

[date], 2016

Ms. Audrey Hollins
Office of Professional Competence, Planning and Development
State Bar of California
180 Howard Street
San Francisco, CA 94105-1639

Re: Proposed Rule of Professional Conduct 6.3
Membership In Legal Services Organization

Dear Ms. Hollins:

The Professional Responsibility and Ethics Committee of the Los Angeles County Bar Association (“PREC”) appreciates the opportunity to comment on the draft rules of conduct (the “Proposed Rules”) proposed by the State Bar’s Commission for the Revision of the Rules of Professional Conduct (the “Rules Revision Commission”). Please see our letter dated [date], 2016, describing PREC and praising the efforts of the Rules Revision Commission.

Proposed Rule 6.3 [Membership In Legal Services Organization] uses the term “legal services organization” without definition. Since its meaning is not reasonably clear, it should be defined or the language revised. We recommend that the term be replaced by, or defined by reference to, legal aid organizations, or pro bono services, or nonprofit organizations.

Also, this Proposed Rule references “legal services organizations,” whereas the Comment references “legal service organizations” (i.e., without an “s” at the end of “service”). If this terminology is retained, we recommend conforming the terminology.

Thank you again for the opportunity to comment on the Proposed Rules.

Very Truly Yours,