

[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 8.1.1 [1-110]
Compliance with Conditions of Discipline and Agreements in Lieu of Discipline

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.

PREC recommends that reference in Proposed Rule 8.1.1 [Compliance with Conditions of Discipline and Agreements in Lieu of Discipline (current Rule 1-110)] to “any agreement is lieu of discipline” be deleted as it is unnecessary. Violations of agreements in lieu of discipline already constitute a violation of Business and Professions Code section 6068, subdivision (1). There is no need for a rule that also addresses violations of agreements in lieu of discipline.

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

Very Truly Yours,