faculty advisor and attorney coach well into my second decade, I can tell you first hand of its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	24954420
Are you an attorney?	No
Commenting on behalf of an organization	No
Name	EJ Renner
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>Proposed State Bar rule 2.84, as revised following initial public comment, would allow attorneys to receive MCLE credit for coaching students, servings as an attorney scorer, and/or presiding as judge over mock trial, moot court, arbitration, and mediation competitions at the middle school, high school, collegiate level, graduate, and law school level. Attorneys would be able to claim up to 2 hours of general credit during a compliance period.</p> <p>Change "servings" as an attorney scorer ** to "serving"</p>
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25010092
Are you an attorney?	Yes
Name	Eric Gene Young
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>I volunteer each year as a presiding judge for an organization called Empire Mock Trials, which gives high school kids an opportunity to prepare a mock case for trial. The program is quite rigorous, and I am dumbfounded by how sharp and prepared the students are who participate. The format is also every bit as challenging and realistic as law school mock trial formats, including calling live lay and expert witnesses, making and responding to objections, and citing to statutory and decisional law to the court.</p> <p>I have thought for some time that CLE credit should be considered for presiding over a mock trial through this program because it would incentivize more attorneys to participate. Empire has been providing this program across the country for about 15 years, and they struggle to get enough attorneys to participate as judges for the many students who participate. This is a shame because at the conclusion of the mock trial proceedings, there is an opportunity to interact with the students and discuss our experiences as attorneys with them. Attorneys should be encouraged to engage in more activities like this that target an even younger population than law students.</p>

From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)

ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Providers" to your file name).

Anything the Bar can do to improve the quality of MCLE courses is desirable. My niche interest is legal technology, and there are some providers who are still charging for courses that are 6,7, and 8 years old now. Courses in technology that are that old have no relevance whatsoever. These rules changes will encourage providers to offer more current content, which is what attorneys need.

Proposed Amendments to MCLE Rules

Reference #	25011292
Are you an attorney?	Yes
Name	Erika Johnson-Brooks
Professional Affiliation	Office of the City Attorney Los Angeles
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a regular volunteer and supporter of mock trial and its positive impact on youth, I support amending the proposed rule to allow MCLE credit to attorneys who coach or score mock trial at the all levels (middle school, high school, college). Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. It's also extremely beneficial for the profession by serving as mentors to these students. We create a positive experience for those who may eventually decide to become lawyers.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25011827
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Ethan Feng
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>As a long time participant of mock trial as a student and as a coach of mock trial teams, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs.</p> <p>Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies.</p> <p>In particular, it is difficult to learn the nuances of the rules of evidence from a classroom setting, and the constant exposure to issues of evidence through coaching and judging mock trial has been extremely helpful in my practice. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.</p>
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25028238
Are you an attorney?	No
Commenting on behalf of an organization	Yes
Name	Melissa Aaron
Professional Affiliation	Fresno County Superintendent of Schools
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	I urge you to vote on allowing attorneys to receive MCLE credit for serving our students and community for mock trial.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25024554
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Jeffrey Winter
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Providers" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate

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Proposed Amendments to MCLE Rules

Reference #	25008951
Are you an attorney?	No
Commenting on behalf of an organization	No
Name	Jeni Boulanger
Professional Affiliation	Oak Hills High School
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25007941
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Jennifer Keller
Professional Affiliation	Keller/Anderle LLP
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25019215
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	john holly
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	I have coached High School Mock Trial teams for 16 years. Helping students prepare the case includes studying the facts and the law, preparing pretrial motions, direct and cross examinations, objections and responses to objections, and opening and closing statements. I have been a criminal defense attorney for twenty years, litigating both trials and appeals. Mock Trial helps litigation skills stay sharp.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	24931689
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	John W. Fricks
Professional Affiliation	Ogden & Fricks LLP
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>Thank you for considering including of mock trial coaches and scoring attorneys' efforts to be rewarded with MCLE credit. Thank you also for including all age ranges. As an attorney and MT proponent for nearly 35 years, I can attest that teaching and scoring mock trial and related rules of evidence are an invaluable educational tool for the attorney (and not just the student). In addition, as something that supports attorney participation in mock trial, it is a great program to educate the public about the "rule of law" and is a great way to shed some light/publicity on the good that attorneys do in the community.</p> <p>BIG THUMBS UP!</p>
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25070866
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Joshua Hanks
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>I have participated in the local high school mock trial program for over 20 years. I participated as a student and have coached and/or scored every year since my graduation. The kids participating in this program put in so much time and effort. There is nothing more disheartening for the kids than to show up and only have one scorer. Anything that can be done to encourage more participation would be beneficial and I know, from years of informal polling, that offering MCLE credits would definitely cause some attorneys who don't ordinarily participate to give it a try. Therefore, I am wholeheartedly in favor of this proposition.</p>
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25015915
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Karen BOBROW
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25049456
Are you an attorney?	No
Name	Kathy Graber
Professional Affiliation	High School Mock Trial Coach/LAUSD Teacher
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>As a 30+ year coach of high school mock trial I can testify to its positive impact on my students. I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.</p>
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25009862
Are you an attorney?	Yes
Name	Kelly Sutherland
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	I agree that MCLE hours should be granted to attorneys who coach a mock trial team and to those who score or preside over a mock trial competition. Those attorneys are sharpening their critical analysis skills, their evidence knowledge, and their trial procedure skills.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25009751
Are you an attorney?	No
Commenting on behalf of an organization	No
Name	Kevin S. Blum
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25049352
Are you an attorney?	No
Commenting on behalf of an organization	No
Name	Laura Beers-Dannerth
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a school advisor of mock trial, I believe in its positive impact on youth. I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25007526
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Lauren Gafa
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25017499
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Lauretta Komlos
Professional Affiliation	SFUSD - Lowell High School
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>As a high schooler, I was inspired to pursue the profession in law as a result of participating in a Law Day, Mock Trial competition. I had incredible appreciation for the local District Attorney who mentored me and my classmates as well as for the judge who presided over the trial. Years later, after practicing Criminal Law for 20 years, I transitioned into teaching High Schoolers. I am now so very lucky to be a Mock Trial coach at my school site, becoming the mentor who I once admired.</p> <p>These programs have an impact on young adults and create a respect and passion for the practice of law. They enrich both the young adults who participate as well as the lawyers, judges, and teachers who coach, mentor, and officiate. I believe that practicing attorneys would greatly benefit by receiving MCLE credit. I have seen over and over, attorneys who participate in some fashion with Mock Trial are reinvigorated and grateful for their participation. It fosters a continued love of the law and is both educational (especially for those who need to brush up on</p>

rules of evidence ;) as well as purposeful.

Please seriously considering affirming proposed amendments that would allow for MCLE credit for Mock Trial participation.

From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.) AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	24931649
Are you an attorney?	Yes
Commenting on behalf of an organization	Yes
Name	Susan Kang Gordon
Professional Affiliation	Law Office of Susan Kang Gordon
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	24934732
Are you an attorney?	Decline to state
Commenting on behalf of an organization	No
Name	Maggie Reeves
Professional Affiliation	none
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>This amendment is win-win. It's a "win" to allow attorneys to earn MCLE credits for this activity, and it's a "win" for the participants in these mock trial programs. Attorneys who participate in this program can learn some good caselaw, refresh their memories about rules of evidence, and have to give good counsel to the participants. The participants will benefit from having a greater variety and number of attorney-scorers. I truly hope this passes.</p>
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25009838
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Marysa Lin
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25016750
Are you an attorney?	Yes
Commenting on behalf of an organization	Yes
Name	CHARLES DES ROCHES
Professional Affiliation	Monterey County Bar Association
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25038425
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Natasha Mehta
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25012137
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	NESTOR BARRERO
Professional Affiliation	Constangy, Brooks, Smith & Prophete LLP
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>I am a supporter of mock trial and its positive impact on youth and have served for many years as an attorney scorer in mock trial competitions. I support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Middle school program are just as intensive and rigorous as high school and college level activities. Lawyers who participate in mock trial efforts, whether as coaches, scorers or judges engage in attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.</p>
From the choices below, we ask that you indicate your position on the proposed amendments to	AGREE with the proposed recommendations

MCLE provider rules. (This is a required field.)

Proposed Amendments to MCLE Rules

Reference #	25009285
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Patricia Fullinwider
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25007818
Are you an attorney?	Yes
Name	Rebecca Charlesworth
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25016525
Are you an attorney?	No
Commenting on behalf of an organization	No
Name	Rina R. Tringali, CPA, CFE
Professional Affiliation	Professional Associate
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	Agree with proposal to offer MCLE Credit for Mock Trial Volunteers. A certain amount of preparation goes into this work, as well as reinforcement when training students. Well earned in my opinion.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	24934207
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Robert B. Ewing
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	I have worked for many years as an attorney scorer for our local high school mock trial competition and have found it to be a great experience, that does involve having to both read all the materials as well as do some additional research on cases cited in the packet so that I can do my job. I know that the county office of education struggles every year to attract enough attorneys to volunteer their time, particularly when they learn that they must put in time to prepare. Hopefully this change in the rules would make it easier to encourage attorney participation and make for a stronger program.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	NO POSITION

Proposed Amendments to MCLE Rules

Reference #	25060101
Are you an attorney?	Yes
Name	Ron Nessim
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25010481
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Safia Gray Hussain
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25052497
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Sandra J. McManus
Professional Affiliation	Law Office of Sandra J. McManus
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>As a supporter of mock trial, since 1996, and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.</p> <p>I believe that by offering scorers and coaches MCLE credits for the time they spend with the teams that it will encourage more participation from the attorney benches of the local Bar Associations.</p>
From the choices below, we ask that you indicate your position on the proposed amendments to	AGREE with the proposed recommendations

MCLE provider rules. (This is a required field.)

ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Providers" to your file name).

Same comment as above although if a fee is required to be paid by coaches and scorers who are volunteering their time (hours and hours of time) then it may discourage participation or they just won't request the MCLE credits.

Proposed Amendments to MCLE Rules

Reference #	25009125
Are you an attorney?	No
Commenting on behalf of an organization	Yes
Name	David Russell
Professional Affiliation	School District Computer Technician
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25009293
Are you an attorney?	Yes
Commenting on behalf of an organization	No
Name	Sherry Patterson
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a participant of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25014384
Are you an attorney?	No
Commenting on behalf of an organization	Yes
Name	Heidi Carmen
Professional Affiliation	Teacher Coach
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	<p>As a public high school teacher, I've lost count of the hours personally spent working with students outside of school hours, planning, and otherwise working beyond contracted expectations. That said, the attorney coaches affiliated with my mock trial team humble me even more with the dedication they show, year in and year out. There are the weekly hours spent in person with students at our practices, but also the review of student work on shared documents, the attendance and feedback provided at multiple scrimmages throughout the year, and of course, the weeks-long dedication to competition season, itself. My students mention our attorney coaches among the most-influential people in their high school careers. That speaks volumes to the consideration that should be given to this issue.</p>
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25010028
Are you an attorney?	No
Commenting on behalf of an organization	Yes
Name	Natalie Montgomery
Professional Affiliation	Teacher Coach MT
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
ENTER COMMENTS HERE. To upload files proceed to the ATTACHMENTS section below (add "MCLE_Credit" to your file name).	As a supporter of mock trial and its positive impact on youth, I wholeheartedly support amending the proposed rule to not only allow for MCLE credit to attorneys who coach or score mock trial at the high school and college level, but to also include middle school and graduate level programs. Participating in mock trial supports attorney professional development by having them actively engage in legal analysis, critical thinking, and evaluating courtroom skills, including rules of evidence, trial procedures, and legal strategies. For these reasons, I support the inclusion of coaching and volunteering for mock trial at the middle school, high school, college, and graduate levels to be included in the list of activities acceptable to receive MCLE credit.
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations

Proposed Amendments to MCLE Rules

Reference #	25010536
Are you an attorney?	Yes
Name	Virginia Hazarian
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE credit rules. (This is a required field.)	AGREE with the proposed recommendations
From the choices below, we ask that you indicate your position on the proposed amendments to MCLE provider rules. (This is a required field.)	AGREE with the proposed recommendations