WASHINGTON STATE
BAR ASSOCIATION

BOARD OF GOVERNORS MEETING

July 24-25, 2026

Meeting Materials

Tulalip Resort Casino, Tulalip WA
Zoom and Teleconference

Board of Governors Meeting
Tulalip Resort, Tulalip, WA
July 24-25, 2026

WSBA Mission: To serve the public and the members of the Bar, to ensure the integrity of the legal profession, and to champion justice.

ALL ITEMS ON THIS AGENDA ARE POTENTIAL ACTION ITEMS

To participate by Zoom or Teleconference:

Friday, July 24th : Meeting ID: 862 7410 7638 Passcode: 704385
https://wsba.zoom.us/j/86274107638?pwd=xPIWiQCEdbcdq8BAQGarNI7Plb6WNR.1

Saturday, July 25th : Meeting ID: 856 5489 1874 Passcode: 008684
https://wsba.zoom.us/j/85654891874?pwd=P8D5rYsuyDLz2xbOwdSrSaaqR70JP5.1

To participate by phone, call +1 253-205-0468

FRIDAY, JULY 24, 2026

9:00 AM – CALL TO ORDER & WELCOME

☐ **WELCOME & LAND ACKNOWLEDGEMENT WITH TRIBAL LEADERS**

MEMBER & PUBLIC COMMENT

☐ **MEMBER AND PUBLIC COMMENTS**

CONSENT CALENDAR

☐ **CONSENT CALENDAR**

The purpose of the consent calendar is to efficiently act on items that appear to be non-controversial and will not require discussion. Input on these topics is welcome and can accomplished by (1) sending an email to boardfeedback@wsba.org, (2) contacting a member of the Board, or (3) contacting the Executive Director. Any governor may request that any item be removed from the consent calendar without providing a reason and it will be discussed immediately after the consent calendar. The remaining items will be voted on *en blonc*.

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☐ **GOVERNOR ROUNDTABLE**

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☐ **MEETING FEEDBACK: ROSE, THORNS & BUD**

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WASHINGTON STATE
BAR ASSOCIATION

BOARD OF GOVERNORS MEETING MINUTES

Wenatchee, WA

May 1-2, 2026

Call to Order and Welcome

The meeting of the Board of Governors of the Washington State Bar Association (WSBA) was called to order by Immediate Past President Sunitha Anjilvel at 9:02 a.m. on Friday, May 1, 2026. Governors in attendance were:

Matthew Dresden
Kevin Fay
Kristina Larry
Todd Bloom
Nam Nguyen
Allison Widney
Kari Petrasek
Parvin Price
Christopher Bhang
Mary Rathbone
Emily Arneson
Jordan Couch
Alain Villeneuve

Officers and Executive Staff in attendance were President Francis Adewale, Immediate Past President Sunitha Anjilvel, President-Elect Kari Petrasek, Executive Director Terra Nevitt, Chief Communications and Outreach Officer Sara Niegowski, Chief Disciplinary Counsel & Parliamentarian Doug Ende, Chief Regulatory Counsel Renata Garcia, Advancement Department Director Kevin Plachy, Chief Equity & Justice Officer Diana Singleton, General Counsel Laurie Powers, Director of Finance Tiffany Lynch, Deputy Executive Director Dua Abudiab, and HR Director & Chief Culture Officer Glynnis Klinefelter Sio.

Also in attendance were Alec Stephens, Alex Reaganson, Alexander Wisby, Betsylew Miale-Gix, Brian McMahon, Bobby Henry, Catherine Biestek, Catherine Schur, Dan Crystal, Darcel Labo, Andrew Yi, David Ward, George Fearing, Justin Bingham, Kyle Sciuchetti, Nancy Hawkins, Nicole Gustine, Norma Linda Ureña, Julianne Unite, Min Kang, Paris Eriksen, Patrick Malone, Peter Arkison, Rajeev Majumdar, Sophie Ying, and Timothy Allen.

DRAFT

Immediate Past President Anjilvel commended the legal community's role in fostering public understanding of and trust in the legal system noting President Adewale's concurrent participation in a Law Day event in Olympia. A short film was premiered showcasing the positive impact of the WSBA's Lawyers in the Classroom program. Board members were encouraged to serve as community ambassadors by participating in the pledge drive to have lawyers in classrooms on Constitution Day.

Member and Public Comments

Immediate Past President Anjilvel opened the floor for member and public comments. Alex Reaganson, Chair of the Washington New Members Committee, addressed the Board on behalf of the committee and individually. Mr. Reaganson expressed support for Governor Couch's proposal to remove ABA accreditation requirements for the bar exam, citing the potential to increase diversity in the legal profession and to generate additional licensing fee revenue. He emphasized the importance of eliminating barriers for graduates of non-accredited schools, particularly those from low-income backgrounds.

Consent Calendar

Immediate Past President Anjilvel presented the consent calendar. There being no requests for removal or objections, the items on the consent calendar were adopted by unanimous consent. Governor Villeneuve expressed appreciation for the APEX Award process and encouraged increased member participation in future nominations.

Executive Director's Report

Executive Director Nevitt referred to her written report available in the meeting materials and invited questions. No questions were raised.

Proposed Amendments to APR 3(d), APR 4(d), and WSBA Bylaws Re Score Expiration and Bar Exam Requirement – First Read

Chief Regulatory Counsel Garcia presented proposed amendments to Admission and Practice Rules 3(d) and 4(d), along with corresponding amendments to the WSBA Bylaws, addressing score expiration timelines and bar exam requirements. The proposal was presented for initial Board review. The Board discussed the proposal, and the matter will return to the Board for further consideration.

Proposed Amendments to APR 3(b)(3) Re Common Law Jurisdictions for Bar Exam – First Read

Chief Regulatory Counsel Garcia introduced the first reading of proposed amendments to APR 3(b)(3), which govern qualifications for lawyers from common law jurisdictions to sit for the Washington bar exam. The proposed amendments seek to modernize language that currently references "jurisdictions where the common law of England is the basis of jurisprudence" and to align the active legal experience requirements for internationally trained lawyers with those applicable to U.S.-trained lawyers, who require one year of experience compared to three years currently required of foreign-trained lawyers. Governors expressed support for the changes and suggested further language revisions to encompass lawyers from civil law jurisdictions. Chief Garcia agreed to follow up with Governors and to gather feedback from the admissions team on practical implementation. The matter will return to the Board at a future meeting.

Proposed Amendments to APR 1(e) Re Definition of Active Legal Experience – First Read

Chief Regulatory Counsel Garcia presented proposed amendments to clarify the definition of "active legal experience" for purposes of admission by motion and reactivation of inactive licenses. The current definition was identified as vague and inconsistently applied. The proposal establishes a minimum standard of 1,000 qualifying hours over a 12-month period and explicitly excludes unauthorized practice of law and other specified activities. Concerns were raised that the proposed list of qualifying activities was overly restrictive, potentially excluding positions involving substantive legal work under lawyer supervision that do not formally require a law license. Chief Garcia acknowledged the complexity of establishing clear and enforceable standards and indicated that the feedback would be taken into account. Further review and consultation with the admissions team were proposed before the matter returns to the Board.

Proposed Changes to Admissions Policies Re Definition of Approved Law School

Chief Regulatory Counsel Garcia presented proposed changes to the definition of "approved law school" for admission to practice in Washington. The proposal would allow graduates of law schools recognized by other jurisdictions for state bar eligibility—in addition to ABA-accredited schools—to sit for the Washington bar exam. Discussion included opinions on the quality of education at non-ABA-accredited institutions and potential impacts on competency standards, as well as the access benefits for first-generation students, working adults, and applicants facing financial or geographic barriers. Supporters noted that graduates of non-accredited schools are already being licensed in Washington through existing pathways. Gov. Rathbone moved to approve the proposed changes to admissions policies re definition of approved law school as presented, with an effective date of September 1, 2026. The motion passed with one negative vote, with three members not present.

Proposed Changes to Admissions Policies Re LPO Exam and Repeat Late Filing Deadline for NextGen

Chief Regulatory Counsel Garcia presented two related action items. The first would amend the Limited Practice Officer (LPO) examination schedule by shifting exam dates from February and July to April and October, to better align with applicant schedules and reduce administrative costs. The second would add an additional application deadline for candidates who did not pass the immediately preceding Washington State bar examination, in response to anticipated delays in score delivery associated with the transition to the next-generation bar exam, to avoid penalizing applicants for circumstances outside their control. Gov. Petrasek moved to approve the proposed changes to admissions policies re LPO exam and repeat late filing deadline for NextGen as presented. The motion passed unanimously. Gov. Arneson and Gov. Villenueve were not present for the vote.

Proposed Changes to Committee and Board Policy Re Board of Bar Examiners

Chief Regulatory Counsel Garcia presented a proposal to amend WSBA policy to increase the maximum size of the Board of Bar Examiners from 50 to 75 members. The expansion is intended to ensure adequate capacity for grading and drafting ethics prompts as the WSBA transitions to the next-generation bar exam and the new portfolio evaluation pathway. All Board members continue to be selected through a competitive application process and mandatory training, with scheduling coordinated around preset grading conference dates. Additional costs would be offset by application fees beginning in fiscal year 2027. Gov. Bloom inquired about the necessity of a maximum size limit, which was addressed by emphasizing the importance of structured training and managed recruitment. Gov. Couch moved to approve the proposed changes to committee and

board policy regarding Board of Bar Examiners. The motion passed unanimously. Gov. Arneson and Gov. Villenueve were not present for the vote.

President-Elect Candidate Interview and Election

The Board conducted the election for the 2026–2027 WSBA President-Elect. Gov. Nguyen was the sole candidate for the position. Gov. Nguyen delivered an opening statement and responded to questions from the Board. Ballots were administered and counted by Executive Director Nevitt, General Counsel Powers, and Chief Disciplinary Counsel Ende via secret electronic ballot. Gov. Nguyen was elected as WSBA President-Elect for 2026–2027.

Governor Candidate Interviews and Elections

The Board conducted candidate interviews and elections for three open Board of Governors seats: District 8, District 7 North, and District 2 (mid-term vacancy). Each candidate was allotted 15 minutes for an opening statement and questions from the Board. Ballots were administered and counted by Executive Director Nevitt, General Counsel Powers, and Chief Disciplinary Counsel Ende, with voting conducted by secret electronic ballot. Candidates not being interviewed were excluded from the proceedings during each respective interview.

District 8

The candidates for the District 8 seat were Timothy Allen, Brian McMahon, Sophie Ying and Makan Shetabi. Aaron Richter had withdrawn from the race prior to the meeting; Makan Shetabi was not present for the interview. Sophie Ying was elected to represent District 8.

District 7 North

The candidates for the District 7 North seat were Alexander Wisby and Norma Linda Ureña. Norma Linda Ureña was elected to represent District 7 North.

District 2 Mid-Term Vacancy

The candidates for the District 2 mid-term vacancy were Kenneth Zirkman, Min Kang, and Peter Arkison. Kenneth Zirkman had withdrawn from the race prior to the meeting. Min Kang was elected to represent District 2 in the mid-term vacancy.

The Board expressed appreciation to all candidates who participated in the interview and election process.

Interim Report from the Oath Review and Drafting Task Force

Task Force Chair Majumdar and Chief Disciplinary Counsel Ende presented an interim report from the Oath Review and Drafting Task Force. The Task Force has been gathering historical documents and academic resources on the development of U.S. oaths of attorney. The task force includes a diverse group of judges, private practitioners, and non-lawyer practitioners, meets monthly, and has achieved high survey response rates from licensed legal professionals and specialty bar associations.

Gov. Villeneuve suggested that the revised oath reflect Washington State's unique legal and constitutional history and its relationship with tribal nations.

Special Meeting of the Washington State Bar Foundation: Approve Appointment of New Trustee

The Board convened a Special Meeting of the Washington State Bar Foundation. Foundation Board President Anderson presented a proposal to appoint Audrey Tran, a second-year law student, as the new law student trustee on the Washington State Bar Foundation Board of Trustees. The foundation has historically maintained a designated law student trustee position; Ms. Tran's term would run through her graduation. Gov. Petrasek moved to approve the appointment of Audrey Tran to the Washington State Bar Foundation Board of Trustees. The motion was passed unanimously. Mr. Anderson also noted that a public member trustee vacancy exists on the foundation board and that efforts to identify a qualified candidate are underway.

RECESS

There being no further business for the day, the meeting recessed at 4:00 p.m. on May 1, 2026.

SATURDAY, MAY 2, 2026

Call to Order

The Board of Governors reconvened on Saturday, May 2, 2026, at 9:03 a.m. at the Wenatchee Convention Center, with President Adewale presiding.

President's Report

President Adewale opened with a call to action for legal practitioners across Washington to participate in Constitution Day programs on September 17, 2026, encouraging Board members to lead by example as community ambassadors by being present in classrooms in their respective districts. President Adewale also noted the upcoming joint column with Executive Director Nevitt in Bar News and provided updates on ongoing Law Day activities.

Final Report from the Member Well-Being Task Force

Task Force Chair Bingham, joined by Task Force Members Labo and Sciuchetti, Member Wellness Program Manager Crystal, and Advancement Department Director Plachy, presented the Member Well-Being Task Force's final report following two years of work. The report addressed systemic well-being challenges across the legal profession and put forward actionable strategies to improve lawyer well-being.

Gov. Arneson moved to accept the Final Report from the Member Well-Being Task Force and to task relevant staff with implementing next steps, including bringing policy questions and updates back to the Board. The motion passed unanimously. Gov. Fay and Gov. Villenueve were not present for the vote.

Proposed Client Protection Fund Assessment for 2027 and 2028

Treas. Nguyen and Director of Finance Lynch presented the proposed Client Protection Fund Assessment for 2027 and 2028. The Client Protection Fund protects clients from financial loss resulting from dishonest conduct by lawyers and is supported by WSBA's active attorney, Limited License Legal Technician, House Counsel, Foreign Law Consultant, and pro hac vice members. The fund currently holds approximately $5 million. The Client Protection Board recommended a $5 assessment for both 2027 and 2028. The Budget and Audit Committee reviewed this recommendation and proposed a modification: no assessment for 2027 and

a $5 assessment for 2028, based on the current fund balance and the absence of any immediate threat to the fund's solvency. Gov. Petrasek moved to approve the Budget and Audit Committee's recommendation of a $0 assessment for 2027 and a $5 assessment for 2028. The motion passed unanimously. Gov. Fay and Gov. Villenueve were not present for the vote. The recommendation will be forwarded to the Supreme Court for final determination.

Proposed Changes to General Rule 9 (GR 9)

Court Rules and Procedures Committee Chair Yi and Administrative Office of the Courts staff attorney Ward presented proposed changes to GR 9, which governs Supreme Court rulemaking. The principal proposed change would move the deadline for submitting rule changes from October 15 to September 1, providing additional time for stakeholders, including the WSBA, to offer pre-publication comments to the Supreme Court.

Chair Yi proposed that the Board delegate limited authority to the Court Rules and Procedures Committee to conduct initial technical pre-screening of proposed rules prior to their publication for public comment. This screening would be confined to identifying typographical and grammatical errors and would not encompass substantive review or comment on behalf of the WSBA. Discussion ensued regarding the need for a formal charter to define the committee's authority and accountability when acting in this capacity. Gov. Arneson and Chair Yi agreed to work with staff liaison Gustine to develop appropriate guidelines, to be presented at the July meeting. Comments on the proposed GR 9 changes are due by June 1, 2026.

Governor At-Large Election

DEI Council Co-Chairs Gov. Larry and Alec Stephens presented the Council's report on the at-large governor election. The Council evaluated five candidates—following one withdrawal—using a structured rubric and recommended two finalists for placement on the member ballot. Executive Director Nevitt addressed the election timeline under the WSBA Bylaws and the appropriate process for managing any changes in candidate status prior to the election. Gov. Bhang moved to accept the DEI Council's recommendation to advance Tom Ahearne and Sophie Ying to the ballot for the at-large governor position. The motion passed unanimously, with one abstention.

Executive Session

The Board entered executive session at 11:07 a.m. to receive and discuss legal advice regarding litigation involving mandatory bar associations and the Keller deduction, as a follow-up to prior executive session discussions in November 2025 and March 2026, and to discuss the WSBA's future strategy with respect to the Keller deduction in 2027 and beyond. The session concluded at 11:56 a.m. and the Board returned to public session.

Governor Roundtable

Gov. Price requested an update on Department of Justice rulemaking. Chief Disciplinary Counsel Ende reported that the WSBA's public comment on the DOJ's rulemaking proposal had been timely submitted and

publicly posted, following a delay in posting evidently attributable to an exceptionally high volume of submissions received by the Department.

Gov. Dresden, co-chair of the Member Engagement Council, updated the Board on the section viability review process currently underway for three sections: the Legal Assistance and Military Personnel Section, the Liquor, Cannabis, and Psychedelic Section, and the Animal Law Section. Gov. Dresden noted that presentation of recommendations to the full Board has been delayed to September.

Gov. Bhang highlighted the upcoming National Mock Trial Competition in Des Moines, Iowa, and expressed support for Seattle's University Prep High School team competing at the national level.

Meeting Feedback: Rose, Thorns & Bud

Governors participated in a meeting feedback session using the Rose, Thorns & Bud format. Positive feedback was extended to the meeting hosts in Wenatchee and to President Adewale for his leadership in chairing the meeting. Areas for continued attention and future planning were noted, including coordination of the July retreat, which will be led by President-Elect Petrasek.

ADJOURNMENT

There being no further business, President Adewale adjourned the meeting at 12:02 p.m. on May 2, 2026.

Respectfully,

Terra Nevitt
WSBA Executive Director & Secretary

DRAFT

Board of Governors Meeting – Motions List
Olympia, WA
May 1-2, 2026

- **Approve the Consent Calendar:** Adopted by unanimous consent.
- **Approve Proposed Changes to Admissions Policies Re Definition of Approved Law School (Effective September 1, 2026):** Passed with one negative vote; three members not present.
- **Approve Proposed Changes to Admissions Policies Re LPO Exam and Repeat Late Filing Deadline for NextGen:** Passed unanimously; three members not present.
- **Approve Proposed Changes to Committee and Board Policy Re Board of Bar Examiners:** Passed unanimously; three members not present.
- **Elect Nam Nguyen as WSBA President-Elect for 2026–2027:** Elected unanimously by secret ballot.
- **Elect Sophie Ying as District 8 Governor:** Elected by secret ballot following a runoff election.
- **Elect Norma Linda Ureña as District 7 North Governor:** Elected by secret ballot.
- **Elect Min Kang as District 2 Governor (Mid-Term Vacancy):** Elected by secret ballot.
- **Approve Appointment of Audrey Tran to the Washington State Bar Foundation Board of Trustees:** Passed unanimously.
- **Accept the Final Report from the Member Well-Being Task Force and Task Staff with Implementation of Recommendations:** Passed unanimously; three members not present.
- **Approve Client Protection Fund Assessment ($0 for 2027 and $5 for 2028):** Passed unanimously; three members not present.
- **Approve DEI Council Recommendation to Advance Tom Ahearne and Sophie Ying to the At-Large Governor Ballot:** Passed unanimously, with one abstention.

DRAFT

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Rajeev D. Majumdar, Chair, Oath Review and Drafting Task Force
Douglas Ende, Staff Liaison

DATE: June 17, 2026

RE: Proposed Extension to the Oath Review and Drafting Task Force Charter

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ACTION: Presented for adoption is an amendment to the Oath Review and Drafting Task Force Charter to extend the deadline from October 31, 2026 to May 1, 2027 for completion of work and submission of a final report to the Board of Governors.

Background

At the May 2026 meeting of the Board of Governors, Task Force Chair Rajeev D. Majumdar provided the Board with a status update on the progress of the WSBA Oath Review and Drafting Task Force. In short, the Task Force has largely completed the "Review" component of its work and—with the formation of two drafting-oriented subcommittees—has embarked upon the "Drafting" component. That work proceeds apace, and the Task Force will have reviewed a working draft of a revised oath at its June 2026 meeting.

The Task Force Charter was adopted by the Board on July 18, 2025. The Charter provides that the Task Force is to complete work and submit a final report not later than one year after the first Task Force meeting, unless the timeline for completion is extended by the Board. The first meeting of the Task Force was held on October 31, 2025. To meet the current deadline for completion of work, the Task Force would be obliged to report to the Board at its September 24-25, 2026 meeting.

While that deadline is not implausible, the Task Force realizes that complying with its responsibility to "communicate about its process with members and the public and seek input"[1] will take some time. For this reason, and out of an abundance of caution, by unanimous consent at its meeting on May 18, 2026, the Task Force authorized the Chair to request an extension of the Charter.

Accordingly, the Task Force requests an extension of the Charter deadline to May 1, 2027, which will give the Task Force sufficient time to (1) engage in meaningful stakeholder outreach and communication and (2) report to the Board at its May 13-14, 2027 meeting, or sooner.

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[1] This element of the Charter further requires the Task Force to "including Force the directive to "obtain advisory perspectives from stakeholder groups with an interest in the content of the oath, including new and young lawyers; senior lawyers; the access to-justice community; the judiciary; law schools and law students; Inns of Court; WSBA Sections; and county, affinity, and specialty bar associations."

Info for Risk/Fiscal/Equity Analyses

The proposed extension has a fiscal impact to accommodate in-person Task Force meetings and an interim presentation to the Board of Governors at a future meeting. In-person meetings average $450 per meeting to reimburse volunteers' travel, and attendance at BOG meetings is estimated at $500 per meeting. If the extension is granted and the Task Force meets monthly during this time and presents once to the Board of Governors, the fiscal impact is estimated at $3,200.

As for the Risk and Equity Analyses, neither the scope nor the nature of this initiative has changed since these analyses were done at the time the Task Force was proposed and approved by the BOG. The only request being submitted for action is to extend the timeline of the project for six months to ensure adequate stakeholder engagement. This would appear to have no Risk or Equity impact.

WSBA RISK ANALYSIS: This section is to be completed by the Office of General Counsel, with input from the *proposing entity or individual.*

Provided as confidential materials.

WSBA FISCAL ANALYSIS: This section is to be completed by the Finance Department, with input from the proposing entity or individual.

As described in the above information section, the primary fiscal impact of proposed amendment is the travel costs associated with in-person meetings and presentation to the Board of Governors estimated at $3,200. Travel costs are reimbursed based on rates and limitations outlined in WSBA's Fiscal Policies and include items such as mileage, meals and accommodations. If approved, these expenses will be added to the FY 2027 Budget which will be presented to the Board of Governors for approval in September 2026. Additionally, the fiscal impact includes staff time used to assist in drafting the proposal, incorporating changes into relevant records, communicating changes to stakeholders, and providing administrative support to volunteers. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

By extending the deadline for completing his work and presenting its report, it will allow for more thorough and targeted community input, feedback and communications which may contribute to a more inclusive process and equitable outcome. To this end, we see no equity concerns with this proposed extension. As the task force continues its work, we encourage it to consider who may be most impacted by any proposed changes and proactively engage them in ways that are accessible for them.

Attachment

- Proposed Oath Review and Drafting Task Force Charter Extension

CHARTER

Oath Review and Drafting Task Force

Adopted: July 18, 2025.
Extended July 24, 2026.

Background

Oaths of legal practitioners in the state of Washington are found in Admission and Practice Rule (APR) 5. There is an Oath of Attorney, as well as corresponding Oaths for Limited Practice Officers (LPO) and Limited License Legal Technicians (LLLT).[1] Taking the oath is a preadmission requirement for each license type, and the oath, in most cases, must be taken in person, by telephone, or by videoconference before an elected or appointed judge sitting in the state of Washington.[2] The Oath of Attorney has been a component of the Admission and Practice Rules (formerly known as the Rules for Admission to Practice) since 1938. The oath adopted by the Supreme Court was based on the statutorily prescribed oath first adopted by the Washington Legislature in 1917, though language used in the oath appears to date back to Territorial laws enacted in 1863. The Oath of Attorney has been amended from time to time,[3] but much of the language that remains is derived from the statute. The Oath for LPOs was added to the APR in 2017, formerly appearing in the Regulations of the APR 12 Limited Practice Board; it was initially adopted in 1987 as part of the former Rules for Admission and Certification to Limited Practice. The Oath for LLLTs was adopted in 2012.

Task Force Purpose and Responsibilities

The Oath Review and Drafting Task Force is established to evaluate whether WSBA should suggest the Supreme Court amend Washington State's APR 5 oaths in ways that would update and reinvigorate them. Should the Task Force recommend amendment of the oath, it shall prepare draft amendments for the Board of Governors' consideration. In performing these responsibilities, the Task Force shall proceed according to the following objectives and guidelines.

- The Task Force shall communicate about its process with members and the public and seek input. The Task Force shall, in particular, obtain advisory perspectives from stakeholder groups with an interest in the content of the oath, including new and young lawyers; senior lawyers; the access-to-justice community; the judiciary; law schools and law students; Inns of Court; WSBA Sections; and county, affinity, and specialty bar associations.
- The Task Force shall gather and review historical materials about the development of Washington State's oaths, as well as perform a comparative analysis of the oaths in use by other jurisdictions.
- The Task Force shall consider whether it is advisable to consolidate the three existing oaths into one oath.
- The Task Force shall, in considering the content of the oath, recognize that violation of the oath can be a basis for discipline in Washington. See RPC 8.4(k); LPORPC 1.10(e); LLLT RPC 8.4(k).

[1] *See* APR 5(g), (h), (j).
[2] APR 5(f). Note that in June 2025, the Supreme Court adopted changes to the oath requirements in order to permit oaths to be taken by telephone or videoconference.
[3] For example, in the 1950s, the Oath included the following language: "I am not now and never have been a member of any organization or party having for its purpose and objective the overthrow of the United States government by force or violence." *See* Ralph S. Brown & John D. Fassett, *Loyalty Tests for Admission to the Bar*, 20 U. CHI. L. REV. 480, 485 (1952-1953).

- The Task Force shall provide periodic updates to the Board of Governors about its progress.
- The Task Force shall ensure that its recommendations are consistent with WSBA's organizational parameters as defined in General Rule 12.2.
- The Task Force shall submit a final report to the Board of Governors, including, as appropriate, draft amendments to the oaths and related rules.

Timeline

The work of the Task Force shall be accomplished according to the following schedule:

- Begin meeting no more than six weeks after member and chair appointments are completed;
- Complete work and submit a final report not later than one year after the first Task Force meeting, unless the timeline for completion is extended by the Board;
- If the Board of Governors approves a recommendation to submit suggested amendments to the Supreme Court, prepare a set of suggested rule amendments and GR 9 materials for submission to the Supreme Court before the first GR 9 deadline after the draft amendments are approved.

Task Force Membership

The Task Force shall consist of the following voting members:

- An active WSBA member, not currently serving on the Board of Governors, who shall serve as Chair;
- Two current or former members the Board of Governors or WSBA officers;
- Six members of the WSBA, including at least one Limited Practice Officer or Limited License Legal Technician and a judicial member.

In recruiting and appointing voting members, consideration shall be given to diversity in a range of areas, including gender, ethnicity, disability status, sexual orientation, geography, areas of practice, and practice experience.

In accordance with WSBA Bylaws Art. IX(B)(2), selection of the chair and persons to be appointed to the Task Force will be made by the President with confirmation by the Board of Governors.

The Executive Director shall designate a WSBA staff liaison.

Meetings

The presence of a majority of Task Force members at a meeting constitutes a quorum. A quorum must be present at the time any vote is taken. Decisions of the Task Force shall be made by majority vote of members present at the time of the vote.

Extended Timeline

On July 24, 2026, the Board of Governors extended the deadline for completion of work and submission of a final report to May 1, 2027.

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia, Chief Regulatory Counsel

DATE: June 15, 2026

RE: Definition of Approved Law Schools – Proposed Amendments to WSBA Admissions Policies

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CONSENT: Approve proposed amendments to the WSBA Admissions Policies that refine and clarify the definition of "law school approved by the Board of Governors."

The Washington Supreme Court, in Rule 2(a)(5) of the Admission and Practice Rules (APR), delegated to the Board of Governors the power to approve law schools for the purposes of admission and licensure to practice law and also to maintain a list of the approved law schools. The Board of Governors adopted a new definition of approved law schools at its meeting in May 2026. The new definition will be effective September 1, 2026.

After receiving questions and feedback about the new definition of "Law school approved by the Board of Governors," we propose edits to clarify that:

1. A law school may be considered approved only if it is accredited, or provisionally accredited, by the American Bar Association (ABA) at the time the degree is conferred.
2. A non-ABA-accredited law school must be approved or accredited by a state or territory of the United States or the District of Columbia, rather than merely recognized.
3. The applicant would be eligible to sit for the bar exam in the other jurisdiction based on the JD received.

The same effective date as the new definition would apply to the amendments (September 1, 2026).

Additional information, including the fiscal, equity, and WSBA risk analyses are included in the attached memo.

Attachments

1. Proposed Amendments to the WSBA Admissions Policies – Markup
2. BOG Cover Memo with Attachments, dated April 7, 2026

ADMISSIONS POLICIES OF THE WASHINGTON STATE BAR ASSOCIATION

Under the authority of, and consistent with, the Washington Supreme Court's Admission and Practice Rules (APR), the Board of Governors of the Washington State Bar Association (Bar) has adopted the following Admissions Policies in administering those rules. These policies apply to individuals seeking reinstatement under APR 25 or admission to the Bar as a lawyer, limited practice officer (LPO), house counsel or foreign law consultant. These policies supplement APR 3-5, 8(f), 14 and 20-25. Any discrepancy or conflict between these policies and the APR is unintentional and will be resolved in favor of strict compliance with the APR.

Adopted July 1, 2012. Amended July 28, 2017, amendments effective September 1, 2017.
Amended November 14, 2020, amendments effective December 1, 2020.
Amended January 13, 2022, amendments effective February 1, 2022.
Amended June 9, 2023, amendments effective September 1, 2023.
Amended July 15, 2024, by Court order, amendments effective September 1, 2024.
Correction approved March 21, 2025.
Correction on August 12, 2025, to section X in compliance with APR 3(d).
Amended and correction approved November 14, 2025, amendments effective February 1, 2026.
<u>Amended July **, 2026, amendments effective September 1, 2026.</u>

I. GENERAL PROVISIONS AND DEFINITIONS

A. Applications

Applications for admission to practice law in Washington must be completed and submitted online or as prescribed by the Bar's admissions staff.

B. Definitions

"Attorney Applicant" means a person applying for admission as a lawyer under APR 3 or a person petitioning for reinstatement under APR 25 who, at the time of filing the application, has ever been admitted to practice law as a lawyer (or the equivalent for that jurisdiction) in any jurisdiction other than Washington.

"Foreign Law Consultant Applicant" means a person applying for licensure as a foreign law consultant under APR 14.

"General Applicant" means a person applying for admission as a lawyer under APR 3 who, at the time of filing the application, has never been admitted to practice law as a lawyer (or the equivalent for that jurisdiction) in any jurisdiction other than Washington, or a person petitioning for reinstatement under APR 25 who has been admitted to practice law in Washington only.

"House Counsel Applicant" means a person applying for licensure as house counsel under APR 8(f).

"Law school approved by the Board of Governors" is a law school either (1) approved or accredited, or provisionally approved or accredited, by the American Bar Association (ABA) at the time the degree was conferred or (2) ~~recognized~~ approved or accredited by a state or territory of the United States or the District of Columbia and a state or territory of the United States or the District of Columbia accepts the Juris Doctor (J.D) from that law school as meeting the education requirement to be eligible to sit for the bar exam in that jurisdiction at the time the ~~Juris Doctor~~ J.D. or LL.M. degree for the practice of law was conferred. An applicant who graduated from a law school not approved or accredited by the ABA bears the burden of demonstrating to the Bar that the law school is ~~recognized~~ approved or accredited by a state or territory of the United States or the District of Columbia and a state or territory of the United States or the District of Columbia accepts the J.D. as meeting the education requirement to be eligible to sit for the bar exam in that jurisdiction or otherwise meets this definition.

"LPO Applicant" means a person applying for admission, or petitioning for reinstatement under APR 25, as a limited practice officer.

II. – XI. [Unchanged.]

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia, Chief Regulatory Counsel

Jordan Couch, Governor At-Large

DATE: April 7, 2026

RE: Definition of Approved Law Schools – Proposed Amendments to WSBA Admissions Policies

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DISCUSSION & FIRST READ: Presented for discussion are proposed amendments to the WSBA Admissions Policies that would change the definition of approved law schools.

Purpose

The purpose for the proposed amendments is to change the definition of approved law schools that qualify for admission and licensure to practice law in Washington.

Background

The Washington Supreme Court, in Rule 2(a)(5) of the Admission and Practice Rules (APR), delegated to the Board of Governors the power to approve law schools for the purposes of admission and licensure to practice law and also to maintain a list of the approved law schools. In 1978, the Board of Governors adopted the list of ABA-accredited law schools as approved law schools. The definition of approved law schools has not changed significantly since then. See definition of "Approved Law School" in section I.B. of the WSBA Admissions Policies.

Proposal

The proposed amendments would keep the ABA-accredited law schools on the approved list but would also add law schools that other states have recognized as meeting the education requirements to sit for the bar exam in that jurisdiction. The burden would be on the applicant for admission to demonstrate that the law school is so recognized by another state. Finally, the defined term "Approved Law School" would be changed to "Law school approved by the Board of Governors" as that is the term used in the APR. See, for example, APR 3(b)(1), "graduation with Juris Doctor (JD) degree from a law school approved by the Board of Governors."

Rationale

Expanding the definition of approved law school beyond exclusive reliance on ABA accreditation is consistent with emerging national trends and regulatory innovation in lawyer licensure. A few states already recognize state-level accredited law schools. Alabama, California, Connecticut, Massachusetts, and Tennessee allow bar eligibility through non-ABA law schools[1]. More recently, Texas and Florida have moved to eliminate sole reliance on ABA accreditation as well. These models demonstrate that states can maintain rigorous standards for competency and public protection while broadening access to the legal profession.

[1] See, Domestic Legal Education – NCBE Comprehensive Guide to Bar Admission Requirements at ncbex.org.

This proposal would also align with Washington's other pathways to licensure. Washington already grants licenses to people who did not go to ABA accredited law schools. As it stands now, to be eligible to take the bar exam in Washington one must have gone to an approved law school. However, lawyers who have practiced more than one year in another state, regardless of what law school they attended, are eligible for licensure through admission by motion. In addition, Washington licenses individuals who have only a foreign law degree, or who completed the law clerk program without attending any law school at all.

Expanding the definition of approved law school is consistent with Washington's current practice, would support innovation in legal education, and reduce unnecessary barriers to entry without compromising quality.

Information for Fiscal Analysis

The proposed amendments have very little financial impact on the WSBA. There will be some small expense for updating the application software with the new list of approved law schools as well as some staff time for communication updates.

Information for Equity Analysis

Adding additional law schools to the approved list reduces barriers and allows more people from diverse backgrounds to enter the legal profession in Washington.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

The risk analysis is available as confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The proposed amendments have a fiscal impact on a variety of areas. Primarily the impact with be on costs associated with indirect expenses for staff time dedicated to drafting the proposal, updating applicable records, and disseminating information regarding changes to stakeholders. These tasks fall within the routine responsibilities of current WSBA personnel and will not necessitate additional staffing or significant resources from other internal departments. As noted above, there will likely be a minimal amount of direct expenses to support software updates to the WSBA's admissions system for these amendments. Lastly, there may also be an increase in revenue from bar exam applications submitted by candidates who were previously ineligible to sit for the exam, but this is unlikely to lead to a material increase.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analyses is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all.

The proposed amendments to WSBA admissions policies regarding the definition of approved law schools has the potential to enhance fairness and consistency in the admissions process, and to reduce unnecessary barriers to

entering the Washington legal profession, especially given that pathways into the WSBA through non-ABA accredited law schools already exist.

Attachments

1. Proposed Amendments to the WSBA Admissions Policies – Markup
2. Memo re Approved List of Law Schools for Bar Examination Purposes, BOG Materials, June 1978
3. List of known law schools recognized by other states to qualify for the bar exam
4. *Court Opens Door to New Law School Accreditors for Bar Admission*, The Florida Bar News, Jan. 16, 2026
5. Texas Supreme Court Order re Misc. Docket No. 26-9002, January 6, 2026

ADMISSIONS POLICIES OF THE WASHINGTON STATE BAR ASSOCIATION

Under the authority of, and consistent with, the Washington Supreme Court's Admission and Practice Rules (APR), the Board of Governors of the Washington State Bar Association (Bar) has adopted the following Admissions Policies in administering those rules. These policies apply to individuals seeking reinstatement under APR 25 or admission to the Bar as a lawyer, limited practice officer (LPO), house counsel or foreign law consultant. These policies supplement APR 3-5, 8(f), 14 and 20-25. Any discrepancy or conflict between these policies and the APR is unintentional and will be resolved in favor of strict compliance with the APR.

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I. GENERAL PROVISIONS AND DEFINITIONS

A. Applications

Applications for admission to practice law in Washington must be completed and submitted online or as prescribed by the Bar's admissions staff.

B. Definitions

~~"Approved Law School" means a law school approved by the Board of Governors. Only those law schools approved, or provisionally approved, by the American Bar Association at the time the J.D. was conferred are approved by the Board of Governors. A list of ABA approved law schools is available on the ABA website.~~

"Attorney Applicant" means a person applying for admission as a lawyer under APR 3 or a person petitioning for reinstatement under APR 25 who, at the time of filing the application, has ever been admitted to practice law as a lawyer (or the equivalent for that jurisdiction) in any jurisdiction other than Washington.

"Foreign Law Consultant Applicant" means a person applying for licensure as a foreign law consultant under APR 14.

"General Applicant" means a person applying for admission as a lawyer under APR 3 who, at the time of filing the application, has never been admitted to practice law as a lawyer (or the equivalent for that jurisdiction) in any jurisdiction other than Washington, or a person petitioning for reinstatement under APR 25 who has been admitted to practice law in Washington only.

"House Counsel Applicant" means a person applying for licensure as house counsel under APR 8(f).

"Law school approved by the Board of Governors" is a law school approved or accredited, or provisionally approved or accredited, by the American Bar Association or recognized by a state or territory of the United States or the District of Columbia as meeting the education requirement to be eligible to sit for the bar exam in that jurisdiction at the time the Juris Doctor or LL.M. degree for the practice of law was conferred. An applicant who graduated from a law school not approved by the ABA bears the burden of demonstrating to the Bar that the law school is recognized by a state or territory of the United States or the District of Columbia as meeting the education requirement to be eligible to sit for the bar exam in that jurisdiction or otherwise meets this definition.

"LPO Applicant" means a person applying for admission, or petitioning for reinstatement under APR 25, as a limited practice officer.

II. – XI. [Unchanged.]

To: Board of Governors, Washington State Bar Association

Re: Approved List of Law Schools for Bar Examination Purposes

This memorandum responds to a request to report to the Board of Governors as to the utility and propriety of employing the American Bar Association approved list of law schools as constituting those law schools whose graduates are eligible to apply to sit for the Washington State Bar Examination. Consideration of the question is limited to the concept of protection of the public interest to the end that the results of the Bar Examination can be reasonably interpreted as evidencing qualification to practice law in the State of Washington.

In preparation of this memorandum, the following materials have been particularly examined: Survey of the Legal Profession; Reports of Consultant and the Advisory and Editorial Committee on Bar Examinations and Requirements for Admission to the Bar (1952) and particularly Chapter VII on "The Accreditation of Law Schools"; American Bar Association report on "Approval of Law Schools; Standards and Rules of Procedure" (as amended 1977); Memoranda 7778-27 and 7778-33 of the American Bar Association Section of Legal Education and Admissions to the Bar setting out interpretations of the standards and rules of procedure for approval of law schools and amendment thereto; current list of "Law Schools on the Approved List of the American Bar Association" listed by state, number of full-time and part-time students by class year, minority participation, total enrollment, degrees, charges, college prerequisites, required credits, full-time and part-time staff, library capacity.

This memorandum states and comments upon a series of questions relevant to a recommendation on the subject to the Board of Governors.

1. Is it both useful and necessary for the Washington State Bar Association to define a list of approved law schools in connection with eligibility for applicants to sit for the Washington State Bar Examination? Any school, of whatever form, length, staff, curriculum whatsoever can designate itself a "Law School". On this basis, the question appears to be self-answering. While the three-day bar examination can identify applicants whose responses evidence disqualification (e.g. as to knowledge of specific fields of law or as to ability of analysis and expression), it is impossible in such an examination to cover all fields of law to a degree that guarantees competence in the interests of protection of the public. As a starting premise, it is therefore necessary to be sure that the applicants have successfully passed a course of adequate legal instruction. A determination of adequacy of such instruction

requires a recognition that the school meet some standard other than merely self-designation as a Law School. Accordingly there must be a method of approving those law schools whose graduates have received such adequate training as to be eligible for examination and admission.

2. Can the WSBA or the Washington Supreme Court adequately determine on an independent basis the standards of all law schools in the United States? As a practical matter this cannot be independently done in this state. There are literally hundreds of law schools in the United States. To test each law school on a continuing basis as to such matters as curriculum, entrance examinations, staff, courses of study, etc., is utterly beyond the manpower capacity of the Association or the court or other local body.

3. Are the American Bar Association's standards for accreditation ones which would be independently selected by the WSBA or the Supreme Court? The basic subjects under which the standards of accreditation are detailed, as set by the Council of the Section of Legal Education and Admissions to the Bar and approved by the House of Delegates of the American Bar Association, are outlined as follows:

Organization and administration
Educational program
Faculty
Admission
Library
Physical plant

Attached are detailed expressions on these subjects as amended in 1977. Were the Washington State Bar Association or the Washington Supreme Court to specify general subjects of qualification, we believe they would coincide with the above list; the detailed expressions on those subjects are, in their entirety, appropriate to measure adequacy of training of law school graduates.

4. Are the ABA standards and procedures carefully and fairly administered? The basic administration of the accreditation program is by the Council of the Section of Legal Education and Admissions to the Bar, a standing section of the American Bar Association. Actions of the Council are subject to confirmation by the House of Delegates of the American Bar Association. Adequate procedural standards are established for policing the continued meeting of the standards of accreditation, for removing schools from the accredited list and for adding and reinstating law schools to that list. The annual list of approved law schools with current data as to significant features of qualification evidences the continuing attention of the Council to the

accuracy of the approved list. An illustration in this state of a threatened loss of accreditation of one law school, and the resultant improvement in the organization and administration of that law school evidences the useful care exercised by the Council in assuring the reliability of the list of approved schools.

5. Does application of the ABA standards by the WSBA endanger qualification and eligibility of graduates of the three law schools in this state? All three law schools in the State of Washington are on the approved list of the American Bar Association; there are no unaccredited schools in this state.

6. Are the ABA standards generally recognized and applied? While a completely current summary of requirements for examination and admission in all states is not available, the most recent one examined evidences that 39 states and the District of Columbia make reference to the ABA approved list of law schools in connection with eligibility for examination and admission. The application of the standards is not completely uniform, some of the states apply the standards only for out-of-state law students; some have supplemental lists approved by the State Department of Education or the State Supreme Court and some refer additionally to the list of member schools of the American Association of Law Schools. While not determinative of their propriety, the widespread acceptance of the ABA list of approved law schools evidences that the ABA standards and list of approved law schools coincide with standards recognized in a substantial majority of the states.

7. Does application by the WSBA of the ABA standards and list of approved law schools discriminate against individually qualified graduates of unaccredited schools? While obviously there is a degree of discrimination in any approval list, the differentiation does not appear to be unfair. In the first place there are plenty of accredited law schools to accommodate those who have a pre-entry intent to practice law in Washington. Attached is a current list of the accredited schools, 164 in number. They are located in 47 states, the District of Columbia and Puerto Rico. Only Alaska, Nevada and Rhode Island are not represented in the list (we understand that there is no law school in Alaska and that situation may also apply in Nevada and Rhode Island). Additionally, the WSBA has an alternative of clerkship studying for applicants who are not graduates of approved law schools, and grants advanced standing for graduates of non-approved schools. Accordingly there are channels which can be pursued by graduates of unaccredited law schools for admission in Washington.

8. Does the application by the WSBA of the ABA standards limit the number of lawyers being admitted to practice in this state, to the prejudice of the public? As noted, the current list of approved law schools is 164 in number. In all recent years there has been a substantial increase in the number of individuals annually admitted to the practice of law in Washington. Currently there are more than 8,000 lawyers and admissions are at a rate of approximately 10% a year. Reports of recent admittee questionnaires indicate that a substantial number of them are underemployed. No evidence is perceived that the employment of the ABA approved law school list operates as a deterrent to the numbers of lawyers admitted to practice in this state.

Based on the foregoing considerations, it is suggested that a resolution in substantially the following form be adopted by the Board of Governors of the Washington State Bar Association:

"RESOLVED that the Washington State Bar Association hereby confirms the application of the standards of accreditation of law schools as adopted by the Council of the Section of Legal Education and Admissions to the Bar of the American Bar Association and confirmed by the House of Delegates, as the standards applicable in determining approval of law schools whose graduates are eligible to apply to sit for the Washington State Bar Examination;

FURTHER RESOLVED that the Washington State Bar Association hereby adopts the list of such ABA-accredited law schools, and as such list may be modified by addition thereto or deletion therefrom, as the list of approved law schools whose graduates are eligible to apply to sit for the Washington State Bar Examination."

State-Approved Law Schools[1] -- April 4, 2026

Locale State (city)	Law School	State(s) Approval
Alabama (Birmingham)	Birmingham School of Law[6]	Alabama
Alabama (Birmingham)	Miles Law School[8]	Alabama
California (Chico)	Cal Northern School of Law[17]	California
California (Ventura)	Colleges of Law	California
California (San Francisco)	Golden gate University School of Law	California
California (online)	JFK School of Law, National University[21]	California
California (Bakersfield)	Kern County College of Law	California
California (Stockton)	Laurence Drivon School of Law, Humphreys University	California
California (Sacramento)	Lincoln Law School of Sacramento	California
California (San Jose)	Lincoln Law School of San Jose	California
California (Seaside)	Monterey College of Law	California

[1] See also: List of law schools in the United States - Wikipedia

Locale State (city)	Law School	State(s) Approval
California (Sacramento)	Northwestern California University School of Law	California
California (Los Angeles)	Purdue Global Law School, Purdue University Global[15]	California
California (Clovis)	San Joaquin College of Law	California
California (Menlo Park)	St. Francis School of Law[23]	California
California (San Diego)	Thomas Jefferson School of Law	California
California (Santa Ana)	Trinity Law School, Trinity International University	California
California (Ontario)	University of La Verne College of Law	California
California (Inglewood), (Chatsworth)	University of West Los Angeles School of Law	California
Massachusetts (Andover)	Massachusetts School of Law	Massachusetts, Connecticut
Tennessee (Nashville)	Nashville School of Law	Tennessee

COURT OPENS DOOR TO NEW LAW SCHOOL ACCREDITORS FOR BAR ADMISSION

Jan 16, 2026 By Samadhi Jones Senior Editor Top Stories

The rule changes specify that any new accrediting agency must be recognized by the U.S. Department of Education and approved by the court, which has exclusive jurisdiction to regulate admission to the Bar according to Florida's Constitution.

The Florida Supreme Court on January 15 amended admissions rules to eliminate the ABA as the sole law school accreditor for Florida Bar eligibility, creating a framework for additional accrediting bodies to be recognized by the court.

"The Court's goal is to promote access to high-quality, affordable legal education in law schools that are committed to the free exchange of ideas and to the principle of nondiscrimination," the opinion states. "To be clear, under the rule changes, graduates of ABA-accredited law schools will continue to be eligible to sit for the bar examination, and the rule changes do not preclude any law school from continuing to seek ABA accreditation."

The case, *In Re: Amendments to Rules Regulating The Florida Bar and Rules of the Supreme Court Relating to Admissions to The Bar,* **SC2025-2064**, creates "the opportunity for additional entities to carry out an accrediting and gatekeeping function on behalf of the Court."

The rule changes specify that any new accrediting agency must be recognized by the U.S. Department of Education and approved by the court, which has exclusive jurisdiction to regulate admission to the Bar according to Florida's Constitution. Currently, the ABA is the only accreditor of law schools recognized by the U.S. Department of Education.

No additional accrediting agency has yet been identified, and the court has not finalized its procedure for approving institutional accreditors. The opinion says that the court will contact the seven agencies recognized by the U.S. Department of Education for accrediting institutions offering degree programs to assess their interest in accrediting law schools.

The Workgroup on the Role of the American Bar Association in Bar Admission Requirements, which was created by the court in March 2025, was charged with studying the current framework and requirements for Bar admission and proposing alternatives that would "end reliance on the ABA." The workgroup submitted 12 alternatives for the court's consideration in October 2025. (For details, see the *News* article, **Court workgroup explores alternatives to ABA role in Bar admissions**.)

The amendments to the Rule of the Supreme Court Relating to Admissions to the Bar 4-13.2 (Definition of Accredited) require adoption of conforming amendments to the following Rules Regulating The Florida Bar: 1-3.9 (Law Faculty Affiliates), 4-6.6 (Short-Term Limited Legal Services Programs), 11-1.2 (Activities), 11-1.3 (Requirements and Limitations), 11-1.8 (Practice After Graduation), 12-1.2 (Definitions), 20-3.1 (Requirements for Registration), and 21-2.1 - 2 - (Eligibility) and Rule of the Supreme Court Relating to Admissions to the Bar 3-14.1 (Filed as an Applicant). The amendments become effective October 1 at 12:01 a.m.

Justice Jorge Labarga filed a dissenting opinion, saying that "the ABA has developed incomparable expertise in the accreditation process" during its 34 years as the sole law school accreditor. Citing language from the workgroup's report, Justice Labarga pointed to standards developed by the ABA that "provide consumer protections, public accountability and institutional transparency . . . protecting against predatory admissions and poor programs outcomes."

Interested parties have 75 days to file comments. Those requesting an oral argument must file comments and submit the request by March 31.

Supreme Court of Texas

Misc. Docket No. 26-9002

Final Approval of Amendments to
Rule 1 of the Rules Governing Admission to the Bar of Texas

ORDERED that:

1. On April 4, 2025, in Misc. Dkt. No. 25-9018, the Court invited comments on the law school accreditation component of the Rules Governing Admission to the Bar of Texas. Specifically, the Court requested feedback on:

   a. whether to reduce or end the Rules' reliance on the American Bar Association; and

   b. alternatives the Court should consider.

2. On September 26, 2025, in Misc. Dkt. No. 25-9070, the Court proposed amendments to Rule 1 of the Rules Governing Admission to the Bar of Texas and again invited public comment.

3. No additional changes have been made to the proposed amendments following the comment period. This order gives final approval to the amendments set forth in Misc. Dkt. No. 25-9070 and reproduced below, effective immediately.

4. This order also gives final approval to the initial list of law schools approved by the Court as satisfying the law study requirements for licensure, published in Misc. Dkt. No. 25-9070 and attached to this order. The list includes all law schools that are currently approved under the Court's existing rules.

5. In Misc. Dkt. No. 25-9070, the Court advised that it intends to provide stability, certainty, and flexibility to currently approved law schools by guaranteeing ongoing approval to schools that satisfy a set of simple, objective, and ideologically neutral criteria using metrics no more onerous than those currently required by the ABA. At this time, the Court has concluded that a law school already on Texas's list of approved schools need only ensure

compliance with ABA standards 316, 502(a)-(c), 503, and 509 in order to maintain ongoing approval by the Court.

6. In re-asserting its authority over the approval of law schools, the Court continues to advise that it:

   a. intends to preserve the portability of Texas law-school degrees into other states and to preserve the portability of out-of-state law-school degrees into Texas;

   b. does not intend to impose additional accreditation, compliance, or administrative burdens on currently approved law schools, which need not take any additional action in order to remain approved law schools in Texas;

   c. will not consider the fact that a law school loses ABA accreditation to be sufficient grounds for removal of the school from Texas's list of approved schools;

   d. intends to develop, in consultation with the Texas Board of Law Examiners, a deliberative approach to requests from law schools not currently accredited by the ABA that wish to be added to Texas's list;

   e. does not anticipate immediate changes to the current list of approved law schools; and

   f. may consider, in the future, returning to greater reliance on a multi-state accrediting entity other than the ABA should a suitable entity become available.

7. The Clerk is directed to:

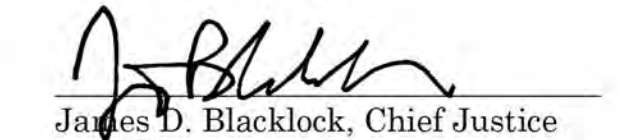
   a. file a copy of this order with the Secretary of State;

   b. cause a copy of this order to be mailed to each registered member of the State Bar of Texas by publication in the *Texas Bar Journal*;

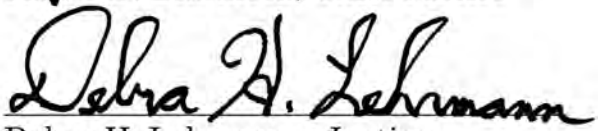
   c. send a copy of this order to the Governor, the Lieutenant Governor, and each elected member of the Legislature; and

   d. submit a copy of this order for publication in the *Texas Register*.

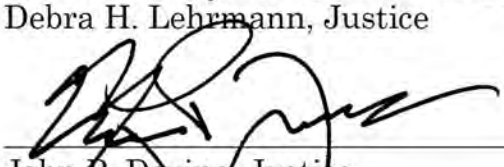
Date: January 6, 2026.



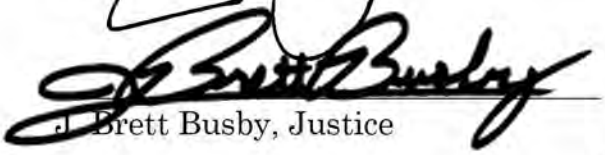
James D. Blacklock, Chief Justice



Debra H. Lehrmann, Justice

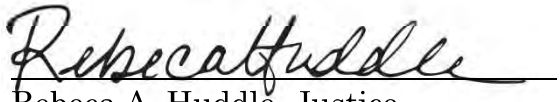


John P. Devine, Justice

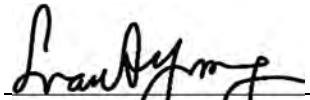


J. Brett Busby, Justice

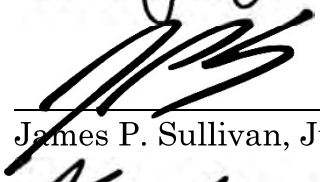
Jane N. Bland, Justice



Rebeca A. Huddle, Justice



Evan A. Young, Justice



James P. Sullivan, Justice

Kyle D. Hawkins, Justice

Rule 1
Definitions and General Provisions

(a) Frequently used terms are defined as follows:

***

(4) "Approved law school" means a law school approved by the ~~American Bar Association~~Supreme Court.

***

Supreme Court of Texas

Approved Law Schools

The below law schools are approved by the Court as satisfying the law study requirements for admission to the Texas Bar:

Akron
Alabama
Albany
American
Appalachian
Arizona
Arizona State
Arkansas – Fayetteville
Arkansas – Little Rock
Atlanta's John Marshall Law School
Ave Maria School of Law
Baltimore
Barry University
Baylor
Belmont University
Boston College
Boston University
Brigham Young
Brooklyn
Buffalo
California – Berkeley
California – Davis
California – San Francisco
California – Irvine
California – Los Angeles
California Western
Campbell
Capital
Case Western Reserve
Catholic University of America
Chapman
Charleston
Chicago
Chicago-Kent
Cincinnati
City University of New York
Cleveland State
Colorado
Columbia
Connecticut
Cooley Law School
Cornell
Creighton
Dayton
Denver
DePaul
Detroit Mercy
District of Columbia
Drake
Drexel
Duke
Duquesne
Elon
Emory
Faulkner
Florida
Florida A&M
Florida International
Florida State
Fordham
George Mason
Georgetown
George Washington
Georgia

Georgia State
Golden Gate
Gonzaga
Harvard
Hawaii
Hofstra
Houston
Howard
Idaho
Illinois Chicago
Illinois
Indiana University – Bloomington
Indiana University – Indianapolis
Inter American
Iowa
Jacksonville
Judge Advocate General's School
Kansas
Kentucky
Lewis and Clark
Liberty
Lincoln Memorial
Louisiana State
Louisville
Loyola – Chicago
Loyola – Los Angeles
Loyola – New Orleans
Maine
Marquette
Maryland
Massachusetts
McGeorge
Memphis
Mercer
Miami
Michigan State
Michigan
Minnesota
Mississippi College
Mississippi
Missouri
Missouri – Kansas City
Mitchell Hamline
Montana
Nebraska
Nevada
New England Law – Boston
New Hampshire
New Mexico
New York Law School
New York University
North Carolina
North Carolina Central
North Dakota
Northeastern
Northern Illinois
Northern Kentucky
Northwestern
Notre Dame
Nova Southeastern
Ohio Northern
The Ohio State
Oklahoma
Oklahoma City
Oregon
Pace
Pennsylvania
Penn State – Dickinson Law
Pepperdine
Pittsburgh
Pontifical Catholic of Puerto Rico
Puerto Rico
Quinnipiac
Regent
Richmond
Roger Williams
Rutgers
St. John's
Saint Louis
St. Mary's
St. Thomas (Florida)
St. Thomas (Minnesota)
Samford
San Diego
San Francisco
Santa Clara
Seattle
Seton Hall

South Carolina
South Dakota
South Texas – Houston
Southern University
Southern California
Southern Illinois
Southern Methodist
Southwestern
Stanford
Stetson
Suffolk
Syracuse
Temple
Tennessee
Texas
Texas A&M
Texas Southern
Texas Tech
Toledo
Touro
Tulane
Tulsa
UNT Dallas
Utah
Vanderbilt
Vermont
Villanova
Virginia
Wake Forest
Washburn
Washington and Lee
Washington
Washington University
Wayne State
Western New England
Western State
West Virginia
Widener – Delaware
Widener – Commonwealth
Willamette
William and Mary
Wilmington
Wisconsin
Wyoming
Yale
Yeshiva

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

FROM: Kari Petrasek, WSBA President-elect

RE: 2026-2027 Chair Appointments

DATE: June 23, 2026

Consent: Appointment of the 2026-2027 WSBA committee and board chairs listed below.

The WSBA has a number of standing committees that are created and authorized by the BOG to study matters relating to the general purposes and business of the Bar which are of a continuous and recurring character. Pursuant to the WSBA Bylaws, IX(B)(1)(c), the President-elect annually selects the Chair or Vice Chair of each committee, with the BOG having the authority to accept or reject that selection. Below is the slate of WSBA committee chairs for the year 2026-2027. The candidates' resumes are attached. All eligible members of the committees listed below were encouraged to apply for the Chair position. Additional Chair appointments forthcoming.

Committee/Board	Recommended for Appointment
Board of Bar Examiners	Chair: Bruce Turcott Vice-chair: Cathy Helman
Character and Fitness Board	Chair: Gabriel Rothstein Vice-Chair: Jennifer Flynn
Client Protection Board	Chair: Carrie Umland
Committee on Professional Ethics	Chair: Michele Carney
Court Rules and Procedures Committee	Chair: Andrew Yi
Council on Public Defense	Chair-elect: Michael Schueler
Law Clerk Board	Chair: Sarah Propst
Legislative Review Committee	Chair: Matthew LeMaster
Small Town and Rural Council	Chair: Ashley Cummins (two-year term)
Washington New Members Committee	Chair-elect: Ariel Cook

May 16, 2026

Dear Paris:

Please accept my renewal application for Chair, Board of Bar Examiners (BOBE), for FY 2026-27.

I have been a member of the BOBE since 2007. I graded nearly every exam and assisted with training new graders until becoming Chair in October 2020. I have been Chair for remote grading Winter and Summer 2021, in-person grading Winter 2022, remote grading Summer 2022, and in-person grading Winter 2023 through Winter 2026. In 2021, I participated with WSBA admissions staff in the initiation of Exam360 grading software, replacing the paper grading process.

We are currently preparing for the first administration of the NextGen exam in Summer 2026, which will mean a substantial change in grading practices, with a larger number of items with shorter answers. Also on the horizon are portfolio evaluations, which are expected to begin in 2027. Finally, we are working to recruit additional members to expand the grader pool by 50% to be prepared for these changes.

I have given presentations to the Executive Committee, Board of Governors, and Joint Minority Mentorship Program. I was appointed to the WSBA Equity and Diversity Committee and Washington Bar Licensure Task Force. With the Vice-Chair, admissions staff, and BOG liaison, I participate in recruiting, selecting, onboarding, and training BOBE members. It has truly been a pleasure working with these volunteers and staff.

I also participate in National Conference of Bar Examiners (NCBE) Annual Bar Admissions Conferences, am a member of the NCBE Outreach and Communications Committee, and have applied to join the NCBE Diversity Committee.

I would be honored to continue to assist WSBA in implementing the NextGen and portfolio evaluations.

My resume is attached.

Sincerely,

Bruce Turcott
blturcott@gmail.com
(360) 701-4052

Bruce L. Turcott
4308 5th Avenue NW
Olympia, Washington 98502
(360) 701-4052
blturcott@gmail.com

Legal Experience

Editor, *Cannabis Law Deskbook*, AG Alliance (2022-2024)
Tracked developments in cannabis law across fifty-six U.S. jurisdictions and abroad, managed two dozen volunteer authors, edited annual editions and interim updates published by Thomson Reuters. Coordinated development and delivery of cannabis law and regulation courses in partnership with University of Arizona Law. Led monthly cannabis roundtable meetings of two dozen state Attorneys General offices.

Senior Counsel, Attorney General's Office (2000-2022)
Licensing and Administrative Law Division (2004-2022)
Lead counsel to Liquor and Cannabis Board, including implementation of Initiative 502 legalizing marijuana from 2012-2022. Co-chair of Attorney General's I-502 implementation work group. Drafted final orders for Director of Licensing. Advised Board of Accountancy and Executive Ethics Board. Served as co-counsel in defense of Initiative 1183 that privatized liquor. Served as prosecutor for 18 business and professional licensing programs, lead counsel for Employment Security Department, counsel for Environmental Hearings Office, team leader, and paralegal and law clerk supervisor. Won 2018, 2013, and 2012 AGO Excellence Awards. Won 2012, 2010, and 2009 Iditarod Awards for complex litigation. AGO fiscal note coordinator and division legislative coordinator.
Social and Health Services Division (2000-2004)
Served as lead counsel for Department of Social and Health Services contracts, financial recovery, information technology, lands and buildings, public disclosure, and public assistance programs. Represented state in mental health commitment hearings. Coordinated division bill analysis.

Department of Social and Health Services, Division of Child Support
Legislative Liaison (1998-2000) and Claims Officer (1992-1998)
Developed request legislation and obtained sponsors and passage. Coordinated bill analysis and participated in DSHS cabinet bill review. Presented at conferences and prosecutor trainings. Represented agency in approximately 500 adjudicative proceedings to establish child support.

Session Attorney, Code Reviser's Office (1991-1993)
Drafted 679 bills at request of legislators and agencies. Advised bill requesters on legislative process.

Legal Counsel to CNMI School System; Assistant Attorney General (1990-1991)
Served as counsel for Board of Education, U.S. Commonwealth of the Northern Mariana Islands Public School System personnel, procurement, and all legal matters. Assisted Governor mediate employee strike.

Law Clerk, Chief Judge Sidney C. Volinn (1988-1989)
Drafted Ninth Circuit Bankruptcy Appellate Panel opinions.

Chief, Div. of Law; Assistant Attorney General; Federated States of Micronesia (1986-1988)
Directed delivery of legal services to executive branch of newly self-governing former U.S. Trust Territory, including capital construction, fishery patrol, immigration, and national police. Wrote 50 attorney general opinions. Advised agency rulemaking. Supervised contract review. Drafted bills, testified, advised President.

Law Clerk, Justice Barbara Durham, State Supreme Court (1986)
Drafted majority opinions, concurrences, and dissents. Wrote pre-hearing bench memoranda.

Other Experience

Instructor, English as a second language, Everett Community College, 1979-1981

Teaching Assistant, ESL intensive summer institute, University of Washington, 1979

Sous Chef, Gerard's Relais de Lyon, Bothell, 1976-1977

Education and Bar Admission

J.D., University of Washington School of Law, 1985

M.Ed., Higher Education, University of Washington, 1979

B.A., Anthropology, University of Hawaii, 1974

Admitted to practice in Washington, 1985; Federated States of Micronesia Supreme Court, 1986; U.S. District Court, W.D. Washington, 1989, E.D. Washington, 2000; Ninth Circuit, 2007; Tenth Circuit, 2016

Publications

"Washington's Implementation of Legalized Cannabis: A Model for Other States and the Federal Government,"100 Wash. L. Rev. 125 (2025).

Editor, Cannabis Law Deskbook, AGA/Thomson Reuters, published 2021, 2022, 2023, 2024.

"Constitutional Jurisprudence of the Federated States of Micronesia Supreme Court," 6 UCLA Pac. Basin L.J. 103 (1989).

"Beginnings of the Federated States of Micronesia Supreme Court," 5 U. Haw. L. Rev. 361 (1983).

Honors and Community Service

- National Conference of Bar Examiners, Communications and Outreach Comm., 2021-present; 7/26 NextGen Leadership Comm., 2024-present
- Chair, Board of Bar Examiners, Washington State Bar Association, 2020-present; Member, 2007-present
- State Supreme Court, Washington Bar Licensure Task Force, 2020-2022
- Washington State Bar Association, Equity & Disparity Workgroup, 2020-2023
- Founding Chair, Conference of Western Attorneys General AG Alliance Cannabis Project Advisory Council, 2019-2020
- Chair, National Association of Attorneys General Informal Cannabis Working Group, 2018-2022
- Frequent presenter on cannabis law, client advice, and administrative law; guest lecturer to UW Law School cannabis law seminar 11 times
- Compact of Free Association Islander Health Care Program Advisory Committee, 2018-2022
- Arbitrator, Financial Industry Regulatory Authority, 2013-present
- Attorney General's Excellence Awards, 2012, 2013, 2018
- Volunteer, WSBA Call to Duty – Pro Bono Legal Services for Veterans
- Volunteer Judge, University of Washington School of Law moot court and national competitions
- Former Board member and officer of Capitol Land Trust; negotiated conservation easements
- Member by invitation, American Society of Legal Writers
- American Jurisprudence Award, Professional Responsibility
- Won first-year law school moot court competition

CATHY M. HELMAN

[redacted]

June 1, 2026

Washington State Bar Association
1325 Fourth Avenue, Suite 600
Seattle, Washington 98101

Dear Bar Leaders,

Please allow me to retain my position as the vice-chair of the Board of Bar Examiners. I became a bar examiner in February 2014 and vice-chair in the fall of 2020. I have graded both the summer and winter exams every year and filled in for absentee graders when emergencies have arisen. I truly enjoy reading answers submitted by the applicants and seeing the different approaches when analyzing a challenging legal question. As vice-chair, I've enjoyed training new graders and providing support to the members of the Board of Bar Examiners before, during, and after the grading process.

The position as vice-chair of the Board of Bar Examiners has provided an opportunity to view the bar exam from a new angle. I've learned more about the processes that go into developing and administering the bar exam. I am currently a member of the Washington Bar Licensure Steering Committee for developing alternative pathways to the bar exam. I have worked with the bar leaders to ensure that the bar exam provides a fair and equitable process for admission into the Washington State Bar Association and the practice of law. I also BETA tested the NextGEN Bar exam and have participated in discussions regarding its implementation in Washington State. I look forward to continuing in this role and using my experience to maintain the integrity of the bar exam and the grading process.

Thank you for your consideration.

Sincerely,
Cathy M. Helman

CATHY M. HELMAN

[redacted]
[redacted] ◦ [redacted]

EMPLOYMENT

Office of Administrative Hearings, Spokane Valley**,** WA
Administrative Law Judge — November 2016- Present

- Presides over hearings for licensing cases, public assistance benefits, and child support payments
- Conducts prehearing conferences, motion hearings, and evidentiary hearings
- Issues written orders with detailed findings of fact and conclusions of law

Burke Law Group, PLLC (now Allen Fischer, PLLC), Spokane**,** WA
Associate — July 2015- May 2018

- Appellate contract with the Office of Public Defense for representation of indigent clients
- Prior work representing clients in Family Law Superior Court and Appellate Court matters, including dissolutions, paternity, child support, adoption actions, and Social Security appeals

Washington State Court of Appeals, Division III, Spokane**,** WA
Law Clerk for Hon. Teresa Kulik (ret.) and Hon. Robert Lawrence-Berrey — June 2011- July 2015

- Researched and wrote legal memoranda/first draft opinions for over 160 appeals court cases
- Conducted extensive research on criminal, civil, and dependency and termination matters
- Assessed oral arguments of litigants and counseled the Judge on the merits

Washington State Court of Appeals, Division III, Spokane, WA
Legal Intern for Jay Bromme, Staff Attorney — August 2009- May 2010

- Drafted decisions for prisoner Personal Restraint Petitions

EDUCATION

Gonzaga University School of Law, Spokane, WA
Juris Doctor, *cum laude* — December 2010

Utah Valley University, Orem, UT
Bachelor of Science, Communications, *summa cum laude* — May 2008

PROFESSIONAL AFFILIATIONS

Washington State Bar Association — Admitted May 2011

- Board of Bar Examiners- Exam grader — February 2013- May 2021
- Board of Bar Examiners- Co-chair — May 2021- Present

GABRIEL ROTHSTEIN

[redacted], Wa • [redacted] • grothstein@snocopda.org or [redacted]

EXPERIENCE

Judge Pro tempore King and Snohomish County
Worked as a Judge Pro tempore in King County District Courts and Everett Municipal Court 2024-present

Snohomish County Public Defender's Office, Everett Washington,
Youth Access to Counsel – on call attorney July 2023 – Present
Receiving on-calls from youth throughout the State of Washington who have been detained or arrested and must be provided with counsel before being questioned by law enforcement.
71.09/SVP Unit April 2023- Present
Represent clients under the 71.09 Civil Commitment/Sexually Violent Predator Law. This includes all aspects of the representation arguing motions, probable cause, trial. Clients are housed at the Special Commitment Center (SCC) as well as on LRA's in the community.
Felony Unit, July 2019 – April 2023
Represent adult clients charged with felony offenses in all stages of criminal hearings from probable cause through arraignment, pre-trial motions, trial, and post-trial hearings.
Lead of Juvenile Unit, November 2017- July 2019
Represent juvenile clients in all stages of criminal hearings from probable cause through arraignment, pre-trial motions, trial, and post-trial hearings. Supervise multiple lawyers in the juvenile unit. Attend meetings regarding youth advocacy and working to address issues in juvenile court.
Juvenile Unit, September 2016 - November 2017
Represent juvenile clients in all stages of criminal hearings from probable cause through arraignment, pre-trial motions, trial, and post-trial hearings.
Felony Unit, April 2013 – September 2016
Represent adult clients charged with felony offenses in all stages of criminal hearings from probable cause through arraignment, pre-trial motions, trial, and post-trial hearings.
Misdemeanor Supervisor, April 2010 – March 2013
Supervise approximately 12 lawyers in the misdemeanor unit. Aid and assist new lawyers in advocating for clients and managing the art of defending people accused of crimes.
Felony Unit, September 2006 – March 2010
Represent adult clients charged with felony offenses in all stages of criminal hearings from probable cause through arraignment, pre-trial motions, trial, and post-trial hearings.
Adult Drug Court Attorney, 2008-2010
Represented and advocated adults in the drug court program while carrying half of a felony caseload.
Misdemeanor Unit, January 2005- August 2006
Represent adult clients charged with misdemeanor offenses in all stages of criminal hearings from probable cause through arraignment, pre-trial motions, trial, and post-trial hearings

Housing Justice Project, Seattle, Washington
Volunteer Attorney 2004
Unemployment Law Project, Seattle Washington
Volunteer Attorney 2004

BOARD PARTICIPATION

Holman Recovery Center in-patient substance abuse treatment facility – Board of Directors
WSBA Character and Fitness Board – Chairperson

EDUCATION

UCLA School of Law, Los Angeles, CA
Attended 2001-2003, Juris Doctorate, May 2003

Rutgers School of Law, Newark, New Jersey
Attended 2000-2001
Emory University, Atlanta, GA
Bachelor of Arts, Sociology, June 1997 3.1

Gabriel Rothstein

grothstein@snocopda.org

5/12/2026

Washington State Bar Association

1325 Fourth Ave. Suite 600

Seattle, WA 98101

RE: Interest in continuing to serve as Chairperson of the WSBA Character and Fitness Board

Dear Bar Leaders,

My name is Gabriel Rothstein. I am a public defender in Snohomish County Washington. I have been a PD since January of 2005. I am dedicated to my job and to serving my clients to the best of my ability. I have held many different roles at my office, currently I am representing clients under the Civil Commitment/71.09 Statute.

I have served on the Character and Fitness Board since Approximately October of 2024. I was made Chairperson of the CFB in approximately April of 2025. I was a newer member of the board at the time, but I was recommended by the former chair, and I was interested in the opportunity so long as none of the longer serving members wanted the spot.

I cannot express how much I enjoy serving on this board. I find our work not only important but incredibly engaging. I find that my job as chair is to keep the board focused on the task at hand, but to also make sure that every board member has an opportunity to be heard. I frequently alternate the order in which board members ask questions of witnesses and/or the order in which board members speak during our deliberation sessions. It's important to me that all the voices are heard in particular the voices of our non-lawyer members. Their input is an invaluable part of our deliberation.

I would love to serve as the Chair of the CFB for the next year.

Thank you for your time and consideration, looking forward to hearing from you,

Gabe

GABRIEL ROTHSTEIN

Gabriel Rothstein WSBA 36009

Jennifer Flynn

Employment

Skagit County Prosecutor's Office October 2017 – Present
Senior Deputy Prosecutor Mount Vernon, WA

Prepare and try a variety of felony cases, with a particular focus on serious traffic offenses and domestic violence. Research, draft, and respond to complex litigation and motions. Conduct trials, testimonial hearings, and oral arguments to both the bench and juries. Prepare and present annual legal training for law enforcement agencies and provide legal advice to officers in the field during the course of investigation. Review referrals for charging decisions. Identify areas for additional investigation or evidence gathering. Negotiate resolutions on a high volume of cases while maintaining accountability on priority offenses. Communicate with victims and witnesses to preserve victims' rights and advance the integrity of the justice system. Mentor and collaborate with attorneys in the district court unit to advance their skill set. Previous roles in this office include the District Court and Juvenile Court units. Specialties and interests include mental health/competency, high risk victims, investigation of traffic fatalities, use of medical records in criminal cases, and forensic toxicology.

Zachor & Thomas, Inc., PS. June 2016 – October 2017
Associate Attorney Edmonds, WA

Primary prosecuting authority for City of Arlington and City of Lake Stevens. Reviewed evidence and interviewed witnesses in misdemeanor and infraction cases. Coordinated follow-up investigation with law enforcement. Interviewed and understood the needs of victims of domestic violence. Negotiated case dispositions. Prepared and presented a cohesive case narrative at trial. Appeared on a minimum of twelve in-custody and two out-of-custody calendars each week. Assumed primary responsibility for a criminal case load of roughly 300-400 active cases, 600 cases in warrant status, and a monthly flow of approximately 50 dispositions and 50 new filings. Assisted with training and supervision of Rule 9 interns.

Northwest Justice Project February 2016 – June 2016
Volunteer Attorney Bellingham, WA

Advocated for high-risk victims of domestic violence in Superior Court hearings. Drafted petitions for Domestic Violence Protection Orders. Reviewed transcripts of hearings before a commissioner to prepare for revision before a judge. Interviewed victims to help them shape testimony into a cohesive legal narrative. Researched and drafted motions for revision and review as necessary.

Other Experience & Community Involvment

Skagit Superior Court Forms Committee December 2025-Present
Committee member
Collaborate with other stakeholders to review and draft forms for use in Superior Court criminal proceedings

Skagit County Prosecuting Attorney's Guild October 2025-Present
Treasurer

Leadership Skagit September 2025-June 2026
Member of Class of 2026
Leadership development program combining coursework, community interaction, and a service project. Partnered with PFLAG Skagit to hold an event for local queer youth

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WAPA Criminal Committee November 2024-present
Committee Member
Develop the agenda and recruit presenters for Washington state's annual conference for prosecutors

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WSBA Character & Fitness Board October 2024-Present
Board Member

WSBA Adjunct Disciplinary Counsel Panel October 2024-Present
Adjunct Disciplinary Counsel

Skagit Courthouse Security Committee June 2024-Present
Committee Member
Adopt a courthouse security plan in compliance with GR 36 and develop security protocols for court staff, attorneys, and the public

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Skagit County Teen Court Fall 2022 – Present
Attorney Mentor
Provide training and support to high school students in a restorative justice program

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Skagit Women's Alliance & Network (SWAN) Winter 2021 – Fall 2022
Board member

Potential Impeachment Disclosure Committee August 2019-Present
Committee Member
Internal committee to review allegations of misconduct and determine if an officer/witness should be placed on the PID list maintained by the prosecutor's office

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Skagit County Domestic Violence Task Force Spring 2018 – Present
Co-chair/Representative of Prosecuting Attorney's Office

Skagit County Gang Task Force Summer 2018 – January 2025
Representative of Prosecuting Attorney's Office

Archbishop Murphy High School Mock Trial Summer 2019 – Spring 2022
Head Coach Fall 2016 – Spring 2019
Assistant Coach

Education

Boston College Law School (BCLS), Newton, MA
Juris Doctor, May 2015

Honors/Awards:	BCLS 2015 Mock Trial Competition, First Place; American Mock Trial Association 2015 Mock Trial New England Regional Competition, Semi-finalist; Public Interest Designation Fellow
Leadership:	BCLS Pro Bono Board, President; Public Interest Law Foundation, Stipends Coordinator; Immigration Spring Break 2014, Trip Co-Coordinator
Pro Bono:	Special Education Advocacy Training through Federation for Children with Special Needs; Special Education Surrogate Parent for a child in state custody; U-Visa Adjustment of Status through Voices for Immigrant Defense and Advocacy
Practical Experience:	Representation of juveniles in education and post-adjudication criminal matters through Juvenile Rights Advocacy Project, assistance with completion of forms related to adjustment of status via Latinas Know Your Rights project of Greater Boston Legal Services, Rule 9 Intern at Whatcom County Prosecutor's Office, Intern at Middlesex District Attorney's Office in Special Assault Unit and Conviction Integrity Unit.

Yale University, New Haven, CT
Bachelor of Arts in American Studies, May 2012

Selected Activities:	Community Health Educators; Yale Mock Trial Association; Hill Mentors Program; Prison Education Program

June 4, 2026

President-elect Kari Petrasek

WSBA Board of Governors

To whom it may concern,

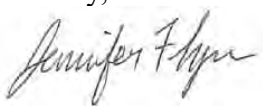
I am writing to convey my interest in serving as the vice-chair of the Character & Fitness Board. I was encouraged to apply by our current chair, Gabriel Rothstein. I have been a member of the Board for a little over 1.5 years and have greatly enjoyed the opportunity to serve the WSBA and the public.

As a member of the board, it has been a privilege to work with bar counsel and WSBA support staff. Prior to my service I had never been to the WSBA headquarters; now I look forward to our in-person meetings and feel more connected to the work of the WSBA as a whole. I have also enjoyed working with the diverse Board members, including attorneys from various practice areas as well as non-attorney members. Our deliberations are a welcome opportunity to escape from the silo of my criminal practice and consider different viewpoints.

I have been particularly impacted by hearing from applicants and petitioners appearing before the Board. It has been my goal to approach every hearing with an open mind and to make each person who appears before us feel that they have been treated with dignity and respect throughout the Character & Fitness process. While our recommendation is not always in their favor, it is always within our power to treat them with the civility and kindness that our profession aspires to.

I appreciate each of your work to the Bar and look forward to the opportunity to continue my own service. Please do not hesitate to contact me should you need to follow up on any aspect of this potential appointment.

Warmly,



Jennifer Flynn

CARRIE D. UMLAND

Professional Summary

Persuasive litigator providing legal counsel and representation to injured people. Skilled in fostering positive and trusting client relationships. Well-established knowledge of civil law and years of obtaining the best results for clients.

Skills

- Litigation Strategy and Management
- Client Advocacy and Trial Preparation
- Legal Research & Documentation
- Legal Research & Documentation
- State & Federal Court Trials
- Reliable and Detail Oriented

Work History

TELARE LAW – Richland, WA **Personal Injury Attorney**,
2025 to present

- Lead team that provides compassionate and efficient case management and resolution.
- Represent clients injured in automobile collisions, construction site injuries, premises liability, and dog bites.
- Experienced in the development and implementation of pre-litigation processes and litigation discovery plans, motions practice, and resolution by negotiation, ADR, or trial.

PALACE PERSONAL INJURY LAW - University Place, WA
Personal Injury Attorney, 2012 to 2025

- Represent clients injured in automobile collisions, construction site injuries, premises liability, and dog bites.
- Experienced in the development and implementation of pre-litigation and litigation discovery plans, motions practice, and resolution by negotiation, ADR, or trial.

Earlier Positions

GRAHAM LUNDBERG PESCHEL P.S – Seattle, WA Associate Attorney, 2005 to 2012

PLANCO FINANCIAL SERVICES/HARTFORD LIFE
Regional Marketing Director, 2000 to 2005

DAVID H. MIDDLETON & ASSOCIATES, P.S – Federal Way, WA
Associate Attorney, 1998 to 2000

Education & Credentials

Juris Doctor -- SEATTLE UNIVERSITY SCHOOL of LAW, 12/1994
Washington Bar Admission – June 1995 WSBA #24949

June 5, 2026

Carrie Umland
[redacted]
Carrie.Umland@TelareLaw.com

WSBA Bar Leaders
1325 4th Avenue, Suite 600
Seattle, WA 98101

Dear WSBA Bar Leaders,

I am writing to express my sincere interest in serving as chair of the Washington State Bar Association's Client Protection Board. I would welcome the opportunity to support the Board's important mission of helping protect the public, reinforcing confidence in the legal profession, and ensuring the fair and thoughtful administration of the Client Protection Fund.

I have served on the Client Protection Board since 2014 and served as chair from 10/02/20 through 9/30/24. The work we do as a Board is fulfilling and provides an opportunity to give back to the legal profession. I have thoroughly enjoyed serving as chair and have not applied since 2024 to give others the opportunity to serve. However, I would very much like to chair the Board again.

Thank you for your consideration. I would be grateful for the opportunity to serve in this capacity and to contribute to the continued strength and credibility of the WSBA's client protection efforts.

Sincerely,

Carrie D. Umland

Carrie Umland

MICHAEL A. SCHUELER.
901 FIFTH AVENUE, SUITE 2800C, SEATTLE, WA 98164
(425)736-8506 | MICHAEL@HSR-LAW.COM

EDUCATION:

National Criminal Defense College: July-August 2019
- Intensive trial skills college
- Focus on client communication, voir dire, opening, cross, direct, and closing arguments over a two-week period under the tutelage of nationally renowned criminal defense lawyers

Seattle University School of Law: Juris Doctor, *Cum Laude*, May 2014
- Pro Bono Pledge – Outstanding Service Recognition (250+ hours of service)
- Dean's List 2013-2014
- CALI Award – Criminal Externship Seminar – Fall 2013
- Content Development Director, Seattle Journal of Environmental Law

University of Washington, Seattle: B.A. in Sociology with Honors and Political Science, June 2010

WORK EXPERIENCE:

Partner – Heyman Schueler Rain, PLLC.
Seattle, WA – January 2025 - Present
- General criminal defense and criminal appellate practice handling misdemeanors through felony representation in courts throughout Washington state.
- Post Conviction *Padilla* representation with Seattle Clemency Project.
- Member of the 2025 Federal Defender of Western District of Washington CJA Mentorship Program
- Provide conflict Public Defense services for:
  - Snohomish County
  - Island County
  - City of Kirkland Municipal Court
  - City of Woodinville Municipal Court

King County Department of Public Defense – Associated Counsel for the Accused Division
Seattle, WA – May 2016 - January 2025
- July 2024 – January 2025 – Supervised the South Felony Unit for ACAD along with another supervisor. In this role, I supervised three lawyers while carrying a mostly full caseload of all levels of felony cases up to and including homicides. I worked with the new attorneys to the unit to help acclimate them to felony practice, including providing training on scoring, different legal defenses, and how best to work up a criminal case. I have also provided training to all of DPD's new felony lawyers about alternatives to secure confinement at our Felony Core Skills training as well as provided training to our new lawyers in our New Lawyer Core Skills training.
- June 2022 – June 2024 MAPP - Along with supervising the Seattle Municipal Court Unit, I served as the MAPP, a position in which I worked closely with our Managing Attorney on a variety of operations issues at ACAD, including tracking training requests and budget, evaluations, attorney certifications, implementing policy changes, consulting on a variety of issues that arise internally and externally, and stood in as acting managing attorney when the Managing Attorney was out of office or on leave.
- July 2021-July 2024 – I supervised the Seattle Municipal Court Unit at ACA where I managed a team of 11 lawyers, along with a second supervisor. I worked with my co-supervisor and Managing Attorney to create training materials to be used by new lawyers focusing on trial skills and client communication skills. I also led the small group units for our new lawyer 'Core Skills' program. I acted as mentor/trainer on a variety of litigation issues and a resource for all stages of representation, from initial contact through sentencing and post-conviction issues. I evaluated potential conflicts of interest, resolve issues within the unit, and work with the ACA and Director's Office management team on larger systems/systemic issues.
- I previously represented a full caseload of clients in superior court ranging from class C to class A felonies including multiple third strike, homicide, and sex offense cases.
- Previously represented clients in district court with an emphasis on domestic violence cases.
- Presented on GR 37 and *Batson* issues to South District Court Unit and Seattle Municipal Court Unit in spring and summer 2021.
- On interview team for 2019 summer Rule 9 interns.
- Small group leader for 2021 ACAD summer intern training.
- Small group leader for 2021 ACAD Core Skills trial training.

Pro Bono Counsel, *City of Seattle v. Erickson*, 188 Wn.2d 721, 398 P.3d 1124 (2017)
Kent, WA – November 2014-July 2017
- Successfully litigated a *Batson* challenge from the RALJ court through the Court of Appeals, Division I, and to the Washington Supreme Court resulting in a bright-line rule for when the last venire person who shares a protected class status with the defendant is stricken with a peremptory challenge.

Public Defender, Cowlitz County Office of Public Defense
Longview, WA – December 2014 – May 2016
- Represented a full caseload of clients in district court, superior court, and juvenile court through first appearance, arraignment, pretrial motions, jury and bench trials, post-trial motions, RALJ appeals, and motions for discretionary review to the Court of Appeals, Division 2.

Volunteer Attorney, Associated Counsel for the Accused – King County Department of Public Defense
Kent, WA – September 2014 – November 2014
- Volunteered with misdemeanor and felony units to help with research and writing including briefing on litigating a loss of juvenile jurisdiction where the state failed to adequately serve the defendant.

Rule 9 Legal Intern, Right to Counsel Clinic
Seattle, WA – January 2014-September 2014
- Wrote sections of a motion for discretionary review on prosecutorial misconduct and ineffective assistance of counsel.
- Successfully wrote and argued sections of a RALJ appeal focusing on numerous violations of my client's due process rights.

Rule 9 Legal Intern, The Defender Association – King County Department of Public Defense, Felony Division
Seattle, WA – August 2013-December 2013
- Co-counsel in a felony organized retail theft trial.
- Drafted numerous motions in support of trial team including a CrR 3.6 brief in an Unlawful Possession of a Firearm in the Second Degree case.

Rule 9 Legal Intern, Associated Counsel for the Accused – King County Department of Public Defense, Felony Division
Kent, WA – May 2013-September 2013
- Successfully briefed and argued a severance motion severing one count of forgery from one count of second degree theft.
- Drafted a CrR 3.6 motion in a triple homicide case.
- Represented clients weekly in Drug Court.

Student Extern, Federal Public Defender for the Western District of Washington
Seattle, WA – August 2012-December 2012
- Conducted research and wrote memos regarding Fourth and Fifth Amendment violations by Seattle police, statutory interpretation of felon in possession of a firearm offenses, and sentencing issues pertaining to complex credit card fraud cases.
- Researched and drafted Appellant's Opening Brief in *United States v. Martinez-Mascareno*, 530 Fed. Appx. 667 (9th Cir. 2013).

Student Fellow, Washington State Bar Association Moderate Means Program
Seattle, WA – February 2012-May 2013
- Responsible for screening clients and conducting intakes for civil cases, particularly family law and landlord-tenant issues.
- Conducted legal research and wrote memos summarizing the issues, the law, and the likely outcome of the case.

PROFESSIONAL ASSOCIATIONS:
Council on Public Defense – Washington State Bar Association
Seattle, WA – 2025- present
- Member

Washington Defender Association (WDA)
Seattle, WA – 2014-Present
- Board of Governors Member 2025 – present

MICHAEL A. SCHUELER.
901 FIFTH AVENUE, SUITE 2800C, SEATTLE, WA 98164
(425)736-8506 | MICHAEL@HSR-LAW.COM

Washington Association of Criminal Defense Lawyers (WACDL)
Seattle, WA – 2014-Present
- Current Case Law Committee Member
- Current Amicus Committee Member
- Past Public Defense Committee Member
- Past Publications Advisory Board Member

Duke Law School Inclusive Juries Project
Durham, NC – 2024-Present
- Member of Advisory Board
- Provided Washington case law summary and overview of implementation of GR 37 in June 2024 meeting and conference

National Lawyers Guild – Seattle Chapter
Seattle, WA – 2014-Present
- Past Vice President through of August 2020

SPEAKING ENGAGEMENTS:
Putting the RPCs and New Indigent Defense Standards to Work in Your Case
- 2025 WDA Ethics Conference

Object Anyway
- 2025 WDA Annual Conference

Preparing Witnesses and Issues with Expert and Hostile Witnesses
- 2025 WSBA Trial Advocacy Program

GR 37 Panel Discussions – A view from the Podium
- 2023 Superior Court Judge's Spring Conference
- 2024 Appellate Spring Conference

Tackling Bias in Jury Selection: Putting GR 37 to Work
- 2022 WDA Ethics Conference
    - Moderator of panel discussion

Better Than Batson: Using new GR 37 in Jury Selection
- King County Department of Public Defense Harmony Conference
    - September 7, 2018
- Washington Defender Association Annual Conference
    - April 27, 2019
- Kitsap County Bar Association Annual CLE
    - October 12, 2019

AWARDS:
- 2023 Anthony Savage Award
    - Presented by the Washington Association of Criminal Defense Lawyers for outstanding trial performance or result achieved by an attorney in practice less than ten years.

VOLUNTEER WORK:
Seattle, WA – 2017-Present
- Mentor law students from Seattle University School of Law who are interested in careers in criminal defense, focusing on those interested in Public Defense.

PUBLICATION:
- *A Sinking Feeling: The Problem of Abandoned Boats in Washington Waterways*, 4 Seattle J. Envtl. L 215 (2014).

MICHAEL A. SCHUELER
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June 4, 2026

Washington State Bar Association President-Elect Kari Petrasek
Via Email – barleaders@wsba.org

Dear President-Elect Petrasek:

I am seeking appointment as Chair-Elect of the Washington State Bar Association's Council on Public Defense (CPD). Over the past year as a CPD member, I have been honored to contribute to efforts to improve public defense services statewide and to support implementation of the WSBA Standards for Indigent Defense. I am eager to take on a leadership role to continue this work, and I believe my experience as a public defender in both major metropolitan and rural communities—as well as my current work as a conflict public defender—makes me an excellent fit for this position. I have built strong relationships across the public defense community and hope to leverage those connections to benefit all Washingtonians.

Public defense has been the through-line of my career. From my Rule 9 internships with the Associated Counsel for the Accused Division (ACAD) and The Defender Association, to my first attorney role with the Cowlitz County Office of Public Defense, to nearly a decade with the King County Department of Public Defense, and now my work as a contractor, I have always taken pride in being a public defender. My practice has taken me through rural courts, municipal courts, juvenile courts, district courts, superior courts, and appellate courts.

These experiences have given me a firsthand understanding of how indigent defense is delivered differently across Washington and how agencies address the challenges line defenders face every day. I am acutely aware of how policy decisions—particularly around caseload standards—affect defender morale and contribute to the attrition crisis facing public defense statewide. This perspective will help me advocate effectively for policy changes that support high-quality, sustainable public defense services.

In addition, the last four years of my indigent defense practice were deeply focused on training, mentorship, and policy implementation to strengthen public defense in King County. In my most recent roles at ACAD, I supervised the Seattle Municipal Court Unit—where the majority of ACAD attorneys begin—and later supervised new felony attorneys in the Kent Felony Unit. In these positions, I developed training, provided in- and out-of-court mentorship, and helped new lawyers find their voice so they could zealously advocate for their clients. These experiences shape how I approach CPD's work: with a commitment to developing new defender talent statewide and ensuring that all clients receive effective representation.

I welcome the opportunity to discuss how my experience as a public defender in Washington will guide my service to the CPD. I look forward to continuing the work of strengthening public defense and helping ensure that Washington's indigent defense system is the best it can be.

Sincerely,

Michael A. Schueler

CARNEY & MARCHI, P.S.
ATTORNEYS AT LAW

ATTORNEYS

NICHOLAS MARCHI
MICHELE CARNEY*

****Also admitted in Texas.***

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7502 WEST DESCHUTES PLACE
KENNEWICK, WASHINGTON 99336
TELEPHONE: (509) 545-1055

Date: May 14, 2026
Via Email: **barleaders@wsba.org**

To Whom it May Concern:

I am applying for the Chair position for the Committee on Professional Ethics. I am currently serving as a member of this committee.

My resume is submitted with this application. I have extensive experience serving as Chair for various boards and committees. I have served as Chair of the WSBA Disciplinary Board, AILA National Ethics Committee and AILA National Innovation and Technology Committee.

I have a keen interest in the intersection of ethics and technology. I frequently have spoken at national and international conferences on both ethics and legal technology. In addition, I have written several articles on ethics – particularly those facing immigration lawyers.

My law practice focuses on immigration law and has also pivoted to ethics consultations.

It is my belief that I have the skill, interest and patience necessary to lead a committee focusing on ethical issues facing the legal community.

My resume has detailed information as to my credentials. Thank you for your consideration.

Sincerely,
Michele Carney (e-signature)
Michele Carney
CARNEY & MARCHI, PS

MICHELE CARNEY

Carney & Marchi, P.S. • 1809 7th Avenue, Suite 1110, Seattle, WA 98101 • (206) 224-0909 • mcarney@carmarlaw.com

PROFESSIONAL PROFILE

Seattle-based attorney with more than thirty years of practice in immigration and nationality law and a national reputation in legal ethics, professional responsibility, and the intersection of law, technology, and innovation. Founding partner of Carney & Marchi, P.S. and an experienced board chair, committee chair, and faculty member. Frequent author and lecturer on legal ethics, AI, and the future of law practice – especially how they relate to immigration lawyers.

LEADERSHIP HIGHLIGHTS

- Chair, Washington State Bar Association Disciplinary Board (2016–2017); Vice-Chair (2015–2016)
- Chair, AILA National Ethics Committee (2021–2023)
- Chair, AILA National Innovation and Technology Committee (2023–2025)
- Past Chair, AILA Washington Chapter (2013-2014)

PROFESSIONAL EXPERIENCE

Carney & Marchi, P.S. *Seattle, Washington*

Founding Partner | 1993 – Present

Practice focused on immigration and nationality law as well as providing consultations to those facing ethical issues.

PROFESSIONAL LEADERSHIP & SERVICE

Washington State Bar Association

Committee on Professional Ethics	*Current*
Adjunct Disciplinary Counsel Panel	*Current*
Character and Fitness Board	*2021 – 2024*
Practice of Law Board	*2015 – 2021*
Chair, Disciplinary Board	*2016 – 2017*
Vice-Chair, Disciplinary Board	*2015 – 2016*
Disciplinary Board	*2014 – 2017*
Adjunct Disciplinary Counsel Panel	*1996 – 2004*
Board of Law Examiners	*1994 – 1996; 2000 – 2002*
Law Office Management Assistance Program Committee	*2001 – 2011*

American Immigration Lawyers Association (AILA)

Board of Editors, AILA Law Journal	*2025 – Present*
Member, National Ethics Committee	*2025 – Present*
Future of Law Committee	*2025 – Present*
Chair, National Innovation and Technology Committee	*2023 – 2025*
Chair, National Ethics Committee	*2021 – 2023*
Lead, Ethics Compendium Subcommittee	*2018 – 2021*
Lead, Innovation & Technology Government Relations Subcommittee	*2022 – 2023*
National Innovation Technology Summit Committee	*2019 – 2020*
Faculty, AILA University Online Tutorials	*2019*
National Annual Conference Committee	*2016*
National Fall Conference Committee	*2014*
Regional Immigration Conference Committee	*2015, 2016*
Regional Annual Conference Committee	*2015*

AILA Washington Chapter Chair

2013-2014

SELECTED SPEAKING ENGAGEMENTS & FACULTY APPOINTMENTS

Frequent national and international speaker on legal ethics, generative AI, technology adoption, and immigration practice. Recent and representative engagements include:

- *Future of Law Report* — AILA National Roundtable, April 2026
- *Immigration Law and Ethics* — International Bar Association Webinar, December 2025
- *Ethics of AI* — AILA New England Chapter Conference, Boston, November 2025
- *Paying Filing Fees Electronically Without Violating Trust Account Regulations* — AILA Washington Annual Ethics CLE, November 2025
- *Custom GPTs* — AILA National Online Course, October 2025
- *Ethics of AI and Business Immigration* — AILA NW Regional Law Conference, Seattle, October 2025
- *Ethics of Wellness* — AILA NW Regional Law Conference, Seattle, October 2025
- *Panel on AI and Regulation* — TILE Innovation and Technology Conference, Seattle University School of Law, June 2025
- *Reasonableness of Fees When Using AI: Navigating ABA Formal Opinion 512* — American Bar Association, February 2025
- *Electronic Filing for Family and Humanitarian-Based Cases* — AILA National Course, January 2025
- *Generative AI Advances for Lawyers* — AILA Utah Chapter, April 2024
- *Ethical Change Management: Implementing Technology for an Efficient Law Practice* — Philadelphia, PA, April 2024
- *Is There Common Ground?* — AILA Rome District Chapter, Amsterdam, March 2024
- *Hot Topics in Ethics* — AILA Washington Chapter, December 2023
- *GAI and Ethics* — AILA Carolinas Chapter, November 2023
- *Ethical Use of AI in Your Practice* — AILA Technology Summit, San Francisco, October 2023
- *Using AI in Your Practice* — AILA National Roundtable, July 2023
- *Ethics of GPT-4 and Beyond* — AILA National Roundtable, April 2023
- *Calmly Navigating the Treacherous Waters of Lozada and IAC Complaints* — AILA National Conference, New York, June 2022
- *Fiery Ethical Issues in Removal Proceedings* — AILA Fall Conference, Maui, September 2022
- *Reimagining Your Practice in a Changing World* — AILA Innovation and Technology Summit, December 2021

Additional faculty appearances for the AILA Washington Chapter, AILA Chicago Chapter, AILA Texas Chapter, AILA Santa Clara Chapter, AILA Upper Midwest Regional CLE, WSBA, and AILA University. Complete list available on request.

SELECTED PUBLICATIONS

- *Futures Report (Task Force Member)* — American Immigration Lawyers Association, April 2026
- *The Mystery of Blockchain Technology for Immigration Lawyers* — American Bar Association, September 2025
- *Recent Enforcement Measures in Removal Defense: Ethically Navigating the New Landscape* — AILA, September 2025
- *The Justice Gap and Immigration Law* — Co-author, AILA Law Journal, May 2025
- *As Attorneys Adopt Generative AI, Three Elements Should Be Cardinal* — Co-author, Law360, March 2025
- *Getting Real About USCIS Technology and Us* — AILA, March 2024
- *How to Navigate Legal Fees in Unpredictable Removal Cases* — AILA, March 2024
- *EOIR's New Limited Practice Professional Conduct Rule: Ethical and Practical Implications* — AILA, March 2023
- *Guidance on Refunds of Flat Fees Under Prosecutorial Discretion Relief* — AILA, May 2022
- *Think Immigration: How Legal Ethics Has Evolved in Immigration Practice* — AILA, May 2022
- *Bite-Sized Ethics: Simple Tips for Avoiding a Disciplinary Complaint in Immigration Court* — AILA, April 2022
- *Ethical Duties for Prosecutorial Discretion Requests* — AILA, September 2021
- *The Ethics of Engaging Freelance Paralegals in the Practice of Immigration Law* — AILA, April 2021
- *Taking the Measure of Lozada* — AILA, April 2021
- *Mastering the Myriad Challenges of Immigration Court* — AILA, October 2020
- *Immigration Lawyers Guide to Delivering Online Legal Services* — AILA, 2020
- Contributing Author, *AILA Ethics Compendium on Immigration Law* — chapters on ABA Model Rules 1.4 (Communication), 1.5 (Fees), 1.16 (Declining and Terminating Representation), and 3.3 (Candor Towards the Tribunal), 2014 – 2020.

BAR ADMISSIONS

- Washington State Bar Association
- State Bar of Texas
- U.S. District Court for the Eastern and Western Districts of Washington
- United States Court of Appeals for the Ninth Circuit

EDUCATION

Southern Methodist University School of Law *Dallas, Texas*

Juris Doctor, May 1991

McGill University *Montreal, Quebec, Canada*

Bachelor of Arts, Political Theory, 1984

PRO BONO & PUBLIC SERVICE

- (current) Vice-Chair, AILA Washington Rapid Response Committee
- (past) CARA Project Volunteer Attorney — represented detained women and children from Central America at the Family Residential Detention Center in Dilley, Texas.
- (past) Volunteer for OneAmerica Citizenship Day and AILA Washington detained-case projects at the Northwest Detention Center, Tacoma.

[redacted] [redacted]

EDUCATION

VANDERBILT UNIVERSITY LAW SCHOOL, NASHVILLE, TN
Doctor of Jurisprudence, December 2011
Honors and Activities: Thomas H. Malone Inn of Phi Delta Phi (International Legal Honors and Ethics Fraternity); Vanderbilt-Meharry Interdisciplinary Case Competition

NEW YORK UNIVERSITY, NEW YORK, NY
B.A., Economics (Minor: Mathematics), *magna cum laude*, May 2008
Honors and Activities: Phi Beta Kappa; Dean's List (all semesters); Red Dragon Society; New York University Founders Day Award (awarded to undergraduates graduating in the top 10% of their class); New York University Honors Scholar

PROFESSIONAL EXPERIENCE

KING COUNTY PROSECUTING ATTORNEY'S OFFICE, SEATTLE, WA (APRIL 2025 - PRESENT)
Senior Deputy Prosecuting Attorney

SEATTLE UNIVERSITY SCHOOL OF LAW, SEATTLE, WA (SUMMER 2025 TERM)
Adjunct Professor of Law

PIERCE COUNTY PROSECUTING ATTORNEY'S OFFICE, TACOMA, WA (JUNE 2021 – APRIL 2025)
Deputy Prosecuting Attorney

THURSTON COUNTY OFFICE OF PUBLIC DEFENSE, OLYMPIA, WA (AUGUST 2014 – MAY 2021)
Defense Attorney

PIERCE COUNTY DEPARTMENT OF ASSIGNED COUNSEL, TACOMA, WA (JANUARY 2014 – AUGUST 2014)
Defense Attorney

THE LAW OFFICES OF KRUPA & CLARK, P.S., TACOMA, WA (FALL 2012-WINTER 2013)
Associate Attorney

PIERCE COUNTY PROSECUTING ATTORNEY'S OFFICE, TACOMA, WA (SPRING 2012 – FALL 2012)
Deputy Prosecuting Attorney

JUDGE PRO TEMPORE EXPERIENCE

SAN JUAN COUNTY DISTRICT COURT, FRIDAY HARBOR, WA (OCTOBER 2024 - PRESENT)

LEWIS COUNTY SUPERIOR COURT, FRIDAY HARBOR, WA (AUGUST 2024 - PRESENT)

SAN JUAN COUNTY SUPERIOR COURT, FRIDAY HARBOR, WA (NOVEMBER 2024 ANTICIPATED START - PRESENT)

THURSTON COUNTY DISTRICT COURT, OLYMPIA, WA (AUGUST 2021 - PRESENT)

[redacted]

LAKEWOOD MUNICIPAL COURT, LAKEWOOD, WA (AUGUST 2021 - PRESENT)

OLYMPIA MUNICIPAL COURT, OLYMPIA, WA (AUGUST 2021 - PRESENT)

PRESENTATIONS

Fall 2022 – Presented as part of a panel to help train the New Jersey judiciary, defense, and prosecution bars on attorney-conducted voir dire and educating on Washington's GR 37 Rule regarding the use of peremptory strikes in jury selection

Spring 2017 - "A Career in Law - Perspectives from a Public Defender" at Curtis High School in University Place, Washington presented to Elizabeth Corbishley's class at Curtis High School in University Place, Washington

Spring 2016 - "A Career in Law - Perspectives from a Public Defender" presented to Elizabeth Corbishley's class at Curtis High School in University Place, Washington

October 2013 - "Anatomy of a Malpractice Suit" (approved for 1 Washington MCLE credit) presented to the Honorable Robert J. Bryan Inns of Court in Tacoma, Washington

COMMUNITY SERVICE

Washington State Access to Justice Board (OCTOBER 2024 – PRESENT) Appointed by the Washington Supreme Court for a three-year term starting October 1, 2024. The Board coordinated civil legal aid efforts around the state with a particular focus on race-based equity.

Washington State Bar Association Court Rules and Procedures Committee Board: Chair of the Subcommittee Studying Proposed Changes to the Rules of Appellate Procedure (OCTOBER 2024 – PRESENT) Appointed by the Washington State Bar Association for a two-year term starting October 1, 2024. Studied and analyzed proposed new court rules and amendments as requested by the Supreme Court.

University of Washington – Tacoma: Advisory Board Member of the Legal Pathways Program (FEBRUARY 2025 – PRESENT) Serve on the advisory board for the UW – Tacoma's Legal Pathways Program, designed to serve as a pipeline from college to law school for first-generation college students and students of color.

Korean-American Bar Association of Washington: Board of Directors (JANUARY 2025 – PRESENT)

Board Member and Volunteer Ambassador - Climbers of Color (JULY 2018 – JULY 2023) (a non-profit dedicated to increasing diversity in the climbing, mountaineering, and skiing communities by developing leaders of color) from 2017 to Present

Board member – A Step Ahead in Pierce County (2012 - 2016) (a non-profit serving developmentally disabled children) from 2012 to 2016

Board member – Puget Sound Chapter of the MS Society (2014 - 2017)

[redacted]

Clover Park Community College Career and Technical Education Advisory Board (2015 - 2017)

University Place School District Career and Technical Education Advisory Board (2013 - 2015)

BAR ADMISSIONS

Washington State Courts; United States District Court for the Western District of Washington; United States Court of Appeals for the Ninth Circuit

ASSOCIATIONS

Graduate of the 2024 National Judicial College's Course for Aspiring Judges (sole recipient of a full tuition scholarship from the National Asian Pacific Bar Association)

Graduate of the 2024 Washington State Judicial Institute Clinic (a non-profit dedicated to the appointment and election of people of color, LGBTQ+ persons, and women to the bench)

Korean Prosecutors Association (OCTOBER 2024 – PRESENT)

National Asian Pacific Bar American Bar Association (JULY 2024 – PRESENT)

American Bar Association (#06121462) – Judicial Division Appellate Judges Conference Member (JUNE 2024 – PRESENT)

Korean-American Bar Association of Washington (OCTOBER 2024 – PRESENT)

Tacoma-Pierce County Bar Association (MAY 2012 – SEPTEMBER 2014; JUNE 2024 – PRESENT)

The Appellate Project (MAY 2024 – PRESENT) – a non-profit organization empowering students of color to thrive in the appellate field by providing mentorship

ATTORNEYS
Edward Moore
MOORE LAW PLLC

Sarah Y. Propst
ATTORNEY AT LAW

Peter C. Rudolf
RUDOLF LAW PLLC

Adam T. Strand
LAW OFFICES OF ADAM T STRAND PLLC

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Lisa Ugalde-Soros
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LISA@GLGPLLC.COM

Advocating for our neighbors with experience, compassion, and integrity.

Wednesday, June 10, 2026
Sent Via: Email

Law Clerk Program
Washington State Bar Association
1325 Fourth Ave. Ste. 600
Seattle WA 98101

Re: Statement of Interest – Chair of Law Clerk Board

Greetings:

I am pleased to submit my name for consideration as Chair of the APR 6 Law Clerk Board.

My service on the Board over the past couple of years has enhanced my strong appreciation for the important role the Law Clerk Program plays in Washington's legal profession. As a former clerk, I am committed to the continued development and growth of this meaningful alternative path to licensure.

As a Board member, I have valued the opportunity to work collaboratively with fellow members and WSBA staff in carrying out the Board's responsibilities. Those experiences have reinforced my commitment to fair, consistent, and thoughtful decision-making, as well as to supporting both law clerks and tutors throughout the program.

If selected as Chair, I would focus on fostering productive collaboration among Board members, ensuring efficient and well-organized Board operations, and promoting consistent application of the program's rules and standards. I would also work to support the continued success and visibility of the Law Clerk Program as an important pathway into the legal profession.

It would be an honor to serve as Chair and to continue contributing to the Board's mission of maintaining a rigorous, accessible, and respected program for future members of the Washington bar.

Thank you for your consideration.

Sincerely,

/s/ Sarah Y. Propst

Sarah Y. Propst, Attorney at Law

SARAH Y. PROPST

[redacted] / [redacted]

Work Experience

ATTORNEY AT LAW, *Galloway Law Group PLLC*, 8/2023 - Present

- Demonstrated knowledge of court environments and the justice system, including sources of law, court rules, and procedures for courts of limited jurisdiction
- Intimate understanding of separation of powers, intergovernmental and inter-organizational relationships, and case-flow management
- Regular and effective collaboration with judges, elected officials, and diverse groups, facilitating meetings and strategic teamwork
- Maintenance of strong working relationships with court personnel, administrators, law enforcement, and justice system partner agencies

LAW CLERK (Limited Law License), *Galloway Law Group PLLC*, 1/2021 - 8/2023

- Resolve complex, controversial issues through consensus building, mediation, and persuasive, patient communication
- Negotiate contracts and communicate effectively through writing, speaking, listening, and interpersonal relations
- Supervise and evaluate staff while promoting continual training and education

SENIOR PARALEGAL, *Galloway Law Group PLLC*, 3/2018 - 1/2021

- Manage and oversee multiple staff members; lead team building, personnel management, mentoring, and staff education initiatives, retaining and promoting multiple staff members from entry level to expert level
- Apply strategic thinking, priority setting, and critical decision-making to solve complex problems and develop firm policies

PARALEGAL, *Galloway Law Group PLLC,* 3/2017 - 3/2018

- Utilize information, telecommunications, and records management technology while enhancing customer service, public education, and media relations
- Respond sensitively to the needs of a diverse community with a service-oriented approach

Education & Training

- APR 6 LAW CLERK PROGRAM GRADUATE, Washington State Supreme Court
- Uniform Bar Examination Passed - Feb. 2023 (95th percentile nationwide in Real Estate)ADVANCED PARALEGAL CERTIFICATION (Associate in Arts), Edmonds College (American Bar Association Accredited)
- BACHELOR OF ARTS, University of Alabama
- **Certified Records Manager,** *ICRM*
- **Board Member**, *Washington State Bar Association Law Clerks Board*
- **Board Member**, *Sno-Isle Libraries Foundation*

Davis Wright Tremaine LLP

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920 Fifth Avenue
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Matthew D. LeMaster
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mattlemaster@dwt.com

June 3, 2025

Washington State Bar Association
Attn: Bar Leaders
1325 Fourth Avenue, Suite 600
Seattle, WA 98101-2539
barleaders@wsba.org

Re: Legislative Review Committee Chair Application

Dear Bar Leaders:

I am writing to express my interest in chairing the Legislative Review Committee (the "Committee") in 2025. I believe in the mission of the Committee and I believe I have the skill and energy to act as Chair.

I have been on the Committee since 2015. I have seen how the Committee carefully reviews and evaluates specific legislation from various sections of the WSBA. I have seen how the diversity of the backgrounds and practices of the members of the Committee has, on many occasions, fostered necessary and thoughtful feedback and facilitated the improvement of potential legislation.

I believe the Committee has a very important role. It is a process oriented Committee that compels the sections of the WSBA to pause and reflect on the intended and unintended consequences of legislation. The Committee benefits the WSBA's membership because of the Committee's rigorous review of potential legislation. As a result, legislation has a heightened level of credibility and an increased probability of passage.

The Committee's role is not uncontroversial. A number of members, each year ask "why does the Committee exist." I believe the answer is clear: to provide an additional and important "check" to make sure a broad array of voices are heard as legislation moves through the WSBA's processes.

If selected, I will do my best to work with Sanjay Walvekar to ensure everyone has a voice and the business of the Committee proceeds in an efficient manner. I worked closely with Mr.

Walvekar several years ago to cause the passage of important amendments to the Limited Liability Companies Act and the Limited Partnership Act. I really enjoyed working with Mr. Walvekar.

For the foregoing reasons, I would request that you thoughtfully evaluate my application. I have enclosed my CV. Please contact me with any questions.

Very truly yours,

Matthew D. LeMaster

cc: Sanjay Walvekar
sanjayw@wsba.org

Davis Wright Tremaine LLP

Matt LeMaster (He/Him)

PARTNER

Seattle
T [redacted]
F

Chair, M&A Practice
Co-chair, Veteran Attorneys Affinity Group

M [redacted]
E mattlemaster@dwt.com

Education

J.D., University of Washington School of Law, 1997

B.S., University of Oregon, 1990

Admitted to Practice

Washington

Matt LeMaster is the chair of DWT's mergers and acquisitions practice. He focuses on business transactions, corporate governance, mergers and acquisitions, and finance. He has specific experience in media, technology, advanced manufacturing, distribution, senior living and hospitality.

Matt has been designated by Chambers USA as a leading lawyer (Band 3) in Corporate and Commercial law in Washington state.

Chambers reviewers noted his "quick response and concise answers in the midst of stressful negotiations" and his ability "to become part of the team and help solve problems to accomplish business goals."

In addition to his specific knowledge of transactions and mergers and acquisitions, Matt acts as principal outside counsel to Coast Hotels USA, Icom America Inc., Modjoul Inc., and Convoy Supply Inc. Matt is also an affiliate professor at the University of Washington School of Law, where he teaches a course on mergers and acquisitions.

Matt co-chairs DWT's veteran's affinity group, and helps manage equity partner compensation as a member of DWT's share committee.

Practice Highlights

Mergers & acquisitions

Matt's core practice involves assisting his clients to achieve transformational business changes through mergers, acquisitions, financings, and other transactions.

Outside general counsel

Matt regularly assists significant ventures as outside general counsel who have daily legal requirements, but have no in-house counsel.

Industry expertise

Matt is deeply focused on media, technology, advanced manufacturing, distribution, senior living and hospitality industry verticals.

Experience

Media and Technology

Acquisition of television stations

Assisted in acquisition from Cox Media of asset purchase of twelve television stations.

Formation and financing of Modjoul, Inc.

Managed the formation, structuring, and financing of a robotics company.

Formation and financing of Visus Therapeutics, Inc.

Managed early stage formation and investment of eye therapeutics company.

Acquisition of i1Biometrics

Represented client in the acquisition of high-tech mouth guard sensing company.

Disposition of Implement.com

Represented client in the disposition of a cloud-based technology consulting company.

Sale of Blueview Technologies

Represented client in sale of sonar technology company.

Sale of business for Geospiza, Inc.

Represented Geospiza, Inc., a bioinformatics company, in its merger with PerkinElmer.

Advanced Manufacturing and Distribution

Acquisition of Valence Surface Technologies subsidiaries

Represented client in acquisition of advanced manufacturing businesses.

NxEdge Inc.

Represented company that specializes in machining, anodizing, coating, and cleaning of process components for semiconductor industry in auction and sale.

Acquisitions by Convoy Supply

Represented building products company in multiple asset acquisitions.

Acquisition of Granite Building Products, Inc.

Represented acquisition of stock of building products company.

Acquisition of Icom Canada

Represented Icom America, Inc. in acquisition of Canadian operations.

Senior Living and Hospitality

Management of legal affairs for Leisure Care

Represented Leisure Care and affiliates in the acquisition, financing, and negotiation of management agreements for multiple senior living facilities.

Acquisitions by Coast Hotels

Represented client in the acquisition of hotel facilities.

Disposition of hotel properties for The Peninsula Group

Represented client in the divestitures of multiple hotel facilities and follow-on acquisitions of replacement commercial properties.

Hotel management agreements and technical services agreements

Represented multiple clients in the drafting and implementation of long-term hotel management agreements, for owners and operators, including Red Lion Hotels Corporation and Coast Hotels.

Liquor licensing counsel

Provides liquor licensing counsel for multiple hotel and restaurant ownership groups including Red Lion Hotels Corporation and Coast Hotels.

Gaming counsel

Represented Grant Thornton Limited in gambling licensing matters in receivership of Washington Gaming, Inc. and provided gaming counsel to Wells Fargo Gaming in connection with debt refinancing of a casino borrower.

Memberships & Affiliations

- Co-Chair, 2021-present; Member, 2016-present – WSBA Partnership and LLC Law Committee
- Co-director, Global Business Law Institute, University of Washington School of Law, 2019-present
- Affiliate Professor, University of Washington School of Law, Mergers and Acquisitions A 534, 2019-present
- Seattle Rotary Club 4, Member, 2019-present
- Rotary Business Mentor, University of Washington, Foster Consulting and Business Development Center, 2022-present
- Leadership Council, University of Washington School of Law, Member, 2020-present
- Stewardship Committee, University of Washington School of Law, Member, 2020-present
- American Bar Association, M&A Committee, Member, 2020-present
- Advancement Committee, University of Washington School of Law, Member, 2019-2020
- University of Oregon School of Law, Mentor, 2021-present
- University of Washington School of Law, Mentor, 2019-present
- Leadership Council on Legal Diversity, Mentor, 2019-present
- Association for Corporate Growth, Member, 2015-present
- National Association of Corporate Directors, Member, 2018-present
- Law Firm Annual Challenge, University of Washington School of Law, Chair, 2018
- ALIS Planning Committee, Member, 2012-2018
- Mercer Island Youth Football Coach and Football Advisory Board, Director, 2011-2016
- Pacific Rim M&A Institute, Founder and Director, 2014-2016
- Northwest Education Fund, Director, 2015-2018
- Legislative Committee, Washington State Bar Association, Member, 2011-2016, 2020-present
- Childhaven, Director, 2010-2012
- Bellevue Rotary Club, Member, 2002-2010; Director, 2004-2007
- Business Law Section, Washington State Bar Association – Immediate Past Chair, 2009-2010; Chair, 2008-2009; Chair-Elect and Treasurer, 2007-2008; Chair, Mid-Year Meeting, June 2007; Vice Chair, 2006-2007; Recorder, 2005-2006; Co-chair, Publications Committee, 2002-2005
- Washington State Business Leaders Network, Director, 2006-2009

- Washington Attorneys Assisting Community Organizations (WAACO), Director, 2008-2009
- Hire America's Heroes, Director, 2007-2009
- American Bar Association, Committee on State and Local Bar Relations, Member, 2007-2010
- American Bar Association, Negotiated Acquisitions Committee, Member, 2006-2016
- Seattle University Directors Academy, Advisory Board, Director, 2007-2009
- King County Bar Association, Corporate/In-House Section, Co-Chair, 2003-2005
- King County Bar Association, Community Involvement Committee, Chair, 2002-2003
- King County Bar Association, Board of Trustees, Young Lawyer Division, Director, 2001-2002
- Advance Bellevue, Graduate, 2002

Professional Recognition

- Named as one of "America's Leading Lawyers for Business" by Chambers USA in Corporate/Commercial Law (Washington), 2017-2022; Named a "Recognised Practitioner" in Corporate/Commercial Law (Washington), 2016; Leisure & Hospitality (Nationwide), 2019
- Named one of the "Best Lawyers in America" by Best Lawyers in Corporate Law, 2012-present; in Leisure and Hospitality Law, 2021-present
- Selected to "Washington Rising Stars" and "Washington Super Lawyers," Thomson Reuters
- Avvo Rating 10/10

Background

- Captain, U.S. Army, Combat Engineer, obtained Airborne, Ranger, and German Badge for Military Proficiency qualifications; graduate of NATO Winter Long-Range Reconnaissance Patrol School
- Varsity Football, ROTC Cadet Battalion Commander, George C. Marshall Outstanding Cadet, Distinguished Military Graduate – University of Oregon
- Climbed "The Grand," Grand Tetons, 2019; completed the "Decalibron," climbed Mounts Democrat, Cameron, Lincoln, and Bross in one day, 2020; climbed the "Mountaineer's Route" on Mount Whitney, 2022

Insights

Chambers USA Recognizes Davis Wright Tremaine for Leadership Across Key Industry Sectors and Honors the Firm for Excellence in 51 Practices, 06.05.23

Davis Wright Tremaine Advises INSP in the Purchase of TV Stations in 12 Markets from Cox Media Group, 08.01.22

Panelist, "M&A Financing and Market Update," Northwest Middle Market Growth Conference 2022, 07.14.22

Chambers USA Recognizes Davis Wright Tremaine for Excellence in Key Practice Areas and Industry-Leading Success With DEI, 06.07.22

"Veterans Day Conversation," Davis Wright Tremaine Webinar, 11.11.21

Davis Wright Tremaine Recognized by Chambers USA for Industry-Leading Excellence in Key Practice Areas, 05.21.21

Co-author, "Frequently Asked Questions and Current Trends in Representations and Warranties Insurance in Private M&A Deals," California Business Law Reporter, May 2021

Mentioned in "Global Business Law Institute Appoints New Chair, Members to Industry Advisory Board," University of Washington School of Law, 05.12.20

Davis Wright Tremaine Recognized by Chambers USA for Industry-Leading Excellence in Key Practice Areas, 04.28.20

Davis Wright Tremaine Recognized by Chambers as One of the Country’s Leading Law Firms for Business, 05.29.19

Addressing Homelessness Block by Block, 2018

Moderator, "Private Equity Investing in Aerospace and Defence Companies," Capital Roundtable, New York, N.Y., 09.13.18

Ashley Cummins

[redacted], WA / acummins@seattleu.edu / [redacted]

EDUCATION

Seattle University Seattle, Washington
Master of Public Administration, focus in Nonprofit Leadership Expected June 2028

Gonzaga University School of Law Spokane, Washington
Juris Doctor May 2017

Washington State University Pullman, Washington
Bachelor of Arts, Major in Sociology and Minor in Political Science May 2014
Bachelor of Arts, Major in Criminal Justice May 2014

EXPERIENCE

Seattle University School of Law Seattle, Washington
Associate Director, Access to Justice Institute (ATJI) July 2024 – Present
- Directs institutional efforts to expand student participation in pro bono service, creating structured pathways that connect emerging lawyers with community-based legal needs
- Develops virtual and in-person programs to enhance student engagement with the legal profession, including career panels, mentorship programs, and networking events
- Executes pro bono service days and volunteer placements for students
- Cultivates cross-sector partnerships with bar associations and legal service providers, and community organizations to strengthen student engagement
- Aligns strategic planning and budget management with long-term goals

Associate Director, ATJI & Center for Professional Development (CPD) July 2023 – July 2024
- Collaborated with multiple departments in a dual role as an Associate Director of the Access to Justice Institute as well as the Center for Professional Development
- Organized social justice events, trainings, symposia, and networking opportunities
- Provided one on one counseling to students and alumni on career options, preparation of application materials, and job search and professional development processes

Eastside Legal Assistance Program Bellevue, Washington
Housing Stability Program Attorney November 2021 - July 2023
- Represented and advised low-income tenants with the goal of improving self-advocacy, retaining housing in pre-eviction matters, and upholding and asserting tenant's rights
- Drafted demand letters, pro se court pleadings, and settlement agreements and represented clients throughout the mediation process for rent-based evictions

- Recruited, trained, and supervised legal interns and Rule 9 interns throughout the year
- Identified and screened cases appropriate for pro bono placement, coordinating referrals to volunteer attorneys to expand service capacity

Nevada Legal Services Reno, Nevada
Senior Attorney October 2019 - April 2021
- Managed a full caseload while organizing and coordinating outreach efforts and drafted pro se materials across all four Nevada Legal Services' offices in Northern Nevada
- Represented clients in advanced and complex litigation matters
- Designed and delivered statewide CLE programs to recruit and train pro bono attorneys, serving as a mentor and ongoing resource to volunteer counsel
- Supervised a multi-disciplinary COVID-19 response task force of attorneys, legal interns, and social work interns to address emergent community legal needs

Staff Attorney October 2017 - October 2019
- Provided free representation ranging from counsel and advice to extended direct representation in eviction proceedings, subsidized housing terminations, administrative hearings on government benefit denials, and record sealing petitions
- Taught monthly educational presentations on a variety of legal topics to pro se litigants

ADMISSION TO PRACTICE

Washington State Bar Association, *Member* October 2017 – Present
State Bar of Nevada, *Legal Services Member* November 2017 – April 2021

LEADERSHIP

American Bar Association Chicago, Illinois (Remote)
Legal Pathways and Law Student Outreach Vice Director October 2025 – Present
Washington Alpine Club Seattle, Washington
Vice President November 2023 – Present
Washington State Bar Association Seattle, Washington
Small Town and Rural Practice Council, Member October 2023 - Present
Washington Alpine Club Seattle, Washington
Board Member November 2022 – October 2023
State Bar of Nevada Reno, Nevada
Young Lawyer Section, CLE Northern Nevada Committee Chair August 2019 – April 2021
Washington State University Alumni Association Reno, Nevada
Sacramento Club Vice President January 2019 – April 2021
Washington State Bar Foundation Seattle, Washington
Board of Trustees, Student Trustee May 2015 – September 2017

Ashley Cummins

[redacted] / acummins@seattleu.edu / [redacted]

May 30, 2026
Via Email: barleaders@wsba.org

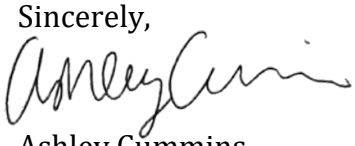
Dear President-Elect Petrasek,

Since joining the STAR Council in 2023, I have been inspired by STAR's commitment to strengthening rural practice and expanding access to justice throughout Washington. I am interested in serving as Chair because I believe my experience in civil legal aid, active involvement in STAR programming, and current work supporting the next generation of attorneys position me to help advance the Council's mission and support its continued success.

My commitment to STAR's work is rooted in both professional and personal experience. After graduating from law school, I relocated to Northern Nevada to work as a civil legal aid attorney serving communities affected by legal deserts, an experience that shaped my commitment to strengthening rural practice and access to justice. Over the past three years, I have taken active leadership roles in STAR programming, including the STAR Summit and Legal Lunchbox CLE series. Most recently, I co-chaired the 2026 Legal Lunchbox CLE, which drew more than 1,700 attendees and became the highest-attended program in STAR's history. I have also helped plan the STAR Summit for the past two years, bringing together stakeholders from across Washington to address challenges facing rural communities and identify practical solutions. My work at Seattle University School of Law also provides a unique perspective on attorney recruitment, retention, and barriers to rural practice.

Throughout my time on the Council, I have consistently volunteered to support STAR initiatives whenever needed and have valued the opportunity to collaborate with colleagues who share a commitment to rural communities. If selected, I would bring that same collaborative approach to the Chair position while building on the strong foundation STAR has established. Thank you for your consideration. I would be honored to serve as Chair and help advance STAR's mission throughout Washington.

Sincerely,



Ashley Cummins

[redacted] [redacted] [redacted]

May 31, 2026
Washington New Members Committee

Recommendations Subcommittee,

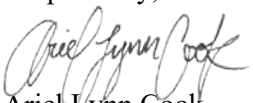
I am respectfully submitting my application for Chair of the Washington New Members Committee, and in the alternative, to be an At-Large member of the Committee. While I am proud of the contributions I've made as the Regional Representative for the Greater Olympia region in the year I have served in this role, I am resolved that I have more to contribute to the Committee and our New Member community.

When I joined the Committee in March 2025, my primary goal was to reinvigorate the Committee's online presence. I learned through student organization leadership during law school that social media is the most consistent and accessible medium of mass-communication, and I wanted to bring those insights to the Committee with the goal of amplifying the Committee's reach to New Members. Since my appointment, we have successfully launched a new LinkedIn page that reaches hundreds of members each month, regained control of the previously-abandoned Facebook page that boasts over 1.7 thousand followers, and developed a monthly content plan for both platforms.

However, much of this work remains incomplete. I struggled with health issues that disrupted my participation in Committee work in recent months, and as a result we have not yet achieved optimal consistency in our social media outreach. To realize the full potential of the Committee's online presence, we still need to pursue a regular content schedule, and we need to continue to seek innovative ways to engage New Members with our Committee, our programs and initiatives, and the community. While growing our connections with New Members both on-and-offline empowers the Committee to strengthen our community network and improve the accessibility of our programs, the qualitative analytics and quantitative insights available through social media bears valuable potential for the Committee's data-driven focus. Regardless of my position on the Committee, my application reflects my intention to continue to pursue these specific initiatives and the broader goals of the Committee to support New Members' professional development.

I have chosen to submit my application for Chair in addition to applying for At-Large Membership because I believe I can offer inclusive and dedicated leadership. As we have discussed, our Committee is building momentum. As I have demonstrated in my role so far, I want to be a part of that vital forward-force: to push our Committee's initiatives forward and expand our vision for what the Committee can offer New Members.

Respectfully,



Ariel Lynn Cook

Ariel Lynn Cook

[redacted] | arielcook@foxrothschild.com | [redacted] Seattle WA [redacted]

Education

Seattle University School of Law — **Seattle, WA**
Juris Doctor Candidate — May 2024
Rank/GPA: Top 10% | 3.8
Honors: Dean's Medal | Full Tuition Academic Honors Scholarship | Pro Bono Pledge Award | Order of the Barristers | CALI Excellence for the Future Awards in Persuasive Writing & Oral Advocacy, Evidence, Criminal Procedure, and Constitutional Law II
Scholarship: Independent Study: *Reproductive Rights in the Post*-Dobbs *Landscape* (2024)
Moot Court: ABA National Appellate Advocacy Competition: *Regional Champion* | American Association for Justice Student Trial Advocacy Competition: *Regional Champion* | James E. Bond Moot Court Competition: *1st Place* | Seattle University Motions Competition: *1st Place* | Seattle University Mock Trial Competition: *1st Place*
Leadership: Family Law Society: *President* | Advocacy Training Society: *President*

University of Washington — **Tacoma, WA**
Bachelor of Arts in Law and Policy — June 2021
GPA: 3.66
Honors: Dean's List (2021)
Scholarship: Politics, Philosophy, and Public Affairs Paper Prize for Capstone Essay: *Immigration Detention in the Trump Era: A Timeline and Analysis* (2021), published in the University of Washington Digital Commons (linked here)

Professional Experience

Fox Rothschild, LLP — **Seattle, WA**
Associate — October 2025 - Present
- Drafting pleadings, conducting legal research, and presenting oral argument for litigation, state and local taxation, and appellate matters

Washington State Supreme Court, Chambers of Justice Charles Johnson — **Olympia, WA**
Judicial Law Clerk — August 2024 – August 2025
- Providing advice and analysis regarding pending appellate cases, drafting bench memoranda and opinions

Fox Rothschild, LLP — **Seattle, WA**
Summer Associate — May 2023 - August 2023
- Drafting pleadings and internal research memoranda for litigation in various practice areas

Summit Law Group, PLLC — **Seattle, WA**
First-Year Summer Clerk — May 2022 - August 2022
- Drafting pleadings and internal research memoranda for litigation in various practice areas

The Moceri Law Group, PLLC — **Tacoma, WA**
Chief Operating Officer — December 2020 - June 2021
- Managing firm operation policies and procedures, personnel, and office administration

Paralegal — March 2019 - September 2020
- Managing case dates and deadlines, drafting pleadings, and communicating with clients

Administrative Assistant — August 2018 - January 2019
- Managing firm calendars and acting as firm point-of-contact for clients

Volunteer Experience

Regional Competition Mock Trial Coach, **Seattle University School of Law** — January 2025 - Present
Volunteer Attorney, **Entre Hermanos Immigration Department** — November 2023 - Present
Volunteer Attorney, **Northwest Immigrant Rights Project** — April 2025 - Present
Volunteer Attorney, **Kids in Need of Defense** — May 2025 - Present
Committee Member, **WSBA Washington New Members Committee** — April 2025 - Present

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

FROM: Ethan Frenchman, Chair, WSBA Judicial Recommendation Committee; Sanjay Walvekar, Staff Liaison to the Judicial Recommendation Committee

CC: Terra Nevitt, Executive Director

DATE: June 25, 2026

RE: WSBA Judicial Recommendation Committee June 2026 Interviews and Recommendations

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ACTION: Approve the recommendations of the WSBA Judicial Recommendation Committee.

The WSBA Judicial Recommendation Committee met on June 25, 2026 for the purpose of conducting interviews with two individuals interested in being considered for openings on the Washington State Court of Appeals and the Washington Supreme Court. Per committee guidelines approved by the Board of Governors, the proceedings and records of the committee, including applicant names, committee discussions, and committee votes, are kept strictly confidential. The committee's recommendations are available in the Governor's materials via the WSBA cloud-sharing service.

WASHINGTON STATE
BAR ASSOCIATION

Office of General Counsel
Nicole Gustine, Assistant General Counsel

TO: WSBA Board of Governors

FROM: Nicole Gustine, Assistant General Counsel

DATE: May 5, 2026

RE: Confidentiality of Client Protection Board Recommendations

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The Board of Governors (BOG) is responsible for approving gifts from the Client Protection Board. Per Court Rule, all the materials, reports, and deliberations shall not be public. (APR 15 Procedural Regulations, Regulation 13(b)). As such, the recommendations are placed on the Consent Calendar. If discussion is requested by any Governor, it shall be taken up in Executive Session.

> **APR 15**
> **CLIENT PROTECTION FUND PROCEDURAL REGULATIONS**
> **REGULATION 13. CONFIDENTIALITY**
>
> (a) Matters Which Are Public. On approved applications, the facts and circumstances which generated the loss, the Client Protection Board's recommendations to the Trustees with respect to payment of a claim, the amount of claim, the amount of loss as determined by the Client Protection Board, the name of the lawyer, LLLT, or LPO causing the loss, and the amount of payment authorized and made, shall be public.
>
> (b) Matters Which Are Not Public. The Client Protection Board's file, including the application and response, supporting documentation, and staff investigative report, and deliberations of any application; the name of the applicant, unless the applicant consents; and the name of the lawyer, LLLT, or LPO unless the lawyer, LLLT, or LPO consents or unless the lawyer's, LLLT's, or LPO's name is made public pursuant to these rules and regulations, shall not be public.

The following report of CPB recommendations contains only pre-approved applications, and is therefore provided to you as a Trustee, confidentially. The report will not appear in the BOG meeting's public session materials. Please take the time to review the materials thoroughly prior to the BOG public session meeting.

Pursuant to ELC 3.4(l), the Chief Disciplinary Counsel has authorized the release of otherwise confidential disciplinary information to the Board of Governors for the purpose of reviewing and deciding on Client Protection Fund Board recommendations. The Board of Governors is advised of its obligation to maintain the confidentiality of these materials.

Please do not discuss any details regarding the matters, including the names or amounts related to the matter, at the public session meeting.

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

FROM: Executive Director Terra Nevitt

DATE: June 24, 2026

RE: Executive Director's Report

NextGen Exam Administration - July 2026

Regulatory Services staff are hard at work preparing for the first administration of the NextGen bar exam and it is shaping up to be a big one, with 804 examinees expected in Yakima on July 28 and 29. This exam brings an unprecedented 131 testing accommodation requests. This is the first time we have exceeded 100, which has required securing additional private testing rooms at the Holiday Inn as well as group testing rooms at the Convention Center. Because this is our first time administering the NextGen bar exam, planning has been more intensive than in past exam cycles as we navigate new processes and unknowns. The increased number of requests for accommodations has also expanded our staffing needs – we anticipate hiring 65 proctors and 28 WSBA staff members are expected to assist with exam administration. Despite the challenges, the team's adaptability and commitment continue to shine, leaving us confident and hopeful for a smooth and successful first NextGen bar exam. You can learn more about the NextGen Exam here. Washington is among the first group of states to administer the new exam, alongside our neighbors Oregon and Idaho.

Second Annual Bar Leaders' Summit - 'Together, We Raise the Bar'

We held our second annual WSBA Bar Leaders' Summit on Friday, May 15. The summit brings together county and affinity bar leaders from across Washington to strengthen connections, share practical strategies, and build the knowledge and skills needed to lead thriving, resilient bar organizations. The summit was held at the WSBA offices and there were 42 bar leaders in attendance. The feedback has been overwhelmingly positive.

Rule of Law Ambassador Program Updates: Take the Pledge!

Our Rule of Law Ambassador Program continues to be active providing programming to equip legal professionals to build trust and confidence in the legal system. More than 100 people registered for the Speak Up for Justice! event in Bellingham on May 18 and we also held a wonderful event in South Bend on June 5.

In May we also held our first Ambassador Cohort Training, which is intended to empower a cohort of legal professionals to *directly* facilitate conversations with community leaders to strengthen local democratic institutions and court systems. Eleven volunteers and 9 WSBA staff attended a two-day, immersive and high-engagement coaching session. The goal is to prepare each member of the cohort to hold a bridge-building, town-hall type event with leaders in their community sometime in the coming months. This will lay the foundation for a cohort-training model we plan to replicate and expand in coming years, supported by our own trained staff. We will share more about the outcomes of the cohort training as well as the dates of the bridge-building events as they are scheduled.

Finally, on May 1, we called upon legal professionals to pledge to visit a classroom on Constitution Day, September 17, 2026. By bringing the Constitution and its day-to-day application to life for students across the state, the legal community can help to bridge civic divides and safeguard the future of our judiciary. This is an ideal year to launch what we hope will become an annual tradition in our community as we celebrate the 250th anniversary of the Declaration of Independence. This effort was launched with a press event at the Temple of Justice with Justices, and 50 to 100 legal professionals delivering goody baskets to schools across the state with materials promoting the Lawyer in the Classroom program. It is not too late to join this effort. Learn more and take the pledge here.

Attachments
Q2 FY26 Fiscal Update Memo
Q1 FY26 Discipline Report
Outreach Report
Media Report
Member Demographics Report
Litigation Report (confidential)

WASHINGTON STATE
BAR ASSOCIATION

To: Board of Governors
Budget and Audit Committee

From: Tiffany Lynch, Director of Finance

Subject: FY 2026 Second Quarter Financial Update

Date: April 29, 2026

GENERAL FUND

The March 31, 2026 financials marks the end of the second quarter of fiscal year 2026. With 50% of the year complete, the General Fund is outperforming against budget with revenue ahead of budget, indirect expenses on target, and direct expenses under budget. The result is a net income of $1,273,835 without the use of Facilities or Special Projects and Innovation Fund reserves and $1,367,835 with the use of those reserves. Below is a narrative which highlights the areas of interest and estimates moving forward.

REVENUE

Total revenue is ahead of budget at 56% (+$1,402,082) which includes the following areas of note:

a. *Licensing Fees* are ahead of budget at 51% due to higher than anticipated late fees. Most license renewal fees were collected in January, with late fees following in February and March. The remaining revenue will be from new member licenses. WSBA is expected to meet or slightly exceed its budget by year-end.
b. *Bar Exam Fees* are ahead of budget at 86% (+$538,815) mainly due to timing of the collection of fees for the Summer 2026 exam, which typically concludes in May. Admission fees for other categories will remain in effect throughout the rest of the year, which is expected to help achieve the budget targets.
c. *Bar News Revenue* is ahead of budget at 60% (+$52,743), partly because revenue collection aligns with producing nine magazines annually and we have already released five year-to-date. Additionally, advertising revenue has exceeded expectations, so we expect to finish the year slightly over budget.
d. *Entity Regulation Annual Fees* are under budget at 20% (-$23,750). Applications opened for submission during the current fiscal year; however, as of March, no approvals have been granted. Given the volume of applications received to date, annual revenue is expected to be generated in the second half of the year, though it is projected to fall below the budgeted amount.
e. *Law Clerk Fees* are over budget at 114% (+$31,667). Program participants are able to enroll throughout the year and pay a prorated fee at the time of enrollment. Annual fees are paid by all individuals who remain enrolled between November and February, comprising the majority of revenue collected thus far. Only a minimal amount of fees is anticipated to be collected

during the rest of the year.

f. *Donations & Grants (Public Service Programs)* revenue under budget at 2% (-$63,679), however the full budget amount will be collected in April. These are funds raised by the Washington State Bar Foundation through licensing renewal to support WSBA programming.
g. *Reimbursement from Sections* is over budget for the year by $113,434 (+41%). This revenue is derived from the per-member charge that reimburses WSBA for the cost of administering Sections for the membership year (January-December). Because WSBA's membership year and fiscal year are different, three months of the reimbursement collected for October-December will be allocated to FY27 in September and we expect that this will bring revenue back in alignment with the budget.

EXPENSES

Total expenses are slightly under budget at 49% (-$330,404), which includes the following areas of note:

a. *Direct Expenses* are under budget by 8% (-$232,910). Direct program costs such as board/council/taskforce meetings, event expenses, supplies, staff travel, etc. vary depending on the timing of activities. We expect spending in these areas to pick up as we move into the second half of the fiscal year.
b. *Indirect Expenses* are on budget at 50% with minimal savings variance of $97,495.
    i. Salaries, Taxes, & Benefits combined are tracking ahead of budget at 51% (+$184,389). Salaries are currently over budget due to compensation grid changes and quarterly vacation accruals. Staff turnover in the second half should bring actual spending closer in line with the budget by year-end. Additionally, medical expenses are ahead of budget at 56% (+$102,047) due to higher than budgeted medical rate increases for the year.
    ii. Other Indirect Expenses are tracking under budget at 44% (-$281,885) mainly due to the timing of costs for legal fees, Computer Pooled Expenses (IT direct expenses), and workplace benefits. We anticipate that the majority of these expenses will be incurred in the second half of the year, with some limited savings.

CONTINUING LEGAL EDUCATION (CLE)

The CLE fund includes CLE Seminars, CLE Products, and Deskbook cost centers which collectively have budgeted a net loss requiring a use of reserves of ($131,482) for FY 2026. March 31, 2026 results reflect a net loss of ($77,829). Revenue is running under budget by ($78,353) (-5%) due to lower seminar registrations and timing of receipt of deskbook royalties. Expenses overall are under budget by ($66,266) (-4%), mostly due to timing of direct expenses that have not been incurred yet for seminars held later in the fiscal year.

CLIENT PROTECTION FUND (CPF)

The Client Protection Fund (CPF) budgeted a surplus of $244,100 for FY 2026. Actual results as of March 31, 2026 reflect a surplus of $704,573. Revenue is ahead of budget for the year at 87% (+$345,326), primarily from member assessments which are recognized upon collection during annual license renewals. Overall expenses are under budget at 16% (+$237,197) mainly from the timing of payment for Gifts to Injured Clients, the bulk of which is made at the end of the fiscal year.

SECTIONS FUND

The Sections Operations cost center represents the collective total of financial activity for all 29 sections. Sections budgeted a loss of ($437,806) for FY 2026. Actual results as of March 31, 2026 reflect a surplus of $135,921. Section Dues revenue and Reimbursement to WSBA for Indirect Expense costs are over budget because Sections collect the majority of their dues in January and February and similar to Reimbursement from Sections in the General Fund, one quarter of the dues and reimbursement expenses will be allocated to FY27 as a result of the difference between the membership year and fiscal year. Direct expenses of Section Activities are running slightly under budget at 47% (-$32,318). By March, most of the expenses for Sections are tied to per-member charge cost for administering Sections, which correspond to membership dues revenue. In the latter half of the year, it is anticipated that most expenses will shift towards program-related activities.

MEMO

To: Terra Nevitt, WSBA Executive Director

From: Douglas J. Ende, WSBA Chief Disciplinary Counsel & Director of the Office of Disciplinary Counsel

Date: May 27, 2026

Re: Quarterly Discipline Report, 1st Quarter (January – March) 2026

A. Introduction

The Washington Supreme Court's exclusive responsibility to administer the systems for discipline of licensed legal professionals (including disability systems) is delegated by court rule to WSBA. See GR 12.2(b)(6). Staff and volunteers carrying out the functions delegated by the Rules for Enforcement of Lawyer Conduct (ELC) act under the Supreme Court's authority. The investigative and prosecutorial function is discharged by the employees in the Office of Disciplinary Counsel (ODC), which is responsible for investigating allegations and evidence of professional misconduct and incapacity and prosecuting violations of the Washington Supreme Court's Rules of Professional Conduct.

The Quarterly Discipline Report provides a periodic, high-level overview of the functioning of the Office of Disciplinary Counsel. The report graphically depicts key discipline-system indicators for the 1st Quarter 2026. Note that all numbers and statistics herein are considered tentative/approximate. Final figures will be issued in the 2026 Discipline System Annual Report.

B. REMINDER: Limitations on Governor/Officer Involvement in Discipline Matters

By rule, the Supreme Court has expressly restricted the involvement of Governors, Officers, and the Executive Director in investigative, prosecutorial, or adjudicative decisions in the discipline system. The BOG does not have right or responsibility to review or influence decisions or recommendations in individual discipline/disability cases. Rule for Enforcement of Lawyer Conduct (ELC) 2.2(b). Accordingly, the BOG does not adopt disciplinary policies that constrain or alter the discretion of disciplinary counsel or other constituents of the discipline system with respect to the handling of individual matters. Inquiries or complaints about the handling of particular grievances or cases (from licensed legal professionals or grievants) should immediately be referred to the Chief Disciplinary Counsel and/or WSBA General Counsel and should not be responded to directly. Current and former members of the Board of Governors, Executive Directors, and Officers cannot knowingly advise or represent individuals regarding pending or likely disciplinary grievances or proceedings. ELC 2.14.

C. Summary of Disposition of Formal Matters[1]

Public Dispositions

Disbarments (3):

James Sinclair #52172
Joseph W. Kuhlman #42884
Stephen Kenneth Monro #26075

Suspensions (4):

Nichole Danelle Fisher #54253 (*Stipulation*) (30 Month Suspension)
Diana E. Moller #24707 (6 Month Suspension)
Andrew Michael Reeves #47116 (1 Year Suspension)
Timothy Ronald Richards #44812 (*Stipulation*) (8 Month Suspension)

Reprimands (2):

Matthew W. Anderson #43045 (*Stipulation*)
Alice Bagirova #49294 (*Stipulation*)

Resignation in Lieu of Discipline (2):

Hari L. Alipuria #26899
G. Christopher Ramsey #35358

Reciprocal Discipline (4):

Gregory Mark Abel #29268 (Suspension) (30 Days)
David L. Vicevich #45426 (Reprimand)
John David Du Wors #33987 (Disbarment)
Kerry P. Zeiler #56524 (Suspension) (3 Years stayed, 2 Years with Probation)

Disability Found (1):

Ernesto Jack Piza #31033

Interim Suspensions (2):

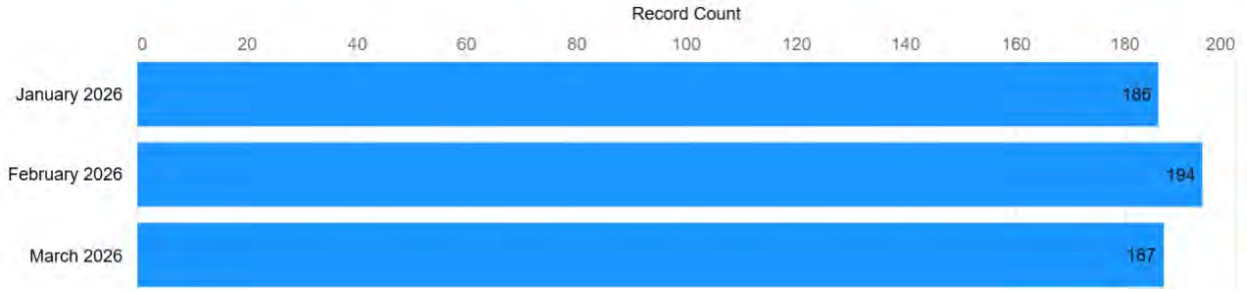
Interim ELC 7.2: Interim Suspension in Other Circumstances

Gerald T. Osborn #13712
Shannon Marie McMinimee #34471

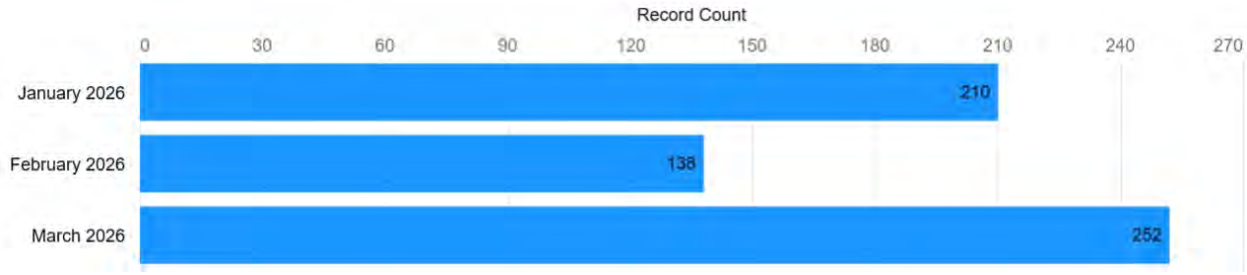
[1] Names in red font denote actions occurring in the current reporting quarter.

D. Grievances and Dispositions[2]

Number of Grievances Received	**2026 YTD: 567**
	2025: 2,228



Number of Grievances Resolved	**2026 YTD: 600**
	2025: 1,895



Diversion Statistics

	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr	2026 Total *(to date)*	2025 Total
New Diversion Files	2				2	4
Completed Diversion Files	1				1	4
Terminated Diversion Files	1				1	0

[2] These figures may vary from subsequent quarterly reports and statistical summaries owing to limitations on data availability at the time of issuance of these quarterly reports.

Disciplinary Actions and Statistics

	1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.	2026 Total *(to date)*	2025 Total
Formal Complaints Filed	8				8	27
Reciprocal Discipline Files Opened	2				2	16
Stipulations	4				4	17
Hearings Held[3]	8				8	7
Open Proceedings	51					

Matters Acted on by Reviewing Bodies

	1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.	2026 Total *(to date)*	2025 Total
Supreme Court	12				12	40
Disciplinary Board	14				14	29
Review Committee	122				122	408

E. Final Disciplinary Actions

	1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.	2026 Total *(to date)*	2025 Total
Disbarments	4				4	7
Resignations in Lieu	2				2	6
Suspensions	6				6	18
Reprimands	3				3	11
Admonitions	0				0	4
Total	15				15	46

F. Disability Found

	1st Qtr.	2nd Qtr.	3rd Qtr.	4th Qtr.	2026 Total *(to date)*	2025 Total
Disability Found	1				1	5

[3] Includes default hearings.

G. Discipline Costs Collected[4]

Quarterly Discipline Costs Collected	Total
1st Quarter	$21,311
2nd Quarter	TBD
3rd Quarter	TBD
4th Quarter	TBD
2026 Total	**$21,311**
2025 Total	$40,7560

[4] The cost figures may vary from amounts indicated in previous quarterly reports, statistical summaries, and annual reports, owing to limitations on the data available at the time of issuance of these quarterly reports and the final cost figures available after WSBA Finance staff closes the monthly books.

WASHINGTON STATE BAR ASSOCIATION

MEMO

To: Board of Governors

From: Darlene Parker, Sr. Outreach Coordinator

Date: June 9, 2026

Re: Summary of Outreach, March 1, 2026 – May 31, 2026

Between March 2026 and May 2026, WSBA leaders and staff participated in numerous outreach activities across Washington's legal community, including affinity and county bar events, legal service organizations, community celebrations, and various CLE presentations.

Events and Presentations		
Affinity Bar and County Bar Associations		
Date	**Event Title**	**Bar Association**
March 7	33rd Annual Gala	Latino Bar Association of Washington
March 7	Barrister's Ball	Clark County Bar Association of Washington
March 28	Celebrating Judge Tam Bui: A Historic First	Vietnamese American Bar Association of Washington
April 1	Professionalism Award Dinner	Spokane County Bar Association
April 23	Brew Review	Unemployment Law Project
April 24	30th Birthday Celebration	TeamChild
May 5	Breakfast with Champions	King County Bar Association
May 8	Annual Meeting & Dinner	Thurston County Bar Association
May 8	Annual Scholarship Dinner	Loren Miller Bar Association
May 15	Spectacular Spectacular: A Fundraising Extravaganza	LGBTQIA+ Bar Association
Other Legal Entities		
Date	**Event Title**	**Legal Entity**
May 15	Annual Gala	Northwest Immigrant Rights Project
May 27	Breakfast for Justice	Eastside Legal Assistance Program
APEX in Community Celebrations		
Date	**Award/Honoree**	
March 1	Outstanding Judge: LeRoy McCullough	
May 27	Legal Innovation: AOC Blake Refund Bureau	
Speak Up for Justice		
March 11	Speak Up for Justice: Tacoma	
March 27	Speak Up for Justice: Yakima	
April 10	Speak Up for Justice: Spokane	

April 14	Speak Up for Justice: Seattle		
April 15	Speak Up for Justice: Mount Vernon		
April 24	Speak Up for Justice: Olympia		
May 18	Speak Up for Justice: Bellingham		
Presentations and Panels			
Date	**Title**	**Host**	**WSBA Presenter**
March 20	Public Easements CLE - Ethics and AI	The Seminar Group	Jeanne Marie Clavere
March 30	Lunch and Learn: Immigration Enforcement and the Fourth Amendment	WSBA	Terra Nevitt
March 31	History of Admissions	UW Law School	Terra Nevitt
April 2	Residential Evictions CLE - Common Ethical Dilemmas and an Overview of Recent Advisory Opinions	The Seminar Group	Jeanne Marie Clavere
April 2	Lunch and Learn: First and Second Amendments and Immigration Enforcement	WSBA	Terra Nevitt
April 7	Pupilage 6 - Ethics and the Movie "Legally Blonde"	Dwyer Inn of Court	Jeanne Marie Clavere
April 7	Lunch and Learn: When Jurisdictions Collide	WSBA	Terra Nevitt
April 18	NW Bankruptcy Institute - Legal Ethics and Online Lawyer Communications: Advertising, Listservs, Blogs, and Social Media Comments	OSB and WSBA Debtor Creditor Sections	Jeanne Marie Clavere
April 28	Support Enforcement Annual Conference	WAPA	Sandra Schilling
April 29	Municipal Attorneys – Common Ethical Dilemmas with Organizations	Muni/PUD	Sandra Schilling
April 29	History of Admissions	University of Illinois Law School	Terra Nevitt
May 4	Grounding in Washington's Strategic Guides & Current Environment	WSBA/ATJ Board	Renata Garcia, Terra Nevitt, Diana Singleton
May 5	Common Ethical Issues in Litigation	Snohomish County Bar Association	Jeanne Marie Clavere
May 6	Monthly CLE – Communication and Solicitation	Benton County Bar Association	Sandra Schilling
May 12	Overview of WSBA's Ambassador Program	State Bar of New Mexico	Terra Nevitt
May 20	Corporate Counsel Section – Ethics and AI	WSBA	Jeanne Marie Clavere

May 21	ALPS – Ethics and AI	WSBA	Jeanne Marie Clavere
May 22	Entity Regulation Roundtable	WSBA Solo and Small Practice Section	Renata Garcia and Terra Nevitt
May 26	STAR Summit	Ellensburg – Kittitas County	Sandra Schilling
May 27	Landlord Tenant Section – Communication and Solicitation	WSBA	Sandra Schilling

WASHINGTON STATE BAR ASSOCIATION

To: Board of Governors

From: Communications and Outreach Manager Jennifer Olegario and Chief Communications Officer Sara Niegowski

Date: June 15, 2026

Re: **Summary of Media Contacts**, April 21-June 15, 2026

Date	Journalist and Media Outlet	Inquiry
April 21	Patrick Malone, Seattle Times	Questions about the Well-Being Task Force's final report. Interview set up with task force leaders.
April 28	Rachel Rippetoe, Law360	Questions about how the Entity Regulation Pilot Project is going in Washington, post launch.
May 1-June 15	Nina Shapiro, Seattle Times	Asked about public discipline information for lawyer Alexandra Lozano; ongoing conversation about discipline case and resources for clients as events developed.
May 4	Rachel Riley, Law360	Questions about the Well-Being Task Force's final report.
May 12-June12	Sharon Yoo, King 5 News	Asked about public discipline information for lawyer Alexandra Lozano; ongoing conversation about discipline case and resources for clients as events developed.
May 14	Cara Bayles, Law360	Questions about the WSBA's Character and Fitness application, especially the "civil action" section related to domestic violence survivors. Responded that this

		section is under consideration, but no changes have been made yet.
May 20	Christine Charnosky, Law.com	Inquiry into amendments made to admissions rules, bylaws, and policies by the Board of Governors at the May meeting, specifically to constraints limiting admissions to graduates of ABA accredited law schools.
May 20	Sam Skolnik, Bloomberg Law	Inquiring about any possible changes we are considering to RPC 1.14 (Clients with Diminished Capacity).
May 22	Karen Sloan, Reuters	Inquiry for comment about bar exam eligibility.
May 27	Isaias Alvarado, El País	Inquiry related to Alexandra Lozano, asking for 11-page statement and official comment.
May 27	Nick Pasion, PSBJ	Inquiry related to Alexandra Lozano, asking for 11-page statement and official comment. Shared official statement.
May 27	Rachel Riley, Law 360	Inquiry related to Alexandra Lozano. Shared official statement.
May 27	Jaime Mendez, Se Habla	Inquiry related to Alexandra Lozano, in particular disciplinary procedure. Shared official statement.
May 27-June 9	Jack Brook, Associated Press	Asked about public discipline information for lawyer Alexandra Lozano; ongoing conversation about discipline case and resources for clients as events developed.
May 27-June 8	Yesenia Amaro, the Oregonian/OregonLive	Questions about public discipline information for lawyer Alexandra Lozano; ongoing conversation about discipline

		case and resources for clients as events developed.
May 28	Gloria Ibáñez, El Sol de Yakima	Inquiry related to Alexandra Lozano, in particular recommendations for the clients.
June 11	Jaylinn Herrera, NBC and Telemundo Chicago	Inquiry related to Alexandra Lozano, in particular recommendations for the clients.

News Releases

- WSBA Names David J. Bentsen Local Hero
- Washington's Legal Community Launches Statewide Classroom Pledge on Law Day

Press Coverage

- Washington's Legal Community Launches Statewide Classroom Pledge on Law Day, TVW (Washington State Public Affairs Network), May 1, 2026
- WA mulls controversial mental health standard for lawyers, Seattle Times, May 2, 2026
- Wash. Bar Task Force Spotlights Atty Mental Health Issues, Law360, May 4, 2026
- WA immigration lawyer Alexandra Lozano sued for alleged malpractice, Seattle Times, May 11, 2026 (note: no mention of the WSBA)
- Years of complaints preceded lawsuit against Tukwila immigration attorney: 'She told me to accuse my wife of hitting me', KING 5 News, May 14, 2026
- Yakima County attorney suspended for violating professional conduct rules, Apple Valley News, May 18, 2026
- Half the Nation's Bar Apps Could Remove Rape Questions" Law360, May 19, 2026
- Washington State Opens Door for Graduates of Non-ABA-Accredited Law Schools to Sit for Bar, Law.com, May 21, 2026
- Washington joins states easing reliance on ABA accreditation of law schools, Reuters, May 22, 2026
- Grads of non-ABA-accredited law school can sit for Washington state bar exam, ABA Journal, May 22, 2026
- Lozano Civil Action: Resignation from the Washington State Bar Association, Lozano Civil Action Tracker, May 26, 2026

- Immigration attorney accused in federal lawsuit permanently resigns from Washington bar, KING 5, May 26, 2026
- Washington immigration attorney accused of fraud resigns, KGW, May 26, 2026
- WA immigration lawyer Alexandra Lozano, facing possible discipline, resigns, Seattle Times, May 26, 2026
- 'I didn't think she would fold that quick': Former clients relieved after Alexandra Lozano barred from practicing law in WA, KING 5, May 27, 2026
- 'Lawyer of Miracles' Alexandra Lozano barred from practicing law in Washington state, KING 5, May 27, 2026
- Immigration attorney who gave up license amid allegations had more than 35,000 clients, Oregonian, May 28, 2026
- Federal lawsuit accuses Tukwila-based immigration attorney of misleading clients, Oregonian, May 29, 2026
- New lawsuit alleges Alexandra Lozano's immigration playbook was replicated in Ohio, KING 5, May 29, 2026
- Immigration attorney's resignation raises concerns for clients in Oregon and Washington, KGW, June 1, 2026
- Pink jets and luxury condos: Former clients question Alexandra Lozano's lifestyle as lawsuits and complaints mount, KING 5, 2026
- Federal investigators examining former Tukwila immigration lawyer Alexandra Lozano, KING 5, June 4, 2026
- Clients of beleaguered immigration attorney seek answers amid fear, Oregonian, June 8, 2026
- 'Nothing to show for it': Former clients seek answers after Tukwila immigration attorney resigns, KING 5, June 9, 2026
    - Repost: Yahoo, June 9, 2026
- State issues alert as Tukwila immigration law firm closes, founder resigns license, KOMO News, June 10, 2026
- Luz Legal, formerly Alexandra Lozano Immigration Law, abruptly closes, KGW, June 10, 2026
- WA immigration law firm founded by Alexandra Lozano shuts down, Seattle Times, June 10, 2026
    - Repost: Yakima Herald-Republic, June 10, 2026
- Closure of immigration law firm founded by Alexandra Lozano draws dozens of concerned clients to Yakima office, Yakima Herald-Republic, June 11, 2026

# # #

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Jeanne Marie Clavere, Senior Professional Responsibility Counsel

Mark Fucile, Chair, Committee on Professional Ethics

DATE: June 17, 2026

RE: Committee on Professional Ethics—Suggested comments to selected Rules of Professional Conduct on Artificial Intelligence from joint project with the Washington State Supreme Court.

ACTION: Approve and suggest to the Washington State Supreme Court amendments regarding the ethics of artificial intelligence in legal practice as recommended by the Committee on Professional Ethics.

Background

The proposed amendments to the RPC comments are a joint project with the Washington State Supreme Court. The Supreme Court developed draft comments to the RPC to provide further guidance to attorneys on ethical issues they may face when using artificial intelligence (AI). The CPE has acted in a technical capacity to provide assistance to the Supreme Court in refining the draft comments initially put forth by the Court. It is suggested that the Court and BOG act as co-proponents of the comments in the General Rule 9 rule-making process.

The RPCs that have suggested comments are**:** 1.1, 1.4, 1.5, 1.6, 3.1, 3.3, 5.1, 5.2, 5.3, 7.1 and 8.4

CPE Analysis

After receiving the Supreme Court's draft comments in February of this year, the CPE formed a subcommittee composed of Michele Carney, Zachary Dillon and Judge Frederick Corbit. The Subcommittee met with the Supreme Court Clerk, who acted as a conduit between the Supreme Court and the CPE. The Subcommittee, in consultation with the CPE, provided suggested edits and analysis to the Clerk for the Supreme Court's consideration. Although the WSBA addressed the use of AI tools in legal practice last year through Advisory Opinion 202505, the Supreme Court Clerk communicated to the Subcommittee the Supreme Court's desire to provide further guidance directly in the RPC comments to assist attorneys in unique ethical issues when using AI and in light of continuing rapid developments in this area affecting both lawyers and the court system.

In its work, the Subcommittee reviewed other state guidance (such as California) as well as reviewed sanction cases in both Federal and State courts. Each of these comments provide guidance to supplement the RPC with respect to AI.

Note that the same comment is recommended for Rule 5.1, 5.2 and 5.3. This comment was originally provided by the Supreme Court as one comment to all three rules. We ultimately recommend that the comment only be added under one Rule. We recommend placing it under Rule 5.1, but we are providing the same comment to all three rules in deference to the Supreme Court. The CPE held a meeting on June 12, 2026. At that meeting, friendly amendments were made and the CPE voted affirmatively for the amendments to go forward to the BOG meeting in July 2026.

Stakeholders

When the Supreme Court approached the WSBA about this project through the Clerk in February, the Clerk communicated the Court's direction that this project be undertaken on an expedited basis in view of the rapid developments and impacts from AI affecting law practice and the court system. Due to this expedited process, the CPE did not post the draft comments itself for public comment. The CPE anticipates, however, that the Court would ordinarily publish the comments for public comment on the court rules website and that the WSBA will provide notice of the availability of that public comment forum.

Approval by CPE

The Committee on Professional Ethics approved the comments at its June 12, 2026, meeting and the accompanying recommendation that the WSBA join the Supreme Court as a co-proponent of the comments in the GR 9 rule-making process.

Conclusion

We recommend that the BOG join the Supreme Court as a co-proponent of these comments in the GR 9 rule-making process. We respectfully believe that the comments if ultimately adopted by the Supreme Court will be very helpful to not only attorneys but also to the court system and the public as well.

Fiscal Analysis

The Committee on Professional Ethics is unaware of any potential fiscal impacts for the WSBA.

Equity Analysis

One aspect of the proposal that appeared to raise an equity issue is the potential for decision-making based on use of AI tools to be affected by biased outputs generated by AI tools. While AI technologies can produce biased outputs and may result in discriminatory treatment if used without appropriate safeguards, the Committee's suggested comments, particularly the additions to Rule 8.4, represent an important step toward mitigating these risks when lawyers use AI. In the context of this proposal the primary equity issue is the potential for decision-making assistance based on use of AI tools which can

generate biased outputs. These comments are intended to guide lawyers in recognizing and addressing potential bias in AI tools as part of their ethical obligations.
Consistent with the Supreme Court's direction, the Committee on Professional Ethics limited this facet of the current project to working with the draft comments to the Rules of Professional Conduct provided by the Supreme Court rather than exploring broader regulatory changes. The Committee and the Supreme Court Clerk's Office have also discussed a Phase Two that would take a deeper look at whether additional rule changes or regulatory approaches are needed as AI continues to evolve, including more comprehensive consideration of AI-related bias.

Attachment

Attached is recommended language amending comments to 1.1, 1.4, 1.5, 1.6, 3.1, 3.3, 5.1, 5.2, 5.3, 7.1 and 8.4.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

Provided as confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The fiscal impact of this recommendation is primarily for staff time used to assist in drafting the suggested amendments, incorporate any approved changes into relevant records, communicating changes to stakeholders, and providing support to volunteers throughout the process of developing the recommendation. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analysis is to understand how entities incorporated an equity lens to proposed action items presented to the Board of Governors. This analysis in particular focuses on the potential for unintended consequences, with emphasis on the effectiveness with which the proposed comments help fulfill the regulatory objectives outlined in GR 12.1(j), which includes ensuring freedom from discrimination for these receiving legal services.

The rapidness with which AI tools have already been adopted and used by legal professionals creates an urgent need to update rules of professional conduct so their duties and responsibilities when using these tools are clear, including the duty to remain aware of the risks of bias and discrimination. The proposed comments are similar to changes being proposed or adopted by other states, and in line with the American Bar Association's Formal Opinion 512.[1] We understand that the CPE in collaboration with the Supreme Court are working expeditiously to mitigate the risks and harm associated with using AI through this first step of these proposed comments.

Given that large language models, generative AI, and agentic AI programs (particularly those trained on open-source data) have been consistently observed to produce biased outputs, and the use of AI tools has directly led to discriminatory treatment and outcomes in housing, healthcare, and employment[2], we recommend that CPE and the Supreme Court move forward with their potential Phase Two that would include a more comprehensive consideration of AI-related bias and take a deeper look into potential rule changes or regulatory approaches as AI continues to evolve.

We recommend this deeper and more comprehensive consideration of AI-related bias because the proposed comments may not be sufficient to prevent or address instances of AI-facilitated bias and discrimination. The proposed changes emphasize the duty of lawyers to develop and maintain awareness of how AI tools work and its associated risks and exercise their professional judgment to decide whether the benefits to their practice outweigh these risks. A joint statement on discrimination and bias in AI by the Federal Trade Commission, Consumer Financial Protection Bureau, and the U.S. Equal Employment Opportunity Commission notes that the complexity of AI systems makes it difficult even for AI developers to be aware of the degree to which models are biased without extensive data collection and analysis to assess disparate impacts.[3]

If the CPE does move forward with a Phase Two, below is a list of several regulatory approaches to reducing or mitigating AI-facilitated bias and discrimination and their tradeoffs, which are informed by a Harvard Law Review Study for its consideration.[4]

1. **Status Quo or No Action**: There are no specific rules or comments regarding the use of AI tools.
2. **Process Regulation (Proposed Comments)**: Rules broadly enable the use of AI tools in the practice of law, but puts into place procedural requirements for legal professionals such as

[1] ABA Committee On Ethics and Professional Responsibility, Formal Opinion 512 (2024).

[2] American Civil Liberties Union, "Accountability in Artificial Intelligence"

disclosing the use and risks to clients, requiring human verification of any AI-generated outputs, developing organizational policies and trainings regarding ethical use. The proposed comments are in line with this form of regulation, and the trade-offs are discussed in detail above.

3. **Prohibition**: Rules strictly prohibit using AI tools in the practice of law, or restrict the types of models they can use in the practice of law. While it would completely shield those receiving legal services from AI-facilitated bias or discrimination, rules of this nature would be difficult to enforce and ensures that the positive benefits of AI tools cannot be accessed.
4. **Regulation of Inputs**: Rules require that AI tools can only be used if the model training data omits certain inputs (such as race/ethnicity, gender, or other protected categories and proxies). The challenge with this approach is that most open-source AI developers fail to disclose the data used to train their models, nor does it address bias at the algorithm and design level. In addition, AI models have been found to reproduce biased outputs that results in disparate impacts, even when the data does not contain data about protected categories and their markers.
5. **Audit of Outputs**: Rules require that legal professionals or employers can use AI tools only if they have mechanisms in place to assess whether they result in disparate outcomes.

1 ABA Committee on Ethics and Professional Responsibility, Formal Opinion 512 (2023).

2 American Civil Liberties Union, "Accountability in Artificial Intelligence"

3 Federal Trade Commission, "Joint Statement on Enforcement Efforts Against Discrimination and Bias in Automated Systems" (2023).

4 "Resetting Antidiscrimination Law in the Age of AI ," 138 Harv. L. Rev. 1562 (2025).

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 1.1 and accompanying COMMENT [11]

RPC 1.1 COMPETENCE [Unchanged]

Comments

[1] – [8] [Unchanged]

Additional Washington Comments

[9] – [10] [Unchanged]

Artificial Intelligence

[11] With respect to artificial intelligence (AI), a lawyer must maintain a reasonable and ongoing understanding of the capabilities and limitations of the specific AI technologies the lawyer might use. A lawyer must recognize inherent risks of these tools and must verify the accuracy of AI-generated work. A lawyer's professional judgment may not be delegated to AI. See Rule 2.1.

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 1.4 and accompanying COMMENT [14]

RPC 1.4 COMMUNICATION [Unchanged]

Comments

[1] – [7] [Unchanged]

Additional Washington Comments

[8] – [13] [Unchanged]

Artificial Intelligence

[14] A lawyer has a duty to inform a client of the use of artificial intelligence when it is assisting in making substantial decisions, impacts the means by which a client's objectives will be met, and/or may materially impact the client's confidentiality. In evaluating whether a duty to inform exists, a lawyer should weigh the circumstances of the representation including the novelty of the technology, the risk of its use, and how the tool will process client information.

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 1.5 and accompanying COMMENT [19]

RPC 1.5 FEES [Unchanged]

Comments

[1] [Unchanged]

[2] [**Washington revision**] When the lawyer has regularly represented a client, they ordinarily will have evolved an understanding concerning the basis or rate of the fee and the expenses for which the client will be responsible. In a new client-lawyer relationship, however, an understanding as to fees and expenses must be promptly established, including any fees for the use of artificial intelligence tools or services. Generally, it is desirable to furnish the client with at least a simple memorandum or copy of the lawyer's customary fee arrangements that states the general nature of the legal services to be provided, the basis, rate or total amount of the fee and whether and to what extent the client will be responsible for any costs, expenses or disbursements in the course of the representation. A written statement concerning the terms of the engagement reduces the possibility of misunderstanding. See Washington Comment [17] for fee agreements that include LLLT services.

[3] – [9] [Unchanged]

Additional Washington Comments

[10] – [19] [Unchanged]

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 1.6 and accompanying COMMENT [29]

RPC 1.6 CONFIDENTIALITY OF INFORMATION [Unchanged]

Comments

[1] – [20] [Unchanged]

Additional Washington Comments

[21] – [28] [Unchanged]

Artificial Intelligence

[29] Before a lawyer enters information relating to the representation of a client into an AI tool, a lawyer must evaluate the risk that the information will be disclosed to or accessed by others inside or outside the firm. A lawyer must not provide any information relating to the representation of a client to an AI tool that lacks adequate confidentiality and security protections and must ensure the service provider does not use or share that information for its own purposes. A lawyer has an ongoing duty to remain knowledgeable about how the AI tool collects, uses, and protects confidential information, including reviewing the terms of use, monitoring updates, and understanding how the software operates.

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 3.1 and accompanying COMMENT [4]

RPC 3.1 MERITORIOUS CLAIMS AND CONTENTIONS [Unchanged]

Comments

[1]-[3] [Unchanged]

Artificial Intelligence

[4] Lawyers may use artificial intelligence and other automated technologies to assist in legal research, drafting, and case evaluation. However, such use does not relieve the lawyer of the duty to ensure that their claims and contentions have a nonfrivolous basis in law and fact. Reliance on technology does not diminish a lawyer's obligation to exercise human judgment and act with reasonable diligence, and lawyers should not rely on AI-generated output without verifying and confirming its accuracy.

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 3.3 and accompanying COMMENT [16]

RPC 3.3 CANDOR TOWARD THE TRIBUNAL [Unchanged]

Comments

[1]-[15] [Unchanged]

Artificial Intelligence

[16] A lawyer must verify the accuracy of all AI generated output before submitting them to a tribunal. This includes ensuring there are no misstatements of law or fact, frivolous arguments, citations to nonexistent authorities, misrepresentation of the holdings of existing authorities, or other inaccuracies.

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 5.1 and accompanying COMMENT [9]

RPC 5.1 RESPONSIBILITIES OF PARTNERS, MANAGERS, AND SUPERVISORY LAWYERS [Unchanged]

Comments

[1] – [8] [Unchanged]

Artificial Intelligence

[9] Managerial and supervisory lawyers should establish clear policies regarding the permissible use of artificial intelligence, and supervisory lawyers must make reasonable efforts to ensure that the firm's lawyers and nonlawyers comply with professional obligations when using AI, including training in the ethical and practical use of AI tools relevant to their work and the associated risks.

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 5.2 and accompanying COMMENT [3]

RPC 5.2 RESPONSIBILITIES OF A SUBORDINATE LAWYER
[Unchanged]

Comments

[1] – [2] [Unchanged]

Artificial Intelligence

[3] Managerial and supervisory lawyers should establish clear policies regarding the permissible use of artificial intelligence, and supervisory lawyers must make reasonable efforts to ensure that the firm's lawyers and nonlawyers comply with professional obligations when using AI, including training in the ethical and practical use of AI tools relevant to their work and the associated risks.

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 5.3 and accompanying COMMENT [6]

RPC 5.3 RESPONSIBILITIES REGARDING NONLAWYER ASSISTANTS
[Unchanged]

Comments

[1] – [4] [Unchanged]

Additional Washington Comments

[5] [Unchanged]

Artificial Intelligence

[6] Managerial and supervisory lawyers should establish clear policies regarding the permissible use of artificial intelligence, and supervisory lawyers must make reasonable efforts to ensure that the firm's lawyers and nonlawyers comply with professional obligations when using AI, including training in the ethical and practical use of AI tools relevant to their work and the associated risks.

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 7.1 and accompanying COMMENT [15]

RPC 7.1 COMMUNICATIONS CONCERNING A LAWYER'S SERVICES
[Unchanged]

Comments

[1] – [4] [Unchanged]

Additional Washington Comments

[5] – [14] [Unchanged]

Artificial Intelligence

[15] Lawyers may use AI in marketing, but any such use must be consistent with the lawyer's duty not to make false or misleading communications about the lawyer or the lawyers' services. Lawyers must maintain reasonably effective human oversight of all automated systems used to engage with clients or prospective clients.

SUGGESTED AMENDMENTS TO THE RULES OF PROFESSIONAL CONDUCT
RULE 8.4 and accompanying COMMENTS [9] and [10]

RPC 8.4 MISCONDUCT [Unchanged]

Comments

[1] – [5] [Unchanged]

Additional Washington Comments

[6] – [8] [Unchanged]

Artificial Intelligence

[9] A lawyer using AI tools should be aware of possible biases and the risks they may create and have mechanisms in place to attempt to address those potential AI biases.

[10] It is prejudicial to the administration of justice to submit inaccurate information to a tribunal by failing to adequately check the accuracy of legal filings and citations created with the assistance of artificial intelligence tools. Filing inaccurate legal materials or false citations under these circumstances may also violate Rule 3.1 or 3.3.

WASHINGTON STATE
BAR ASSOCIATION

To: Board of Governors

From: Tiffany Lynch, Director of Finance

cc: Executive Leadership Team

Re: FY 2027 Budgets – 1st Draft

Date: June 15, 2026

The Budget and Audit Committee reviewed the first draft of the FY 2027 budget at their meeting on June 15, 2026.

The WSBA budget guides fund allocation to fulfill regulatory duties, safeguard the public, and assist legal professionals in their legal work. Prepared annually, it supports programs aligned with our mission and may be amended during the year to address unexpected changes.

This memo outlines variances between the FY 2027 first draft and FY 2026 budget, with additional information supporting the key areas of change. Individual cost center budget details are included in attachments along with a WSBA Budget Glossary (*see* ***attachment E***) for reference.

BUDGET COMPARISON: FY 2026 vs FY 2027

ALL FUNDS BUDGET[1]	FY 2026	FY 2027	Difference	% Change
REVENUE	$26,027,883	$26,085,078	+$57,195	+0.2%
EXPENSE	$26,832,570	$27,952,711	+$1,120,141	+4.2%
Direct Expense	*$3,851,105*	*$3,847,257*	*($3,848)*	*(0.1%)*
Indirect Expense	*$22,981,465*	*$24,105,454*	*+$1,123,989*	*+4.9%*
NET INCOME/(LOSS)	**($420,312)**	**($1,867,633)**	**+$1,447,321[2]**	
Use of Facilities Reserve	$744	$744	$0	
Use of Special Projects & Innovation Reserve	$224,255	$91,813	($132,442)	
NET INCOME/(LOSS) w/use of designated reserves	**($195,313)**	**($1,775,076)**	**+$1,579,763[2]**	

The preliminary FY 2027 WSBA budget separates finances into three funds: the General Fund, CLE Fund, and Client Protection Fund. (A fourth fund dedicated to Sections will be added in August.) Each fund maintains specific reserves that are adjusted annually based on the financial outcomes of their respective cost centers.

[1] Includes General, CLE, and Client Protection Funds. Sections funds will be presented in August.
[2] A positive number indicates an increase in the net loss amount from FY 2026 Budget to FY 2027 Budget.

Attorney license fees are WSBA's primary source of revenue, accounting for nearly 70% of its annual budget. The largest expense for WSBA is indirect costs—which include salaries, benefits, and other overhead expenses. Indirect costs represent about 85% of the expense budget and are influenced by rising market prices for labor, employee benefits, and related items.

(1) GENERAL FUND

The General Fund accounts for most of WSBA's activities, including regulatory duties and many services provided to members and the public. License fees serve as the main revenue source for the 41 cost centers supported by the General Fund. The initial FY 2027 General Fund budget is calculated using attorney license fees of $475 for the 2027 calendar year, reflecting a $7 increase from the 2026 fee of $468.

The FY 2027 budget incorporates designated reserve funds to address ongoing equipment depreciation related to the WSBA's office space downsizing initiative (utilizing Facilities Reserves), as well as to support the principal development activities of the Licensure Pathways project (drawing from Special Projects and Innovation Reserves). The Licensure Pathways project is scheduled for deployment in FY 2027 and it is expected that all reserve funds earmarked for the project will be spent in full by the end of the 2027 fiscal year. (*See **attachment A** for General Fund detailed cost center budgets.)*

General Fund Budget	FY 2026	FY 2027	Difference	% Change
▪ Revenue	$23,485,538	$24,313,188	+$827,650	+3.5%
▪ Expenses	$24,402,843	$25,585,386	+$1,182,543	+4.8%
▪ Net Income/(Loss)	($917,304)	($1,272,198)	+$354,894[3]	
▪ Use of Facilities Reserves	$744	$744	$0	
▪ Use of Special Projects & Innovation Reserves	$224,255	$91,813	($132,442)	
▪ **NET INCOME/(LOSS) w/use of designated reserves**	**($692,306)**	**($1,179,641)**	**+$487,335[3]**	

(2) CLE FUND

The CLE Fund is a board-designated reserve from CLE net income, used to cover losses and major costs for CLE programs, products, or capital needs. The FY 2027 CLE Fund Budget has three cost centers: CLE Products, CLE Seminars, and Deskbooks. (*See **attachment B** for CLE Fund detailed cost center budgets.)*

CLE Fund Budget	FY 2026	FY 2027	Difference	% Change
▪ Revenue	$1,596,865	$1,616,890	+$20,025	+1.3%
▪ Expenses	$1,728,347	$1,657,053	($71,294)	(4.1%)
▪ **NET INCOME/(LOSS)**	**($131,482)**	**($40,163)**	**($91,319)[3]**	

(3) CLIENT PROTECTION FUND (CPF)

The Client Protection Fund (CPF), established in 1995 by the Washington Supreme Court and WSBA, compensates individuals who suffer financial loss due to lawyer dishonesty or mishandling of client funds. It is funded primarily through annual fees from active members and *pro hac vice* admissions as mandated by the Court. (*See **attachment C** for Client Protection Fund detailed cost center budgets.)*

[3] A positive (+) difference means an increase in the net income or loss and a negative (-) difference means that there is a decrease in the net income or loss from the FY 2026 budget.

Client Protection Fund Budget	FY 2026	FY 2027	Difference	% Change
▪ Revenue	$945,480	$155,000	($790,480)	(83.6%)
▪ Expenses	$701,380	$710,272	+$8,892	+1.3%
▪ **NET INCOME/(LOSS)**	**$244,100**	**($555,272)**	**+$799,372**[4]	

CAPITAL BUDGET

The Capital Budget is meant to address the cost of purchasing, refreshing, and/or replacing outdated hardware and office equipment. Anticipated FY 2027 items include replacement of computer hardware and mailing equipment and a security camera system upgrade. *(See **attachment D** for capital budget details.)*

KEY AREAS OF CHANGE

Provided below is a list of the key areas of change between the FY 2026 and FY 2027 budget followed by relevant narrative information for items with an asterisk.

Revenue Changes from FY 2026 Budget ($20,000 or greater)	Budget Impact
GENERAL FUND:	**+$827,650**
▪ **License fees:** increase of $7 for full active fee membership starting 2027 and related increase to late fees	+$394,265
▪ **Admissions fees:** increase in bar exam fees and addition of portfolio application fees (pending BOG approval)	+$371,800
▪ **Bar News (net):** increase to display and job target advertising to align with actual revenue collection trends in FY 2026	+$105,000
▪ **Law Clerk Fees:** increase to align with current enrollment and revenue collected for program fees	+$89,000
▪ **MCLE fees:** actual revenue figures are consistently trending higher; increase to align closer to actual	+54,500
▪ **New Member Education:** reduction based on anticipated product releases	($22,000)
▪ **Interest Income:** lower interest rate return on investments expected	($150,000)
CLE FUND:	**+$20,025**
▪ **Royalties (DESK):** increase to align with current royalty earnings	+$36,000
▪ **Digital Video Sales (CLEP):** increase based on anticipated sales for FY 2027	+$25,000
▪ **Seminar Registrations (CLES):** decreased to align with current revenue trend	($63,645)
CLIENT PROTECTION FUND:	**($790,480)**
▪ **Interest Income:** lower interest rate return on investments expected	**($55,000)**
▪ **CPF Member Assessments:** assessment rate reduced from $20 to $0 for 2027	**($735,480)**
Total Increase in Revenue from FY 2026 Budget	**+$57,195**

Indirect Expense Changes from FY 2026 Budget ($20,000 or greater)	Budget Impact
SALARIES:	**+$683,931**
▪ **Compensation Increases*:** increase in compensation grid, annual increases for existing employees, and position reclassifications (see narrative for details).	+$540,165

[4] A positive (+) difference means an increase in the net income or loss and a negative (-) difference means that there is a decrease in the net income or loss from the FY 2026 budget.

▪ **FTEs*:** Increase of 2.4 FTE (see narrative for details).	+$189,948
▪ **Temporary Employees:** reduction to total number of seasonal temporary employees needed for FY 2027.	($46,182)
BENEFITS & PAYROLL TAXES:	**+$615,320**
▪ **Medical:** increase to 1) align budget with FY 2026 actual rates which were higher than budgeted and less conservative budgeting, 2) account for estimated rate increase of 5% across all plans, and 3) addition of coverage for new FTEs	+$491,252
▪ **FICA:** increase resulting from change in salaries budget	+$54,623
▪ **Unemployment Insurance:** increase to 1) align budget with FY 2026 rates which are higher than budgeted and 2) account for increase in salaries budget	+$21,184
OTHER INDIRECTS:	**($175,262)**
▪ **Rent:** anticipated increase in operating costs for WSBA's office space lease	+$66,945
▪ **Depreciation: Computer Hardware:** increased to align with FY 2026 actual expenses which are tracking ahead of budget	+$30,277
▪ **Human Resources Pooled Expenses:** reduction resulting from one-time cost needs budgeted in FY 2026 for staff training and implementation of an HR software module	($20,150)
▪ **Depreciation: Computer Software:** completion of useful life depreciation for a number of organization-wide software items in FY 2027	($33,713)
▪ **Depreciation: Furniture, Leasehold Improvement, & Office Equipment:** completion of useful life depreciation for prior office lease items	($78,278)
▪ **Computer Pooled Expenses:** includes reductions for computer software, and software maintenance & licensing to align with current needs, and removal of one-time implementation costs for a new association management system budgeted in consulting services	($172,507)
Total Increase in Indirect Expense from FY 2026 Budget	**+$1,123,989**

Direct Expense Changes from FY 2026 Budget ($20,000 or greater)	Budget Impact
GENERAL FUND:	**+$119,112**
▪ **Conference/Institute Expense (ATJ):** ATJ conference held every other year. Expenses include WSBA contribution of $35,000 (increased from $30,000 in FY 2025) and $19,000 previously budgeted under the Reception/Forum expense budget for conference honorariums, security, and accessibility support	+$54,000
▪ **Admissions (net):** includes reduction of cost of UBE examinations as part of transition to NextGen bar exam and increases in exam grading and software hosting for implementation of the portfolio pathway	+$32,265
▪ **Postage (Bar News)**: increase in postage rates for mailing of magazine	+$25,000
▪ **Surveys (Communications):** previously budgeted in the BOG cost center under BOG Travel & Outreach, not a new expense	+$20,000
▪ **Software Hosting (Regulatory Reform):** cost moved to Admissions for licensure portfolio pathway implementation	($20,000)
CLE FUND:	**($127,460)**
▪ **Online Product Hosting (CLEP):** lower cost due to switch in vendor providing hosting services	($24,000)
▪ **Obsolete Inventory (DESKBOOKS):** expenses eliminated due to completion of write off for remaining inventory of aged products in FY 2026.	($118,700)
CLIENT PROTECTION FUND:	**+$4,500**
Total Decrease in Direct Expense from FY 2026 Budget	**($3,848)**

A. Indirect Expenses:

1) ***Compensation Increases (+$540,165):*** WSBA bases job grades on factors such as responsibility, skill, knowledge, and education, with steps indicating years of experience. Each grade-step pair corresponds to a specific salary, which is determined by market benchmarks. To maintain

competitive compensation, we conduct annual reviews and periodic comprehensive studies—the latest in FY 2024 resulted in a 3% increase at the market midpoint for FY 2025. This year, after reviewing market conditions, it is recommended that we raise the compensation structure by 1.5%. The FY 2027 salary budget assumes every employee will move up one step within their grade and includes needed position reclassifications that have been identified in recent years.

2) ***Staffing Needs (+$189,948)*:** a total of 2.4 FTE has been identified for additional staffing support in two departments, the Office of Disciplinary Counsel and Advancement. Below is a summary of the position needs.

   a) **1.0 FTE Disciplinary Counsel:** The Intake team needs a Disciplinary Counsel due to a 20% surge in grievances since 2024, a trend expected to continue. The department also foresees additional duties arising from future Entity Regulation Pilot Project grievances alongside current grievance types. Disciplinary Counsel are responsible for reviewing grievances, requesting responses, determining if investigations are needed, drafting dismissal letters, keeping records for the Disciplinary Board's review committee when a grievant seeks reconsideration, and responding to questions from both respondent lawyers and grievants.

   b) **1.0 FTE Program Coordinator:** The addition of the Ethics, Wellness and Practice Program Coordinator fills a longstanding gap in administrative and operational support across the Professional Responsibility, Member Wellness, and Practice Management programs. Currently, each program's manager or advisor performs significant administrative and logistical tasks that dilute their capacity to deliver higher-level services. Centralizing these duties under a dedicated coordinator improves efficiency, consistency, and responsiveness while enabling the higher-level staff to focus on substantive program work. This shared support role will provide scalable infrastructure needed to meet increased expectations identified by the Legal Tech Task Force and WSBA Well-Being Task Force, ensuring WSBA can effectively deliver enhanced services to its members.

   c) **0.4 FTE Professional Responsibility Manager:** The Professional Responsibility Manager position is being restored to full-time and restructured to ensure unified leadership of the Ethics, Wellness, and Practice Management Team. This position has always been full-time. The previous reduction to .6 FTE was a temporary accommodation for the current manager who is nearing retirement, and returning the role to full-time is necessary to meet current and growing operational needs. Consolidating supervision of the Wellness Program Manager and Practice Management Advisor under this position reestablishes a similar structure historically used at WSBA and strengthens alignment among the three related program areas. This change ensures consistent leadership and improves coordination across programs, better supporting WSBA members and advancing the recommendations of the Legal Tech and Well-Being task forces.

OTHER INFORMATION AND ITEMS FOR CONSIDERATION

Presented below is a summary of items we believe warrant your attention. These items may not meet the threshold for dollar variance mentioned previously, are included in the first draft but require further explanation, or are currently excluded from the first draft yet may be incorporated into the final version. We welcome your input as we continue to refine the budget.

1) **Ombudsperson**
   In fiscal year 2025, WSBA's Executive Leadership Team identified an operational priority to assess the feasibility of establishing an ombuds position, with a subsequent directive in FY 2026 to develop

a concrete proposal. This initiative stems from the volume of questions, complaints, and requests for assistance related to regulatory matters that may not be optimally addressed by regulatory staff. Introducing a neutral and independent individual to serve as a point of contact and with an ability to internally review concerns about regulatory processes and make recommendations would enhance user experience and allow regulatory staff to focus more effectively on their core responsibilities. The ombudsperson would triage various inquiries, listen, collaborate, redirect individuals to appropriate personnel, provide information, guide inquirers to relevant agencies or resources, and make recommendations to regulatory staff and the Executive Director. If WSBA were to move forward with developing this role, it would likely mean hiring a staff person and/or engaging with an independent contractor for a pilot project. The first draft of the FY 2027 budget does not include funds for an ombudsperson. We would appreciate feedback on the value of this service.

2) **WSBA Entity Requests**
It is normal for WSBA entities to request different levels of funding each year, depending on their workplan. Highlighted below are some more significant changes and requests from WSBA entities for FY 2027:

- ***Washington New Members Committee:*** Expenses related to this committee are listed in the Member Services and Engagement cost center, totaling $49,000—an increase of $29,000 compared to the FY 2026 budget. This rise reflects planned updates to the WNMC charter, an intention to support more WNMC member attendance at ABA annual and midyear meetings, and a greater number of scheduled outreach events.

- ***Council on Public Defense:*** Expenses for this are listed under the Access to Justice cost center, totaling $26,500—which is $15,500 more than the FY 2026 budget. The increased budget is due to plans to hold two in-person meetings: one will be an annual strategic planning retreat in central Washington, and the other will take place at Gonzaga University alongside a law student event. These are new initiatives, as neither event was previously included or funded.

3) **Professional Fees- Legal**
The first draft of the budget includes $250,000 for legal fees which is the same as the FY 2026 budget. The costs in this budget line vary greatly each year depending on the matters that come forward requiring outside counsel assistance. The budget for this line item has historically been conservative, and actual results are normally less than the budget. Funds expended from this budget are generally intended for legal support in matters where WSBA is a defendant. For the FY 2027 budget, while the budget amount remains unchanged from the prior year, we acknowledge that it is possible that at some point WSBA may also be in need of legal services for prosecutorial purposes. While it may be a rare occurrence, we believe that the current budget amount is sufficient to support those needs at this time.

PROJECTED FUND BALANCES

The chart below illustrates WSBA's reserve balances at the end of FY 2027. Approving the FY 2027 budget reflects an intentional use of WSBA's reserves. This plan includes intentionally setting license fees lower than what is needed to balance the annual budget. Consequently, it is essential to consider how WSBA's reserve balances will be affected if the FY 2027 budget is approved. This analysis assumes that WSBA's financial results for FY 2026 match the budget projections; however, WSBA has historically performed better than its budgeted figures.

	BALANCE @ 9/30/2025	FY 2026 BUDGET	FY 2027 BUDGET 1st DRAFT	ESTIMATED BALANCE @ 9/30/2027
GENERAL FUND	$10,030,146	($917,304)	($1,272,198)	**$7,840,644**
OPERATING	$2,500,000	$0	$0	**$2,500,000**
FACILITIES	$159,925	($744)	($744)	**$158,437**
SPECIAL PROJECTS & INNOVATION	$616,067	($224,255)	($91,812)	**$300,000**
UNRESTRICTED	$6,754,154	($692,306)	($1,179,641)	**$4,882,207**
CLE FUND	$1,233,727	($131,482)	($40,163)	**$1,062,082**
CLIENT PROTECTION	$5,307,092	+$244,100	($555,272)	**$4,995,920**

ATTACHMENTS

A	**Draft FY 2027 General Fund Budget**
B	**Draft FY 2027 CLE Budget**
C	**Draft FY 2027 CPF Budget**
D	**Draft FY 2027 Capital Budget**
E	**Budget Glossary**

ATTACHMENT A

Washington State Bar Association Financial Summary
Fiscal Year 2027 Budget

Category	FY27 Budget Revenues	FY27 Budget Indirect Expenses	FY27 Budget Direct Expenses	FY27 Budget Total Expenses	FY27 Budget Net Result
Access to Justice	-	266,015	181,600	447,615	(447,615)
Admissions/Bar Exam	1,851,240	1,171,250	492,095	1,663,345	187,895
Advancement FTE	-	342,650	4,400	347,050	(347,050)
Bar News	634,600	345,372	407,945	753,317	(118,717)
Board of Governors	-	238,964	366,900	605,864	(605,864)
Conference and Broadcast Services	-	85,276	-	85,276	(85,276)
Character & Fitness Board	-	171,242	27,000	198,242	(198,242)
Communications Strategies	1,000	714,799	240,465	955,264	(954,264)
Communications Strategies FTE	-	269,210	-	269,210	(269,210)
Discipline	83,000	7,040,897	193,303	7,234,200	(7,151,200)
Diversity	115,000	326,480	70,180	396,660	(281,660)
Entity Regulation	87,000	97,768	28,949	126,717	(39,717)
Facilities and Operations	-	821,922	5,071	826,993	(826,993)
Finance	450,000	1,271,431	4,955	1,276,386	(826,386)
Foundation	-	187,453	21,917	209,370	(209,370)
Human Resources	-	574,740	-	574,740	(574,740)
Law Clerk Program	313,000	181,883	56,860	238,744	74,256
Legislative	-	280,767	27,290	308,057	(308,057)
Legal Lunchbox	34,000	60,643	8,100	68,743	(34,743)
Licensing and Membership Records	509,300	850,078	37,067	887,146	(377,846)
Licensing Fees	18,046,531	-	-	-	18,046,531
Limited License Legal Technician	15,450	70,268	9,500	79,768	(64,318)
Limited Practice Officers	180,600	96,244	29,792	126,037	54,563
Mandatory CLE	1,392,750	700,492	150,032	850,525	542,225
Member Wellness Program	6,000	303,061	5,675	308,736	(302,736)
Member Services & Engagement	14,400	333,236	135,320	468,556	(454,156)
Mini CLE	-	135,582	-	135,582	(135,582)
New Member Education	120,000	120,264	4,000	124,264	(4,264)
Office of General Counsel	-	1,176,318	26,200	1,202,518	(1,202,518)
Office of the Executive Director	-	960,339	137,925	1,098,264	(1,098,264)
OGC-Disciplinary Board	-	230,821	137,250	368,071	(368,071)
Practice of Law Board	-	115,858	3,200	119,058	(119,058)
Practice Management Assistance	66,000	186,961	94,795	281,756	(215,756)
Professional Responsibility Program	-	313,855	7,390	321,245	(321,245)
Public Service Programs	118,317	322,255	19,700	341,955	(223,638)
Publication and Design Services	-	131,184	5,000	136,184	(136,184)
Regulatory Services FTE	-	439,205	14,890	454,095	(454,095)
Regulatory Reform	-	54,689	40,000	94,689	(94,689)
Sections Administration	275,000	353,803	2,400	356,203	(81,203)
Technology	-	954,927	-	954,927	(954,927)
Volunteer Engagement	-	261,600	28,417	290,017	(290,017)
Subtotal General Fund	**24,313,188**	**22,559,802**	**3,025,584**	**25,585,386**	**(1,272,198)**
Expenses using reserve funds				(92,557)	92,557
Total General Fund - Net Result from Operations	**24,313,188**			**25,492,829**	**(1,179,641)**
CLE-Seminars and Products	1,470,890	1,086,979	306,965	1,393,944	76,946
CLE - Deskbooks	146,000	260,001	3,108	263,109	(117,109)
Total CLE	**1,616,890**	**1,346,980**	**310,073**	**1,657,053**	**(40,163)**
Expenses using Facilities Reserve funds	-			-	-
Total CLE Fund - Net Result from Operations	**1,616,890**			**1,657,053**	**(40,163)**
Total All Sections	**-**		**-**	**-**	**-**
Client Protection Fund-Restricted	**155,000**	**198,672**	**511,600**	**710,272**	**(555,272)**
Expenses using Facilities Reserve funds	-			-	-
Total CPF Fund - Net Result from Operations	**155,000**			**710,272**	**(555,272)**
Totals	**26,085,078**	**24,105,454**	**3,847,257**	**27,952,711**	**(1,867,633)**
Totals Net of Use of Reserve Funds	**26,085,078**	**24,105,454**	**3,847,257**	**27,860,154**	**(1,775,076)**

Washington State Bar Association
Budget Comparison

Cost Center	FY27 FTE	143.90							
All	FY26 FTE	141.50							
			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
Revenue	40200	COPY FEES	-	-	-		-	-
	40205	DIVERSION	9,000	6,000	(3,000)	-33%	2,500	2,000
	40210	RECORDS REQUEST FEES	-	-	-		270	-
	40300	DONATIONS & GRANTS	267,635	233,317	(34,318)	-13%	271,846	142,139
	40500	INTEREST - INVESTMENTS	800,000	595,000	(205,000)	-26%	1,057,586	419,200
	40600	LICENSE FEES	16,922,074	17,279,644	357,570	2%	16,399,640	8,185,024
	40605	ENTITY LICENSE FEES	-	-	-		-	-
	40610	ENTITY LATE LICENSE FEES	-	-	-		-	-
	40625	LICENSE FEES - NEW ADMITTEES	465,192	451,887	(13,305)	-3%	457,728	288,154
	40650	LICENSE FEES - LATE FEES	250,000	300,000	50,000	20%	455,102	477,437
	40675	LICENSE FEES - REINSTATEMENTS	15,000	15,000	-	0%	18,950	7,288
	40705	EXAM SOFTWARE REVENUE	9,500	-	(9,500)	-100%	32,820	-
	40800	PUBLICATIONS REVENUE	1,250	-	(1,250)	-100%	2,798	-
	40900	ROYALTIES	74,800	82,400	7,600	10%	85,972	45,349
	40950	NME PRODUCT SALES	120,000	100,000	(20,000)	-17%	139,406	90,654
	41000	SHIPPING & HANDLING	210	-	(210)	-100%	117	36
	41100	STATUS CERTIFICATE FEES	29,000	29,000	-	0%	30,900	17,174
	41325	LUNCHEON REGISTRATION	-	-	-		910	4,485
	41435	BENCH-BAR-PRESS MEMBERSHIP DUES	-	-	-		200	1,800
	41450	SPONSORSHIPS	11,500	9,000	(2,500)	-22%	11,600	9,000
	41500	ANNUAL OR OTHER MEETING REV	7,500	-	(7,500)	-100%	3,625	-
	41650	RECEPTIONS REVENUE	-	-	-		4,300	-
	41700	CONFERENCES & INSTITUTES	2,793	-	(2,793)	-100%	99,012	-
	41800	SEMINAR REGISTRATIONS	742,535	673,890	(68,645)	-9%	570,321	158,876
	41805	MINI-CLE REVENUE	32,780	-	(32,780)	-100%	38,660	21,782
	41825	SEMINAR REVENUE-OTHER	32,500	35,500	3,000	9%	27,915	16,000
	41850	SEMINAR SPLITS W/ CLE	(13,650)	(135,000)	(121,350)	889%	0	-
	41855	CLE SECTION SPLITS PROJECTIONS	-	-	-		-	-
	41875	SEMINAR SPLITS W/ OTHERS	21,500	-	(21,500)	-100%	25,069	1,498
	42207	BAR EXAM FEES	1,300,000	1,554,500	254,500	20%	1,527,975	1,209,695
	42230	BAR EXAM LATE FEES	95,000	65,000	(30,000)	-32%	67,200	42,600
	42232	HOUSE COUNSEL APPLICATION FEES	55,000	45,000	(10,000)	-18%	56,490	18,430
	42233	APPLICATION FEES	28,000	22,000	(6,000)	-21%	-	15,000
	42234	ANNUAL FEES	47,500	65,000	17,500	37%	-	-
	42236	PORTFOLIO APPLICATION FEES	-	148,000	148,000		-	-
	42270	RULE 9/LEGAL INTERN FEES	13,000	31,800	18,800	145%	16,400	2,650
	42275	LAW CLERK FEES	220,000	308,000	88,000	40%	251,493	251,667
	42281	LLLT LICENSE FEES	17,000	15,000	(2,000)	-12%	16,235	8,012
	42285	FOREIGN LAW CONSULTANT FEES	1,940	1,940	-	0%	2,910	970
	42286	LAW CLERK APPLICATION FEES	4,000	5,000	1,000	25%	5,100	3,300
	42287	SPECIAL ADMISSIONS	5,000	5,000	-	0%	9,590	4,190
	42288	INVESTIGATION FEES	26,000	25,600	(400)	-2%	26,900	11,080
	42290	PRO HAC VICE	435,000	450,000	15,000	3%	478,994	281,982
	42291	LLLT LATE LICENSE FEES	137	300	163	119%	365	541
	42450	AUDIT REVENUE	1,000	2,000	1,000	100%	680	914
	42570	50 YEAR MEMBER TRIBUTE LUNCH	1,000	1,000	-	0%	1,231	-
	42710	BNEWS DISPLAY ADVERTISING	405,000	450,000	45,000	11%	462,242	254,289
	42720	BNEWS SUBSCRIPT/SINGLE ISSUES	100	100	-	0%	108	140
	42730	BNEWS CLASSIFIED ADVERTISING	2,500	2,500	-	0%	4,952	2,773
	42760	JOB TARGET ADVERTISING	120,000	180,000	60,000	50%	107,157	60,340
	43100	DESKBOOK SALES	5,120	10,000	4,880	95%	14,722	3,386
	43200	COURSEBOOK SALES	3,500	3,500	-	0%	980	325
	43400	DIGITAL VIDEO SALES	900,000	925,000	25,000	3%	904,335	539,773
	43450	SECTION PUBLICATION SALES	-	-	-		90	70
	43455	LEXIS/NEXIS ROYALTIES	75,000	96,000	21,000	28%	67,020	20,594
	43525	CASEMAKER ROYALTIES	25,000	40,000	15,000	60%	38,162	9,878
	44100	WSBA LOGO MERCHANDISE SALES	2,000	-	(2,000)	-100%	2,039	-
	44350	RECOVERY OF DISCIPLINE COSTS	65,000	60,000	(5,000)	-8%	49,963	36,441
	44450	DISCIPLINE HISTORY SUMMARY	19,000	21,000	2,000	11%	21,317	11,940
	44820	CPF RESTITUTION	10,000	10,000	-	0%	20,766	3,352
	44840	CPF MEMBER ASSESSMENTS	735,480	-	(735,480)	-100%	732,050	711,290
	45040	MEMBER CONTACT INFORMATION	5,000	5,000	-	0%	4,773	4,055
	45060	PHOTO BAR CARD SALES	260	300	40	15%	648	324
	45110	LPO EXAMINATION FEES	16,000	18,000	2,000	13%	13,100	10,700
	45115	LPO EXAM LATE FEES	2,000	2,000	-	0%	1,600	1,400
	45120	LPO LICENSE FEES	158,000	154,000	(4,000)	-3%	155,249	74,080
	45125	LPO LATE LICENSE FEES	2,000	3,000	1,000	50%	3,750	3,450
	45210	ACTIVITY APPLICATION FEE	670,000	700,000	30,000	4%	708,300	344,400
	45215	ACTIVITY APPLICATION LATE FEE	250,000	260,000	10,000	4%	268,800	129,500
	45220	MCLE LATE FEES	235,150	253,150	18,000	8%	258,050	244,825
	45230	ANNUAL ACCREDITED SPONSOR FEES	36,250	36,750	500	1%	40,000	36,250
	45250	ATTENDANCE LATE FEES	120,000	116,000	(4,000)	-3%	104,200	55,500
	45255	COMITY CERTIFICATES - REQUEST	13,000	13,000	-	0%	14,175	9,825
	45260	COMITY CERTIFICATES - SUBMIT	17,000	17,000	-	0%	19,700	16,450
	47100	TRIAL ADVOCACY PROGRAM	12,000	13,000	1,000	8%	13,369	(149)
	48010	REIMBURSEMENTS FROM SECTIONS	275,000	275,000	-	0%	276,103	388,434
	48200	SECTION DUES REVENUE	341,573	-	(341,573)	-100%	435,406	481,596
	48225	FISCAL/MEMBERSHIP YEAR ADJUSTMENT	109,570	-	(109,570)	-100%	(2,543)	144,288
		Total Revenue	**26,681,199**	**26,085,078**	**(596,121)**	**-2%**	**26,939,391**	**15,338,446**
Direct	50015	DEPRECIATION	37,278	40,280	3,002	8%	10,792	17,448

50020	BANK FEES	500	500	-	0%	(3,317)	(94)
50033	CONSULTING SERVICES	1,052,147	967,500	(84,647)	-8%	342,246	398,689
50034	IT EXPENSE DUE TO GF	1,103	-	(1,103)	-100%	-	400
50037	DONATIONS/SPONSORSHIPS/GRANTS	-	-	-		250,352	(5,178)
50050	EQUIPMENT, HARDWARE & SOFTWARE	2,635	3,317	682	26%	2,635	1,318
50060	POSTAGE	142,900	168,700	25,800	18%	146,521	86,754
50070	PRINTING & COPYING	245,000	244,800	(200)	0%	219,750	132,182
50080	PUBLICATIONS PRODUCTION	350	350	-	0%	122	-
50085	NEW MEMBER LIAISON SECTION PROGRAM	1,300	1,300	-	0%	585	565
50095	CLE COMPS	-	-	-		390	-
50100	STAFF TRAVEL/PARKING	103,271	126,436	23,165	22%	72,936	33,552
50110	STAFF CONFERENCE & TRAINING	169,850	175,200	5,350	3%	101,485	59,342
50120	STAFF MEMBERSHIP DUES	23,403	24,091	688	3%	17,313	16,337
50125	TASK FORCE EXPENSES	-	-	-		-	-
50130	SUBSCRIPTIONS	13,242	21,262	8,020	61%	8,120	5,360
50135	TRANSCRIPTION SERVICES	-	-	-		-	-
50140	SUPPLIES	6,365	6,350	(15)	0%	6,870	1,446
50145	SURVEYS	-	20,000	20,000		-	-
50155	DIGITAL/ONLINE DEVELOPMENT	2,000	2,287	287	14%	903	21
50160	TELEPHONE	93,575	98,575	5,000	5%	94,685	48,448
50165	CONFERENCE CALLS	1,660	-	(1,660)	-100%	568	113
50185	MEETING EXPENSE	2,000	-	(2,000)	-100%	2,098	-
52110	PRO BONO & PUBLIC SERVICE COMMITTEE	3,500	7,500	4,000	114%	2,361	1,882
52121	ATJ BOARD RETREAT	6,000	4,000	(2,000)	-33%	5,181	-
52125	LEADERSHIP TRAINING	45,000	34,000	(11,000)	-24%	30,955	3,450
52140	ATJ BOARD EXPENSE	51,900	48,000	(3,900)	-8%	55,193	4,659
52210	FACILITY, PARKING, FOOD	160,485	155,200	(5,285)	-3%	149,983	49,665
52215	EXAM GRADING	43,750	73,400	29,650	68%	42,750	21,750
52221	UBE EXAMINATIONS	46,200	1,000	(45,200)	-98%	144,408	40,859
52225	BOARD OF BAR EXAMINERS	45,000	50,000	5,000	11%	20,372	6,235
52230	BAR EXAM PROCTORS	10,000	14,400	4,400	44%	19,674	8,486
52235	CHARACTER & FITNESS BOARD EXP	12,000	15,000	3,000	25%	11,065	5,139
52240	DISABILITY ACCOMMODATIONS	86,500	101,500	15,000	17%	76,184	47,694
52245	CHARACTER & FITNESS INVESTI	1,600	1,600	-	0%	1,225	-
52246	INVESTIGATION	9,900	7,980	(1,920)	-19%	-	-
52250	LAW SCHOOL VISITS	1,500	1,500	-	0%	21	23
52255	LAW CLERK BOARD	9,000	6,000	(3,000)	-33%	5,950	5,122
52258	LAW CLERK OUTREACH	20,000	15,000	(5,000)	-25%	11,025	13,705
52270	DEPRECIATION-SOFTWARE	-	-	-		-	-
52511	BAR LEADERS SUMMIT	35,000	35,700	700	2%	33,963	-
52520	ABA DELEGATES	18,000	16,000	(2,000)	-11%	12,947	6,876
52521	VOLUNTEER RECOGNITION	2,000	2,000	-	0%	39	660
52522	WSBA REPRESENTATIVE	-	500	500		-	-
52540	SECTION/COMMITTEE CHAIR MTGS	500	400	(100)	-20%	89	71
52570	APEX	52,500	60,000	7,500	14%	57,594	380
52573	50 YEAR MEMBER TRIBUTE LUNCH	38,000	44,913	6,913	18%	29,644	-
52585	WASHINGTON LEADERSHIP INSTITUTE	100,000	100,000	-	0%	100,000	100,000
52590	BAR LEADERS CONFERENCE	-	-	-		-	-
52660	JUD RECOMMEND COMMITTEE	3,250	3,250	-	0%	1,675	1,096
52680	DEI COUNCIL	7,600	5,600	(2,000)	-26%	4,323	1,917
52681	DIVERSITY EVENTS & PROJECTS	33,600	43,300	9,700	29%	14,329	5,091
52683	LLLT BOARD	9,000	9,000	-	0%	2,702	1,304
52687	STAFF EQUITY LEADERSHIP LAB	6,000	7,500	1,500	25%	2,039	2,949
52688	EXAM WRITING	15,000	15,000	-	0%	8,400	4,200
52689	LLLT EDUCATION	1,000	500	(500)	-50%	35	-
52691	OUTREACH EXPENSES	10,000	10,000	-	0%	-	-
52692	OUTREACH & COMMUNICATION	10,000	10,000	-	0%	-	-
52710	GRAPHICS/ARTWORK	1,000	1,000	-	0%	75	-
52750	EDITORIAL ADVIS COMMITTEE EXP	300	300	-	0%	-	-
52810	BOG MEETINGS	175,000	160,000	(15,000)	-9%	148,846	46,003
52812	NEW GOVERNOR ORIENTATION	7,000	5,000	(2,000)	-29%	249	-
52820	BOG COMMITTEES' EXPENSES	11,200	10,000	(1,200)	-11%	4,786	2,305
52821	BOG RETREAT	40,000	40,000	-	0%	43,964	31,539
52822	BOG CONFERENCE ATTENDANCE	56,500	48,000	(8,500)	-15%	37,343	16,727
52823	PRESIDENT'S PHOTO	3,300	3,300	-	0%	1,966	-
52830	BOG TRAVEL & OUTREACH	70,000	52,000	(18,000)	-26%	41,245	42,518
52840	ED TRAVEL & OUTREACH	6,000	6,000	-	0%	4,883	3,010
52874	PUBLIC DEFENSE	11,000	26,500	15,500	141%	2,279	4,106
52878	COMMUNICATIONS OUTREACH	8,000	15,600	7,600	95%	12,049	2,814
52880	BOG ELECTIONS	26,900	25,000	(1,900)	-7%	16,298	-
52891	LONG RANGE STRATEGIC PLANNING COUNC	-	-	-		-	-
52940	BOARD OF TRUSTEES	3,600	7,000	3,400	94%	3,593	100
52960	PRESIDENT'S DINNER	12,000	13,000	1,000	8%	10,869	-
53210	COST OF SALES - DESKBOOKS	2,800	-	(2,800)	-100%	2,453	1,195
53220	COST OF SALES - COURSEBOOKS	300	-	(300)	-100%	69	27
53225	COST OF SALES - SECTION PUBLIC	-	-	-		(74)	-
53250	A/V DEVELOP COSTS (RECORDING)	-	-	-		-	-
53260	OBSOLETE INVENTORY	118,700	-	(118,700)	-100%	48,248	65,597
53255	CLE-EQUIP-DEPRECIATION	-	-	-		2,039	-
53265	SPLITS TO SECTIONS	-	-	-		-	-
53270	DESKBOOK ROYALTIES	-	-	-		-	193
53280	ONLINE EXPENSES	-	-	-		-	-
53282	SOFTWARE HOSTING	91,457	102,760	11,303	12%	69,208	42,792
53283	ON24 OVERAGE CHARGE	4,500	4,500	-	0%	4,414	4,422
53285	ONLINE PRODUCT HOSTING EXPENSES	54,000	30,000	(24,000)	-44%	47,861	17,851
53320	POSTAGE & DELIVERY-DESKBOOKS	300	300	-	0%	-	21
53330	POSTAGE & DELIVRY-COURSEBOOKS	200	-	(200)	-100%	59	28
53610	COURSEBOOK PRODUCTION	150	150	-	0%	-	-
53620	POSTAGE - FLIERS/CATALOGS	-	-	-		-	-
53640	ACCREDITATION FEES	2,500	2,250	(250)	-10%	1,752	2,040

53660	SEMINAR BROCHURES	-	-	-		-	-
53690	FACILITIES	175,000	189,900	14,900	9%	164,373	47,107
53700	SPEAKERS & PROGRAM DEVELOP	45,800	49,300	3,500	8%	25,859	6,666
53730	HONORARIUM	4,500	4,500	-	0%	-	-
53731	INSURANCE REBATE	-	-	-		(980)	-
53740	CLE SEMINAR COMMITTEE	200	-	(200)	-100%	-	-
54026	IMAGE LIBRARY	4,800	4,800	-	0%	4,756	4,756
54027	BAR OUTREACH	22,000	20,000	(2,000)	-9%	16,256	15,730
54065	AMBASSADOR TRAINING & TOWN HALLS	10,000	10,000	-	0%	-	-
54130	PRO BONO OUTREACH	4,000	6,000	2,000	50%	2,127	-
54310	COURT REPORTERS	110,350	97,000	(13,350)	-12%	80,877	54,131
54320	OUTSIDE COUNSEL EXPENSES	500	500	-	0%	-	-
54360	LITIGATION EXPENSES	31,000	25,500	(5,500)	-18%	12,748	7,710
54370	DISABILITY EXPENSES	15,000	17,000	2,000	13%	8,427	4,696
54391	LAW LIBRARY DESKBOOK ACCESS	10,000	-	(10,000)	-100%	9,311	-
54400	TRANSLATION SERVICES	10,000	28,000	18,000	180%	4,376	8,190
54430	PRACTICE MONITOR EXPENSES	-	-	-		-	-
54512	STAFF TRAINING- GENERAL	29,300	18,000	(11,300)	-39%	4,971	3,764
54520	RECRUITING AND ADVERTISING	8,750	8,750	-	0%	5,013	1,778
54530	HR INFORMATION SYSTEM	65,950	60,000	(5,950)	-9%	50,000	34,975
54540	SALARY SURVEYS	3,000	1,000	(2,000)	-67%	-	934
54590	TRANSFER TO INDIRECT EXPENSE	(115,700)	(95,550)	20,150	-17%	(62,998)	(46,168)
54610	LIBRARY MATERIALS/RESOURCES	4,000	4,000	-	0%	1,532	292
54645	LEGAL TECH TASK FORCE	3,500	-	(3,500)	-100%	2,750	-
54715	MEMBER WELL-BEING TASK FORCE	4,500	-	(4,500)	-100%	2,542	39
54810	GIFTS TO INJURED CLIENTS	500,000	500,000	-	0%	249,483	15,700
54820	CPF BOARD	2,000	1,500	(500)	-25%	553	864
54910	RENT - OLYMPIA OFFICE	-	-	-		-	-
54920	CONTRACT LOBBYIST	12,500	15,000	2,500	20%	15,000	9,375
54940	LEGISLATIVE COMMITTEE	1,250	1,250	-	0%	130	-
54970	BOG LEGISLATIVE COMMITTEE	300	300	-	0%	-	-
55010	LICENSING FORMS	-	-	-		-	-
55110	LPO EXAM FACILITIES	-	-	-		-	-
55130	LPO BOARD EXPENSES	4,000	4,000	-	0%	1,277	267
55165	LPO OUTREACH	500	500	-	0%	-	-
55210	MCLE BOARD EXPENSES	6,000	3,000	(3,000)	-50%	1,806	531
55220	DEPRECIATION-SOFTWARE	142,057	142,057	0	0%	144,144	72,072
55250	VLEX FASTCASE	87,000	90,000	3,000	3%	84,568	87,812
55265	SPEAKERS & PROGRAM DEVELOPMENT	500	500	-	0%	106	-
55266	NEW MEMBER OUTREACH EVENTS	5,000	18,500	13,500	270%	4,807	938
55270	WASHINGTON NEW MEMBERS COMMITTEE	15,000	30,500	15,500	103%	5,587	8,581
55285	OPEN SECTIONS NIGHT	-	-	-		-	-
55310	DISCIPLINARY BOARD EXPENSES	3,000	3,000	-	0%	1,548	-
55320	CHIEF HEARING OFFICER	41,200	41,200	-	0%	39,996	19,998
55330	HEARING OFFICER EXPENSES	4,000	2,500	(1,500)	-38%	377	149
55340	HEARING OFFICER TRAINING	1,000	2,500	1,500	150%	-	900
55370	APPOINTED COUNSEL	50,645	52,200	1,555	3%	50,400	25,270
55380	DISCIPLINARY SELECTION PANEL	1,000	500	(500)	-50%	-	-
55419	COURT RULES COMMITTEE	1,000	1,000	-	0%	-	-
55510	PRACTICE OF LAW BOARD	16,000	3,000	(13,000)	-81%	740	197
55555	NEW EXPENSE ACCOUNT NEEDED	-	-	-		-	-
55610	CPE COMMITTEE	1,000	1,000	-	0%	286	-
55615	WILLS	1,000	1,000	-	0%	-	-
55620	CUSTODIANSHIP	5,000	2,500	(2,500)	-50%	201	301
55970	MEMBER ENGAGEMENT COUNCIL	500	500	-	0%	-	-
55980	SMALL TOWN AND RURAL COUNCIL	7,500	7,500	-	0%	1,586	-
55981	SMALL TOWN & RURAL COUNCIL OUTREACH & ACTIVITIES	70,000	55,000	(15,000)	-21%	61,910	3,000
55911	CLOUD INFRASTRUCTURE	130,000	130,000	-	0%	66,849	25,643
55995	BENCH-BAR-PRESS LUNCHEON	-	-	-		-	4,935
56100	COMPUTER HARDWARE	65,000	80,000	15,000	23%	66,055	41,040
56150	COMPUTER SOFTWARE	518,000	476,000	(42,000)	-8%	362,082	249,256
56225	HARDWARE SERVICE & WARRANTIES	50,000	50,000	-	0%	41,848	14,413
56230	SOFTWARE MAINT & LICENSING	470,000	410,000	(60,000)	-13%	362,502	212,740
56500	COMPUTER SUPPLIES	-	-	-		-	-
56550	THIRD PARTY SERVICES	177,600	180,000	2,400	1%	97,718	104,166
56900	TRANSFER TO INDIRECT EXPENSES	(2,527,807)	(2,355,300)	172,507	-7%	(1,409,992)	(1,080,926)
57320	TRIAL ADVOCACY EXPENSES	3,200	3,500	300	9%	2,432	-
57450	REGULATORY SCHOOL	10,000	6,000	(4,000)	-40%	7,767	5,286
57460	LAW SCHOOL OUTREACH	500	500	-	0%	-	66
58125	ANNUAL OR OTHER MEETING EXPENS	27,200	-	(27,200)	-100%	12,693	3,000
58150	ATTENDANCE AT BOG MEETINGS	2,604	-	(2,604)	-100%	754	-
58175	AWARDS	6,460	1,000	(5,460)	-85%	2,163	230
58200	BREAKFAST/LUNCH/DINNER MTG EXP	1,500	-	(1,500)	-100%	-	-
58225	CONFERENCE/INSTITUTE EXPENSE	-	54,000	54,000		124,626	-
58300	EXECUTIVE COMMITTEE EXPENSES	57,645	-	(57,645)	-100%	27,211	22,470
58305	EXECUTIVE COMM EXP - OTHER	76,000	-	(76,000)	-100%	72,387	4,047
58315	HONORARIUM	4,500	-	(4,500)	-100%	-	-
58325	LDSHIP/PROF DEVELOP/RETREATS	107,860	-	(107,860)	-100%	51,341	53,640
58326	LEGISLATIVE/LOBBYING	2,500	-	(2,500)	-100%	-	-
58350	MEMBERSHIP & RECRUITING EXP	44,720	-	(44,720)	-100%	17,325	2,726
58375	NEWSLETTER/PUBLICATION EXPENSE	20,000	-	(20,000)	-100%	5,362	3,701
58400	PER MEMBER CHARGE	210,431	-	(210,431)	-100%	276,344	296,400
58415	FISCAL/MEMBERSHIP YEAR ADJUSTMENT	70,108	-	(70,108)	-100%	(242)	92,034
58450	RECEPTION/FORUM EXPENSE	69,890	25,000	(44,890)	-64%	24,698	11,232
58500	NEW MEMBER OUTREACH	5,220	-	(5,220)	-100%	1,068	-
58525	SCHOLARSHIPS/DONATIONS/GRANT	211,700	4,000	(207,700)	-98%	152,901	6,000
58550	SECTION COMMITTEE EXPENSE	6,000	-	(6,000)	-100%	4,155	6,026
58600	SECTION SPECIAL PROJECTS	9,550	-	(9,550)	-100%	300	1,500
58615	LAW SCHOOL OUTREACH	26,510	-	(26,510)	-100%	4,088	500

	58620	MINI-CLE EXPENSE	45,983	-	(45,983)	-100%	13,809	2,820
	58625	SEMINAR EXPENSE - SECTIONS	97,500	-	(97,500)	-100%	13,537	11,481
	58675	WEBSITE EXPENSES	11,880	-	(11,880)	-100%	3,376	4,722
	58680	ELECTIONS	-	-	-		-	-
	58750	SEMINAR SCHOLARSHIPS	5,500	-	(5,500)	-100%	1,340	1,392
		Total Direct Expenses	**4,942,227**	**3,847,257**	**(1,094,969)**	**-22%**	**4,026,596**	**1,904,296**
					-			
Indirect	**51110**	SALARIES	14,130,725	14,860,838	730,113	5%	14,084,308	6,995,854
	51120	BUDGETED TEMPORARY EMPLOYEES	212,850	166,668	(46,182)	-22%	227,350	85,716
	51121	UNANTICIPATED TEMPS	-	-	-		11,970	-
	51122	STAFF REPLACEMENT TEMPS	-	-	-		176,243	-
	51115	SEVERANCE PAY	-	-	-		101,712	-
	51126	EMPLOYEE PLACEMENT FEES	-	-	-		24,773	-
	51130	VACATION & COMP TIME ACCRUALS	-	-	-		42,391	103,071
	51199	SALARY EXPENSE			-		-	-
	51210	EMPLOYEE ASSISTANCE PLAN	4,800	4,800	0	0%	4,800	2,400
	51220	EMPLOYEE SERVICE AWARDS	2,260	2,090	(170)	-8%	2,530	60
	51230	FICA (EMPLOYER PORTION)	1,067,890	1,122,512	54,623	5%	1,074,861	522,305
	51240	L&I INSURANCE	65,406	72,135	6,728	10%	58,255	29,051
	51245	WA STATE FAMILY MEDICAL LEAVE (ER POR	38,961	52,178	13,217	34%	35,664	20,373
	51250	MEDICAL (EMPLOYER PORTION)	1,959,293	2,450,545	491,252	25%	2,074,232	1,089,424
	51270	RETIREMENT (EMPLOYER PORTION)	778,534	792,765	14,230	2%	1,145,337	388,282
	51280	TRANSPORTATION ALLOWANCE	25,944	40,200	14,256	55%	25,482	26,321
	51290	UNEMPLOYMENT INSURANCE	73,419	94,603	21,184	29%	70,438	37,303
	51299	BENEFITS EXPENSE			-		-	-
	51310	WORKPLACE BENEFITS	60,150	77,200	17,050	28%	62,532	11,410
	51340	HUMAN RESOURCES POOLED EXP	115,700	95,550	(20,150)	-17%	62,998	46,168
	51405	MEETING SUPPORT EXPENSES	9,950	12,720	2,770	28%	9,141	3,200
	51409	RENT EXPENSE	-	-			897,893	448,947
	51410	RENT	923,055	990,000	66,945	7%	93,764	43,313
	51411	MOVE/DOWNSIZING EXPENSES	-	-	-		24,906	-
	51413	RENT - CONFERENCE CENTER	-	-			(31,800)	(11,400)
	51420	PERSONAL PROP TAXES-WSBA	6,500	6,100	(400)	-6%	7,190	3,399
	51430	FURNITURE, MAINT, LH IMP	48,450	44,650	(3,800)	-8%	49,748	17,206
	51435	SAFETY & SECURITY	10,420	10,420	0	0%	-	1,053
	51440	OFFICE SUPPLIES & EQUIP	19,635	19,400	(235)	-1%	16,272	7,636
	51450	FURN, LH IMP, & OFFICE EQUIP DEPREC	224,084	145,806	(78,278)	-35%	142,128	111,586
	51470	COMPUTER HARDWARE DEPREC	47,971	78,249	30,277	63%	45,556	25,997
	51480	COMPUTER SOFTWARE DEPREC	36,319	2,606	(33,713)	-93%	47,391	21,190
	51500	INSURANCE	273,491	287,500	14,009	5%	261,653	133,027
	51501	WORK HOME FURNITURE & EQUIP	10,500	7,000	(3,500)	-33%	4,827	1,666
	51505	PROFESSIONAL FEES-AUDIT	43,500	45,500	2,000	5%	36,577	41,695
	51510	PROFESSIONAL FEES- LEGAL	250,000	250,000	0	0%	166,087	35,221
	51512	ONLINE LEGAL RESEARCH	89,000	89,500	500	1%	83,843	45,223
	51513	ACCOMMODATIONS FUND	6,500	6,500	0	0%	-	-
	51514	TRANSLATION SERVICES	25,000	37,650	12,650	51%	5,976	3,804
	51515	TELEPHONE & INTERNET	33,600	32,640	(960)	-3%	32,670	16,140
	51520	POSTAGE - GENERAL	12,000	7,400	(4,600)	-38%	7,469	4,024
	51525	RECORDS MANAGEMENT	7,500	7,000	(500)	-7%	28,584	-
	51530	BANK FEES (INDIRECT)	27,000	25,000	(2,000)	-7%	7,404	15,017
	51620	PRODUCTION MAINT & SUPPLIES	13,250	12,430	(820)	-6%	11,835	6,271
	51710	COMPUTER POOLED EXPENSES	2,527,807	2,355,300	(172,507)	-7%	1,409,992	1,080,526
	51810	GAIN (LOSS) ON ASSETS	-	-			1,396	-
	51925	ALLOWANCE FOR OPEN POSITIONS	(200,000)	(200,000)	-	0%	-	-
	51955	CAPITAL LABOR & OVERHEAD	-	-	-		(104,685)	(16,181)
	51900	OTHER INDIRECT EXPENSE			-		-	-
	51935	INSURANCE REBATE	-	-	-		(11,679)	-
		TOTAL INDIRECT EXPENSES:	**22,981,465**	**24,105,454**	**1,123,989**	**5%**	**22,530,014**	**11,396,299**
		TOTAL ALL EXPENSES:	**27,923,692**	**27,952,711**	**29,020**	**0%**	**26,556,610**	**13,300,596**
		NET INCOME (LOSS):	**(1,242,493)**	**(1,867,633)**	**(625,140)**	**50%**	**382,781**	**2,037,850**

Washington State Bar Association
Budget Comparison

INDIRECT EXPENSES

Cost Center			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
All	FY27 FTE	143.90						
	FY26 FTE	141.50						
INDIRECT	51110	SALARIES	14,130,725	14,860,838	730,113	5%	14,084,308	6,995,854
	51120	BUDGETED TEMPORARY EMPLOYEES	212,850	166,668	(46,182)	-22%	227,350	85,716
	51121	UNANTICIPATED TEMPS	-	-	-		11,970	-
	51122	STAFF REPLACEMENT TEMPS	-	-			176,243	-
	51115	SEVERANCE PAY	-	-			101,712	
	51126	EMPLOYEE PLACEMENT FEES	-	-			24,773	-
	51130	VACATION & COMP TIME ACCRUALS	-	-			42,391	103,071
	51925	ALLOWANCE FOR OPEN POSITIONS	(200,000)	(200,000)	-	0%	-	-
	51935	INSURANCE REBATE	-	-	-		(11,679)	-
	51955	CAPITAL LABOR & OVERHEAD	-	-	-		(104,685)	(16,181)
	51199	**SALARY EXPENSE**	**14,143,575**	**14,827,506**	**683,931**	**5%**	**14,552,383**	**7,168,460**
	51210	EMPLOYEE ASSISTANCE PLAN	4,800	4,800	0	0%	4,800	2,400
	51220	EMPLOYEE SERVICE AWARDS	2,260	2,090	(170)	-8%	2,530	60
	51230	FICA (EMPLOYER PORTION)	1,067,890	1,122,512	54,623	5%	1,074,861	522,305
	51240	L&I INSURANCE	65,406	72,135	6,728	10%	58,255	29,051
	51245	WA STATE FAMILY MEDICAL LEAVE (ER PORTION)	38,961	52,178	13,217	34%	35,664	20,373
	51250	MEDICAL (EMPLOYER PORTION)	1,959,293	2,450,545	491,252	25%	2,074,232	1,089,424
	51270	RETIREMENT (EMPLOYER PORTION)	778,534	792,765	14,230	2%	1,145,337	388,282
	51280	TRANSPORTATION ALLOWANCE	25,944	40,200	14,256	55%	25,482	26,321
	51290	UNEMPLOYMENT INSURANCE	73,419	94,603	21,184	29%	70,438	37,303
	51299	**BENEFITS EXPENSE**	**4,016,507**	**4,631,827**	**615,320**	**15%**	**4,491,600**	**2,115,520**
	51310	WORKPLACE BENEFITS	60,150	77,200	17,050	28%	62,532	11,410
	51340	HUMAN RESOURCES POOLED EXP	115,700	95,550	(20,150)	-17%	62,998	46,168
	51405	MEETING SUPPORT EXPENSES	9,950	12,720	2,770	28%	9,141	3,200
	51409	RENT EXPENSE	-	-			897,893	448,947
	51410	RENT	923,055	990,000	66,945	7%	93,764	43,313
	51411	MOVE/DOWNSIZING EXPENSES	-	-	-		24,906	-
	51413	RENT - CONFERENCE CENTER	-	-			(31,800)	(11,400)
	51420	PERSONAL PROP TAXES-WSBA	6,500	6,100	(400)	-6%	7,190	3,399
	51430	FURNITURE, MAINT, LH IMP	48,450	44,650	(3,800)	-8%	49,748	17,206
	51435	SAFETY & SECURITY	10,420	10,420	0	0%	-	1,053
	51440	OFFICE SUPPLIES & EQUIP	19,635	19,400	(235)	-1%	16,272	7,636
	51450	FURN, LH IMP, & OFFICE EQUIP DEPREC	224,084	145,806	(78,278)	-35%	142,128	111,586
	51470	COMPUTER HARDWARE DEPREC	47,971	78,249	30,277	63%	45,556	25,997
	51480	COMPUTER SOFTWARE DEPREC	36,319	2,606	(33,713)	-93%	47,391	21,190
	51500	INSURANCE	273,491	287,500	14,009	5%	261,653	133,027
	51501	WORK HOME FURNITURE & EQUIP	10,500	7,000	(3,500)	-33%	4,827	1,666
	51505	PROFESSIONAL FEES-AUDIT	43,500	45,500	2,000	5%	36,577	41,695
	51510	PROFESSIONAL FEES- LEGAL	250,000	250,000	-	0%	166,087	35,221
	51512	ONLINE LEGAL RESEARCH	89,000	89,500	500	1%	83,843	45,223
	51513	ACCOMMODATIONS FUND	6,500	6,500	-	0%	-	-
	51514	TRANSLATION SERVICES	25,000	37,650	12,650	51%	5,976	3,804
	51515	TELEPHONE & INTERNET	33,600	32,640	(960)	-3%	32,670	16,140
	51520	POSTAGE - GENERAL	12,000	7,400	(4,600)	-38%	7,469	4,024
	51525	RECORDS MANAGEMENT	7,500	7,000	(500)	-7%	28,584	-
	51530	BANK FEES (INDIRECT)	27,000	25,000	(2,000)	-7%	7,404	15,017
	51620	PRODUCTION MAINT & SUPPLIES	13,250	12,430	(820)	-6%	11,835	6,271
	51710	COMPUTER POOLED EXPENSES	2,527,807	2,355,300	(172,507)	-7%	1,409,992	1,080,526
	51810	GAIN (LOSS) ON ASSETS	-	-	-		1,396	-
	51900	**OTHER INDIRECT EXPENSE**	**4,821,383**	**4,646,121**	**(175,262)**	**-4%**	**3,486,031**	**2,112,319**
		TOTAL INDIRECT EXPENSES:	**22,981,465**	**24,105,454**	**1,123,989**	**5%**	**22,530,014**	**11,396,299**

Washington State Bar Association
Budget Comparison

ACCESS TO JUSTICE

Cost Center	**FY27 FTE**	**1.67**
ATJ	**FY26 FTE**	**1.61**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	41700	CONFERENCES & INSTITUTES	-	-			94,628	-
	TOTAL REVENUE		**-**	**-**	**-**		**94,628**	**-**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	2,800	11,000	8,200	293%	2,736	298
	50110	STAFF CONFERENCE & TRAINING	4,400	5,100	700	16%	1,570	3,662
	52121	ATJ BOARD RETREAT	6,000	4,000	(2,000)	-33%	5,181	-
	52125	LEADERSHIP TRAINING	10,000	9,000	(1,000)	-10%	5,529	3,450
	52140	ATJ BOARD EXPENSE	51,900	48,000	(3,900)	-8%	55,193	4,659
	52874	PUBLIC DEFENSE	11,000	26,500	15,500	141%	2,279	4,106
	58225	CONFERENCE/INSTITUTE EXPENSE	-	54,000	54,000		124,626	-
	58450	RECEPTION/FORUM EXPENSE	30,000	24,000	(6,000)	-20%	22,092	10,701
	TOTAL DIRECT EXPENSES		**116,100**	**181,600**	**65,500**	**56%**	**219,206**	**26,876**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	152,635	160,030	7,395	5%	157,349	74,953
	51299	BENEFITS EXPENSE	45,272	52,065	6,793	15%	49,834	23,065
	51900	OTHER INDIRECT EXPENSE	55,440	53,920	(1,520)	-3%	39,221	24,452
	TOTAL INDIRECT EXPENSES:		**253,348**	**266,015**	**12,667**	**5%**	**246,405**	**122,471**
	TOTAL ALL EXPENSES:		**369,448**	**447,615**	**78,167**	**21%**	**465,610**	**149,346**
	NET INCOME (LOSS):		**(369,448)**	**(447,615)**	**(78,167)**	**21%**	**(370,982)**	**(149,346)**

Washington State Bar Association
Budget Comparison

ADMISSIONS

Cost Center **FY27 FTE** 7.73
ADMISS **FY26 FTE** 7.45

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	40705	EXAM SOFTWARE REVENUE	9,500	-	(9,500)	-100%	32,820	-
	42207	BAR EXAM FEES	1,300,000	1,554,500	254,500	20%	1,527,975	1,209,695
	42230	BAR EXAM LATE FEES	95,000	65,000	(30,000)	-32%	67,200	42,600
	42232	HOUSE COUNSEL APPLICATION FEES	55,000	45,000	(10,000)	-18%	56,490	18,430
	42236	PORTFOLIO APPLICATION FEES	-	148,000	148,000		-	-
	42270	RULE 9/LEGAL INTERN FEES	13,000	31,800	18,800	145%	16,400	2,650
	42285	FOREIGN LAW CONSULTANT FEES	1,940	1,940	-	0%	2,910	970
	42287	SPECIAL ADMISSIONS	5,000	5,000	-	0%	9,590	4,190
	TOTAL REVENUE		**1,479,440**	**1,851,240**	**371,800**	**25%**	**1,713,385**	**1,278,535**
DIRECT EXPENSES:								
	50060	POSTAGE	2,900	3,700	800	28%	2,881	2,020
	50100	STAFF TRAVEL/PARKING	24,000	25,000	1,000	4%	23,654	9,139
	50110	STAFF CONFERENCE & TRAINING	11,000	11,000	-	0%	7,040	5,354
	50120	STAFF MEMBERSHIP DUES	495	495	-	0%	495	245
	50140	SUPPLIES	2,500	2,500	-	0%	4,340	1,044
	52210	FACILITY, PARKING, FOOD	150,985	155,000	4,015	3%	142,986	46,969
	52215	EXAM GRADING	43,750	68,000	24,250	55%	42,750	21,750
	52221	UBE EXAMINATIONS	46,200	1,000	(45,200)	-98%	144,408	40,859
	52225	BOARD OF BAR EXAMINERS	45,000	50,000	5,000	11%	20,372	6,235
	52230	BAR EXAM PROCTORS	10,000	14,400	4,400	44%	19,674	8,486
	52240	DISABILITY ACCOMMODATIONS	75,000	90,000	15,000	20%	75,023	45,424
	52245	CHARACTER & FITNESS INVESTI	1,500	1,500	-	0%	1,225	-
	52250	LAW SCHOOL VISITS	1,500	1,500	-	0%	21	23
	53282	SOFTWARE HOSTING	45,000	68,000	23,000	51%	46,372	26,488
	TOTAL DIRECT EXPENSES		**459,830**	**492,095**	**32,265**	**7%**	**531,241**	**214,036**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	635,395	691,125	55,730	9%	550,545	308,980
	51299	BENEFITS EXPENSE	198,059	230,465	32,406	16%	183,678	104,302
	51900	OTHER INDIRECT EXPENSE	256,539	249,660	(6,879)	-3%	152,641	112,278
	TOTAL INDIRECT EXPENSES:		**1,089,992**	**1,171,250**	**81,258**	**7%**	**886,865**	**525,560**
	TOTAL ALL EXPENSES:		**1,549,822**	**1,663,345**	**113,523**	**7%**	**1,418,106**	**739,596**
	NET INCOME (LOSS):		**(70,382)**	**187,895**	**258,277**	**-367%**	**295,279**	**538,939**

Washington State Bar Association
Budget Comparison

ADVANCEMENT FTE

Cost Center		
ADV FTE	FY27 FTE	1.53
	FY26 FTE	1.41

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	50110	STAFF CONFERENCE & TRAINING	6,600	4,400	(2,200)	-33%	3,496	140
	TOTAL DIRECT EXPENSES		**6,600**	**4,400**	**(2,200)**	**-33%**	**3,496**	**140**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	216,525	233,499	16,974	8%	261,531	110,065
	51299	BENEFITS EXPENSE	50,531	59,752	9,221	18%	71,378	26,294
	51900	OTHER INDIRECT EXPENSE	48,553	49,399	846	2%	46,366	21,300
	TOTAL INDIRECT EXPENSES:		**315,609**	**342,650**	**27,041**	**9%**	**379,274**	**157,658**
	TOTAL ALL EXPENSES:		**322,209**	**347,050**	**24,841**	**8%**	**382,770**	**157,798**
	NET INCOME (LOSS):		**(322,209)**	**(347,050)**	**(24,841)**	**8%**	**(382,770)**	**(157,798)**

Washington State Bar Association
Budget Comparison

BAR NEWS
Cost Center **FY27 FTE** **2.13**
BN **FY26 FTE** **2.13**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	40900	ROYALTIES	2,000	2,000	-	0%	1,753	-
	42710	BNEWS DISPLAY ADVERTISING	405,000	450,000	45,000	11%	462,242	254,289
	42720	BNEWS SUBSCRIPT/SINGLE ISSUES	100	100	-	0%	108	140
	42730	BNEWS CLASSIFIED ADVERTISING	2,500	2,500	-	0%	4,952	2,773
	42760	JOB TARGET ADVERSTISING	120,000	180,000	60,000	50%	107,157	60,340
	TOTAL REVENUE		**529,600**	**634,600**	**105,000**	**20%**	**576,212**	**317,543**
DIRECT EXPENSES:								
	50060	POSTAGE	135,000	160,000	25,000	19%	139,447	82,591
	50070	PRINTING & COPYING	242,000	242,000	-	0%	217,863	130,615
	50110	STAFF CONFERENCE & TRAINING	2,200	2,200	-	0%	-	999
	50120	STAFF MEMBERSHIP DUES	220	220	-	0%	220	-
	50130	SUBSCRIPTIONS	225	225	-	0%	204	-
	50155	DIGITAL/ONLINE DEVELOPMENT	2,000	2,000	-	0%	903	21
	52710	GRAPHICS/ARTWORK	1,000	1,000	-	0%	75	-
	52750	EDITORIAL ADVIS COMMITTEE EXP	300	300	-	0%	-	-
	TOTAL DIRECT EXPENSES		**382,945**	**407,945**	**25,000**	**7%**	**358,713**	**214,226**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	199,151	206,179	7,028	4%	197,992	101,776
	51299	BENEFITS EXPENSE	59,029	70,422	11,393	19%	62,418	30,950
	51900	OTHER INDIRECT EXPENSE	73,346	68,772	(4,574)	-6%	50,200	32,173
	TOTAL INDIRECT EXPENSES:		**331,526**	**345,372**	**13,846**	**4%**	**310,610**	**164,899**
	TOTAL ALL EXPENSES:		**714,471**	**753,317**	**38,846**	**5%**	**669,323**	**379,125**
	NET INCOME (LOSS):		**(184,871)**	**(118,717)**	**66,154**	**-36%**	**(93,111)**	**(61,582)**

Washington State Bar Association
Budget Comparison

BOARD OF GOVERNORS

Cost Center	**FY27 FTE**	**1.73**
BOG	**FY26 FTE**	**1.73**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-	-	-	-
DIRECT EXPENSES:								
	50140	SUPPLIES	765	600	(165)	-22%	415	350
	52125	LEADERSHIP TRAINING	15,000	10,000	(5,000)	-33%	13,474	-
	52810	BOG MEETINGS	175,000	160,000	(15,000)	-9%	148,846	46,003
	52820	BOG COMMITTEES' EXPENSES	11,200	10,000	(1,200)	-11%	4,786	2,305
	52821	BOG RETREAT	40,000	40,000	-	0%	43,964	31,539
	52822	BOG CONFERENCE ATTENDANCE	56,500	48,000	(8,500)	-15%	37,343	16,727
	52830	BOG TRAVEL & OUTREACH	70,000	52,000	(18,000)	-26%	41,245	42,518
	52880	BOG ELECTIONS	26,900	25,000	(1,900)	-7%	16,298	-
	52960	PRESIDENT'S DINNER	12,000	13,000	1,000	8%	10,869	-
	52812	NEW GOVERNOR ORIENTATION	7,000	5,000	(2,000)	-29%	249	-
	52823	PRESIDENTS PHOTO	3,300	3,300	-	0%	1,966	-
	TOTAL DIRECT EXPENSES		**417,665**	**366,900**	**(50,765)**	**-12%**	**319,455**	**139,442**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	135,043	140,784	5,740	4%	131,344	69,091
	51299	BENEFITS EXPENSE	44,269	42,323	(1,946)	-4%	46,441	23,372
	51900	OTHER INDIRECT EXPENSE	59,572	55,857	(3,715)	-6%	40,803	25,997
	TOTAL INDIRECT EXPENSES:		**238,885**	**238,964**	**79**	**0%**	**218,588**	**118,460**
	TOTAL ALL EXPENSES:		**656,550**	**605,864**	**(50,686)**	**-8%**	**538,044**	**257,901**
	NET INCOME (LOSS):		**(656,550)**	**(605,864)**	**50,686**	**-8%**	**(538,044)**	**(257,901)**

Washington State Bar Association
Budget Comparison

CONFERENCE AND BROADCAST SERVICES

Cost Center	**FY27 FTE**	**0.55**
CBS	**FY26 FTE**	**0.55**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	TOTAL DIRECT EXPENSES		-	-	-		-	-
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	49,269	51,267	1,997	4%	-	25,327
	51299	BENEFITS EXPENSE	14,930	16,251	1,321	9%	-	7,893
	51900	OTHER INDIRECT EXPENSE	18,939	17,758	(1,181)	-6%	-	8,314
	TOTAL INDIRECT EXPENSES:		**83,138**	**85,276**	**2,138**	**3%**	**-**	**41,533**
	TOTAL ALL EXPENSES:		**83,138**	**85,276**	**2,138**	**3%**	**-**	**41,533**
	NET INCOME (LOSS):		**(83,138)**	**(85,276)**	**(2,138)**	**3%**	**-**	**(41,533)**

Washington State Bar Association
Budget Comparison

CHARACTER & FITNESS BOARD

Cost Center	**FY27 FTE**	**0.85**
CFB	**FY26 FTE**	**0.85**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	52235	CHARACTER & FITNESS BOARD EXP	12,000	15,000	3,000	25%	11,065	5,139
	54310	COURT REPORTERS	11,050	12,000	950	9%	8,826	5,943
	TOTAL DIRECT EXPENSES		**23,050**	**27,000**	**3,950**	**17%**	**19,891**	**11,082**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	103,891	108,084	4,193	4%	95,640	53,242
	51299	BENEFITS EXPENSE	26,820	35,714	8,894	33%	26,676	14,044
	51900	OTHER INDIRECT EXPENSE	29,270	27,444	(1,825)	-6%	17,779	12,775
	TOTAL INDIRECT EXPENSES:		**159,981**	**171,242**	**11,262**	**7%**	**140,095**	**80,060**
	TOTAL ALL EXPENSES:		**183,031**	**198,242**	**15,212**	**8%**	**159,986**	**91,143**
	NET INCOME (LOSS):		**(183,031)**	**(198,242)**	**(15,212)**	**8%**	**(159,986)**	**(91,143)**

Washington State Bar Association
Budget Comparison

COMMUNICATION STRATEGIES

Cost Center	FY27 FTE	5.39
COMM	FY26 FTE	5.39

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	42570	50 YEAR MEMBER TRIBUTE LUNCH	1,000	1,000	-	0%	1,231	-
	44100	WSBA LOGO MERCHANDISE SALES	2,000	-	(2,000)	-100%	2,039	-
	TOTAL REVENUE		**3,000**	**1,000**	**(2,000)**	**-67%**	**3,270**	**-**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	5,895	8,445	2,550	43%	2,480	1,188
	50110	STAFF CONFERENCE & TRAINING	11,300	11,300	-	0%	12,182	7,791
	50120	STAFF MEMBERSHIP DUES	1,800	1,800	-	0%	987	537
	50130	SUBSCRIPTIONS	4,520	12,420	7,900	175%	1,993	1,157
	50145	SURVEYS	-	20,000	20,000		-	-
	50155	DIGITAL/ONLINE DEVELOPMENT	-	287	287		-	-
	52511	BAR LEADERS SUMMIT	35,000	35,700	700	2%	33,963	-
	52570	APEX	52,500	60,000	7,500	14%	57,594	380
	52573	50 YEAR MEMBER TRIBUTE LUNCH	38,000	44,913	6,913	18%	29,644	-
	52878	COMMUNICATIONS OUTREACH	8,000	15,600	7,600	95%	12,049	2,814
	54027	BAR OUTREACH	22,000	20,000	(2,000)	-9%	16,256	15,730
	54065	AMBASSADOR TRAINING & TOWN HALLS	10,000	10,000	-	0%	-	-
	TOTAL DIRECT EXPENSES		**189,015**	**240,465**	**51,450**	**27%**	**167,148**	**29,597**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	417,995	415,931	(2,064)	0%	387,587	206,485
	51299	BENEFITS EXPENSE	137,502	124,840	(12,662)	-9%	141,929	72,116
	51900	OTHER INDIRECT EXPENSE	185,603	174,028	(11,576)	-6%	127,339	81,186
	TOTAL INDIRECT EXPENSES:		**741,101**	**714,799**	**(26,302)**	**-4%**	**656,855**	**359,787**
	TOTAL ALL EXPENSES:		**930,116**	**955,264**	**25,148**	**3%**	**824,003**	**389,384**
	NET INCOME (LOSS):		**(927,116)**	**(954,264)**	**(27,148)**	**3%**	**(820,733)**	**(389,384)**

Washington State Bar Association
Budget Comparison

COMMUNICATION STRATEGIES FTE

Cost Center	**FY27 FTE**	**1.00**
COMM FTE	**FY26 FTE**	**1.00**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	TOTAL DIRECT EXPENSES		-	-	-		-	-
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	183,193	189,449	6,256	3%	183,668	94,767
	51299	BENEFITS EXPENSE	39,830	47,473	7,643	19%	45,043	20,681
	51900	OTHER INDIRECT EXPENSE	34,435	32,287	(2,148)	-6%	23,706	15,124
	TOTAL INDIRECT EXPENSES:		**257,458**	**269,210**	**11,752**	**5%**	**252,417**	**130,572**
	NET INCOME (LOSS):		**(257,458)**	**(269,210)**	**(11,752)**	**5%**	**(252,417)**	**(130,572)**

Washington State Bar Association
Budget Comparison

DISCIPLINE
Cost Center **FY27 FTE** **40.00**
DISC **FY26 FTE** **39.00**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	42450	AUDIT REVENUE	1,000	2,000	1,000	100%	680	914
	44350	RECOVERY OF DISCIPLINE COSTS	65,000	60,000	(5,000)	-8%	49,963	35,441
	44450	DISCIPLINE HISTORY SUMMARY	19,000	21,000	2,000	11%	21,317	11,940
	TOTAL REVENUE		**85,000**	**83,000**	**(2,000)**	**-2%**	**71,960**	**48,295**
DIRECT EXPENSES:								
	50080	PUBLICATIONS PRODUCTION	350	350	-	0%	122	-
	50100	STAFF TRAVEL/PARKING	15,000	17,500	2,500	17%	10,929	9,548
	50110	STAFF CONFERENCE & TRAINING	37,800	49,000	11,200	30%	29,817	23,220
	50120	STAFF MEMBERSHIP DUES	7,659	7,953	294	4%	6,995	7,456
	50160	TELEPHONE	3,000	3,000	-	0%	2,291	1,191
	54310	COURT REPORTERS	66,200	50,000	(16,200)	-24%	46,308	24,357
	54320	OUTSIDE COUNSEL EXPENSES	500	500	-	0%	-	-
	54360	LITIGATION EXPENSES	30,000	25,000	(5,000)	-17%	12,431	7,710
	54370	DISABILITY EXPENSES	15,000	17,000	2,000	13%	8,427	4,696
	54400	TRANSLATION SERVICES	10,000	23,000	13,000	130%	4,376	8,190
	TOTAL DIRECT EXPENSES		**185,509**	**193,303**	**7,794**	**4%**	**121,696**	**86,369**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	4,131,360	4,396,833	265,472	6%	3,946,975	2,017,777
	51299	BENEFITS EXPENSE	1,139,859	1,352,578	212,719	19%	1,209,931	588,371
	51900	OTHER INDIRECT EXPENSE	1,342,955	1,291,486	(51,469)	-4%	920,518	587,275
	TOTAL INDIRECT EXPENSES:		**6,614,175**	**7,040,897**	**426,721**	**6%**	**6,077,424**	**3,193,423**
	TOTAL ALL EXPENSES:		**6,799,684**	**7,234,200**	**434,515**	**6%**	**6,199,120**	**3,279,792**
	NET INCOME (LOSS):		**(6,714,684)**	**(7,151,200)**	**(436,515)**	**7%**	**(6,127,161)**	**(3,231,497)**

Washington State Bar Association
Budget Comparison

DIVERSITY

Cost Center **FY27 FTE** **2.15**
DIV **FY26 FTE** **2.24**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	40300	DONATIONS & GRANTS	135,000	115,000	(20,000)	-15%	135,000	135,000
	TOTAL REVENUE		**135,000**	**115,000**	**(20,000)**	**-15%**	**135,000**	**135,000**
DIRECT EXPENSES:								
	50033	CONSULTING SERVICES	3,000	3,000	-	0%	45	-
	50100	STAFF TRAVEL/PARKING	3,700	3,700	-	0%	2,771	394
	50110	STAFF CONFERENCE & TRAINING	4,400	6,300	1,900	43%	2,662	-
	50120	STAFF MEMBERSHIP DUES	775	780	5	1%	655	430
	52680	DEI COUNCIL	7,600	5,600	(2,000)	-26%	4,323	1,917
	52681	DIVERSITY EVENTS & PROJECTS	33,600	43,300	9,700	29%	14,329	5,091
	52687	STAFF EQUITY LEADERSHIP LAB	6,000	7,500	1,500	25%	2,039	2,949
	TOTAL DIRECT EXPENSES		**59,075**	**70,180**	**11,105**	**19%**	**26,824**	**10,781**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	198,124	195,896	(2,228)	-1%	199,629	88,344
	51299	BENEFITS EXPENSE	66,814	61,167	(5,646)	-8%	72,149	30,944
	51900	OTHER INDIRECT EXPENSE	77,134	69,417	(7,716)	-10%	63,447	36,410
	TOTAL INDIRECT EXPENSES:		**342,071**	**326,480**	**(15,591)**	**-5%**	**335,225**	**155,698**
	TOTAL ALL EXPENSES:		**401,146**	**396,660**	**(4,486)**	**-1%**	**362,050**	**166,479**
	NET INCOME (LOSS):		**(266,146)**	**(281,660)**	**(15,514)**	**6%**	**(227,050)**	**(31,479)**

Washington State Bar Association
Budget Comparison

ENTITY REGULATION

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
Cost Center	**FY27 FTE**	**0.40**						
ER	**FY26 FTE**	**0.55**						
REVENUE:								
	42233	APPLICATION FEES	28,000	22,000	(6,000)	-21%	-	15,000
	42234	ANNUAL FEES	47,500	65,000	17,500	37%	-	-
	TOTAL REVENUE		**75,500**	**87,000**	**11,500**	**15%**	**-**	**15,000**
	50015	DEPRECIATION	-	5,863	5,863		-	-
	50110	STAFF CONFERENCE & TRAINING	4,400	4,400	-	0%	-	1,551
	52246	INVESTIGATION	9,600	7,680	(1,920)	-20%	-	-
	52692	OUTREACH & COMMUNICATION	10,000	10,000	-	0%	-	-
	53282	SOFTWARE HOSTING	3,973	1,007	(2,966)	-75%	-	471
	TOTAL DIRECT EXPENSES		**27,973**	**28,949**	**977**	**3%**	**-**	**2,021**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	77,471	67,436	(10,035)	-13%	-	39,987
	51299	BENEFITS EXPENSE	18,673	17,417	(1,256)	-7%	-	9,787
	51900	OTHER INDIRECT EXPENSE	18,939	12,915	(6,024)	-32%	-	8,314
	TOTAL INDIRECT EXPENSES:		**115,083**	**97,768**	**(17,315)**	**-15%**	**-**	**58,088**
	TOTAL ALL EXPENSES:		**143,055**	**126,717**	**(16,338)**	**-11%**	**-**	**60,109**
	NET INCOME (LOSS):		**(67,555)**	**(39,717)**	**27,838**	**-41%**	**-**	**(45,109)**

Washington State Bar Association
Budget Comparison

FACILITIES AND OPERATIONS

Cost Center	**FY27 FTE**	**5.97**
FAC	**FY26 FTE**	**5.78**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	2,376	2,376	-	0%	2,299	1,188
	50110	STAFF CONFERENCE & TRAINING	-	2,500	2,500		512	-
	50120	STAFF MEMBERSHIP DUES	189	195	6	3%	200	-
	TOTAL DIRECT EXPENSES		**2,565**	**5,071**	**2,506**	**98%**	**3,011**	**1,188**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	406,195	461,839	55,644	14%	418,565	218,375
	51299	BENEFITS EXPENSE	141,474	167,328	25,854	18%	152,500	76,631
	51900	OTHER INDIRECT EXPENSE	199,033	192,754	(6,279)	-3%	136,831	86,965
	TOTAL INDIRECT EXPENSES:		**746,702**	**821,922**	**75,220**	**10%**	**707,896**	**381,971**
	TOTAL ALL EXPENSES:		**749,267**	**826,993**	**77,726**	**10%**	**710,907**	**383,159**
	NET INCOME (LOSS):		**(749,267)**	**(826,993)**	**(77,726)**	**10%**	**(710,907)**	**(383,159)**

Washington State Bar Association
Budget Comparison

FINANCE

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
Cost Center	**FY27 FTE**	**6.92**						
FIN	**FY26 FTE**	**6.92**						
REVENUE:								
	40500	INTEREST - INVESTMENTS	600,000	450,000	(150,000)	-25%	746,108	320,276
	TOTAL REVENUE		**600,000**	**450,000**	**(150,000)**	**-25%**	**746,108**	**320,276**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	3,750	3,750	-	0%	2,920	2,882
	50110	STAFF CONFERENCE & TRAINING	500	500	-	0%	303	-
	50120	STAFF MEMBERSHIP DUES	670	705	35	5%	350	230
	TOTAL DIRECT EXPENSES		**4,920**	**4,955**	**35**	**1%**	**3,574**	**3,112**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	777,786	805,328	27,542	4%	763,774	398,571
	51299	BENEFITS EXPENSE	209,178	242,676	33,498	16%	225,519	111,135
	51900	OTHER INDIRECT EXPENSE	238,288	223,427	(14,861)	-6%	163,500	104,200
	51936	FACILITY RESERVE REBATE	-	-			10,962	-
	TOTAL INDIRECT EXPENSES:		**1,225,253**	**1,271,431**	**46,178**	**4%**	**1,163,755**	**613,906**
	TOTAL ALL EXPENSES:		**1,230,173**	**1,276,386**	**46,213**	**4%**	**1,167,328**	**617,018**
	NET INCOME (LOSS):		**(630,173)**	**(826,386)**	**(196,213)**	**31%**	**(421,220)**	**(296,742)**

Washington State Bar Association
Budget Comparison

FOUNDATION
Cost Center **FY27 FTE** **1.05**
FOUND **FY26 FTE** **1.05**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	50033	CONSULTING SERVICES	3,350	3,500	150	4%	3,200	3,350
	50050	EQUIPMENT, HARDWARE & SOFTWARE	2,635	3,317	682	26%	2,635	1,318
	50060	POSTAGE	400	400	-	0%	-	-
	50070	PRINTING & COPYING	1,000	1,000	-	0%	362	-
	50100	STAFF TRAVEL/PARKING	4,000	2,500	(1,500)	-38%	685	21
	50110	STAFF CONFERENCE & TRAINING	2,200	2,200	-	0%	1,687	69
	50140	SUPPLIES	2,000	2,000	-	0%	1,775	11
	52940	BOARD OF TRUSTEES	3,600	7,000	3,400	94%	3,593	100
	TOTAL DIRECT EXPENSES		**19,185**	**21,917**	**2,732**	**14%**	**13,937**	**4,869**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	108,755	112,614	3,859	4%	106,658	56,719
	51299	BENEFITS EXPENSE	30,528	40,937	10,409	34%	32,740	15,890
	51900	OTHER INDIRECT EXPENSE	36,156	33,902	(2,255)	-6%	24,752	15,782
	TOTAL INDIRECT EXPENSES:		**175,440**	**187,453**	**12,013**	**7%**	**164,150**	**88,391**
	TOTAL ALL EXPENSES:		**194,625**	**209,370**	**14,745**	**8%**	**178,087**	**93,261**
	NET INCOME (LOSS):		**(194,625)**	**(209,370)**	**(14,745)**	**8%**	**(178,087)**	**(93,261)**

Washington State Bar Association
Budget Comparison

HUMAN RESOURCES

Cost Center	**FY27 FTE**	**4.00**
HR	**FY26 FTE**	**4.00**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	50033	CONSULTING SERVICES	1,000	1,000	-	0%	-	-
	50100	STAFF TRAVEL/PARKING	300	300	-	0%	121	96
	50110	STAFF CONFERENCE & TRAINING	4,200	4,000	(200)	-5%	1,147	2,577
	50120	STAFF MEMBERSHIP DUES	1,200	1,200	-	0%	752	852
	50130	SUBSCRIPTIONS	2,000	1,300	(700)	-35%	993	1,192
	54512	STAFF TRAINING- GENERAL	29,300	18,000	(11,300)	-39%	4,971	3,764
	54520	RECRUITING AND ADVERTISING	8,750	8,750	-	0%	5,013	1,778
	54530	HR INFORMATION SYSTEM	65,950	60,000	(5,950)	-9%	50,000	34,975
	54540	SALARY SURVEYS	3,000	1,000	(2,000)	-67%	-	934
	54590	TRANSFER TO INDIRECT EXPENSE	(115,700)	(95,550)	20,150	-17%	(62,998)	(46,168)
	TOTAL DIRECT EXPENSES		-	-	-		-	-
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	504,229	519,623	15,394	3%	515,618	220,428
	51299	BENEFITS EXPENSE	98,098	125,969	27,870	28%	135,556	62,305
	51925	ALLOWANCE FOR OPEN POSITIONS	(200,000)	(200,000)	-	0%	-	-
	51900	OTHER INDIRECT EXPENSE	137,739	129,149	(8,590)	-6%	94,474	60,283
	TOTAL INDIRECT EXPENSES:		**540,066**	**574,740**	**34,674**	**6%**	**745,647**	**343,016**
	TOTAL ALL EXPENSES:		**540,066**	**574,740**	**34,674**	**6%**	**745,647**	**343,016**
	NET INCOME (LOSS):		**(540,066)**	**(574,740)**	**(34,674)**	**6%**	**(745,647)**	**(343,016)**

Washington State Bar Association
Budget Comparison

LAW CLERK PROGRAM

Cost Center	**FY27 FTE**	**1.18**	**FY2026 Budget**	**FY2027 Budget**	**FY26 vs. FY27 Comparison**	**% Change**	**FY2025 Actuals YTD**	**FY2026 Actuals YTD**
CLERK	**FY26 FTE**	**1.18**						
REVENUE:								
	42275	LAW CLERK FEES	220,000	308,000	88,000	40%	251,493	251,667
	42286	LAW CLERK APPLICATION FEES	4,000	5,000	1,000	25%	5,100	3,300
	TOTAL REVENUE		**224,000**	**313,000**	**89,000**	**40%**	**256,593**	**254,967**
DIRECT EXPENSES:								
	50015	DEPRECIATION	37,278	34,417	(2,861)	-8%	10,792	17,448
	50130	SUBSCRIPTIONS	331	350	19	6%	300	-
	52245	CHARACTER & FITNESS INVESTI	100	100	-	0%	-	-
	53282	SOFTWARE HOSTING	700	993	293	42%	694	513
	52255	LAW CLERK BOARD	9,000	6,000	(3,000)	-33%	5,950	5,122
	52258	LAW CLERK OUTREACH	20,000	15,000	(5,000)	-25%	11,025	13,705
	TOTAL DIRECT EXPENSES		**67,409**	**56,860**	**(10,549)**	**-16%**	**28,761**	**36,789**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	104,845	111,084	6,240	6%	116,579	50,553
	51299	BENEFITS EXPENSE	31,938	32,700	762	2%	36,511	16,612
	51900	OTHER INDIRECT EXPENSE	40,633	38,099	(2,534)	-6%	28,935	17,709
	TOTAL INDIRECT EXPENSES:		**177,416**	**181,883**	**4,467**	**3%**	**182,024**	**84,874**
	TOTAL ALL EXPENSES:		**244,825**	**238,744**	**(6,081)**	**-2%**	**210,785**	**121,663**
	NET INCOME (LOSS):		**(20,825)**	**74,256**	**95,081**	**-457%**	**45,807**	**133,304**

Washington State Bar Association
Budget Comparison

LEGISLATIVE

Cost Center **FY27 FTE** **1.70**
LEG **FY26 FTE** **1.70**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		**-**	**-**	**-**		**-**	**-**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	2,500	2,500	-	0%	565	157
	50110	STAFF CONFERENCE & TRAINING	2,200	2,200	-	0%	2,101	248
	50120	STAFF MEMBERSHIP DUES	215	215	-	0%	215	-
	50130	SUBSCRIPTIONS	2,000	2,000	-	0%	1,986	1,990
	50160	TELEPHONE	575	575	-	0%	577	298
	52660	JUD RECOMMEND COMMITTEE	3,250	3,250	-	0%	1,675	1,096
	54920	CONTRACT LOBBYIST	12,500	15,000	2,500	20%	15,000	9,375
	54940	LEGISLATIVE COMMITTEE	1,250	1,250	-	0%	130	-
	54970	BOG LEGISLATIVE COMMITTEE	300	300	-	0%	-	-
	TOTAL DIRECT EXPENSES		**24,790**	**27,290**	**2,500**	**10%**	**22,248**	**13,163**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	164,492	171,002	6,511	4%	163,053	81,273
	51299	BENEFITS EXPENSE	47,770	54,877	7,107	15%	51,318	24,951
	51900	OTHER INDIRECT EXPENSE	58,539	54,888	(3,651)	-6%	40,091	25,575
	TOTAL INDIRECT EXPENSES:		**270,801**	**280,767**	**9,966**	**4%**	**254,461**	**131,798**
	TOTAL ALL EXPENSES:		**295,591**	**308,057**	**12,466**	**4%**	**276,709**	**144,962**
	NET INCOME (LOSS):		**(295,591)**	**(308,057)**	**(12,466)**	**4%**	**(276,709)**	**(144,962)**

Washington State Bar Association
Budget Comparison

LEGAL LUNCHBOX

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
Cost Center	**FY27 FTE**	**0.45**						
LLB	**FY26 FTE**	**0.45**						
REVENUE:								
	41450	SPONSORSHIPS	9,000	9,000	-	0%	9,000	9,000
	43400	DIGITAL VIDEO SALES	25,000	25,000	-	0%	26,705	21,266
	TOTAL REVENUE		**34,000**	**34,000**	**-**	**0%**	**35,705**	**30,266**
DIRECT EXPENSES:								
	52240	DISABILITY ACCOMMODATIONS	2,000	2,000	-	0%	-	-
	53700	SPEAKERS & PROGRAM DEVELOP	100	100	-	0%	-	-
	53730	HONORARIUM	1,500	1,500	-	0%	-	-
	53283	ON24 OVERAGE CHARGE	4,500	4,500	-	0%	4,414	4,422
	53731	INSURANCE REBATE	-	-	-		(980)	-
	TOTAL DIRECT EXPENSES		**8,100**	**8,100**	**-**	**0%**	**3,434**	**4,422**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	33,193	34,909	1,717	5%	31,125	16,892
	51299	BENEFITS EXPENSE	11,236	11,204	(32)	0%	11,320	5,972
	51900	OTHER INDIRECT EXPENSE	15,496	14,529	(966)	-6%	10,110	6,810
	51935	INSURANCE REBATE	-	-	-		(11,679)	-
	TOTAL INDIRECT EXPENSES:		**59,925**	**60,643**	**718**	**1%**	**40,876**	**29,673**
	TOTAL ALL EXPENSES:		**68,025**	**68,743**	**718**	**1%**	**44,310**	**34,095**
	NET INCOME (LOSS):		**(34,025)**	**(34,743)**	**(718)**	**2%**	**(8,605)**	**(3,829)**

Washington State Bar Association
Budget Comparison

LICENSING & MEMBERSHIP RECORDS

Cost Center **FY27 FTE** **4.78**
LICMR **FY26 FTE** **4.78**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	41100	STATUS CERTIFICATE FEES	29,000	29,000	-	0%	30,900	17,174
	42288	INVESTIGATION FEES	25,000	25,000	-	0%	26,100	10,580
	42290	PRO HAC VICE	435,000	450,000	15,000	3%	478,994	281,982
	45040	MEMBER CONTACT INFORMATION	5,000	5,000	-	0%	4,773	4,055
	45060	PHOTO BAR CARD SALES	260	300	40	15%	648	324
	TOTAL REVENUE		**494,260**	**509,300**	**15,040**	**3%**	**541,415**	**314,115**
DIRECT EXPENSES:								
	50033	CONSULTING SERVICES	-	-	-		6,000	-
	50060	POSTAGE	4,000	4,000	-	0%	3,725	2,144
	50110	STAFF CONFERENCE & TRAINING	-	4,400	4,400		-	-
	52246	INVESTIGATION	300	300	-	0%	-	-
	54360	LITIGATION EXPENSES	-	-	-		29	-
	53282	SOFTWARE HOSTING	18,380	28,367	9,987	54%	18,682	13,265
	TOTAL DIRECT EXPENSES		**22,680**	**37,067**	**14,387**	**63%**	**28,437**	**15,409**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	503,843	518,856	15,013	3%	505,732	256,713
	51299	BENEFITS EXPENSE	139,284	176,890	37,606	27%	151,518	72,859
	51900	OTHER INDIRECT EXPENSE	164,598	154,333	(10,266)	-6%	113,996	72,027
	TOTAL INDIRECT EXPENSES:		**807,725**	**850,078**	**42,353**	**5%**	**771,246**	**401,600**
	TOTAL ALL EXPENSES:		**830,405**	**887,146**	**56,741**	**7%**	**799,683**	**417,009**
	NET INCOME (LOSS):		**(336,145)**	**(377,846)**	**(41,701)**	**12%**	**(258,268)**	**(102,894)**

Washington State Bar Association
Budget Comparison

LICENSE FEES
Cost Center
LIC

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	40600	LICENSE FEES	16,922,074	17,279,644	357,570	2%	16,399,640	8,185,024
	40625	LICENSE FEES - NEW ADMITTEES	465,192	451,887	(13,305)	-3%	457,728	288,154
	40650	LICENSE FEES - LATE FEES	250,000	300,000	50,000	20%	455,102	477,437
	40675	LICENSE FEES - REINSTATEMENTS	15,000	15,000	-	0%	18,950	7,288
	TOTAL REVENUE		**17,652,266**	**18,046,531**	**394,265**	**2%**	**17,331,420**	**8,957,902**
	NET INCOME (LOSS):		**17,652,266**	**18,046,531**	**394,265**	**2%**	**17,331,420**	**8,957,902**

Washington State Bar Association
Budget Comparison

LIMITED LICENSE LEGAL TECHNICIAN PROGRAM

Cost Center **FY27 FTE** **0.43**
LLLT **FY26 FTE** **0.43**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	41800	SEMINAR REGISTRATIONS	-	-	-		6,240	-
	42281	LLLT LICENSE FEES	17,000	15,000	(2,000)	-12%	16,235	8,012
	42291	LLLT LATE LICENSE FEES	137	300	163	119%	365	541
	45220	MCLE LATE FEES	150	150	-	0%	-	450
	TOTAL REVENUE		**17,287**	**15,450**	**(1,837)**	**-11%**	**22,840**	**9,003**
DIRECT EXPENSES:								
	52683	LLLT BOARD	9,000	9,000	-	0%	2,702	1,304
	52689	LLLT EDUCATION	1,000	500	(500)	-50%	35	-
	TOTAL DIRECT EXPENSES		**10,000**	**9,500**	**(500)**	**-5%**	**2,737**	**1,304**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	41,479	43,806	2,327	6%	54,809	20,884
	51299	BENEFITS EXPENSE	12,046	12,578	532	4%	16,975	6,229
	51900	OTHER INDIRECT EXPENSE	14,807	13,883	(923)	-6%	13,606	6,413
	TOTAL INDIRECT EXPENSES:		**68,332**	**70,268**	**1,936**	**3%**	**85,389**	**33,525**
	TOTAL ALL EXPENSES:		**78,332**	**79,768**	**1,436**	**2%**	**88,126**	**34,829**
	NET INCOME (LOSS):		**(61,045)**	**(64,318)**	**(3,273)**	**5%**	**(65,286)**	**(25,826)**

Washington State Bar Association
Budget Comparison

LIMITED PRACTICE OFFICERS

Cost Center	**FY27 FTE**	**0.58**
LPO	**FY26 FTE**	**0.58**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	42288	INVESTIGATION FEES	1,000	600	(400)	-40%	800	500
	45110	LPO EXAMINATION FEES	16,000	18,000	2,000	13%	13,100	10,700
	45115	LPO EXAM LATE FEES	2,000	2,000	-	0%	1,600	1,400
	45120	LPO LICENSE FEES	158,000	154,000	(4,000)	-3%	155,249	74,080
	45125	LPO LATE LICENSE FEES	2,000	3,000	1,000	50%	3,750	3,450
	45220	MCLE LATE FEES	3,000	3,000	-	0%	1,800	5,400
	TOTAL REVENUE		**182,000**	**180,600**	**(1,400)**	**-1%**	**176,299**	**95,530**
DIRECT EXPENSES:								
	50070	PRINTING & COPYING	200	200	-	0%	83	65
	50140	SUPPLIES	100	100	-	0%	-	-
	52210	FACILITY, PARKING, FOOD	9,500	200	(9,300)	-98%	6,997	2,696
	52215	EXAM GRADING	-	5,400	5,400		-	-
	52688	EXAM WRITING	15,000	15,000	-	0%	8,400	4,200
	55130	LPO BOARD EXPENSES	4,000	4,000	-	0%	1,277	267
	55165	LPO OUTREACH	500	500	-	0%	-	-
	53282	SOFTWARE HOSTING	3,404	4,392	988	29%	3,460	2,054
	TOTAL DIRECT EXPENSES		**32,704**	**29,792**	**(2,912)**	**-9%**	**20,217**	**9,282**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	56,369	59,871	3,502	6%	66,267	28,318
	51299	BENEFITS EXPENSE	16,315	17,647	1,332	8%	20,282	8,490
	51900	OTHER INDIRECT EXPENSE	19,972	18,727	(1,246)	-6%	16,211	8,736
	TOTAL INDIRECT EXPENSES:		**92,656**	**96,244**	**3,588**	**4%**	**102,760**	**45,544**
	TOTAL ALL EXPENSES:		**125,360**	**126,037**	**676**	**1%**	**122,977**	**54,826**
	NET INCOME (LOSS):		**56,640**	**54,563**	**(2,076)**	**-4%**	**53,322**	**40,704**

Washington State Bar Association
Budget Comparison

MANDATORY CONTINUING LEGAL EDUCATION

Cost Center	**FY27 FTE**	**4.73**
MCLE	**FY26 FTE**	**4.73**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	45210	ACTIVITY APPLICATION FEE	670,000	700,000	30,000	4%	708,300	344,400
	45215	ACTIVITY APPLICATION LATE FEE	250,000	260,000	10,000	4%	268,800	129,500
	45220	MCLE LATE FEES	232,000	250,000	18,000	8%	256,250	238,975
	45230	ANNUAL ACCREDITED SPONSOR FEES	36,250	36,750	500	1%	40,000	36,250
	45250	ATTENDANCE LATE FEES	120,000	116,000	(4,000)	-3%	104,200	55,500
	45255	COMITY CERTIFICATES - REQUEST	13,000	13,000	-	0%	14,175	9,825
	45260	COMITY CERTIFICATES - SUBMIT	17,000	17,000	-	0%	19,700	16,450
	TOTAL REVENUE		**1,338,250**	**1,392,750**	**54,500**	**4%**	**1,411,425**	**830,900**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	50	50	-	0%	-	-
	50110	STAFF CONFERENCE & TRAINING	4,400	4,400	-	0%	5,045	-
	50120	STAFF MEMBERSHIP DUES	525	525	-	0%	500	525
	55210	MCLE BOARD EXPENSES	6,000	3,000	(3,000)	-50%	1,806	531
	55220	DEPRECIATION-SOFTWARE	142,057	142,057	0	0%	144,144	72,072
	TOTAL DIRECT EXPENSES		**153,032**	**150,032**	**(3,000)**	**-2%**	**151,496**	**73,128**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	407,360	427,261	19,901	5%	396,116	224,665
	51299	BENEFITS EXPENSE	124,032	120,513	(3,519)	-3%	130,729	66,374
	51900	OTHER INDIRECT EXPENSE	162,876	152,718	(10,158)	-6%	112,777	71,182
	TOTAL INDIRECT EXPENSES:		**694,269**	**700,492**	**6,223**	**1%**	**639,622**	**362,221**
	TOTAL ALL EXPENSES:		**847,301**	**850,525**	**3,224**	**0%**	**791,118**	**435,349**
	NET INCOME (LOSS):		**490,949**	**542,225**	**51,276**	**10%**	**620,307**	**395,551**

Washington State Bar Association
Budget Comparison

MEMBER WELLNESS PROGRAM

Cost Center	**FY27 FTE**	**1.81**
MWP	**FY26 FTE**	**1.48**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	40205	DIVERSION	9,000	6,000	(3,000)	-33%	2,500	2,000
	TOTAL REVENUE		**9,000**	**6,000**	**(3,000)**	**-33%**	**2,500**	**2,000**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	1,200	1,200	-	0%	125	52
	50110	STAFF CONFERENCE & TRAINING	5,500	2,200	(3,300)	-60%	2,654	580
	50120	STAFF MEMBERSHIP DUES	500	875	375	75%	689	300
	50130	SUBSCRIPTIONS	1,400	1,400	-	0%	1,324	663
	54715	MEMBER WELL-BEING TASK FORCE	4,500	-	(4,500)	-100%	2,542	39
	TOTAL DIRECT EXPENSES		**13,100**	**5,675**	**(7,425)**	**-57%**	**7,335**	**1,633**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	149,311	172,241	22,931	15%	145,333	77,451
	51299	BENEFITS EXPENSE	42,656	72,380	29,724	70%	45,285	22,520
	51900	OTHER INDIRECT EXPENSE	50,963	58,440	7,476	15%	34,861	22,356
	TOTAL INDIRECT EXPENSES:		**242,930**	**303,061**	**60,131**	**25%**	**225,480**	**122,327**
	TOTAL ALL EXPENSES:		**256,030**	**308,736**	**52,706**	**21%**	**232,815**	**123,960**
	NET INCOME (LOSS):		**(247,030)**	**(302,736)**	**(55,706)**	**23%**	**(230,315)**	**(121,960)**

Washington State Bar Association
Budget Comparison

MEMBER SERVICES & ENGAGEMENT

Cost Center **FY27 FTE** **2.45**
MSE **FY26 FTE** **2.45**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	40900	ROYALTIES	10,800	14,400	3,600	33%	15,600	6,000
	41450	SPONSORSHIPS	2,500	-	(2,500)	-100%	2,600	-
	41800	SEMINAR REGISTRATIONS	2,000	-	(2,000)	-100%	1,080	-
	TOTAL REVENUE		**15,300**	**14,400**	**(900)**	**-6%**	**19,280**	**6,000**
DIRECT EXPENSES:								
	50070	PRINTING & COPYING	1,600	1,600	-	0%	1,442	1,502
	50085	NEW MEMBER LIAISON SECTION PROGRAM	1,300	1,300	-	0%	585	565
	50095	CLE COMPS	-	-	-		390	-
	50100	STAFF TRAVEL/PARKING	3,500	5,000	1,500	43%	3,158	48
	50110	STAFF CONFERENCE & TRAINING	2,700	2,700	-	0%	1,850	(25)
	50120	STAFF MEMBERSHIP DUES	1,020	1,020	-	0%	390	-
	50130	SUBSCRIPTIONS	400	1,200	800	200%	350	-
	54391	LAW LIBRARY DESKBOOK ACCESS	10,000	-	(10,000)	-100%	9,311	-
	54610	LIBRARY MATERIALS/RESOURCES	4,000	4,000	-	0%	1,532	292
	55266	NEW MEMBER OUTREACH EVENTS	5,000	18,500	13,500	270%	4,807	938
	55270	WASHINGTON NEW MEMBERS COMMITTEE	15,000	30,500	15,500	103%	5,587	8,581
	55970	MEMBER ENGAGEMENT COUNCIL	500	500	-	0%	-	-
	55981	SMALL TOWN AND RURAL COUNCIL OUTREACH AND ACTIVITIES	70,000	55,000	(15,000)	-21%	61,910	3,000
	55980	SMALL TOWN AND RURAL COUNCIL	7,500	7,500	-	0%	1,586	-
	57460	LAW SCHOOL OUTREACH	500	500	-	0%	-	66
	58175	AWARDS	1,000	1,000	-	0%	-	72
	58450	RECEPTION/FORUM EXPENSE	1,000	1,000	-	0%	200	17
	58525	SCHOLARSHIPS/DONATIONS/GRANT	-	4,000	4,000		-	-
	TOTAL DIRECT EXPENSES		**125,020**	**135,320**	**10,300**	**8%**	**93,098**	**15,056**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	165,619	176,148	10,529	6%	152,229	88,204
	51299	BENEFITS EXPENSE	59,059	77,984	18,925	32%	60,478	31,248
	51900	OTHER INDIRECT EXPENSE	84,365	79,104	(5,262)	-6%	57,870	36,871
	TOTAL INDIRECT EXPENSES:		**309,043**	**333,236**	**24,192**	**8%**	**270,577**	**156,323**
	TOTAL ALL EXPENSES:		**434,063**	**468,556**	**34,492**	**8%**	**363,674**	**171,380**
	NET INCOME (LOSS):		**(418,763)**	**(454,156)**	**(35,392)**	**8%**	**(344,394)**	**(165,380)**

Washington State Bar Association
Budget Comparison

MINI CLE

Cost Center	**FY27 FTE**	**0.96**
MINI	**FY26 FTE**	**0.96**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	TOTAL DIRECT EXPENSES		-	-	-		-	-
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	76,520	80,222	3,702	5%	72,060	38,762
	51299	BENEFITS EXPENSE	24,764	24,365	(399)	-2%	25,111	13,091
	51900	OTHER INDIRECT EXPENSE	33,057	30,996	(2,062)	-6%	21,614	14,490
	TOTAL INDIRECT EXPENSES:		**134,341**	**135,582**	**1,241**	**1%**	**118,786**	**66,343**
	NET INCOME (LOSS):		**(134,341)**	**(135,582)**	**(1,241)**	**1%**	**(118,786)**	**(66,343)**

Washington State Bar Association
Budget Comparison

NEW MEMBER EDUCATION

Cost Center	**FY27 FTE**	**0.87**	**FY2026 Budget**	**FY2027 Budget**	**FY26 vs. FY27 Comparison**	**% Change**	**FY2025 Actuals YTD**	**FY2026 Actuals YTD**
NME	**FY26 FTE**	**0.87**						
REVENUE:								
	40300	DONATIONS & GRANTS	-	-	-		15	-
	40950	NME PRODUCT SALES	120,000	100,000	(20,000)	-17%	139,406	90,654
	41800	SEMINAR REGISTRATIONS	10,000	7,000	(3,000)	-30%	19,458	7,593
	47100	TRIAL ADVOCACY PROGRAM	12,000	13,000	1,000	8%	13,369	(149)
	TOTAL REVENUE		**142,000**	**120,000**	**(22,000)**	**-15%**	**172,247**	**98,098**
DIRECT EXPENSES:								
	55265	SPEAKERS & PROGRAM DEVELOPMENT	500	500	-	0%	106	-
	57320	TRIAL ADVOCACY EXPENSES	3,200	3,500	300	9%	2,432	-
	TOTAL DIRECT EXPENSES		**3,700**	**4,000**	**300**	**8%**	**2,538**	**-**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	66,306	69,455	3,149	5%	63,527	33,992
	51299	BENEFITS EXPENSE	22,014	22,719	705	3%	22,597	11,643
	51900	OTHER INDIRECT EXPENSE	29,958	28,090	(1,868)	-6%	19,871	13,011
	TOTAL INDIRECT EXPENSES:		**118,278**	**120,264**	**1,986**	**2%**	**105,995**	**58,646**
	TOTAL ALL EXPENSES:		**121,978**	**124,264**	**2,286**	**2%**	**108,533**	**58,646**
	NET INCOME (LOSS):		**20,022**	**(4,264)**	**(24,286)**	**-121%**	**63,714**	**39,452**

Washington State Bar Association
Budget Comparison

OFFICE OF GENERAL COUNSEL

Cost Center	**FY27 FTE**	**6.46**
OGC	**FY26 FTE**	**6.12**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	40210	RECORDS REQUEST FEES	-	-	-		270	-
	44350	RECOVERY OF DISCIPLINE COSTS	-	-	-		-	1,000
	TOTAL REVENUE		**-**	**-**	**-**		**270**	**1,000**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	3,500	8,000	4,500	129%	3,799	1,614
	50110	STAFF CONFERENCE & TRAINING	10,250	8,050	(2,200)	-21%	363	2,812
	50120	STAFF MEMBERSHIP DUES	2,500	2,500	-	0%	1,625	2,004
	50140	SUPPLIES	-	150	150		104	-
	52240	DISABILITY ACCOMMODATIONS	2,500	2,500	-	0%	1,161	58
	54310	COURT REPORTERS	-	-	-		(179)	-
	54360	LITIGATION EXPENSES	1,000	500	(500)	-50%	287	-
	55419	COURT RULES COMMITTEE	1,000	1,000	-	0%	-	-
	55615	WILLS	1,000	1,000	-	0%	-	-
	55620	CUSTODIANSHIP	5,000	2,500	(2,500)	-50%	201	301
	TOTAL DIRECT EXPENSES		**26,750**	**26,200**	**(550)**	**-2%**	**7,362**	**6,789**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	718,300	772,271	53,972	8%	678,051	343,003
	51299	BENEFITS EXPENSE	187,732	195,391	7,659	4%	201,611	95,734
	51900	OTHER INDIRECT EXPENSE	210,741	208,656	(2,085)	-1%	146,386	92,245
	TOTAL INDIRECT EXPENSES:		**1,116,772**	**1,176,318**	**59,546**	**5%**	**1,026,048**	**530,982**
	TOTAL ALL EXPENSES:		**1,143,522**	**1,202,518**	**58,996**	**5%**	**1,033,410**	**537,771**
	NET INCOME (LOSS):		**(1,143,522)**	**(1,202,518)**	**(58,996)**	**5%**	**(1,033,140)**	**(536,771)**

Washington State Bar Association
Budget Comparison

OFFICE OF THE EXECUTIVE DIRECTOR

Cost Center	**FY27 FTE**	**4.18**
OED	**FY26 FTE**	**4.23**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		**-**	**-**	**-**		**-**	**-**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	2,000	2,400	400	20%	2,299	1,188
	50110	STAFF CONFERENCE & TRAINING	13,300	13,300	-	0%	14,556	5,500
	50120	STAFF MEMBERSHIP DUES	1,335	1,225	(110)	-8%	1,120	945
	52125	LEADERSHIP TRAINING	20,000	15,000	(5,000)	-25%	11,951	-
	52585	WASHINGTON LEADERSHIP INSTITUTE	100,000	100,000	-	0%	100,000	100,000
	52840	ED TRAVEL & OUTREACH	6,000	6,000	-	0%	4,883	3,010
	TOTAL DIRECT EXPENSES		**142,635**	**137,925**	**(4,710)**	**-3%**	**134,809**	**110,643**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	643,856	669,779	25,923	4%	611,429	329,991
	51299	BENEFITS EXPENSE	142,505	155,599	13,094	9%	161,753	78,057
	51900	OTHER INDIRECT EXPENSE	145,659	134,960	(10,699)	-7%	99,941	63,713
	TOTAL INDIRECT EXPENSES:		**932,020**	**960,339**	**28,319**	**3%**	**873,123**	**471,761**
	TOTAL ALL EXPENSES:		**1,074,655**	**1,098,264**	**23,609**	**2%**	**1,007,932**	**582,405**
	NET INCOME (LOSS):		**(1,074,655)**	**(1,098,264)**	**(23,609)**	**2%**	**(1,007,932)**	**(582,405)**

Washington State Bar Association
Budget Comparison

OFFICE OF GENERAL COUNSEL - DISCIPLINARY BOARD

Cost Center **FY27 FTE** **1.40**
OGCDB **FY26 FTE** **1.30**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	50110	STAFF CONFERENCE & TRAINING	2,200	250	(1,950)	-89%	-	-
	50120	STAFF MEMBERSHIP DUES	100	100	-	0%	-	-
	54310	COURT REPORTERS	33,100	35,000	1,900	6%	25,922	23,830
	55310	DISCIPLINARY BOARD EXPENSES	3,000	3,000	-	0%	1,548	-
	55320	CHIEF HEARING OFFICER	41,200	41,200	-	0%	39,996	19,998
	55330	HEARING OFFICER EXPENSES	4,000	2,500	(1,500)	-38%	377	149
	55340	HEARING OFFICER TRAINING	1,000	2,500	1,500	150%	-	900
	55370	APPOINTED COUNSEL	50,645	52,200	1,555	3%	50,400	25,270
	55380	DISCIPLINARY SELECTION PANEL	1,000	500	(500)	-50%	-	-
	TOTAL DIRECT EXPENSES		**136,245**	**137,250**	**1,005**	**1%**	**118,243**	**70,147**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	128,774	150,717	21,943	17%	128,615	67,438
	51299	BENEFITS EXPENSE	37,003	34,902	(2,102)	-6%	39,935	19,627
	51900	OTHER INDIRECT EXPENSE	44,765	45,202	437	1%	30,678	19,610
	TOTAL INDIRECT EXPENSES:		**210,543**	**230,821**	**20,278**	**10%**	**199,228**	**106,675**
	TOTAL ALL EXPENSES:		**346,788**	**368,071**	**21,283**	**6%**	**317,472**	**176,822**
	NET INCOME (LOSS):		**(346,788)**	**(368,071)**	**(21,283)**	**6%**	**(317,472)**	**(176,822)**

Washington State Bar Association
Budget Comparison

PRACTICE OF LAW BOARD

Cost Center **FY27 FTE** **0.53**
PLB **FY26 FTE** **0.55**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	200	200	-	0%	-	-
	55510	PRACTICE OF LAW BOARD	16,000	3,000	(13,000)	-81%	740	197
	TOTAL DIRECT EXPENSES		**16,200**	**3,200**	**(13,000)**	**-80%**	**740**	**197**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	63,145	78,102	14,958	24%	42,930	32,194
	51299	BENEFITS EXPENSE	16,771	20,805	4,034	24%	13,655	8,753
	51900	OTHER INDIRECT EXPENSE	18,939	16,951	(1,988)	-10%	10,644	8,314
	TOTAL INDIRECT EXPENSES:		**98,855**	**115,858**	**17,004**	**17%**	**67,229**	**49,260**
	TOTAL ALL EXPENSES:		**115,055**	**119,058**	**4,004**	**3%**	**67,969**	**49,457**
	NET INCOME (LOSS):		**(115,055)**	**(119,058)**	**(4,004)**	**3%**	**(67,969)**	**(49,457)**

Washington State Bar Association
Budget Comparison

PRACTICE MANAGEMENT ASSISTANCE

Cost Center **FY27 FTE** **1.28**
PMA **FY26 FTE** **0.95**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	40900	ROYALTIES	62,000	66,000	4,000	6%	68,618	39,349
	TOTAL REVENUE		**62,000**	**66,000**	**4,000**	**6%**	**68,618**	**39,349**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	2,500	1,500	(1,000)	-40%	265	906
	50110	STAFF CONFERENCE & TRAINING	2,400	2,500	100	4%	3,003	563
	50120	STAFF MEMBERSHIP DUES	295	295	-	0%	195	-
	50130	SUBSCRIPTIONS	-	500	500		-	-
	54645	LEGAL TECH TASK FORCE	3,500	-	(3,500)	-100%	2,750	-
	55250	VLEX FASTCASE	87,000	90,000	3,000	3%	84,568	87,812
	TOTAL DIRECT EXPENSES		**95,695**	**94,795**	**(900)**	**-1%**	**90,781**	**89,281**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	92,930	112,419	19,490	21%	91,575	49,427
	51299	BENEFITS EXPENSE	26,882	33,214	6,332	24%	28,732	14,021
	51900	OTHER INDIRECT EXPENSE	32,713	41,328	8,615	26%	22,311	14,279
	TOTAL INDIRECT EXPENSES:		**152,525**	**186,961**	**34,436**	**23%**	**142,618**	**77,727**
	TOTAL ALL EXPENSES:		**248,220**	**281,756**	**33,536**	**14%**	**233,399**	**167,008**
	NET INCOME (LOSS):		**(186,220)**	**(215,756)**	**(29,536)**	**16%**	**(164,781)**	**(127,659)**

Washington State Bar Association
Budget Comparison

PROFESSIONAL RESPONSIBILITY PROGRAM

Cost Center	**FY27 FTE**	**1.80**
PRP	**FY26 FTE**	**1.08**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		**-**	**-**	**-**		**-**	**-**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	4,000	3,500	(500)	-13%	1,083	1,432
	50110	STAFF CONFERENCE & TRAINING	2,400	2,200	(200)	-8%	2,347	-
	50120	STAFF MEMBERSHIP DUES	590	690	100	17%	590	590
	55610	CPE COMMITTEE	1,000	1,000	-	0%	286	-
	TOTAL DIRECT EXPENSES		**7,990**	**7,390**	**(600)**	**-8%**	**4,305**	**2,022**
INDIRECT EXPENSES:					-			
	51199	SALARY EXPENSE	143,536	179,064	35,528	25%	142,101	70,323
	51299	BENEFITS EXPENSE	36,061	76,673	40,612	113%	39,029	18,498
	51900	OTHER INDIRECT EXPENSE	37,190	58,117	20,927	56%	25,449	16,205
	TOTAL INDIRECT EXPENSES:		**216,787**	**313,855**	**97,068**	**45%**	**206,580**	**105,025**
	TOTAL ALL EXPENSES:		**224,777**	**321,245**	**96,468**	**43%**	**210,885**	**107,048**
	NET INCOME (LOSS):		**(224,777)**	**(321,245)**	**(96,468)**	**43%**	**(210,885)**	**(107,048)**

Washington State Bar Association
Budget Comparison

PUBLIC SERVICE PROGRAMS

Cost Center	**FY27 FTE**	**2.13**
PSP	**FY26 FTE**	**2.10**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	40300	DONATIONS & GRANTS	132,635	118,317	(14,318)	-11%	134,832	2,639
	TOTAL REVENUE		**132,635**	**118,317**	**(14,318)**	**-11%**	**134,832**	**2,639**
DIRECT EXPENSES:								
	50037	MODERATE MEANS	-	-	-		250,352	(5,178)
	50100	STAFF TRAVEL/PARKING	2,000	3,700	1,700	85%	445	39
	50110	STAFF CONFERENCE & TRAINING	3,200	2,500	(700)	-22%	1,654	-
	52110	PRO BONO & PUBLIC SERVICE COMMITTEE	3,500	7,500	4,000	114%	2,361	1,882
	54130	PRO BONO OUTREACH	4,000	6,000	2,000	50%	2,127	-
	TOTAL DIRECT EXPENSES		**12,700**	**19,700**	**7,000**	**55%**	**256,939**	**(3,257)**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	187,614	193,131	5,517	3%	136,510	82,782
	51299	BENEFITS EXPENSE	50,197	60,352	10,155	20%	45,949	26,751
	51900	OTHER INDIRECT EXPENSE	72,313	68,772	(3,541)	-5%	38,347	28,638
	TOTAL INDIRECT EXPENSES:		**310,124**	**322,255**	**12,131**	**4%**	**220,806**	**138,171**
	TOTAL ALL EXPENSES:		**322,824**	**341,955**	**19,131**	**6%**	**477,745**	**134,914**
	NET INCOME (LOSS):		**(190,189)**	**(223,638)**	**(33,449)**	**18%**	**(342,913)**	**(132,275)**

Washington State Bar Association
Budget Comparison

PUBLICATION & DESIGN SERVICES

Cost Center	**FY27 FTE**	**0.89**
PUB	**FY26 FTE**	**0.89**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	50130	SUBSCRIPTIONS	200	200	-	0%	88	-
	54026	IMAGE LIBRARY	4,800	4,800	-	0%	4,756	4,756
	TOTAL DIRECT EXPENSES		**5,000**	**5,000**	**-**	**0%**	**4,844**	**4,756**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	70,644	73,597	2,953	4%	81,302	36,102
	51299	BENEFITS EXPENSE	22,914	28,851	5,937	26%	26,149	12,109
	51900	OTHER INDIRECT EXPENSE	30,647	28,736	(1,911)	-6%	20,917	13,434
	TOTAL INDIRECT EXPENSES:		**124,205**	**131,184**	**6,979**	**6%**	**128,367**	**61,644**
	TOTAL ALL EXPENSES:		**129,205**	**136,184**	**6,979**	**5%**	**133,212**	**66,400**
	NET INCOME (LOSS):		**(129,205)**	**(136,184)**	**(6,979)**	**5%**	**(133,212)**	**(66,400)**

Washington State Bar Association
Budget Comparison

REGULATORY SERVICES FTE

Cost Center	**FY27 FTE**	**2.10**
RSD FTE	**FY26 FTE**	**2.00**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-	-	-	-
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	600	600	-	0%	864	106
	50110	STAFF CONFERENCE & TRAINING	11,500	13,800	2,300	20%	2,172	734
	50120	STAFF MEMBERSHIP DUES	490	490	-	0%	490	490
	TOTAL DIRECT EXPENSES		**12,590**	**14,890**	**2,300**	**18%**	**3,526**	**1,330**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	288,255	292,306	4,050	1%	300,342	140,610
	51299	BENEFITS EXPENSE	68,347	79,097	10,750	16%	81,381	34,959
	51900	OTHER INDIRECT EXPENSE	68,870	67,803	(1,066)	-2%	52,644	30,061
	TOTAL INDIRECT EXPENSES:		**425,472**	**439,205**	**13,734**	**3%**	**434,368**	**205,630**
	TOTAL ALL EXPENSES:		**438,062**	**454,095**	**16,034**	**4%**	**437,894**	**206,961**
	NET INCOME (LOSS):		**(438,062)**	**(454,095)**	**(16,034)**	**4%**	**(437,894)**	**(206,961)**

Washington State Bar Association
Budget Comparison

REGULATORY REFORM

Cost Center	**FY27 FTE**	**0.25**
RR	**FY26 FTE**	**0.85**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-	-	-	-
DIRECT EXPENSES:								
	50033	CONSULTING SERVICES	25,000	30,000	5,000	20%	14,311	8,828
	50185	MEETING EXPENSE	2,000	-	(2,000)	-100%	2,098	-
	52691	OUTREACH EXPENSES	10,000	10,000	-	0%	-	-
	53282	SOFTWARE HOSTING	20,000	-	(20,000)	-100%	-	-
	TOTAL DIRECT EXPENSES		**57,000**	**40,000**	**(17,000)**	**-30%**	**16,409**	**8,828**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	110,346	37,247	(73,099)	-66%	155,273	57,534
	51299	BENEFITS EXPENSE	27,639	9,370	(18,269)	-66%	43,259	14,424
	51900	OTHER INDIRECT EXPENSE	29,270	8,072	(21,198)	-72%	28,992	12,775
	TOTAL INDIRECT EXPENSES:		**167,255**	**54,689**	**(112,566)**	**-67%**	**227,523**	**84,733**
	TOTAL ALL EXPENSES:		**224,255**	**94,689**	**(129,566)**	**-58%**	**243,933**	**93,561**
	NET INCOME (LOSS):		**(224,255)**	**(94,689)**	**129,566**	**-58%**	**(243,933)**	**(93,561)**

Washington State Bar Association
Budget Comparison

SECTIONS ADMINISTRATION

Cost Center	**FY27 FTE**	**2.53**
SECT	**FY26 FTE**	**2.53**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	48010	REIMBURSEMENTS FROM SECTIONS	275,000	275,000	-	0%	276,103	388,434
	TOTAL REVENUE		**275,000**	**275,000**	**-**	**0%**	**276,103**	**388,434**
DIRECT EXPENSES:								
	50100	STAFF TRAVEL/PARKING	1,900	2,000	100	5%	60	336
	50120	STAFF MEMBERSHIP DUES	-	-	-		60	-
	52540	SECTION/COMMITTEE CHAIR MTGS	500	400	(100)	-20%	89	71
	TOTAL DIRECT EXPENSES		**2,400**	**2,400**	**-**	**0%**	**209**	**407**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	174,309	180,803	6,494	4%	164,849	89,577
	51299	BENEFITS EXPENSE	61,514	91,313	29,799	48%	64,054	32,387
	51900	OTHER INDIRECT EXPENSE	87,120	81,686	(5,433)	-6%	60,273	38,138
	TOTAL INDIRECT EXPENSES:		**322,943**	**353,803**	**30,860**	**10%**	**289,176**	**160,102**
	TOTAL ALL EXPENSES:		**325,343**	**356,203**	**30,860**	**9%**	**289,385**	**160,510**
	NET INCOME (LOSS):		**(50,343)**	**(81,203)**	**(30,860)**	**61%**	**(13,283)**	**227,925**

Washington State Bar Association
Budget Comparison

TECHNOLOGY

Cost Center	**FY27 FTE**	**5.00**
TECH	**FY26 FTE**	**5.00**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	50033	CONSULTING SERVICES	1,019,797	930,000	(89,797)	-9%	318,690	386,511
	50100	STAFF TRAVEL/PARKING	1,000	1,000	-	0%	1,341	198
	50110	STAFF CONFERENCE & TRAINING	6,000	3,000	(3,000)	-50%	1,091	-
	50120	STAFF MEMBERSHIP DUES	410	300	(110)	-27%	-	-
	50160	TELEPHONE	90,000	95,000	5,000	6%	91,817	46,960
	55911	CLOUD INFRASTRUCTURE	130,000	130,000	-	0%	66,849	25,643
	56100	COMPUTER HARDWARE	65,000	80,000	15,000	23%	66,055	41,040
	56150	COMPUTER SOFTWARE	518,000	476,000	(42,000)	-8%	362,082	249,256
	56225	HARDWARE SERVICE & WARRANTIES	50,000	50,000	-	0%	41,848	14,413
	56230	SOFTWARE MAINT & LICENSING	470,000	410,000	(60,000)	-13%	362,502	212,740
	56550	THIRD PARTY SERVICES	177,600	180,000	2,400	1%	97,718	104,166
	56900	TRANSFER TO INDIRECT EXPENSES	(2,527,807)	(2,355,300)	172,507	-7%	(1,409,992)	(1,080,926)
	TOTAL DIRECT EXPENSES		-	-	-		**(0)**	**0**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	629,276	620,846	(8,431)	-1%	1,431,745	358,519
	51299	BENEFITS EXPENSE	158,341	172,646	14,304	9%	373,331	88,928
	51955	CAPITAL LABOR & OVERHEAD	-	-	-		(104,685)	(16,181)
	51900	OTHER INDIRECT EXPENSE	172,174	161,436	(10,738)	-6%	284,119	75,221
	TOTAL INDIRECT EXPENSES:		**959,791**	**954,927**	**(4,864)**	**-1%**	**1,984,511**	**506,487**
	TOTAL ALL EXPENSES:		**959,791**	**954,927**	**(4,864)**	**-1%**	**1,984,511**	**506,487**
	NET INCOME (LOSS):		**(959,791)**	**(954,927)**	**4,864**	**-1%**	**(1,984,511)**	**(506,487)**

Washington State Bar Association
Budget Comparison

VOLUNTEER ENGAGEMENT

Cost Center	**FY27 FTE**	**1.70**
VE	**FY26 FTE**	**1.70**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	TOTAL REVENUE		-	-	-		-	-
DIRECT EXPENSES:								
	50060	POSTAGE	600	600	-	0%	468	-
	50110	STAFF CONFERENCE & TRAINING	4,500	2,000	(2,500)	-56%	3,554	1,653
	50120	STAFF MEMBERSHIP DUES	385	500	115	30%	300	424
	50130	SUBSCRIPTIONS	816	817	1	0%	881	358
	52520	ABA DELEGATES	18,000	16,000	(2,000)	-11%	12,947	6,876
	52521	VOLUNTEER RECOGNITION	2,000	2,000	-	0%	39	660
	52522	WSBA REPRESENTATIVE	-	500	500		-	-
	57450	REGULATORY SCHOOL	10,000	6,000	(4,000)	-40%	7,767	5,286
	TOTAL DIRECT EXPENSES		**36,301**	**28,417**	**(7,884)**	**-22%**	**25,956**	**15,258**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	149,220	156,097	6,877	5%	116,711	74,519
	51299	BENEFITS EXPENSE	45,777	50,615	4,838	11%	40,443	24,055
	51900	OTHER INDIRECT EXPENSE	58,539	54,888	(3,651)	-6%	34,541	25,550
	TOTAL INDIRECT EXPENSES:		**253,536**	**261,600**	**8,064**	**3%**	**191,695**	**124,124**
	TOTAL ALL EXPENSES:		**289,837**	**290,017**	**180**	**0%**	**217,651**	**139,381**
	NET INCOME (LOSS):		**(289,837)**	**(290,017)**	**(180)**	**0%**	**(217,651)**	**(139,381)**

ATTACHMENT B

Washington State Bar Association
Budget Comparison

CLE - PRODUCTS

Cost Center	**FY27 FTE**	**1.29**	**FY2026 Budget**	**FY2027 Budget**	**FY26 vs. FY27 Comparison**	**% Change**	**FY2025 Actuals YTD**	**FY2026 Actuals YTD**
CLEP	**FY26 FTE**	**1.29**						
REVENUE:								
	41000	SHIPPING & HANDLING	210	-	(210)	-100%	117	36
	43200	COURSEBOOK SALES	3,500	3,500	-	0%	980	325
	43400	DIGITAL VIDEO SALES	875,000	900,000	25,000	3%	877,630	518,507
	TOTAL REVENUE		**878,710**	**903,500**	**24,790**	**3%**	**878,727**	**518,868**
DIRECT EXPENSES:								
	50034	IT EXPENSE DUE TO GF	179	-	(179)	-100%	-	64
	50120	STAFF MEMBERSHIP DUES	300	250	(50)	-17%	-	218
	52240	DISABILITY ACCOMMODATIONS	2,000	2,000	-	0%	-	149
	53220	COST OF SALES - COURSEBOOKS	300	-	(300)	-100%	69	27
	53260	OBSOLETE INVENTORY	-	-	-		-	-
	53255	CLE-EQUIP-DEPRECIATION	-	-	-		2,039	-
	53285	ONLINE PRODUCT HOSTING EXPENSES	54,000	30,000	(24,000)	-44%	47,861	17,851
	53330	POSTAGE & DELIVRY-COURSEBOOKS	200	-	(200)	-100%	59	28
	TOTAL DIRECT EXPENSES		**56,979**	**32,250**	**(24,729)**	**-43%**	**50,028**	**18,337**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	99,556	103,642	4,087	4%	103,349	53,413
	51299	BENEFITS EXPENSE	32,846	47,112	14,265	43%	35,415	17,922
	51900	OTHER INDIRECT EXPENSE	37,620	41,650	4,030	11%	30,230	16,927
	51936	FACILITY RESERVE REBATE	-	-	-		(1,532)	-
	TOTAL INDIRECT EXPENSES:		**170,023**	**192,405**	**22,382**	**13%**	**167,462**	**88,262**
	TOTAL ALL EXPENSES:		**227,002**	**224,655**	**(2,347)**	**-1%**	**217,491**	**106,598**
	NET INCOME (LOSS):		**651,708**	**678,845**	**27,137**	**4%**	**661,236**	**412,270**

Washington State Bar Association
Budget Comparison

CLE - SEMINARS

Cost Center	**FY27 FTE**	**6.37**	**FY2026 Budget**	**FY2027 Budget**	**FY26 vs. FY27 Comparison**	**% Change**	**FY2025 Actuals YTD**	**FY2026 Actuals YTD**
CLES	**FY26 FTE**	**6.66**						
REVENUE:								
	41800	SEMINAR REGISTRATIONS	730,535	666,890	(63,645)	-9%	543,543	151,283
	41825	SEMINAR REVENUE-OTHER	32,500	35,500	3,000	9%	27,915	16,000
	41850	SEMINAR SPLITS W/ CLE	(150,000)	(135,000)	15,000	-10%	(100,979)	-
	TOTAL REVENUE		**613,035**	**567,390**	**(45,645)**	**-7%**	**470,479**	**167,283**
DIRECT EXPENSES:								
	50034	IT EXPENSE DUE TO GF	924	-	(924)	-100%	-	336
	50100	STAFF TRAVEL/PARKING	16,500	20,215	3,715	23%	10,336	2,721
	50110	STAFF CONFERENCE & TRAINING	3,700	2,200	(1,500)	-41%	-	-
	50120	STAFF MEMBERSHIP DUES	1,200	1,000	(200)	-17%	-	873
	50130	SUBSCRIPTIONS	1,300	800	(500)	-38%	-	-
	50140	SUPPLIES	1,000	1,000	-	0%	236	41
	52240	DISABILITY ACCOMMODATIONS	5,000	5,000	-	0%	-	2,063
	53610	COURSEBOOK PRODUCTION	150	150	-	0%	-	-
	53640	ACCREDITATION FEES	2,500	2,250	(250)	-10%	1,752	2,040
	53690	FACILITIES	175,000	189,900	14,900	9%	164,373	47,107
	53700	SPEAKERS & PROGRAM DEVELOP	45,700	49,200	3,500	8%	25,859	6,666
	53730	HONORARIUM	3,000	3,000	-	0%	-	-
	53740	CLE SEMINAR COMMITTEE	200	-	(200)	-100%	-	-
	TOTAL DIRECT EXPENSES		**256,174**	**274,715**	**18,541**	**7%**	**202,557**	**61,847**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	514,912	517,956	3,045	1%	503,823	262,372
	51299	BENEFITS EXPENSE	169,646	170,949	1,303	1%	179,815	89,452
	51900	OTHER INDIRECT EXPENSE	194,227	205,669	11,443	6%	158,619	87,610
	51936	FACILITY RESERVE REBATE	-	-			(7,969)	-
	TOTAL INDIRECT EXPENSES:		**878,784**	**894,575**	**15,791**	**2%**	**834,288**	**439,434**
	TOTAL ALL EXPENSES:		**1,134,958**	**1,169,290**	**34,331**	**3%**	**1,036,844**	**501,280**
	NET INCOME (LOSS):		**(521,923)**	**(601,900)**	**(79,976)**	**15%**	**(566,365)**	**(333,998)**

Washington State Bar Association
Budget Comparison

DESKBOOKS
Cost Center **FY27 FTE** **1.75**
DESK **FY26 FTE** **1.75**

			FY2026 Budget	FY2027 Budget	FY26 vs. FY27 Comparison	% Change	FY2025 Actuals YTD	FY2026 Actuals YTD
REVENUE:								
	43100	DESKBOOK SALES	5,120	10,000	4,880	95%	14,722	3,386
	43450	SECTION PUBLICATION SALES	-	-	-		90	70
	43455	LEXIS/NEXIS ROYALTIES	75,000	96,000	21,000	28%	67,020	20,594
	43525	CASEMAKER ROYALTIES	25,000	40,000	15,000	60%	38,162	9,878
	TOTAL REVENUE		**105,120**	**146,000**	**40,880**	**39%**	**119,994**	**33,928**
DIRECT EXPENSES:								
	50110	STAFF CONFERENCE & TRAINING	2,200	2,200	-	0%	678	1,914
	50120	STAFF MEMBERSHIP DUES	330	558	228	69%	285	218
	50130	SUBSCRIPTIONS	50	50	-	0%	-	-
	53210	COST OF SALES - DESKBOOKS	2,800	-	(2,800)	-100%	2,453	1,195
	53225	COST OF SALES - SECTION PUBLIC	-	-	-		(74)	-
	53260	OBSOLETE INVENTORY	118,700	-	(118,700)	-100%	48,248	65,597
	53270	DESKBOOK ROYALTIES	-	-	-		-	193
	53320	POSTAGE & DELIVRY-COURSEBOOKS	300	300	-	0%	-	21
	TOTAL DIRECT EXPENSES		**124,380**	**3,108**	**(121,272)**	**-98%**	**51,589**	**69,138**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	145,047	152,346	7,300	5%	180,204	73,735
	51299	BENEFITS EXPENSE	45,925	51,152	5,227	11%	52,319	24,091
	51900	OTHER INDIRECT EXPENSE	51,036	56,503	5,467	11%	41,485	23,065
	TOTAL INDIRECT EXPENSES:		**242,008**	**260,001**	**17,993**	**7%**	**274,008**	**120,891**
	TOTAL ALL EXPENSES:		**366,387**	**263,109**	**(103,279)**	**-28%**	**325,596**	**190,029**
	NET INCOME (LOSS):		**(261,267)**	**(117,109)**	**144,159**	**-55%**	**(205,602)**	**(156,101)**

ATTACHMENT C

Washington State Bar Association
Budget Comparison

CLIENT PROTECTION FUND

Cost Center	**FY27 FTE**	**1.23**	**FY2026 Budget**	**FY2027 Budget**	**FY26 vs. FY27 Comparison**	**% Change**	**FY2025 Actuals YTD**	**FY2026 Actuals YTD**
CPF	**FY26 FTE**	**1.23**						
REVENUE:								
	40300	DONATIONS & GRANTS	-	-	-		2,000	4,500
	40500	INTEREST - INVESTMENTS	200,000	145,000	(55,000)	-28%	220,403	98,924
	44820	CPF RESTITUTION	10,000	10,000	-	0%	20,766	3,352
	44840	CPF MEMBER ASSESSMENTS	735,480	-	(735,480)	-100%	732,050	711,290
	TOTAL REVENUE		**945,480**	**155,000**	**(790,480)**	**-84%**	**975,219**	**818,066**
DIRECT EXPENSES:								
	50020	BANK FEES	500	500	-	0%	(3,317)	(94)
	50110	STAFF CONFERENCE & TRAINING	4,400	4,400	-	0%	-	-
	50120	STAFF MEMBERSHIP DUES	200	200	-	0%	200	-
	54400	TRANSLATION SERVICES	-	5,000	5,000		-	-
	54810	GIFTS TO INJURED CLIENTS	500,000	500,000	-	0%	249,483	15,700
	54820	CPF BOARD	2,000	1,500	(500)	-25%	553	864
	TOTAL DIRECT EXPENSES		**507,100**	**511,600**	**4,500**	**1%**	**246,919**	**16,471**
INDIRECT EXPENSES:								
	51199	SALARY EXPENSE	117,501	116,408	(1,093)	-1%	116,232	60,510
	51299	BENEFITS EXPENSE	34,425	42,551	8,126	24%	36,854	17,984
	51900	OTHER INDIRECT EXPENSE	42,355	39,713	(2,642)	-6%	28,935	18,529
	51936	FACILITY RESERVE REBATE	-	-			(1,461)	-
	TOTAL INDIRECT EXPENSES:		**194,280**	**198,672**	**4,392**	**2.3%**	**180,560**	**97,022**
	TOTAL ALL EXPENSES:		**701,380**	**710,272**	**8,892**	**1%**	**427,479**	**113,493**
	NET INCOME (LOSS):		**244,100**	**(555,272)**	**(799,372)**	**-327%**	**547,740**	**704,573**

ATTACHMENT D

2027 WSBA BUDGET WORKSHEET
CAPITAL BUDGET

	COST CENTER	UNIT COST	QTY	AMOUNT	USEFUL LIFE (YRS)	ESTIMATED IN SERVICE DATE	ANNUAL DEPRECIATION EXPENSE	BUDGET FY 2027
Capital Hardware (General Indirects):								
Hardware replacements	INDIRECT	60,000	1	60,000	3	Jan-27	20,000	15,000
Total				**60,000**			**20,000**	**15,000**
Leasehold Improvements (General Indirects)								
Camera System Upgrade	INDIRECT	7,000	1	7,000	9	Oct-26	814	814
Equipment (General Indirects)								
Mail machine replacement	INDIRECT	13,366	1	13,366	5	Oct-26	2,673	2,673
Total				**20,366**			**3,487**	**3,487**
GRAND TOTAL				**80,366**			**23,487**	**18,487**

ATTACHMENT E

WSBA BUDGET GLOSSARY

Accrual Basis: The basis of accounting whereby revenues are recognized when earned and measurable regardless of when collected; and expenses are recorded when incurred.

Capital Asset: Washington State Bar Association (WSBA) fiscal policies identify this as an item that costs over $2,500 and has a useful life of over 1 year. Capital assets are depreciated over their identified useful life.

Capital Budget: The capital budget forecasts capital asset purchases and capital labor hours anticipated in the coming fiscal year. It reflects the total cash outlay for the organization to purchase or develop assets that are depreciated over the life of the asset. This is reflected in the annual budget as depreciation expense. The Board of Governors reviews and approves the final capital budget, with the entire WSBA budget, at its last meeting of the fiscal year (September).

Capital Labor: Work performed by WSBA employees to develop internally used software systems. Employee hours spent developing software is considered a capital asset and the cost of the labor is depreciated over the useful life of the asset.

Cash Basis: The basis for accounting whereby revenues are recorded only when received and expenses are recorded only when paid, without regard to the period in which they were earned or incurred.

Cost Center: A unit within WSBA that reflects a program or resource. WSBA's financial activities are reported by cost center, meaning both revenue and expenses are included under the financial report for each identified cost center. WSBA has a total of 74 cost centers (29 of which are individual Sections). For a description of WSBA's cost centers, see the FY26 Budget, which includes narrative descriptions on pages 5 through 15.

Department: A division within WSBA that outlines a specific area of activity. WSBA has 9 departments: Advancement, Finance, Human Resources, Information Technology, Office of Disciplinary Counsel, Office of the Executive Director, Office of General Counsel, and Regulatory Services.

Depreciation: The portion of the cost of a capital asset representing the value used over time, due in part to wear and tear, deterioration, and obsolescence, which is reflected as an expense during a particular period. Depreciation is calculated based on the cost of the capital asset divided by its estimated useful life. WSBA calculates depreciation monthly.

Expenses:

Direct: Expenses that are directly related to the support of a specific program or function of the WSBA. Examples include committee expenses or venue costs for putting on an event.

Indirect: Expenses that benefit the whole organization and are considered the basic cost of doing business. Examples include salaries, benefits, payroll taxes, rent, telephone, insurance, legal advice, auditing services, computer equipment, etc. There are numerous ways to allocate common expenses; however, the method chosen must be meaningful, reasonable, accurate, and consistently applied. Generally speaking, WSBA allocates costs based on the staff that are assigned to perform work within each cost center. The allocation of staff time to a cost center can range anywhere from 1-100% and many employees are allocated across multiple cost centers.

Fiscal Year: A 12-month accounting period that may not coincide with the calendar year. The WSBA's fiscal year is from October 1st to September 30th.

FTE: Full-time Equivalent position term is used to describe staffing positions. One FTE is based on 2,080 work hours in a 12-month year. WSBA has employees ranging from 0.5 FTE to 1.0 FTE.

Fund Accounting: An accounting method that is used to track the amount of money allocated to various operations at an organization. WSBA's fiscal policies outline four distinct funds:

General Fund: Houses the majority of WSBA's operations and is funded primarily by license fees. The General Fund comprises of 41 cost centers and the majority of WSBA's FTEs. WSBA's General Fund Reserves are used to support this fund (see "Reserves").

Client Protection Fund: In 1995, the Washington State Supreme Court and the WSBA created the Client Protection Fund (CPF). The purpose of this restricted fund is to relieve or mitigate a loss sustained by any person due to the dishonesty of, or failure to account for money or property entrusted to, any member of the WSBA in connection with the member's practice of law, or while acting as a fiduciary in a matter related to the member's practice of law. The CPF fund receives a mandatory annual assessment from each active lawyer, LLLT, and pro hac vice member of the WSBA. This fund reflects the financial activity for the CPF (1 cost center) and is supported by the CPF reserve fund.

Continuing Legal Education Fund: The fund includes financial activity for 3 cost centers: CLE Products, CLE Seminars, and Deskbooks, and the fund is supported by the CLE Reserve Fund.

Sections Funds: The total difference between revenues, and direct and indirect expenses, for all Sections each year are designated as Section funds. Separate ledgers are maintained for each Section, making up the total for the Section funds.

Fund Balance: The fund balances, or net assets, of the WSBA are the difference between assets and liabilities. Fund balances are either unrestricted or restricted. The Board of Governors may designate, and has designated, portions of the WSBA's unrestricted fund balance for specific purposes. During the annual budgeting process, the Budget & Audit Committee reviews all fund balances, determine if funds allocated to the various reserves should be adjusted while taking into account the goals and purposes of each fund, and make any recommendations for adjustments to the Board of Governors.

Membership Year: WSBA members are licensed on an annual basis, which is a calendar year beginning January 1st through December 31st.

Per-Member Charge: An amount charged for each Section membership to reimburse WSBA for the cost of administering Sections, which includes salaries, benefits, payroll taxes, overhead, and direct expenses. The Section Per-Member Charge (PMC) is calculated as part of the WSBA annual budget process and is based on the first draft of the fiscal year budget.

Net Income: Funds remaining after subtracting expenses from revenue. These funds are then added to the corresponding reserve fund as they are accumulated.

Net Loss: Funds needed after subtracting expenses from revenue. These funds are subtracted from the corresponding reserve fund as they are used.

Reserves: Funds set aside and/or accumulated over time from excess net income to support an identified or unanticipated future funding need. The WSBA Board of Governors creates and designates reserve funds, which can be unrestricted or restricted. All funds except one (Client Protection Fund) are unrestricted.

General Fund Reserves:

Operating- established to cover unanticipated expenses in the event of an emergency.

Facilities- established to support future facilities needs such as an office move or refurbishment of existing office space or preparation for the purchase of operational real estate.

Special Projects & Innovation- established to provide funding for the development of new and innovative programs, projects or products that support and advance the mission of the WSBA.

License Fee Stability- established to assist with stabilization of license fees over time. The fund may be used to offset revenue shortages during a budget cycle in lieu of raising license fees.

Unrestricted- This is the cumulative balance of net assets from General Fund operations not otherwise restricted or designated to any other fund.

Continuing Legal Education Reserve: This reserve serves as an operating reserve in the event WSBA CLE suffers an unanticipated financial loss. The CLE reserve is funded by the annual operating income of the Deskbooks, CLE Seminars, and Products operations. Reserves may be used to cover any net loss, extraordinary costs, or technology upgrades.

Client Protection Fund Reserves: This reserve serves as an operating reserve for the CPF fund. Annual net income or losses for the fund accumulated from year-to-year results in the CPF restricted fund balance.

Sections Funds Reserves: An operating reserve fund for the WSBA sections, consisting of the cumulative balance of net assets/reserves of all sections.

Useful Life: The estimated amount of time an asset will remain in service and provide financial value.

WASHINGTON STATE
BAR ASSOCIATION

To: Board of Governors

From: Budget and Audit Committee

Date: June 15, 2026

Re: Facility Reserve Fund Recommendation

ACTION: Approve the recommendation to allocate $150,000 to the Facilities Reserve from Unrestricted General Fund Reserves.

BACKGROUND:
The Facilities Reserve Fund is a Board designated fund established to support future facilities needs for WSBA's office space. Per fiscal policy, it is expected that the fund's value will increase as the WSBA gets closer to lease completion and the Budget and Audit Committee is responsible for making recommendations regarding the reserve fund balance. The WSBA renewed its most current office space lease in 2024, resulting in a use and reallocation of the Facilities Reserve. In FY 2025, the Board of Governors approved an allocation of $150,000 to the reserve fund (see **Attachment A** for reserve balances). As of April 30, 2026, the balance in the reserve is $159,491, of which $9,491 is earmarked for depreciation related to equipment purchased during the 2024 office downsizing project.

RECOMMENDATION:
In FY 2025, it was advised by WSBA's real estate brokers from JLL that approximately $1.5 million in reserves would be needed to move to another location. This was based on a calculation of $50/square foot x 27,000 square feet (rough approximation of WSBA's current office space) plus inflation. At the time, the WSBA's Facilities Advisory Subcommittee agreed that reserving funds over a longer period was preferred and believed that it would be manageable for WSBA to set aside $150,000 each year over the next 10 years to provide funding for the next office space.

At their meeting on June 15, 2026, the Budget and Audit Committee considered both the previous year's recommendation and the current information provided by JLL to assess whether it would be appropriate to deviate from the annual $150,000 allocation to the reserve for FY 2026. **The Committee voted unanimously to recommend that the Board of Governors approve a reallocation of $150,000 from Unrestricted General Fund Reserves to the Facilities Reserve Fund**.

ATTACHMENT:
A- Facilities Reserve History

RESERVE HISTORY

- Facilities Advisory Subcommittee has historically been active during years leading up to a lease expiration.
- Facilities Reserve balance from 2006 to 2026:

2006	$1,802,599
2007	$1,445,000
2008	$2,500,000
2009	$2,500,000
2010	$2,710,000
2011	$3,340,000
2012	$3,340,000
2013	$3,340,000
2014	$3,340,000
2015	$3,286,096

Original Lease commencement

Build up of reserve fund in preparation for lease expiration in 2016

2016	$2,114,427
2017	$200,000
2018	$450,000
2019	$550,000
2020	$550,000
2021	$1,050,000
2022	$1,000,000
2023	$2,700,000
2024	$207,286
2025	$159,925
Proposed 2026	$309,181

Lease renewal

Build up of reserve fund in preparation for lease expiration in 2026

Lease renewal

WASHINGTON STATE
BAR ASSOCIATION

To: Board of Governors

From: Budget and Audit Committee

Date: June 15, 2026

Re: License Fee Policy Revisions

DISCUSSION/FIRST READ: Review proposed revisions to the WSBA License Fee Policy to include other categories of licensure.

BACKGROUND

WSBA License Fee Policy was adopted by the Board of Governors (BOG) on July 18, 2025. The purpose of the policy is to establish a consistent approach to setting license fees by which fees increase in alignment with an annual market measure that more closely ties to actual increases in the cost of doing business, while also incorporating flexibility to adjust the fee based on availability of reserves. The current policy treats license fees as a uniform concept; however, the WSBA imposes distinct license fees that vary depending on the category of licensure. During the BOG's review and establishment of fees for Limited Practice Officers (LPO) and Limited License Legal Technicians (LLLT) in January 2026, it was determined that the policy requires revision to incorporate language reflecting the various licensure categories.

PROPOSED REVISIONS

The draft policy revisions (***Attachment A***) include a new section titled "*Application of Policy to Various License Types and Statuses*". This section details policy application, including any fee limits based on the license type (lawyer, LPO, LLLT, Judicial, Pro Bono) and status (active, inactive). The recommended percentage limitations are designed to maintain the existing differences in fees between license categories and statuses while also setting minimum fees to help cover operating expenses and reflect the relative value of the license in relation to the benefits covered.

At their June 15, 2026 meeting, the Budget and Audit Committee voted unanimously to recommend the revisions be presented to the Board of Governors.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

Provided as confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The proposed revisions to the license fee policy do not require any change to existing license fees set by the Board of Governors, which is in alignment with existing and proposed budgets. Additionally, any future application of the proposed policy revisions ensures continuity in the proportion of funding provided by each

license fee type to the WSBA's general fund budget. The fiscal impact of the proposed revisions is limited primarily to staff time used to draft the rule change language, incorporate the changes into relevant records, and communicate changes to stakeholders. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

This action has minimal concerns with regard to equity impacts. The proposal will update the existing license fee policies in ways that balance organizational costs while improving transparency and consistency with current fee structures, particularly for limited license types and non-active license fee statuses.

ATTACHMENTS:

Attachment A: License Fee Policy Draft Revisions (April 2026)

A. Purpose

To create a consistent approach to setting license fees by which fees increase in alignment with an annual market measure (based on an industry benchmark defined in section D) that more closely ties to actual increases in the cost of doing business, while also incorporating flexibility to adjust the fee based on availability of reserves.

B. Policy

a. Policy regarding growth of the license fee

In order to maintain existing programing and services, it is anticipated that license fees will be adjusted annually to account for increasing costs, including facilities, salaries and benefits, and direct costs. Adjustments will vary based on membership trends and the changes to the industry benchmark defined in section D. From that basepoint assumption, the license fee may need to be adjusted up or down to account for shifts in programming and the availability of reserves. Because license fees are set before all organizational needs are identified, the WSBA should maintain reserves sufficient to seed desired shifts in programming, which will require adjustments to license fees to maintain.

b. Policy regarding use of license fees

License fees are collected primarily to cover the cost of regulation, as well as programs mandated by the Supreme Court. At the discretion of the Board of Governors, license fees are also used to support programing, services, and the development of tools to serve other aspects of the mission, including supporting legal professionals to better serve the public and other purposes as articulated in GR12.

WSBA shall determine the criteria for evaluating all programs and services to determine resource allocation. Examples of criteria for evaluating member benefits could include: (1) how many members the activity can potentially benefit, (2) how closely the benefit is tied to or furthers a strategic goal, (3) how popular the benefit is, and (4) cost per member to fully or partially subsidize.

C. Process for developing a proposed license fee

Step 1: An effective license fee increase will be developed based on membership trends and apply the industry benchmark (defined in section D). This is considered the status quo effective license fee.

Step 2: Identify desired program shifts and their impact on the effective license fee.

Step 3: The effective license fee can be adjusted up or down based on the level of required reserves, as well as the level of reserves available. This is considered the status quo actual license fee change.

D. Industry Benchmark

Inflation reflects the average change in the price of goods and services over time. WSBA will use the Cost-of-Living Adjustment (COLA) for Washington State L&I as the industry benchmark for calculating the effective license fee. The rate is established annually and will be used to develop a license fee recommendation in alignment with WSBA's annual budget and license fee approval process.

E. Application of Policy to Various License Types and Statuses

Unless otherwise stated, all license fees for all license types and statuses will be reviewed concurrently, using the policy framework and industry benchmark outlined in sections B and D.

a. **Active Lawyer.** The complete policy as written above applies to the active lawyer license fee.
b. **Inactive Lawyer.** The inactive lawyer license fee shall be set at no less than 30% and no more than 50% of the active lawyer license fee.
c. **Pro Bono.** The pro bono license fee shall be set at no less than 30% and no more than 50% of the active lawyer license fee.
d. **Judicial.** The judicial license fee shall be set at no less than 10% and no more than 20% of the active lawyer license fee.
e. **Active Limited License Legal Technician (LLLT).** The active LLLT license fee shall be set at no less than 30% and no more than 50% of the active lawyer license fee.
f. **Inactive Limited License Legal Technician (LLLT).** The inactive LLLT license fee shall be set at no less than 30% and no more than 50% of the active LLLT license fee.
g. **Active Limited Practice Officer (LPO).** The active LPO license fee shall be set at no less than 30% and no more than 50% of the active lawyer license fee.
h. **Inactive Limited Practice Officer (LPO).** The inactive LPO license fee shall be set at no less than 30% and no more than 50% of the active LPO license fee.

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Budget & Audit Committee

DATE: June 15, 2026

RE: Admissions Application Fees

FIRST READ: Discuss Budget & Audit Committee recommendation to establish an application fee for the new admissions pathway (admission by portfolio evaluation), increase the application fee for rule 9 licensed legal interns, and increase attorney applicant fees for the bar exam and UBE score transfer applications.

Background

Under Rule 3(i) of the Admission and Practice Rules (APR), applicants for admission to the practice of law in Washington are required to pay an application fee. The application fees are set by the Board of Governors and subject to review and approval by the Washington Supreme Court.

Application fees are used to cover both the direct and indirect expenses associated with the Admissions cost center. Currently, key functions under the Admissions cost center include processing applications, conducting investigations, holding character and fitness hearings, administering the twice-yearly bar exam, and administering the admission process after the application is approved. The Admissions cost center also includes the Board of Bar Examiners expenses including bar exam grading conferences and training sessions for the examiners. The Admissions cost center is a self-sustaining cost center meaning it is funded solely from application fees; no licensed legal professional license fees are used to fund the Admissions cost center.

Application fees were reviewed and the fees were increased for most applications effective September 1, 2024. At the time, we expected a need to review the application fees in three to five years. Implementation of the portfolio evaluation has brought that timetable forward.

At the Budget & Audit Committee's meeting on May 18, 2026, the Committee considered several proposals. At its June 15, 2026, meeting, the Committee approved the following recommendations for consideration by the Board of Governors.

Recommendations from Budget & Audit Committee

1. Increase the Rule 9 licensed legal intern application fee to $100, increasing by $25 annually until it reaches $200.
2. Discontinue the waiver of the application fee for interns providing legal services to low-income clients through a law school clinic program.
3. Align the application fees for attorney applicants seeking admission by bar exam or UBE score transfer with the application fees for all other attorney applications.
4. Establish an application fee for the new admission pathway – admission by portfolio evaluation—equal to the total amount paid by bar exam applicants.

The proposed application fees, to be effective January 1, 2027, are summarized in the following table.

WSBA Application Fee	Current Fee	Proposed Fee (2027)	Change
Rule 9 Licensed Legal Intern	$50 (since Sept. 2004)	**$100**	$50
Bar Exam - Attorney	$645	**$970**	$325
UBE Score Transfer – Attorney	$645	**$970**	$325
Portfolio Evaluation – General	N/A	**$740**	New
Portfolio Evaluation – Attorney	N/A	**$1,115**	New

In addition, the rule 9 licensed legal intern application fee would increase annually on January 1 as follows:

Application Fee Type	Current WSBA Application Fee	Proposed WSBA Application Fee
Rule 9 Licensed Legal Intern	$50	**$100 (2027)**
Rule 9 Licensed Legal Intern	[redacted]	**$125 (2028)**
Rule 9 Licensed Legal Intern		**$150 (2029)**
Rule 9 Licensed Legal Intern		**$175 (2030)**
Rule 9 Licensed Legal Intern		**$200 (2031)**

Attorney Applicants for the Bar Exam and UBE Score Transfer

The standard practice for setting application fees has been to set higher fees for individuals already admitted to practice law in another jurisdiction. This approach is intended to assist those who are entering the legal profession for the first time by maintaining comparatively lower admission costs for them.

In determining an appropriate application fee for the admission by portfolio evaluation, we discovered that the application fees for attorney applicants for the bar exam and UBE score transfer were not increased to the same level as other pathways for attorney applicants. This oversight allows applicants to select the less expensive application, creating an opportunity for individuals who qualify through multiple avenues to engage in application selection based on price considerations. For example, an Oregon lawyer with at least one year of legal experience and a valid UBE score could apply for admission by UBE score transfer for $645 or by motion for $970. Ideally, application fees should be uniform for all licensed lawyers regardless of their chosen method for seeking admission. Accordingly, for consistency and fairness, and to prevent unintentional revenue loss, we recommend increasing the attorney bar exam and UBE score transfer application fees to $970. Proposed and current attorney applicant fees for all application types are listed below.

Application Fee Type	Current WSBA Application Fee	Proposed WSBA Application Fee
Bar Exam - Attorney	$645	**$970**
UBE Score Transfer – Attorney	$645	**$970**
Admission by Motion – Attorney	$970	$970 (unchanged)
House Counsel	$970	$970 (unchanged)
Foreign Law Consultant	$970	$970 (unchanged)

Rule 9 Licensed Legal Intern Application Fee
Licensed legal interns under APR 9 receive a limited license to practice law under the supervision of a supervising lawyer. Typically, individuals obtain the license while enrolled in law school or participating in the APR 6 law clerk program but can also apply for the license after graduation prior to being admitted as a lawyer. The application fee has remained unchanged at $50 since September 2004. In addition, the application fee is waived if the license is obtained for the sole purpose of participating in a law school clinic program providing free legal services to low-income clients.

The actual cost of processing a Rule 9 legal intern application is considerably more than $50. Although application fees from other application types offset those costs, it is no longer feasible to maintain the license fee at $50 given the rise in labor costs, inflation, and expenses over the last 20 years. As such, we recommend increasing the Rule 9 application fee to $100 for 2027 with subsequent $25 annual increases until the fee reaches $200.

WSBA staff also surveyed other jurisdictions. While only a few responses were received, most indicated fees of $50 or less for intern or law student applications or licenses. Direct comparison, however, is challenging because each state has its own requirements, processes, and scope for intern and law student licensing. Qualifications, duration, and responsibilities vary, making fee structures unique to each jurisdiction. Unlike Washington, it appears that these jurisdictions generally do not conduct thorough character and fitness reviews. In addition, the Washington license also provides greater independence and lasts longer than those in most other jurisdictions.

Additionally, we propose discontinuing the fee waiver for law students in law school clinics providing free legal services to low-income clients, as it is inequitable to charge other applicants serving similar populations. Admissions operates as a self-sufficient cost center and should set fees that cover the costs of reviewing applications, but the proposed $100 fee falls short of the estimated review cost of $400 per application. So, even with the fee increase, substantial subsidies remain as the proposed increases remain well below the actual processing cost.

On May 27, 2026, WSBA staff met with representatives from Washington's three law schools to review the proposals and gather input. The law schools raised no significant concerns and generally agreed that the proposals were reasonable.

New Admissions Pathway: Admission by Portfolio Evaluation
The Washington Supreme Court (Court) currently is considering suggested amendments to the APR to implement a new pathway for admission, to be known as admission by portfolio evaluation. The portfolio evaluation will include a character and fitness application identical to the bar exam application with the same review process. Applicants will submit portfolio items such as written work product and supervisor assessments. Portfolio items will be evaluated by the Board of Bar Examiners.[1]

New costs and expenses associated with portfolio evaluation primarily revolve around additional duties assigned to staff and to the Board of Bar Examiners. Staff will monitor compliance with program requirements and coordinate and support examiners as they evaluate and grade individual portfolio items and receive a stipend similar to what is paid for grading the bar exam answers. Examiners will also be taking on a new task which is to develop ethics prompts for participants who choose not to use the Multistate Professional Responsibility Exam (MPRE). Portfolio grading sessions are expected to take place quarterly with 12-15 graders per session.

[1] For additional information about admission by portfolio evaluation, please visit www.wsba.org/portfolio-eval.

Philosophically, we recommend the application fee for admission by portfolio evaluation should be comparable to if not the same as the application fee for the bar exam. Both provide a way to demonstrate minimum competence to practice law. Both involve substantial staff time to be devoted to tracking an applicant's progress and significant expense associated with grading. In addition to the WSBA application fee, bar exam applicants pay an NCBE exam fee collected by the WSBA. Accordingly, we recommend the application fee for portfolio evaluation be the same as the total amount the WSBA collects from a bar exam applicant. The table below represents the proposed portfolio evaluation application fees compared to the bar exam application fees with the proposed increase to the attorney bar exam applicant.

Application Fee Type	Current WSBA Application Fee	Proposed WSBA Application Fee	NCBE Exam Fee	Total Collected by WSBA
Bar Exam – General	$595	Unchanged	$145	$740
Portfolio Evaluation – General	--	**$740**	--	$740
Bar Exam - Attorney	$645	**$970**	$145	$1,115
Portfolio Evaluation – Attorney	--	**$1,115**	--	$1,115

Other Jurisdictions

Oregon has an experiential pathway for admission called the Supervised Practice Portfolio Examination. Oregon's portfolio examination is substantially similar to Washington's proposed portfolio evaluation. Oregon has the same application fee of $1,000 for both bar exam applicants and its portfolio examination.

Conclusion

A three-year projection shows us that the proposal would result in a net income of approximately $193,000. A three-year projection and reassessment after that time allows us to identify and consider any new trends with the NextGen UBE, testing-accommodations, and the portfolio evaluation. Already we are encountering large increases in the number of applicants seeking testing accommodations. The expenses associated with testing accommodations are considerable and continue to increase. In addition, we have yet to know exactly how many graders will be needed for grading the NextGen UBE and how long grading will take. We also do not yet know exactly how many graders will be needed for grading the portfolio items or how frequently they will need to meet to grade. Finally, we will learn how many people choose the portfolio evaluation over the bar exam.

The following table lists, as a reference, all the admissions application fees including the proposed fee changes.

Application Fee Type	Current WSBA Application Fee	Proposed WSBA Application Fee	NCBE Exam Fee	Total Collected by WSBA
UBE Score Transfer – General	$595	Unchanged	--	$595
Bar Exam – General	$595	Unchanged	$145	$740
Portfolio Evaluation – General	--	**$740**	--	$740
Bar Exam - Attorney	$645	**$970**	$145	$1,115
Portfolio Evaluation – Attorney	--	**$1,115**	--	$1,115
UBE Score Transfer – Attorney	$645	**$970**	--	$970
Admission by Motion – Attorney	$970	Unchanged	--	$970
House Counsel	$970	Unchanged	--	$970
Foreign Law Consultant	$970	Unchanged	--	$970

Rule 9 Licensed Legal Interns	$50	**$100**	--	$100

Information for Fiscal Analysis

If the application fees are increased and established as proposed in this memo, then the Admissions cost center is expected to be able to be self-sustaining for approximately the next five years with a projected net income of approximately $193,000 over the first three-year period.

Information for Equity Analysis

Ensures all attorney applicants are paying the same fee; which also further enables keeping fees lower for people entering the profession for the first time. Removing a waiver for one group ensures an equitable fee structure for all rule 9 applicants.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

The risk analysis is in the BOG's confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The fiscal impact of the proposal is described in this memo and reflected in the attached three-year projection model.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The proposed changes to admission application fees pose minimal equity concerns. Based on the provided materials, the amount of fee increases appear to be scaled to actual financial costs and promote consistency and fairness in the admission fees charged, while also not imposing undue financial burdens on those seeking admission to the bar.

Attachments

- Three-Year Projection Model

ADMISSIONS

	FY 2027	FY 2028	FY 2029
REVENUE			
BAR EXAM FEES	$1,554,500	$1,626,020	$1,626,020
BAR EXAM LATE FEES	$65,000	$65,000	$65,000
HOUSE COUNSEL APPLICATION FEES	$45,000	$45,000	$45,000
FOREIGN LAW CONSULTANT FEES	$1,940	$1,940	$1,940
SPECIAL ADMISSIONS	$5,000	$5,000	$5,000
ALTERNATIVE PATHWAYS APPLICATION FEES	$148,000	$111,000	$111,000
RULE 9/LEGAL INTERN FEES	$36,300	$36,300	$55,950
TOTAL REVENUE	**$1,855,740**	**$1,890,260**	**$1,909,910**
EXPENSES			
STAFF TRAVEL/PARKING	$25,000	$25,750	$25,750
STAFF CONFERENCE & TRAINING	$11,000	$11,330	$11,330
STAFF MEMBERSHIP DUES	$495	$510	$510
SUPPLIES	$2,500	$2,575	$2,575
FACILITY, PARKING FOOD	$155,000	$165,850	$177,460
POSTAGE	$3,700	$3,811	$3,811
BAR EXAM PROCTORS	$14,400	$14,688	$14,982
DISABILITY ACCOMMODATIONS	$90,000	$92,700	$95,481
CHARACTER & FITNESS INVESTIGATIONS	$1,500	$1,600	$1,600
BOARD OF BAR EXAMINERS	$50,000	$63,948	$65,788
EXAMINER FEES	$68,000	$91,000	$91,000
UBE EXAMINATIONS	$1,000	$1,000	$1,000
EXAM GRADING (EXAM 360)	$20,000	$25,000	$5,000
OUTREACH EXPENSES	$10,000	$4,800	$4,800
LAW SCHOOL VISITS	$1,500	$1,500	$1,500
SOFTWARE HOSTING (ILG)	$56,643	$58,909	$61,265
TOTAL DIRECT COSTS	**$510,738**	**$564,971**	**$563,851**
SALARY AND BENEFITS	$924,212	$1,011,742	$1,074,371
OVERHEAD	$259,836	$270,918	$281,755
TOTAL INDIRECT COSTS	**$1,184,048**	**$1,282,661**	**$1,356,126**
TOTAL DIRECT + INDIRECT COSTS	**$1,694,786**	**$1,847,631**	**$1,919,977**
INCOME/(LOSS)	**$ 160,954**	**$ 42,629**	**$ (10,067)**
Cumulative Income/(Loss) Y2-Y6	$ 160,954	$ 203,583	$ 193,516
FTEs	**7.84**	**7.86**	**7.86**

WASHINGTON STATE
BAR ASSOCIATION

TO: Board of Governors

FROM: Terra Nevitt, Executive Director

Paris Eriksen, Manager of Volunteer Engagement

DATE: June 15, 2026

RE: WSBA Treasurer Nomination & Voting Process

ACTION: Elect a current member of the WSBA Board of Governors to serve as the 2026-2027 Treasurer, for a one-year term starting at the conclusion of the Board meeting on September 24-25, 2026.

Nomination Process:

Current members of the Board of Governors have two options to indicate interest in being nominated for Treasurer, 1) submit a cover letter and resume in advance of the July meeting or 2) be nominated from the floor of the July meeting (self-nomination is permitted). To date, one Board member has submitted materials for consideration. These materials follow this memo. After all nominees have been identified, the Board will have the opportunity to interview the candidates and deliberate.

Voting Process:

If there is only one candidate, the Board members will vote to formally elect the candidate as the 2026-2027 Treasurer. If there is more than one candidate, board members will be asked to indicate their choice through secret, electronic ballot. Proxy voting is not permitted. The Treasurer will be elected by a simple majority of Governors voting. If no candidate receives a majority of the votes cast, the two candidates receiving the highest number of voters will be voted on in a run-off election. Votes will be tallied by three persons designated by the President, one of whom must be the Executive Director.

Relevant WSBA Bylaw:

D. ELECTIONS BY BOARD OF GOVERNORS

2. Treasurer

The Treasurer must be a current lawyer Governor and will be nominated and elected by the BOG at the second to the last regularly scheduled BOG meeting of the fiscal year. The Treasurer will be elected by simple majority of Governors voting. In the event there is more than one more nomination, the vote will be by secret written ballot.

Attachment:
Governor Alain Villeneuve, application materials

Alain Villeneuve

[redacted] Seattle, WA 98101 | 312.404.1569 | [redacted]
www.linkedin.com/in/alain-villeneuve-62ab10

Letter of Interest: Treasurer 2026-2027

Dear Governors, President Elect, President, and Past President:

I am happy to offer my name, once again this year, as a nominee to Treasurer of WSBA for 2026-2027. I am the current Governor of District 7S, a member of the Budget and Audit Committee, and a volunteer of the investment subgroup. I am also helping the Director in Finance with a draft new policy as to the payment of stipends to some third parties for possible presentation to the BOG.

As the current director of foreign subsidiaries in my corporate role, a Senior Vice-President, a scientist by trade, I already approve financial and tax-related filings. While not a CPA myself, I greatly value this set of unique skill.

I strongly believe Ms. Tiffany Lynch, CPA and Director of Finance, working in tandem with past presidents, directors, and treasurers has placed our association in a very comfortable and transparent position. I do believe good fiscal policy is one of continuation, transparency and continuation. If re-elected as governor of my district, I plan to seek this role again in the coming years to bring continuation.

Policy 311 of our Board of Governor describe the Treasurer's primary function as "… to inform the Board and officers about the finances of the Bar." One of the key initiatives is for the review and possible presentation to the BOG of several investment strategies within our policy. These can range from highly-conservative (current), conservative, to prudent. My calculation suggests that a 1% policy change would represent a saving of approximates $2-$3 per member per year.

Sincerely,
Alain Villeneuve

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Darryl Colman, MCLE Board Chair
Adelaine Shay, MCLE Board Staff Liaison and WSBA MCLE Manager

DATE: June, 11, 2026

RE: MCLE Board's Preliminary Suggested Amendment to Admission and Practice Rule (APR) 11: High School and Undergraduate Mock Trials

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Action: The MCLE Board asks that the WSBA Board of Governors support its preliminary suggested amendment to Admission and Practice Rule (APR) 11 regarding the establishment of MCLE credit for attorney volunteers who judge or otherwise evaluate students participating in MCLE Board approved high school or undergraduate mock trials.

MCLE BOARD ROLE & RESPONSIBILITIES

Pursuant to APR 11(d)(2)(i), "The MCLE Board shall review and suggest amendments or make regulations to APR 11 as necessary to fulfill the purpose of MCLE and for the timely and efficient administration of these rules and for clarification of education requirements, approved activities, and approved course subjects. Suggested amendments are subject to review by the Board of Governors and approval by the Supreme Court."

SUMMARY

The MCLE Board is proposing a suggested amendment to APR 11 to allow licensed legal professionals to earn MCLE credit for time spent judging or otherwise evaluating students participating in MCLE Board approved high school or undergraduate mock trial events.

BACKGROUND

This initiative arose from the August 9, 2024 meeting, where the YMCA presented the benefits of granting MCLE credit to those involved in high school mock trials. The presentation provided an overview of the specific YMCA mock trial program, which is designed for secondary students, centered around a fictitious case crafted by a Washington Superior Court Judge, and consists of three-hour trials presided over by sitting judges. In addition to the direct judging role, the program also includes attorney raters who provide additional feedback and evaluation.

YMCA's proposal prompted the MCLE Board to convene a subcommittee to study whether mock trial judges at the high school and undergraduate level should receive credit. The subcommittee's work resulted in drafting a suggested amendment which would establish credit for high-school and undergraduate mock trial volunteers. At its October 17, 2025 meeting, the MCLE Board indicated that it was interested in moving forward with the amendment

process and characterized the amendment as a goal for the 2025-2026 fiscal year. At the January 2026 meeting the MCLE Board decided to finalize a report and seek public comment on the potential amendment.

FACTORS IN SUPPORT OF THE SUGGESTED AMENDMENT

Professional Development

Participating in a mock trial program contributes to a licensed legal professional development by providing a way to engage with the Rules of Evidence and courtroom procedure, opportunities that are increasingly rare, especially for newer attorneys, due to the declining number of trials in Washington courts.[1] The program also contributes to professional development by connecting attorneys directly with judges and offering attorneys the opportunity to consider advocacy from the perspective of a judge.

Equity Goals

Offering this MCLE credit benefit promotes diversity of the legal profession through mock trial programs by assisting students who may have an interest in legal careers. Students without family or social ties to the legal profession can, through high school and college-level mock trial programs, learn about the legal profession, see themselves as potential future lawyers and jurists, and gain connections that may help them pursue a legal career. Offering MCLE credit for this supervision and instruction time may encourage lawyers to serve as volunteers for these important programs, thereby furthering WSBA's commitment to increasing access to justice.

Civic Engagement Around the Rule of Law

For students, mock trials facilitate transparency and engagement with the law, create opportunities for education, and allows for youth to see themselves in the role of lawyer. This experience could lend itself to a better understanding of and trust in the rule of law. Providing MCLE credit dovetails with the WSBA Ambassadors Program [2]mission as well the professional responsibilities as quoted (on the Ambassador Program's webpage) and below:

> "[A] lawyer should further the public's understanding of and confidence in the rule of law and the justice system because legal institutions in a constitutional democracy depend on popular participation and support to maintain their authority."
> —RPC Preamble: A Lawyer's Responsibilities[3]
>
> "In general, the Washington State Bar Association strives to … administer programs of legal education … and promote understanding of and respect for our legal system and the law."
> —General Rule 12.2[4]

National Landscape

[1] *See generally* https://www.courts.wa.gov/caseload/?fa=caseload.showArchived
[2] https://www.wsba.org/about-wsba/ambassadors
[3] https://www.courts.wa.gov/court_rules/pdf/RPC/GA_RPC_PREAMBLEANDSCOPE.pdf
[4] https://www.courts.wa.gov/court_rules/pdf/GR/GA_GR_12_02_00.pdf

Washington would be joining at least 11 states currently awarding MCLE credit for judging, evaluating, or scoring high school mock trials, including, Oregon, Colorado, Nevada, Texas, Kentucky, Georgia, New York, Vermont, Rhode Island, New Jersey, and Delaware.

Feedback

Information regarding the potentially suggested amendment is located on the MCLE Board webpage[5], and additionally on March 18, 2026 and April 1, 2026 the "Take Note" WSBA email was sent which contained a paragraph soliciting feedback from WSBA members.

At its April 17, 2026 meeting, the MCLE Board invited in-person public comment on the proposed amendment, and no comments were made. As of May 1, 2026, thirty-nine responses were collected via the online survey. Out of those responses, thirty-seven are in favor of the suggested amendment, and the remaining two are partially in favor. All received comments are included in the attached materials.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

The risk analysis is included in the BOG"s confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The fiscal impact to WSBA resulting from the proposed criteria is limited in size but covers areas of both revenue and expense. Under the current proposal, licensed legal professionals would be able to earn CLE credit for their time spent judging or otherwise evaluating approved mock trials. It is assumed that without this opportunity, these individuals would be earning CLE credit in another capacity, which could include paying for a WSBA provided CLE. Therefore, there is a very small possibility of an impact on WSBA CLE revenue. In terms of expenses, the impact includes the cost of staff time used to draft the amendment language, incorporate the amendment into relevant records, and communicate changes to stakeholders. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analyses is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all. Based on the materials provided, the suggested amendments to APR 11

[5] https://www.wsba.org/Legal-Community/Committees-Boards-and-Other-Groups/mcle-board

do not pose any significant equity concerns. The proposed changes advances procedural equity by allowing MCLE credits for attorney volunteers who judge or evaluate high school or undergraduate mock trials as APR 11 already allows MCLE credits for attorneys should judge or evaluate law school level mock trials. It also seeks to advance equity as an outcome by diversifying the profession and reducing disparities.

Attachments

- MCLE Board Report and Recommendation
- APR 11 Preliminary Suggested Amendment—Redline
- Public Comments—Collected Feedback from Survey

From: Mandatory Continuing Legal Education Board
To: Washington State Licensed Legal Professionals & Community Members
Date: January 9, 2026
RE: **REPORT AND RECOMMENDATION OF THE MCLE BOARD**

Mandatory Continuing Legal Education Board

The Mandatory Continuing Legal Education Board ("MCLE Board") consists of seven members: Darryl Colman (Chair), Katharine Denmark, Nicole Meyer, Efrem Krisher, Henry Phillips, Brendon Taga, and Justin Durueke.

Suggested Amendment

The MCLE Board recommends an amendment to Admission and Practice Rule (APR) 11 that would allow for licensed legal professionals evaluating MCLE Board-approved high school and undergraduate competitions to earn MCLE credit.

The MCLE Board recommends the following suggested amendment to APR 11:

APR11 (d) MCLE Board (2) *Powers and Duties* (vii) Approve Mentoring Programs and High School/College-Level Mock Trial Programs. The MCLE Board shall approve mentoring programs and high school and college-level mock trial programs that meet requirements and standards established by the MCLE Board for the purposes of awarding MCLE credit under these rules.

APR11(e)(11) Judging, evaluating, or scoring participants in a high school or college-level mock trial or moot court program approved by the MCLE Board.

Factors & Information

Professional Development

Participating in the mock trial program contributes to professional development by providing a way to engage with the Rules of Evidence and courtroom procedure, opportunities that are increasingly rare, especially for newer attorneys, due to the declining number of trials in Washington courts.[1] The program also contributes to professional development by connecting attorneys directly with judges and offering attorneys the opportunity to consider advocacy from the perspective of a judge.

[1] *See generally* https://www.courts.wa.gov/caseload/?fa=caseload.showArchived

Equity Goals

Offering this MCLE credit benefit promotes diversity of the legal profession through mock trial programs by assisting students who may have an interest in legal careers. Students without family or social ties to the legal profession can, through high school and college-level mock trial programs, learn about the legal profession, see themselves as potential future lawyers and jurists, and gain connections that may help them pursue a legal career. Offering MCLE credit for this supervision and instruction time may encourage lawyers to serve as volunteers for these important programs, thereby furthering WSBA's commitment to increasing access to justice.

Civic Engagement Around the Rule of Law

For students, mock trials facilitate transparency and engagement with the law, create opportunities for education, and allows for youth to see themselves in the role of lawyer. This experience could lend itself to a better understanding of and trust in the rule of law. Providing MCLE credit dovetails with the WSBA Ambassadors Program mission as well the professional responsibilities as quoted (on the Ambassador Program's webpage) and below:

> "[A] lawyer should further the public's understanding of and confidence in the rule of law and the justice system because legal institutions in a constitutional democracy depend on popular participation and support to maintain their authority."
> —RPC Preamble: A Lawyer's Responsibilities

> "In general, the Washington State Bar Association strives to … administer programs of legal education … and promote understanding of and respect for our legal system and the law."
> —General Rule 12.2

National Landscape

Washington would be joining at least 11 states currently awarding MCLE credit for judging, evaluating, or scoring high school mock trials, including, Oregon, Colorado, Nevada, Texas, Kentucky, Georgia, New York, Vermont, Rhode Island, New Jersey, and Delaware.

Attachments

1. Admission and Practice Rule (APR) 11
2. Draft APR 11 Redline
3. 2025 YMCA Mock Trial Impact Report

SUGGESTED AMENDMENTS TO THE APR 11 (Redline)

TITLE

ADMISSION AND PRACTICE RULES (APR)

RULE 11. MANDATORY CONTINUING LEGAL EDUCATION (MCLE)

(a) – (d)(1) No Changes.

(2) *Powers and Duties* (vii) Approve Mentoring Programs and High School/College-Level Mock Trial Programs. The MCLE Board shall approve mentoring programs, and high school and college-level mock trial programs that meet requirements and standards established by the MCLE Board for the purposes of awarding MCLE credit under these rules.

(d)(3)– (e)(10) No Changes.

APR11(e)(11) Judging, evaluating, or scoring participants in a high school or college-level mock trial or moot court program approved by the MCLE Board.

(f)(1)-(k) No changes.

Washington State Bar Association
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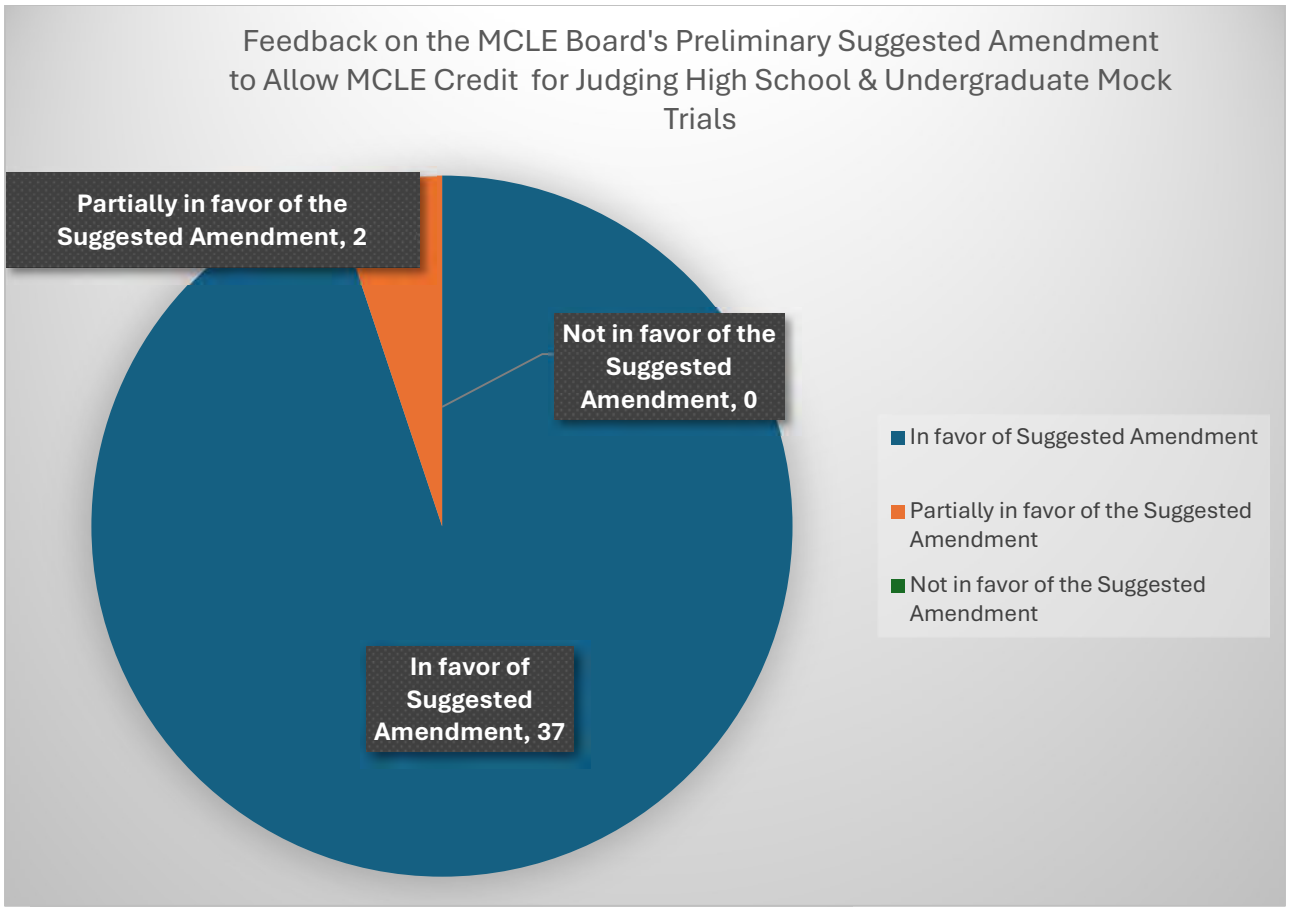
Feedback on the MCLE Board's Preliminary Suggested Amendment to Allow MCLE Credit for Judging High School & Undergraduate Mock Trials
Partially in favor of the Suggested Amendment, 2
Not in favor of the Suggested Amendment, 0
In favor of Suggested Amendment, 37
In favor of Suggested Amendment
Partially in favor of the Suggested Amendment
Not in favor of the Suggested Amendment

Feedback Received as of May 1, 2026

Regarding MCLE Board's Preliminary Suggested Amendment - Judging High School and Undergraduate Mock Trials

Id	Completion Date	Your Name	Your relationship to WSBA	Position on the MCLE Board's Suggested Amendment to APR 11	Please provide any feedback or comments you have regarding the Suggested Amendment:
1	3/18/2026	Jamie Olivares	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	
2	3/18/2026	Jennifer Flynn	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I am strongly in favor of this amendment. I am a lawyer today entirely because of the existence of the YMCA Mock Trial program that was offered in my high school. I am the first person in my family to go to college, let alone law school, and I never would have considered this career path without the experience of participating in high school mock trial. I have been involved in mock trial at some level for the past 22 years - I continued to participate in college and law school, coached a team for six years after becoming a lawyer, and I continue to mentor and judge high school & college competitions. When I took Evidence in law school, I found that I was lightyears ahead of many of my peers because I already had 10 years of experience working with the rules of evidence. Coaching and judging competitions lets me continue to practice rules that might not come up regularly in my practice, and it keeps me excited about what I do. I love having the opportunity to work with young people and help recruit the next generation of lawyers from diverse backgrounds. Many of them would otherwise not know their rights, the pathways to a career, or their own potential. Many of the students we see at the high school level are every bit as talented as some of the students we see at law school level competitions. Due to the larger number of students participating, we need more qualified judges for these competitions and it is hard to get people involved without the incentive of CLE credits. I cannot say enough positive things about the YMCA high school mock trial program. I would be happy to share my experience as a former participant, a coach, and a rater if it would be helpful in any way to the committee in making a decision. I can be contacted at [redacted for privacy].

3	3/18/2026	Kelsey L. Affronte	Licensed legal professional (Lawyer, LLLT, LPO)	Partially in favor of the Suggested Amendment	I think it confirms what attorneys already know, since you're providing feedback to people who have never been to law school/taken the bar. I do like the exposure to different practice styles and feedback from those who have a different perspective on practice, which I think is valuable as a CLE. Maybe there should be a limit on how many of these credits you can claim as MCLE credits? I do like this amendment, but I think these types of volunteer activities have their limits as far as MCLE credits, versus pro bono hours. I also know that these volunteer activities have been hurting for volunteers for many years, so this would be a good way to encourage giving back to your community. Again, maybe that is better as a pro bono credit after a certain number of MCLE hours...
4	3/18/2026	Eli Creighton	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	
5	3/18/2026	David Trujillo	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	
6	3/19/2026	Fawzy T. Simon	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	#1. It causes lawyer to think analytically about a problem. #2. It builds community relations and shows that, even though almost no one consults an attorney when they’re having a GOOD day, still, we care about our communities.
7	3/19/2026	Alyssa Lindburg	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	
8	3/24/2026	Shaunita Felder	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	It takes all of your day to sit and judge those competitions and you have to fill out a rating form, look at materials beforehand, give feedback after to the group and then get stopped for questions and comments in the hall on your way out. These should have been eligible for CLE credit, especially when the YMCA and the judges in charge have our names and information to report.

9	3/25/2026	Ben Stafford	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I am a member of the bar, and for 20 years have coached high school mock trial. I have also judged many law school competitions, for which I've received CLE credit. I would strongly support extend of CLE credit to judging undergraduate and high school mock trials. To be sure, this would facilitate the bar providing an invaluable civic service by encouraging volunteerism. As a former high school mock trial student, participation in the mock trial program is what led to me becoming a lawyer myself. The program is not possible without the scores of lawyers who volunteer their time. But in addition to its salutary benefits in that regard, there is simply no meaningful distinction, in my experience, between judging law school or other mock trial competitions in Washington. When I attended law school, I found evidence to be a breeze because of my high school mock trial experience -- I knew all the rules. And students in high school and college (I've judged a number of competitions) display that knowledge of evidence and trial procedure through mock trials. Lawyer raters, just as with regard to law school competitions, have an opportunity to share trial advocacy feedback at the end of these competitions and, frankly, speaking from personal experience, benefit from hearing a multiplicity of perspectives on what kind of trial presentation is most compelling. I cannot recommend supporting this amendment strongly enough!
10	3/25/2026	Terence Lynch	Licensed legal professional (Lawyer, LLLT, LPO)	Partially in favor of the Suggested Amendment	Completely agree that judging and eating high school Mock Trial should earn lawyer participants CLE credit. I checked “partially agree” because the amendment does not include CLE credits for the several dozen lawyers who volunteer to coach high school teams. These lawyers are competently teaching high schoolers the fundamentals of evidence and basic-to-intermediate trial skills, same as the lawyers who volunteer to teach new bar admittees the same material in trial skills CLEs that are already being given credit. I would amend the rule to permit lawyers to also claim some hours for coaching too.

11	3/25/2026	William L. Downing	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	Before retiring in 2017, I chaired the statewide YMCA Mock Trial Program for a number of years and conducted the King County competition for more than 25 years. The attorney raters invariably reported that they learned a lot from observing the way in which the student lawyers argued the law and the facts. Part of this was in thinking like a judge, hearing the legal analysis on the fly (not laboriously briefed) and part of it was seeing things as a juror might (the emotional as well as the logical.) The insights gained on both levels are extremely valuable for the practitioner. The time is well spent and should be rewarded.
12	3/25/2026	Eric L. Hanson	Mock Trial Coach	In favor of the Suggested Amendment	It is such a blessing to have legal professionals giving back to their communities. These wonderful professionals give hours of their time to judge or rate competitions. Still others volunteer to coach. I know that this amendment is specific to the former though, so I will comment on that only. I do believe that the time our professional volunteers give is important - the impact they have on communities and the lives of the 1000's of youth who participate is meaningful and a benefit to the public as they shape the next generation of legal professionals through their presence, and especially their feedback and shared expertise. Please adopt this motion to include participation in mock trials as an option to accumulated required MCLE hours. This is good policy, and it serves the professional and public good. Thank you.
13	3/25/2026	Patrick Lynch	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I have been involved in high school mock trial as a Coach and Judge since I was sworn in. Clients are continually more and more hesitant to try cases due to the costs involved with trial. Mock Trial, even at the high school level, provides invaluable experience to attorneys that is translatable to their real world practices. I would recommend that this rule be adopted, but I would also recommend that CLE credit be given for the Coaches as well.
14	3/25/2026	Michael Kelly	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I strongly encourage the MCLE Board to adopt this Suggested Amendment. I am a volunteer Coach for Ballard High School's Mock Trial team. While I would not receive the direct benefit of this Suggested Amendment (MCLE credits), I see first-hand how valuable and scarce our judges and raters are. At times we struggle to put on a full tournament due to the lack of a sufficient number of judges and raters. I strongly support this as an additional means of encouraging quality attorneys and judges to give their time to support Mock Trial.
15	3/25/2026	Benjamin Gould	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I have been involved in coaching the Ingraham High School mock trial team and found it to be an invaluable educational experience not just for the students but for myself. To be able to effectively teach procedural, evidentiary, and substantive rules of law, one must master them completely and understand them from the inside out. Reviewing and then having to teach (for example) the hearsay rule and its exceptions, or the rules about character evidence under ER 404, improved my own trial practice. In some ways, my experience coaching the IHS mock trial team has been the single most valuable continuing legal education I have ever benefited from; it is well past time that it be recognized as such.

16	3/25/2026	Trisha Johnson, Senior Deputy Prosecuting Attorney, Skagit County	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I would encourage the Board to adopt the proposed amendment. I am a volunteer in both Washington's YMCA High School Mock Trial program and the ABA Mock Trial college program and am called on to assist in judging due to shortages of available attorneys to assist. The adoption would be helpful to assist in the recruitment of judges for competition, as well as allowing the current attorneys that volunteer to spend their evening and weekend judging to receive credit. We have discovered that once attorneys become involved in judging these young people that are interested in the law and see how amazing their work is, they return to volunteer, assist and even mentor youth in these programs. I agree these programs are an excellent way to engage youth in the legal field and give them exposure they would otherwise they would not have access to.
17	3/25/2026	Erin Riley	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I am a member of the bar of Washington since 2000, litigate civil cases, and have been a volunteer coach for the Ingraham High School mock trial team for the past two years. I have found coaching mock trial a valuable educational experience not just for the students but for myself. To be able to effectively teach pretrial motions, opening and closings, direct and cross examinations, not to mention effective objections and responses, one must master them completely and understand them from the inside out. Thank you.
18	3/25/2026	Susan Fisch	Law Student	In favor of the Suggested Amendment	I support this amendment for all of the reasons listed in the written position. Students participate in Mock Trial to learn about the law and the legal profession. They gain invaluable skills that they can use in all aspects of life regardless of whether they pursue a career in the law. Students gain confidence when members of the bench and bar invest time in them. It helps not only the students that participate but their friends, family and the entire community as well. This experience allows our students to realize that college and a career in the law are attainable. Encouraging attorneys to participate in this process by awarding MCLE credit is a win/win proposition.
19	3/25/2026	Joshua Poisel	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	This amendment makes practical sense. It recognizes the real educational value of mentoring students through mock trial programs. When attorneys invest time in guiding students and evaluating their performance, they're helping build the next generation of legal professionals while reinforcing their own skills. CLE credit for this work will encourage more participation in mock trial programs, mentorship, and shaping future legal professionals. It is also meaningful way and path to connect professional development with community impact.
20	3/26/2026	Megan Dunn	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	Each year it is difficult to recruit licensed attorneys to participate as raters and judges for mock trial competitions. Approving CLE credit for these participants would provide a helpful incentive. The students love hearing from practicing attorneys, so the more this could be encouraged, the better.

21	3/26/2026	Julie Thrall Burrow	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I volunteer a significant number of hours at the local high school's mock trial program. It keeps my rules of evidence knowledge up to date and my argumentative skills honed. And it's super helpful to the program to have licensed attorneys helping out. I'd really appreciate being able to get CLE credit for this. Thanks for considering it.
22	3/27/2026	Laura Gerber	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I am a lawyer in Seattle in private practice. In law school I was on the Moot Court Honor Board and participated in moot court competitions. One of my responsibilities was to recruit local practitioners to serve as judges or raters for our competitions. I recall how difficult it was to find individuals willing to serve as judges for our competitions. I also the incredible benefit these individuals provided when they offered candid, informed feedback to me. I was able to use this feedback to improve my performance and consider new ways to prepare for competitions. In my view, offering CLE credit would be helpful to the extent it would encourage more attorneys to volunteer time to serve as judges or raters for these competitions. For the last two seasons, I have been a coach for the Ingraham High School Mock Trial program. Having recently completed another Mock Trial season, I have witnessed the incredible benefit that in-depth and considered feedback from judges and raters has provided to our students. Our students' skills, their case strategies, and their thinking about their roles as attorneys and witnesses were enhanced when they received informed, candid feedback from judges and raters. Because having dedicated and knowledgeable individuals serving as judges and raters is hugely beneficial to the development of the YMCA Mock Trial program, I support making CLE credit available to these individuals through this amendment.
23	3/27/2026	Hugh Barber	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	Hello- I was KC prosecutor for 27 years and am now in private practice. Throughout my career I have gladly committed to the advancement of our profession through teaching Trial Ad, speaking on panels and judging mock trials presented by law schools, local high schools/colleges and the YMCA. Preparing to judge those mock trials takes a tremendous amount of time and effort, and many qualified attorneys shy away from participating in the non-law school mock trials because we don't get CLE credits for it. Allowing judges and raters of non-law school mock trials to get CLE credits would broaden the pool of attorneys qualified to do so and ensure the participants get the feedback necessary for them to succeed not just in that particular event, but as future lawyers if they choose to become one.

24	3/27/2026	C ANDREW MCCARTHY	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I believe that I may have inadvertently written an extensive comment in support of THIS Amendment in the MSForm for commenting on Colorado comity. I apologize for that mistake. Rather than retype what I wrote, I ask you to please consider my comments where they were intended -- in support of MCLE credit for mock trial judging/scoring/coaching. Thank you.
25	3/27/2026	C ANDREW MCCARTHY	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	My WSBA number is 21080 (inactive as of 2024 (?)). I am a longtime high school mock trial coach at Seattle Prep. I am writing to support this amendment enthusiastically. In close to 30 years of coaching, I have seen hundreds of high school mock trials. At the end of each round, the scorers and the presiding judge provide feedback on trial advocacy to the students. I learn something in every single round -- sometimes something about substantive law, sometimes a trial advocacy tip, sometimes a nuance of evidence law -- but always something. That is true of most of the lawyers in the room, I would venture to say. I also regularly judge at college mock trial competitions (AMTA) at the University of Washington, and at the Empire Mock Trial program (high school). The same is true of those competitions. In the September 2014 issue of the WSBA's NW Lawyer Magazine, I published the article "Teens Take on Attorneys: Mock Trials Have Real Benefits for All." That article sets out the many benefits that mock trial coaching has for practicing attorneys. Although this proposal comes too late to give me CLE credit for any of those many hours that I have spent on the activity, I am confident that credit for mock trial scoring at all levels will improve civics education in Washington State and make it easier to recruit volunteer scorers for competitions. I am unable to attend the meeting on April 17. However, given my experience with mock trial, I would be happy to be part of the process of finalizing some of the details if the amendment goes into effect. For example, should there be some hours allowed for coaching? Or only for scoring/judging? Should there be a cap on the total number of hours that can be earned via mock trial? These are all fair questions, and I would be happy to share my perspective if asked.
26	3/30/2026	Colleen Fitzharris	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I participated in mock trial throughout my high school career and benefitted tremendously from the thoughtful feedback of attorney volunteers. Now that I am a practicing attorney, I regularly return to the lessons I learned as a mock trial participant. I find that watching and providing feedback to my colleagues about their writing and presentation style cause me to reflect on my own practices. I believe that awarding CLE credits to attorneys who help students are not only positively contributing to the education of others but also learn from the experience. I strongly support this amendment and hope the change encourages other attorneys to volunteer their time for this tremendous program.

Feedback Received as of May 1, 2026

Regarding MCLE Board's Preliminary Suggested Amendment - Judging High School and Undergraduate Mock Trials

27	3/30/2026	Geoffrey Burg	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	Dear Members of the WSBA Board and CLE Committee, The YMCA mock trial competition just finished another successful year, made possible not only by the hard work of the YMCA but also by the leadership of Judge Padula and by thousands of volunteer attorney hours from coaches, raters, and judges. I am writing to propose that the Washington State Bar Association (WSBA) adopt a policy awarding Continuing Legal Education (CLE) credits to attorneys who volunteer as coaches, judges, or raters for high school mock trial competitions, not unlike what you already do for law school competitions. This initiative would serve as a powerful incentive for professional engagement while directly advancing our Bar's core mission. As many of us have experienced, the YMCA high school mock trial program is a transformative educational tool. Personally, I have taught mock trial high school students for 10 years and have seen this in action. However, its success depends entirely on the availability of legal professionals to provide mentorship and evaluation, and many schools struggle to find people to teach the students, while the judges are always working hard to find raters. By formalizing CLE credit for this service, the WSBA can achieve several goals: 1. Strengthening the Pipeline of Future Lawyers To ensure our profession thrives, we need to actively recruit the next generation. Mock trial is often the first point of contact a student has with the legal system. When practitioners volunteer, they don't just teach "rules of evidence"; they demystify the profession and provide students from diverse backgrounds with a roadmap to a legal career. 2. Professional Development for Current Attorneys Teaching is one of the most effective ways to master a subject. Attorneys who rate or coach mock trials must engage deeply with the Rules of Evidence, Civil/Criminal Procedure, and Trial Advocacy techniques. Distilling these complex concepts for students requires a level of mastery that directly benefits an attorney’s own practice. 3. Alignment with the WSBA Mission The WSBA’s mission includes "serving the public" and "enhancing the culture of service." Providing CLE credits for mock trial participation: Promotes public understanding of the law. Increases access to justice by supporting programs in underserved schools that may lack legal resources. Fosters civility and professionalism as attorneys model ethical behavior for the community. 4. Incentivizing Pro Bono Service While many attorneys feel a moral obligation to volunteer, the time away from the office remains a hurdle. An allocation of CLE credits could provide the necessary "nudge" to convert interest into action. Several other state bars (New York, California, New Jersey, Connecticut, Georgia, and Texas) have successfully implemented similar programs for their high school students, recognizing that the "educational" component of CLE can extend beyond a lecture hall and into the practical application and teaching of our craft. I believe this change would be supported by the membership and yield dividends for the Washington legal community for years to come. I would welcome the opportunity to discuss how we might structure a pilot program for the upcoming mock trial season. Geoffrey Burg

28	3/30/2026	Lizanne Padula	Lawyer-Judge-WA YMCA MT Program Chair	In favor of the Suggested Amendment	I am strongly in favor of this suggested amendment. First, I hope we can all agree in the value of high school mock trial programs. These programs increase knowledge of our system of justice and promote critical thinking in general. In part, what makes the YMCA Mock Trial Program so valuable is the volunteer participation of Lawyers and Judges. Typically, this volunteer commitment is 3 hours per round of competition. Each volunteer likely spends another hour or two, reading the case and applicable caselaw. The scoring and feedback to the participants is more valuable because it comes from legal professionals giving real, practical and insightful feedback. From these interactions, I have witnessed the development of mentoring relationships and internships. I have seen the Lawyers and Judges, in the courthouse hallways, after the rounds of competition, conversing and inspiring these young minds to continue their pursuit of legal knowledge. As someone that is in charge of rounding up approximately 300 volunteers each year for YMCA Regional & State tournaments, I can attest that I am often asked if the legal volunteer can receive CLE or CJE credits for their participation. I believe that volunteer recruitment would be more effective if we could indicate that CLE/CJE credit is available. This suggested amendment will help ensure that Lawyers and Judges continue to be engaged in local education and community and, through that engagement, foster the next generation of Lawyers and Judges. Lastly, this suggested amendment is wholly consistent with other educational and community-oriented activities promoted by the WSBA and our Supreme Court.
29	4/13/2026	Mary Robnett	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	Participating in the mock trial program, including judging, evaluating, or scoring participants should be approved for CLE credit. It is such a valuable program and ALL participants benefit from the preparation and participation in the program.
30	4/13/2026	Cambria Judd Babbitt	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	As a lawyer who has participated in YMCA mock trial rating, I think CLE credit should be awarded. CLE credit is awarded for judges of law school mock trials and competitions, which serve the same purpose of educating students through practical experience in the area of law
31	4/14/2026	Peter Jones	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I have been judging or evaluating the state mock trial competition for a decade now. They say that by teaching, we learn, and this activity proves it. While it's a good thing for the community, it also helps me sharpen my trial practice skills in real time by being able to discuss issues of trial advocacy with the participating youth. I get more legal education out of this activity than I get from most lecture CLEs, and I wholeheartedly support this amendment.

32	4/16/2026	n/a	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	This is a great step towards access to justice by ensuring attorneys have an active role engaging with our youth, the future lawyers in our community, and by allowing for credits, this opens the door to attorneys that otherwise don't have the privilege of volunteering with youth without anything in return (private attorneys often can use it as pro bono credit or are paid for the work).
33	4/20/2026	Lindsay Zerfas	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	These programs are significant opportunities to engage positively with the public and attract diversity to our profession, which is historically dominated by white men. The youth that participate are a joy to be around and attorneys can learn so much from their bright minds. It also takes a lot of focus and effort to act as a rater. Far more is required of raters at the tournaments than for typical CLEs. Additionally, I run the only Middle School mock trial tournament in the state and assist with the High School mock trial program in Snohomish County. We regularly run into difficulties getting raters. Often, we rely on the same individuals to rate for multiple rounds. It would be spectacular to include CLE credit as this would help recruit raters.
34	4/20/2026	Brooks de Peyster	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	Giving attorneys the opportunity to earn CLE credits for judging undergrad mock trial will be a net positive for our profession and will inspire the next generation of WA lawyers to go to law school.
35	5/1/2026	Peter Heineccius	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I am strongly in favor of the Suggested Amendment for the reasons provided by the MCLE Board. I would further expand the activities listed in APR11(e)(11) to also include "preparing students" for these programs. Lawyers who volunteer their time to teach trial advocacy skills to high school and college students should be treated the same as those who prepare law school students under APR11(e)(9). Thank you.
36	5/1/2026	Muna Jaylaani	Member of the public	In favor of the Suggested Amendment	
37	5/1/2026	Pauline Freund	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	Supporting high school mock trial is a benefit to our whole profession. It’s also a lot of work and should be rewarded.

Feedback Received as of May 1, 2026

Regarding MCLE Board's Preliminary Suggested Amendment - Judging High School and Undergraduate Mock Trials

38	5/1/2026	Tia Rasmussen	Teacher + Mock Trial Coach	In favor of the Suggested Amendment	Every legal professional who rates/judges local mock trial competitions remarks that the students are more competent and commanding than the attorneys they encounter in court every day. Competitions are academic, critical, rigorous, and inspiring. By incentivizing and recognizing participation, you are not only investing in future lawyers in our community, but also reminding legal professionals why they pursued this career in the first place.
39	5/1/2026	Alysa Mo	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	As a former undergraduate mock trial competitor, and current attorney and undergrad mock trial judge, I've seen first hand the value and importance of having judges with diverse tenure and demographics. By permitting MCLE credits to be granted for judging in these competitions, it will be more accessible for attorneys who have stricter billing and life schedules to judge, and the pre-law community will undoubtedly benefit. As an attorney, I've been extremely impressed with the level of knowledge and grasp of the rules of evidence that undergrad students have, and find that my own education of the rules of evidence are often more sharpened by judging undergrad competitions than law school competitions.

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Darryl Colman, MCLE Board Chair

Adelaine Shay, MCLE Board Staff Liaison and WSBA MCLE Manager

DATE: June 11, 2026

RE: MCLE Board's Suggested Amendment to Admission and Practice Rule (APR) 11 – Comity with Colorado

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Action: The MCLE Board asks that the WSBA Board of Governors support its preliminary suggested amendment to Admission and Practice Rule (APR) 11 regarding the establishment of MCLE comity with Colorado.

MCLE BOARD ROLE & RESPONSIBILITIES

Pursuant to APR 11(d)(2)(i), the MCLE Board is tasked with reviewing and proposing amendments or establishing regulations for APR 11 as needed to support the purpose of MCLE. This includes ensuring timely and efficient administration of APR 11 and providing clarity on education requirements, approved activities, and approved course subjects. All suggested amendments are subject to review by the Board of Governors and approval by the Supreme Court.

SUMMARY

As established in APR 11(c)(6), the education requirements in Oregon, Idaho, and Utah substantially meet Washington's education requirements for lawyers. These states have been designated as comity states.

Lawyers licensed in any of the three comity states may satisfy APR 11 requirements by paying the comity fee and submitting a Comity Certificate of MCLE Compliance confirming they met that state's MCLE requirements for their most recent reporting period. The MCLE Board is currently considering a proposed amendment to APR 11(c)(6), which would expand comity to include Colorado.

BACKGROUND

After receiving feedback at the 2024 annual meeting with the Court to explore expanding comity to other states, the MCLE Board began researching the MCLE requirements in other states. This research led them to consider recommending an amendment that would treat Colorado as a comity jurisdiction, since Colorado's MCLE requirements closely resemble those in Washington. Although the current number of lawyers who hold a license in both Colorado and Washington is unknown, as of August 2025, 458 lawyers indicated they were licensed in Colorado at the time of their admission in Washington. At its October 17, 2025, meeting, the MCLE Board decided to move forward with a suggested amendment to extend comity recognition to Colorado, making it an MCLE Board a goal for

the 2025-2026 year. At its January 2026 meeting, the MCLE Board agreed to finalize a report and seek public comment on the potential suggested amendment.

FACTORS IN SUPPORT OF THE SUGGESTED AMENDMENT

Colorado Comity Requirements

Like Washington, Colorado has a 3-year reporting period, requires 45 credits to be earned within that period, and has established an equity, diversity, and inclusivity credit requirement that is similar to Washington's Ethics-Equity credit in substance and intent. Given these similarities, the MCLE Board is considering recognizing Colorado as a comity state.

Colorado Rule 250 and attendant rules and regulations have an all-inclusive comity policy, where attorneys who are complaint in their home jurisdictions and meet certain conditions can use comity from any state to satisfy Colorado requirements. As such, a Washington lawyer who primarily lives in Washington, has their Washington address on file with Colorado Office of Attorney registration for the minimum time period, completes and complies with Washington requirements, and provides a certificate of good standing and Washington MCLE transcript as proof of that compliance, could attain Colorado compliance via Washington comity. The above preliminary suggested amendment would allow those who reside in Colorado to submit comity certificates from Colorado to Washington to meet their CLE requirements in Washington.

Current MCLE Comity Fees

In Washington, lawyers may certify compliance of their MCLE requirements by paying a $25.00 comity fee and submitting a valid comity certificate from a designated comity state (Oregon, Idaho, and Utah). Additionally, Lawyers who are in compliance with their MCLE requirements may request a comity certificate from WSBA by paying a $25.00 comity certificate fee. Comity certificates are not available to those who certified their previous reporting period requirements via comity. Adding Colorado as a comity state may generate a modest amount of revenue.

Comity Submission fee	$25
Comity Certificate from WA fee	$25

Feedback

Details about the suggested amendment are on the MCLE Board webpage[1]. Member feedback was solicited via "Take Note" email on March 18, 2026, and April 1, 2026. At its April 17meeting, no public comments were made in person, but seven survey responses were received by May 1, all supporting the amendment. Comments are included in the attached materials.

[1] https://www.wsba.org/Legal-Community/Committees-Boards-and-Other-Groups/mcle-board

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

Risk analysis is included in the BOG's confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The fiscal impact to WSBA resulting from the proposed criteria is limited in size but covers areas of both revenue and expense. The current proposal would allow MCLE comity with Colorado and as noted above, this would allow the opportunity for additional comity certificate revenue which is minimal at $25 per certificate. In terms of expenses, the impact includes the cost of staff time used to draft the amendment language, incorporate the amendment into relevant records, and communicate changes to stakeholders. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources. Additionally, there could be minimal staff capacity gained for reduced processing MCLE accreditation for those submit comity certificates.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analyses is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all. Based on the materials provided, the suggested amendments to APR 11(6)(a) do not pose any significant equity concerns. The proposed changes will allow comity with Colorado which already allows comity with Washington for the same reason: both states have similar MCLE requirements. These changes would improve procedural fairness for legal professionals who are licensed in multiple states which have similar MCLE requirements.

Attachments

- APR 11 Preliminary Suggested Amendment—Redline
- Public Comments—Collected Feedback from Survey
- MCLE Board Report and Recommendation

From: Mandatory Continuing Legal Education Board
To: Washington State Licensed Legal Professionals & Community Members
Date: January 9, 2026
RE: **REPORT AND RECOMMENDATION OF THE MCLE BOARD COMITY WITH COLORADO**

Mandatory Continuing Legal Education Board

The Mandatory Continuing Legal Education Board ("MCLE Board") consists of seven members: Darryl Colman (Chair), Katharine Denmark, Nicole Meyer, Efrem Krisher, Henry Phillips, Brendon Taga, and Justin Durueke.

Suggested Amendment

The MCLE Board recommends an amendment to Admission and Practice Rule (APR) 11 that would allow for licensed legal professionals to submit a comity certificate from Colorado to satisfy their Washington MCLE requirements.

The MCLE Board recommends the following suggested amendment to APR 11(c)(6):

> Comity. The education requirements in Oregon, Idaho, Colorado, and Utah substantially meet Washington's education requirements for lawyers. These states are designated as comity states. A lawyer may certify compliance with these rules in lieu of meeting the education requirement by paying a comity fee and filing a Comity Certificate of MCLE Compliance from a comity state certifying to the lawyer's subjection to and compliance with that state's MCLE requirements during the lawyer's most recent reporting period.

Background

The MCLE Board decided to research potential comity states after receiving feedback during the 2024 annual meeting with the Court. After conducting research into MCLE requirements in other states the MCLE Board is exploring the prospect of suggesting an amendment that would treat Colorado as a comity jurisdiction given the proximity of their CLE requirements to our own. Satisfying MCLE requirements in Washington through comity lessens the administrative burden on lawyers who are dually licensed in Colorado and Washington state. Although the current number of lawyers who hold a license in both Colorado and Washington is unknown, as of August 2025 there were 458 lawyers who cited they were licensed in Colorado at the time of their admission to the Washington state bar.

Colorado Comity Requirements

Comparable to Washington, Colorado also has a 3-year reporting period, requires 45 credits to be earned within that period, and has established an equity, diversity, and inclusivity credit requirement that is similar to Washington's Ethics-Equity credit in substance and intent. Given these compatibilities, the Board expressed interest in the possibility of recognizing Colorado as a comity jurisdiction.

Colorado Rule 250 and attendant rules and regulations have an all-inclusive comity policy, where attorneys who are complaint in their home jurisdictions and meet certain conditions can use comity from any state to satisfy Colorado requirements.

Colorado Supreme Court and Judicial Education Committee's Regulation 102(3) states that in order to comply via comity, an attorney must (1) have an active license issued by another state that has continuing legal education requirements and is the state of primary residence; (2) that attorney's primary residence and business address in the other state have been on file with the Colorado Office of Attorney Registration for a minimum of 45 days before the end of the attorney's CLE compliance period; (3) the attorney must complete credits in order to comply with their resident state's requirements; and (4) the attorney provides a certificate of good standing establishing CLE compliance in the resident state along with a copy of their CLE transcript that reflects the activities undertaken during their Colorado compliance period.

Given these criteria, a Washington LLP who primarily lives in Washington, has their Washington address on file with Colorado Office of Attorney registration for the minimum time period, completes and complies with Washington requirements, and provides a certificate of good standing and Washington MCLE transcript as proof of that compliance, could attain Colorado compliance via Washington comity. The above proposed suggested amendment would allow those who reside in Colorado to submit comity certificates from Colorado to Washington to meet their CLE requirements in Washington.

Current MCLE Comity Fees

Comity Submission fee	**$25**
Comity Certificate from WA	**$25**

Attachments

1. Admission and Practice Rule (APR) 11
2. Draft APR 11 Redline
3. Colorado Rule 250. Mandatory Continuing Legal and Judicial Education
4. Colorado Continuing Legal and Judicial Education Regulations # amended by the Court, 6/18/2025, effective 1/1/2026

SUGGESTED AMENDMENTS TO THE APR 11 (Redline)

TITLE

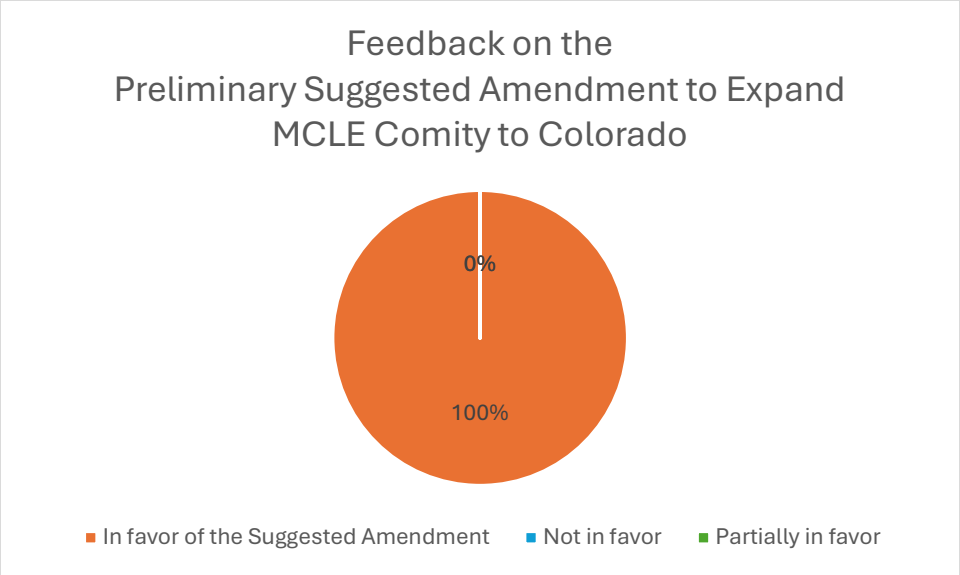
ADMISSION AND PRACTICE RULES (APR)

RULE 11. MANDATORY CONTINUING LEGAL EDUCATION (MCLE)

(a) – (c)(5) No Changes.

(6) Comity. The education requirements in Oregon, Idaho, Colorado, and Utah substantially meet Washington's education requirements for lawyers. These states are designated as comity states. A lawyer may certify compliance with these rules in lieu of meeting the education requirement by paying a comity fee and filing a Comity Certificate of MCLE Compliance from a comity state certifying to the lawyer's subjection to and compliance with that state's MCLE requirements during the lawyer's most recent reporting period.

(c)(7) - (k) No Changes.


Feedback on the
Preliminary Suggested Amendment to Expand
MCLE Comity to Colorado
0%
100%
In favor of the Suggested Amendment
Not in favor
Partially in favor

Feedback Received as of May 1, 2026

Regarding MCLE Board's Preliminary Suggested Amendment - Colorado Comity

Id	Completion Date	Name	Your relationship to WSBA	Position on the MCLE Board's Suggested Amendment to APR 11	Please provide any feedback or comments you have regarding the Suggested Amendment:
1	3/18/2026	Jamie Olivares	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	
2	3/18/2026	Jennifer Hayden	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I fully support the suggested amendment. I agree that satisfying MCLE requirements in Washington through comity lessens the administrative burden on lawyers who are dually licensed in Colorado and Washington State; as I am duly licensed in both states. Not only will the passage of this amendment lessen the burden on the lawyer, but will do so for the hard working MCLE Team for the WSBA that has to process my applications for credits; send and receive messages that deny or accept those applications and send notices requiring further action.
3	3/18/2026	Eli Creighton	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I am barred in both Washington and Colorado. I can attest that both states require similar CLE and ethics considerations, as well as similar commitments to the rule of law, diversity in practice, and progressing the profession.
4	3/18/2026	David Trujillo	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	
5	3/19/2026	Fawzy T. Simon	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I think the sooner the profession discards the antiquated notions that each jurisdiction must individually license attorneys (and any other professionals for that matter) the better it will be for the country. We have any number of “interstate compact” statutes. Why isn’t a lawyer a lawyer everywhere? Why isn’t a nurse a nurse everywhere? Why isn’t a valid driver a valid driver everywhere? I’m referring to the United States. We don’t really have control over anything else, but I wholeheartedly support this proposal

Feedback Received as of May 1, 2026

Regarding MCLE Board's Preliminary Suggested Amendment - Colorado Comity

6	4/13/2026	Doug Boling	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I support the amendment but would also ask that the Board consider changing rules around pro bono service so that the same activities could count towards pro bono service hours. (I have plenty of CLE credits.)
7	4/16/2026	N/A	Licensed legal professional (Lawyer, LLLT, LPO)	In favor of the Suggested Amendment	I came to WA from Colorado and had to let my license there go due to the dual education requirements - this is a great step in allowing folks the flexibility in practice, cutting down on attorney costs, and ensuring efficient continuing education.

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Kevin Plachy, Director of Advancement; Margeaux Green, Practice Management Advisor

DATE: June 4, 2026

RE: Legal Technology Taskforce Policy Recommendations

ACTION/DISCUSSION: First Read — Overview of policy recommendations, stakeholder input, and BOG action pathways

SUMMARY

The WSBA Legal Technology Taskforce delivered its final report to the BOG in September 2025. The report organizes ten Key Points and includes both operational recommendations (for staff implementation) and policy recommendations (for BOG consideration). This memo summarizes the policy recommendations, reports findings from internal stakeholder feedback, outlines BOG pathways to support future decisions. Staff have begun implementing operational work and will continue to do so while the BOG reviews policy issues.

BACKGROUND

In November 2023, the Board of Governors identified emerging technologies—especially AI—as a strategic priority for WSBA and directed the WSBA to create the Legal Technology Taskforce (taskforce) to study impacts, opportunities, and risks for the profession and the public. The taskforce began its 15-month work in May 2024 and evaluated Washington's legal technology landscape, developed recommendations to promote effective, efficient, and ethical technology use, and delivered its final report to the BOG in September 2025 for follow up by the Executive Committee and staff.

Operational Work Underway

Staff are moving forward on operational items that fall within existing authority and our consistent with our FY26-29 Strategic Plan, under the direction of the Executive Director. This includes ongoing operational work for technology-related education and CLE planning; and internal coordination across several program areas including Practice Management, Continuing Legal Education, Member Services and Engagement, and Professional Responsibility. Operational recommendations are being implemented by WSBA staff with input and support from the Technology Implementation Workgroup that was established by the Executive Director in May 2026.[1]

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[1] The WSBA Technology Implementation Workgroup Charter, approved by the Executive Director in May 2026, establishes a staff-led group supported by volunteer subject-matter experts with experience in legal technology, AI, cybersecurity, practice management, ethics, and access-to-justice issues. Although the workgroup has not yet been formally convened, the charter outlines a structure in which WSBA staff project leads collaborate with appointed volunteers through topic-based subgroups to advance implementation of the Taskforce's operational recommendations.

EXECUTIVE OVERVIEW OF POLICY RECOMMENDATIONS

The policy recommendations for the BOG to consider appear in Key Points 2, 3, 6, 7, 8, and 9 of the taskforce report and recommendations. Staff will present Key Point 10 to the BOG at the September meeting. The next section presents each recommendation by Key Point, and includes stakeholder input, staff findings, and possible BOG pathways for action and future decision making.

KEY POINT 2 — BUILDING WSBA CAPACITY AND STRATEGIC PARTNERSHIPS

Recommendations:
The taskforce recommends that the WSBA develop a Strategic Technology Plan to align internal capacity, member support efforts, and strategic partnerships over a multiyear horizon.

Stakeholder Input:
The BOG has already identified technology as a strategic priority, and it has been included in the three-year WSBA Strategic Plan which runs from 2026 through 2029.

Possible BOG Pathways:
Given that technology is already a strategic priority within the current WSBA Strategic Plan, we do not believe that additional action by the BOG is required to implement this recommendation.

KEY POINT 3 — SUPPORTING TECHNOLOGY COMPETENCE: MEETING DIVERSE PRACTICE NEEDS

Recommendations:
The taskforce recommends pursuing a technology MCLE requirement to ensure baseline technology competence and exploring technology content for the Bar Exam.

Stakeholder Input and Findings:
Technology MCLE Requirement

- The Washington Supreme Court (Supreme Court) has tasked the MCLE Board with suggesting amendments to Admission and Practice Rule 11 as necessary to fulfill the purpose of MCLE. Suggested amendments are subject to review by the BOG and approval by the Supreme Court.
- In 2023 the MCLE Board sought support from the BOG on their recommendation to create a stand-alone mental health credit requirement and a stand-alone technology security requirement. As part of its outreach the MCLE Board sought public comment and nearly 1,000 members responded. Approximately 2/3 of members responding to the survey were opposed to the amendments. At its August 11, 2023 meeting, in a vote of 4-6-1, the BOG voted against supporting the stand-alone technology security requirement. The Supreme Court rejected the proposal at that time. However, this occurred before the creation of the taskforce (May 2024) and the release of its report and recommendations (September 2025).
- The taskforce's work included surveying members on their current use and understanding of technology and AI. When asked whether adding a MCLE requirement for a technology related CLE would be beneficial to the legal profession 72% agreed (slightly, moderately or strongly combined).
- Staff will share this recommendation and survey context to the MCLE Board at the August meeting.

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- Stakeholder attendees for these items included Kevin Plachy, Margeaux Green, Renata Garcia, and Adelaine Shay.

Explore Adding Technology and the Law as an Area in the Bar Exam

- Stakeholders suggest that the most practical pathway for incorporating technology or AI content into the licensing process is through the Washington Law Component (WLC) rather than the national bar exam. The WLC is a state specific, self-administered exam updated annually by the Board of Bar Examiners, with Doug Ende, Chief Disciplinary Counsel, developing the ethics topic outline that informs the exam content.
- Stakeholders noted that any adjustments to include technology or AI concepts would need to reflect Washington specific law and ethics expectations, and could be informed by upcoming amendments to the RPC comments related to AI, which the Committee on Professional Ethics plans to present to the BOG in July. Once the BOG approves the suggested amendments, the WSBA will prepare a GR9 and send the proposed amendments to the Supreme Court. Publication of the proposed amendments will go on both the WSBA and the Court's website for comments. When the Supreme Court finalizes those comment updates, staff anticipate that the WLC's ethics outline may be updated accordingly.
- The National Conference of Bar Examiners (NCBE) develops, administers, and reports results for the Multistate Professional Responsibility Examination (MPRE). The WSBA has no authority over this portion of the Bar Exam but could advocate for such a change.
- Stakeholder attendees for these items included Kevin Plachy, Margeaux Green, Renata Garcia, Bobby Henry, and Ramana Pendyala.

Possible BOG Pathways:

Technology MCLE Requirement

The BOG may consider whether it wishes to provide a preliminary position to the MCLE Board regarding the concept of a technology MCLE requirement. The BOG may also direct staff to continue monitoring the MCLE Board's discussion and return with updates after the August meeting.

Explore Adding Technology and Law as an Area in the Bar Exam

Does the BOG have input on the idea of incorporating technology ethics-related questions into the Washington Law Component of the Bar Exam? Because the NCBE has full authority over the MPRE, the BOG has no direct decision-making in exam content. If desired, the BOG may explore whether to engage in optional advocacy by submitting letters or feedback to the NCBE regarding the inclusion of technology and AI ethics topics in the MPRE.

KEY POINT 6 — STRENGTHENING COURT CAPACITY: ADVANCING JUSTICE THROUGH DIGITAL TRANSFORMATION

Recommendations:

The taskforce recommends that the courts modernize their operations with technology by:
- providing comprehensive AI and technology training,
- upgrading courtroom technology,
- updating electronic evidence rules,

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- implement AI detection tools,
- enhancing language access using technology,
- simplifying court forms and e-filings,
- advocate for standardized, statewide court data infrastructure fully funded by the State.

Stakeholder Input and Findings:

- Internal discussions emphasized that these efforts are court led and that WSBA's role is collaborative or advocacy focused when invited. The WSBA Court Rules Committee could have a role in reviewing electronic rules of evidence.
- Stakeholders noted that the BOG recently voted to study court unification, that the Legislature is studying this question, and that WSBA is staffing the legislative taskforce; therefore, the BOG action on statewide infrastructure should wait for taskforce findings.
- Stakeholder attendees for these items included Terra Nevitt, Kevin Plachy, Margeaux Green, Sara Niegowski, Diana Singleton, Nicole Gustine, Melly Diaz, and Dawn Marie Rubio (Administrative Office of the Courts).

Possible BOG Pathways:
The BOG may request a review of the electronic rules of evidence by the Court Rules Committee. The BOG could defer its positions on statewide court data infrastructure until legislative taskforce findings are available. The BOG could set collaboration principles for WSBA's engagement with courts or request targeted follow ups where court partners ask for WSBA assistance.

KEY POINT 7 — LAW SCHOOLS & APR 6 LAW CLERK PROGRAM

Recommendations:
The taskforce recommends law schools:
- embrace a technology conscious culture,
- maintain a practice ready curriculum,
- assess student progress related to technology competencies,
- support faculty in integrating technology into legal education,
- participate in broader policy development.

The taskforce expects similar technology-related preparation for APR 6 law clerks to ensure consistency for future Washington lawyers.

Stakeholder Input and Findings:

- Internal discussions confirmed the BOG's limited authority over law schools and emphasized that most actions in this area are operational or involve advocacy rather than BOG directed policy.
- Participants recommended including APR 6 law clerks in the analysis because the WSBA has greater oversight of that program and clerks should have comparable technology related learning opportunities. Stakeholders discussed potential innovations such as technology focused clinics or incubators.

- Stakeholders noted that the WSBA already engages with law schools across multiple departments and entities, including mentorship and outreach efforts, and that these activities should be coordinated to support consistent messaging and opportunities related to technology competence.
- The Chair of the Legal Technology Task Force provided the law school related recommendations to each of the Washington law school Deans once the report was accepted by the BOG.
- Stakeholder attendees for these items included Kevin Plachy, Margeaux Green, Renata Garcia, Julianne Unite, and Chelle Gegax.

Possible BOG Pathways:
The BOG may choose to signal high level support for integrating technology competence into legal education statewide. In addition, the BOG may consider whether to incorporate technology-related expectations into the APR 6 program or future alternative licensure pathways.

KEY POINT 8 — ADVANCING ETHICAL INNOVATION AND EQUITABLE ACCESS (AI & ATJ)

Recommendations:
The taskforce recommends:
- establishing ethical boundaries for AI legal tools,
- expanding court-based AI resources (in coordination with Key Point 6),
- and fostering development of affordable and scalable tools that improve access to justice.

Stakeholder Input and Findings:
- Stakeholders noted overlaps with the Entity Regulation Pilot Program, but also identified gaps, particularly regarding AI provider transparency and accountability, which fall outside the pilot's scope.
- Stakeholders discussed the need for further analysis of this point's alignment with WSBA's mission.
- For court-based AI resources, stakeholders emphasized that this work is court led. The ATJ Committee is already active in court modernization efforts through its liaisons and engagement with AOC partners.
- For development of affordable legal technology tools, stakeholders identified the ATJ Board, the AI & Access to Justice Initiative, and potential partners such as OCLA, LFW, OPD, and Techtonic.
- Stakeholder attendees included Kevin Plachy, Margeaux Green, Renata Garcia, Diana Singleton, Jeanne Marie Clavere, and Bonnie Sterken.

Possible BOG Pathways:
The BOG may consider whether it wishes to take a position on any aspect of this Key Point and request a legal risk analysis with respect to any engagement with AI-related consumer protection and technology provider accountability issues. The BOG may also choose to signal support for continued coordination with ATJ and court partners on court-based AI resources, which remain court led efforts.

KEY POINT 9 — SAFEGUARDING SENSITIVE LEGAL DATA: STRENGTHENING CONSUMER PROTECTION

Recommendations:
The taskforce recommends advocating for updated consumer protection laws, advocating for enhanced consumer privacy protections, and developing consumer focused certification programs to help the public identify trustworthy legal technology tools.

Stakeholder Input and Findings:
- Internal discussions raised the need for further analysis of this point's alignment with WSBA's mission.
- WSBA staff can flag issues to agencies with appropriate jurisdiction and focus on member education materials or public checklists that remain within operational bounds.
- Stakeholder attendees for these items included Kevin Plachy, Margeaux Green, Sara Niegowski, and Laurie Powers.

Possible BOG Pathways:
The BOG may consider whether it wishes to take a position on any aspect of this Key Point and request a legal risk analysis. Only after that assessment could the BOG consider whether it sees a role for WSBA in elevating concerns to appropriate external agencies, or whether it prefers to refrain from taking a position on this Key Point.

LEGAL / EQUITY / FISCAL ANALYSIS

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

The risk analysis is in the BOG's confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The fiscal impact of the proposed recommendations is primarily staff time used to assist in drafting the recommendations, incorporating the changes into relevant records and systems, and communicating changes to stakeholders. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources. It is possible that there may be some direct expense impact in terms of volunteer reimbursements for applicable travel, meals, and lodging for participation additional meetings and any other relevant work resulting from the recommendations, however we do not anticipate these costs to be material based on the existing information.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analyses is to understand how entities incorporated an equity lens into proposed action items presented to the BOG. Applying an equity lens includes 1) identifying and centering people and communities most impacted decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all. Given the WSBA is in the preliminary stages of determining paths for addressing the recommendations and specific actions have not yet been proposed, a substantive equity analysis of most of these recommendations is premature.

However, equity analysis guidance is requested for potential proposals for an MCLE Technology Requirement and exploring technology content in the bar exam. As noted in the Taskforce Report, the Committee used the Access to Justice Technology Principles as a guide as well as an equity lens of noting the importance of meeting members where they are based on their needs. That said, as the Taskforce and other entities like the MCLE Board and Committee on Professional Ethics, we encourage the application of same equity and justice lenses. We encourage policy makers to consider accessibility when determining whether to require technology competence, asking whether members have meaningful access to technology and/or encounter barriers to technology. For example, there may be varying levels of access to reliable broadband, updated devices, and digital literacy among members based on their geographic location, social identities, and social-economic circumstance. If exploration of the possibility of adding the cybersecurity and technology to the bar exam, the BOG should not only consider accessibility and apply equity and justice lenses, it should consider how to incorporate into other pathways to licensure which are currently under development.

ATTACHMENTS

- WSBA Legal Technology Taskforce Final Report & Recommendations
- Taskforce Policy Recommendations Overview
- WSBA Technology Implementation Workgroup Charter

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2025 WSBA LEGAL TECHNOLOGY TASK FORCE REPORT

Embracing Change: Strategic Roadmap for Washington's Legal Profession in a Time of Technology Disruption

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Acknowledgments

This compilation of work would not be possible without the dedicated contributions of the members of the WSBA Legal Technology Task Force.

THANK YOU TO ALL OF THE CONTRIBUTING MEMBERS.

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Drew Simshaw	*Public Member*
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Judge Christon Skinner	*Adjudicative Member*
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WASHINGTON STATE
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WASHINGTON STATE
BAR ASSOCIATION

Executive Summary

The Washington State Bar Association Legal Technology Task Force presents this comprehensive report of findings and recommendations on how the Washington State Bar Association (WSBA) can support legal professionals in Washington in understanding and adopting emerging technologies, particularly generative artificial intelligence (AI) and advanced data analytics.

Additionally, the report addresses the roles, responsibilities and impacts of entities outside of the WSBA in this technological transformation, and these entities are also the subject of some of the recommendations in the report.

THESE RECOMMENDATIONS FALL WITHIN 10 KEY POINTS:

1 **Harnessing Potential: The Role of Practitioners**

Legal professionals must integrate new technology tools into their daily work to serve clients efficiently, ethically, and competently. This includes understanding the implications of AI and other emerging technologies.

2 **Building the WSBA's Capacity and Strategic Partnerships: Innovating Responsibly and Ensuring Equitable Access**

The WSBA should build sustained internal capacity and create strategic partnerships with technology providers to support members in navigating technological change.

3 **Supporting Technology Competence: Meeting Diverse Practice Needs**

The WSBA should offer tailored guidance and support to help members build technology competence over time, addressing the varying needs of different practice settings. This includes affordable access to education focused on the use, limitations, and benefit of emerging technology.

4 **Building Ethical Frameworks for Technology Use: Supporting Professional Values in a Digital Age**

The Task Force emphasizes the importance of ethical adoption of technology and calls for the development and use of practical frameworks for evaluating new technologies and maintaining professional standards.

5 **Bridging the Cybersecurity Confidence Gap: From Confidence to Competence**

The WSBA should establish clear cybersecurity standards and offer affordable security training to help legal professionals protect client information and maintain public trust.

6 **Strengthening Court Capacity: Advancing Justice through Digital Transformation**

The rule of law and access to justice depends on our courts. The report calls for comprehensive AI training for court personnel, upgrading courtroom technology, implementing AI detection tools to enhance the administration of justice, and a standardized, modern, statewide court data infrastructure fully funded by the State and designed to support integration, efficiency, and equitable access to justice.

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7 Supporting Future Professionals: Transforming Legal Education for the Digital Era

Washington's law schools must comprehensively embed technology across curricula and educational experiences, building not just awareness, but deep technological proficiency.

8 Advancing Ethical Innovation and Equitable Access: Leveraging AI to Close the Justice Gap

The WSBA should ensure that AI-driven legal assistance supports meaningful access to justice by promoting the development of standards and supporting the creation of AI applications that are accurate, ethical, and designed with the public interest in mind.

9 Safeguarding Sensitive Legal Data: Strengthening Consumer Protection in a Digital Era

The Task Force highlights the need for clear cybersecurity standards, affordable security assessments, and transparency in cybersecurity practices to protect client information and maintain public trust.

10 Ensuring Regulatory Innovation and Stability: Future Expertise and Oversight

Technology is developing at rapid rates. Courts, lawyers, and the rules governing them cannot remain static or the chance of forced obsolescence is real. The Task Force recommends establishing a Supreme Court-affiliated board to provide expertise, oversight, and guidance on legal technology and regulatory innovation.

1. Board of Governors November 2023 Meeting Update, Washington State Bar Association (2023), https://www.wsba.org/docs/default-source/about-wsba/governance/bog-meeting-recaps/board-of-governors-meeting-recap-nov.-2-3-2023.pdf?sfvrsn=987f1cf1_2.
2. *Legal Technology Task Force Charter,* Washington State Bar Association (March 7, 2024), https://www.wsba.org/docs/default-source/legal-community/committees/legal-technology-task-force/wsba-legal-technology-task-force-charter.pdf?sfvrsn=3e881ff1_1.

WHY WAS THE TECHNOLOGY TASK FORCE CREATED?

In November 2023, the WSBA Board of Governors recognized the transformative impact of technology, particularly artificial intelligence (AI), on the legal profession.[1] As one of its strategic priorities for the 2023-24 fiscal year, the Board adopted the following statement:

> ***"Assess technology-related opportunities and threats and determine WSBA's role vis-à-vis regulation, consumer protection, and support to legal professionals."***

The creation of the Legal Technology Task Force is a step towards acting on this priority. The Task Force worked to assess the legal technology landscape, identify threats and opportunities across various legal sectors, and make recommendations that support and strengthen the understanding and use of technology in members' practice.[2] The Task Force's report emphasizes the effective, efficient, and ethical use of technology to enhance equitable access to justice.

As part of its work, the Task Force distributed a survey in October 2024 to more than 10,000 WSBA members and received 516 responses representing a wide range of practice areas, firm sizes, and geographic regions. This 5% response rate yields a 98% confidence level with a 5% margin of error. Using the Washington State Supreme Court's Access to Justice Tech Principles as a guide, the Task Force makes these recommendations to the Board of Governors on tangible steps WSBA can take to support and strengthen the use of technology within the legal profession in Washington state.

A Defining Moment

Legal services and technology have long been intertwined. The legal profession has largely embraced technologies that make organizing, transmitting, and accessing information easier—from word processing, e-discovery, databases, and filing systems to cloud platforms and communication tools.

But today's emerging technologies, particularly generative AI and advanced data analytics, are fundamentally different. These tools don't merely help legal professionals organize and access information—they generate, synthesize, and extract insights in ways that challenge our traditional understanding of legal work and professional responsibilities. They derive their power from combining and using data sets in unprecedented ways and perform complex analytical tasks at unprecedented scale. As such, they raise urgent questions as to whether they will not just augment but substitute for aspects of human learning, judgment, and analysis.

This is a defining moment for the legal profession. AI is already transforming legal practice, court operations, and client expectations. It will not replace lawyers, but it will change how lawyering is done.[3] That change is already underway, and the pace is accelerating. Legal professionals need to understand these new technologies not only for efficiency and productivity but also to remain competitive and responsive to their clients' evolving needs. Current approaches to profitability, efficiency, competitiveness, and legal ethics all demand adaptation. While these approaches promise new benefits, they also present complex risks that legal professionals must navigate to remain competitive and responsive to their clients' evolving needs.

AI is already transforming legal practice, court operations, and client expectations. It will not replace lawyers, but it will change how lawyering is done.

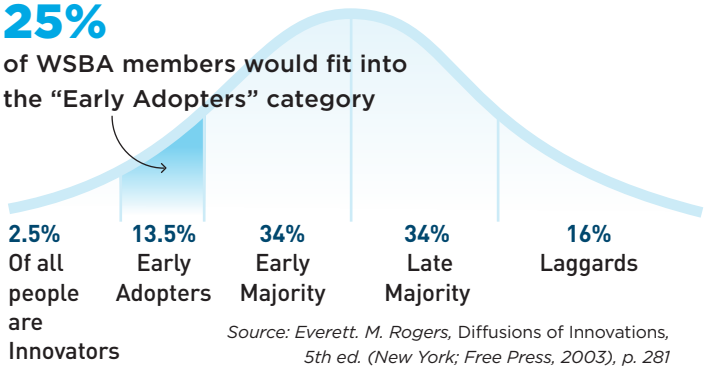
3. Ken Crutchfield, *AI Won't Replace Lawyers — But It Will Change How They Work*, Above the Law (March 26, 2024), https://abovethelaw.com/2024/03/ai-wont-replace-lawyers-but-it-will-change-how-they-work/.

Meeting Members Where They Are

WSBA members are not all in the same place when it comes to legal technology. Some are actively experimenting, while others are just beginning to learn. Many remain uncertain, or face barriers to adoption such as cost, time, or lack of training.

This is normal. As described by Everett Rogers' "Diffusion of Innovation" model,[4] technology adoption occurs along a predictable curve: from innovators and early adopters to the early and late majority, to eventually laggards. The goal is not to rush all legal professionals into using AI or any single tool. The goal is to meet members where they are, with practical, tailored guidance and support that helps them build the necessary technology competence.

"Diffusion of Innovation" model



Source: Everett. M. Rogers, Diffusions of Innovations, *5th ed. (New York; Free Press, 2003), p. 281*

The Task Force's recommendations reflect this approach. They are not one-size-fits-all. Some are directed at the WSBA itself, calling for internal reforms, new resources, and dedicated staff capacity. Others look outward, calling for collaboration with courts, law schools, technology providers, and legal employers. Across all sectors, this report emphasizes ethical adoption, thoughtful experimentation with an eye towards expanding access to justice, and member support.

The goal is to meet members where they are, with practical, tailored guidance and support that helps them build the necessary technology competence.

4. Bill Henderson, *What is the Rogers Diffusion Curve? (004)*, Legal Evolution (May 8, 2017), https://www.legalevolution.org/2017/05/rogers-diffusion-curve-004.

More Than a Trend: A Structural Shift

The legal profession is experiencing a fundamental shift in how technology is transforming legal work—not merely how quickly practitioners adopt it. Generative AI is the most visible example of the shift, but it is not the whole story.

Over the past decade, AI has quietly become embedded in everyday legal tools, e-discovery platforms, legal research engines, contract review software, and even word processors. As with earlier technological leaps, like the introduction of online research in the 1990s or cloud-based practice management tools in the 2010s, initial skepticism is giving way to necessity. In the years ahead, AI likely will become a baseline component of legal competence, even for those who choose not to use it directly.[5]

These changes will reshape how lawyers work, how courts operate, and how clients access legal services. AI is already changing billing models, research strategies, client communication, and even the way courts manage filings and review evidence. These technologies offer opportunities to enhance access to justice, improve language access, and streamline routine legal tasks. But they also pose risks to those fundamental aspects and raise concerns about inaccurate outputs, bias, data security concerns, and a potential erosion of trust in legal professionals. Legal professionals must understand these risks to serve clients competently and ethically and WSBA should support them in these efforts.

AI is already changing billing models, research strategies, client communication, and even the way courts manage filings and review evidence.

5. Tom Martin, *AI in the Legal Profession: Separating Substance from Hype*, The National Law Review (Oct. 9, 2024), https://natlawreview.com/article/ai-legal-profession-separating-substance-hype.

WASHINGTON STATE
BAR ASSOCIATION

Meeting the Moment: Washington's Opportunity to Lead

Washington's legal community is uniquely positioned to lead. With respected law schools, innovative legal professionals, and proximity to major technology companies, Washington is situated at the intersection of innovation and public service.

The Task Force believes that Washington can model how to embrace legal technology in a way that protects the public, upholds professional values, and improves the delivery of legal services and access to justice.

Technology is not an end in itself, especially not in the delivery of effective legal services. At the same time, it has become both a critical tool for legal practice and an essential subject matter that practitioners must understand. The WSBA Technology Survey Report: Preliminary Findings[6] (the Survey) shows a notable gap: Only 25% of survey respondents currently use AI in their practice, that rises to 70% among in-house counsel. But the implications of technology extend far beyond direct usage. As these technologies become increasingly ubiquitous in society, they challenge legal professionals to navigate both their application in practice and their role in shaping our world. Lawyers must also understand how the technology affects their clients' opportunities and challenges. The profession cannot opt out of this transformation—as one Task Force member noted, "the toothpaste is not going back in the tube."

Legal professionals need to embrace and leverage technological change rather than resist it. Practitioners have a special role not only as advocates for their clients but also as officers of the court with responsibility for the quality of justice, including safeguarding the rule of law. Understanding technologies like AI is becoming fundamental to fulfilling these obligations—from ensuring the authenticity of evidence to protecting client confidentiality, and from expanding access to justice to maintaining public trust. By pairing these developing tools with highly competent professionals, it is possible to enhance access to legal services and improve the overall quality of legal services.

As AI reshapes legal work, the profession must integrate these tools without compromising human judgment, strategic thinking, and ethical standards that form its essential value. Technology can enhance efficiency, but the profession's core value lies in human expertise and experience, strategic thinking, and the ability to navigate complexity. The legal profession must ensure that AI adoption strengthens—not weakens—the ethical foundations and public trust that define its role in society.

This moment is not just about catching up to change. It is about shaping the future of the profession.

6. *WSBA Technology Survey Report: Preliminary Findings*, Washington State Bar Association (April 2025), https://www.wsba.org/docs/default-source/legal-community/committees/legal-technology-task-force/wsba-technology-survey-report.pdf?sfvrsn=fd1e1bf1_1.

Ten Key Points

The Task Force developed ten key points to guide these efforts. Within each of the key points, the framework is set for the recommendations that follow.

The recommendations offer a roadmap for shaping the future of the legal profession through education, ethical guidance, regulatory clarity, and cross-sector collaboration. Throughout all the key points the focus remains clear: advance member competence, strengthen public protection, increase access to justice, and ensure that technology enhances, not undermines, our core values as legal professionals.

The key points are grouped to reflect where leadership and action are needed. They begin with the role of the individual practitioner—because above all else, effective and ethical practice in the age of AI depends on member engagement. No matter what steps the WSBA or the courts take, a legal professional's own understanding and judgment are foundational. Subsequent sections address the assessment of the institutional responsibilities of the WSBA, courts, law schools, and policymakers to provide the guidance, infrastructure, and regulation necessary to support members and protect the public.

1 Harnessing Potential: The Role of Practitioners

Legal professionals must proactively build their understanding of emerging technologies, particularly AI, to serve clients competently and uphold their professional obligations. While institutions like the WSBA and the courts have important roles to play in guiding AI adoption in legal settings, each practitioner is ultimately the steward of their own practice and their representation of clients. Individual professionals are best positioned to determine how to integrate new tools into their daily work, ensuring that they serve their clients and other stakeholders efficiently, ethically, and competently. At the same time, making sound determinations will depend greatly on understanding the uses and implication of emerging technology.

Generative AI, in particular, presents a dual learning challenge for the legal profession. It is both a tool for enhancing legal practice and a subject that demands understanding due to its quickly evolving capabilities and pervasive role in society. Legal professionals must grasp its implications as generative AI manifests in the real world. Within the practice, this means understanding how it impacts clients' lives—from issues like automated contracts and disputes over algorithmic bias to new vulnerability for fraud and other harms. In litigation contexts it will touch everything such as evidence authentication and deepfakes. In society, practitioners have a special role not only as advocates for their clients but also as officers of the court with responsibility for the quality of justice, including safeguarding the rule of law.

Generative AI is rapidly becoming a subject matter that legal professionals must understand, even if they opt not to use these tools themselves. For example, as AI-generated content, such as deepfakes and altered documents, becomes more prevalent, legal professionals must develop a foundational understanding of these technologies to effectively challenge or defend evidence in court. Judges and

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juries may also rely on expert testimony built using generative AI outputs, requiring legal professionals to critically engage with and cross-examine such testimony. The growing use of generative AI also introduces new cybersecurity threats, such as sophisticated fraud schemes, malicious deepfake content, physical threats and harassment, and AI-driven attacks designed to bypass traditional security measures.[7] Practitioners must understand these evolving threats to effectively advise clients and protect their own practices from vulnerabilities associated with AI-generated content.

Moreover, as AI becomes pervasive in areas like hiring, lending, and insurance underwriting, legal professionals will increasingly encounter disputes where algorithmic decisions are central to their clients' claims, rights, and opportunities. Understanding how algorithms are designed and trained, where biases can arise, and what remedies may be available will be critical for advising clients effectively. Federal and state agencies are investing in generative AI tools to help streamline and accelerate decisions that may impact access to benefits, with positive outcomes in many cases, but also with room for errors that may go unexplained or uncorrected.[8] All practitioners, whether they adopt AI or not, will need AI competencies such as the ability to evaluate fairness and legality of algorithmic practices in corporate, employment, and civil rights contexts.

This is a moment to be proactive, experiment, and learn. Every legal professional, regardless of practice area or experience, has an opportunity (and obligation) to take a hard look at their own work and ask: Am I leveraging the best tools and learning available to serve my clients fully and well? Am I doing so securely and responsibly?

Generative AI is rapidly becoming a subject matter that legal professionals must understand, even if they opt not to use these tools themselves.

AI and other legal technologies are rapidly expanding what is possible in legal practice, from streamlining research and document drafting to improving client communication and case strategy. Practitioners who actively engage with these technologies—and proactively build their cybersecurity competence—can thrive in this evolving landscape.[9] This means staying informed about emerging digital threats, regularly updating security practices, and ensuring robust protection of client information. It also means engaging with WSBA so it can serve the needs of its members.

RECOMMENDATIONS

A **Build Technology Competence:** Legal professionals must actively seek to understand how emerging technologies, particularly generative AI, impact their practice areas, client needs, and ethical obligations.

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7. Kristopher Turner, *Deepfakes and the Legal Profession*, WisBar (Jan. 2025), https://www.wisbar.org/NewsPublications/WisconsinLawyer/WisconsinLawyerPDFs/98/01/21_23rev.pdf.
8. Sanam Hooshidary, Chelsea Canada, and William Clark, *Artificial Intelligence in Government: The Federal and State Landscape*, NCSL (Nov. 22, 20224), https://www.ncsl.org/technology-and-communication/artificial-intelligence-in-government-the-federal-and-state-landscape.
9. Natalie Pierce and Stephanie Goutos, *Why Lawyers Must Responsibly Embrace Generative AI*, Vol. 21 Berkley Business Law Journal p.1-51, (2023).

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B **Start Small, Learn Fast:** Legal professionals should begin by becoming comfortable identifying common generative AI uses within their existing workflows. Starting small can build familiarity and confidence quickly.

C **Use Simple, Practical Resources**: Legal professionals should take advantage of short articles, checklists, and simple tools designed specifically for ease of use—especially those developed by the WSBA or other professional legal associations—to support issue spotting and evaluation of different technologies.

D **Collaborate to Accelerate Learning:** Legal professionals should engage with colleagues to share real-world examples and experiences involving technology to support legal practice. Peer discussions can clarify concepts and surface practical strategies that are already working in similar practices.

E **Stay Curious and Flexible:** Legal professionals should remain open to exploring how generative AI and other legal technologies may affect their practice. Incremental experimentation can reduce pressure and help practitioners adapt to change more effectively.

2 Building the WSBA's Capacity and Strategic Partnerships: Innovating Responsibly and Ensuring Equitable Access

To support members in navigating technological change, the WSBA must invest in internal capacity, cross-sector partnerships, and accessible technology education. Due to varying levels of preparedness and resources, WSBA members are facing rapid technological changes unevenly and often without the support needed to evaluate, adopt, or implement new tools. Small and mid-sized firms, in particular, often lack access to the training, guidance, and infrastructure they need to navigate this transformation while upholding ethical and professional standards.

The legal profession is experiencing unprecedented technological change, affecting everything from court operations and client service delivery to the tools available to consumers and litigants.[10] The Survey reveals the scope of this transformation—and the growing demand for support. While 70% of in-house counsel responding are already using AI tools, adoption drops to just 22% in small and mid-sized firms—not because these tools are irrelevant, but because practitioners lack the resources, guidance, and support to evaluate and implement them effectively. Early publicity about the potential flaws in AI also enforced doubts and suspicions about its efficacy and ethical framework. This disparity reflects a broader challenge: WSBA members need sustained, practical support to navigate technological change while maintaining their ethical obligations and professional standards. The WSBA made legal research tools available to members because they were indispensable yet inaccessible for many. It will need a similar approach for new tools.

The Survey shows that 69% of respondents believe AI use will require additional training and skills, yet only 26% rate their current knowledge as "good" or better. Members are seeking help with everything

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10. Drew Simshaw, *Access to A.I. Justice: Avoiding an Inequitable Two-Tiered System of Legal Services*, Vol. 24 Yale Journal of Law and Technology p.150-226, (2022).

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from evaluating technology tools to implementing security measures, understanding ethical implications, and adapting their practice models. These needs are not static—they evolve alongside the technologies themselves and as ethical frameworks develop to meet new challenges. As one Task Force member noted, "training and support for members are not a 'one and done' experience."

Ensuring that members can effectively navigate technological transformation is central to WSBA's mission to serve the public, champion justice, and uphold professional competence. To fulfill this mission amid rapid technological change, WSBA must build sustained internal capacity and establish flexible structures for ongoing support and collaboration. This includes assessing staffing capabilities, exploring the creation of a dedicated WSBA technology innovation workgroup to offer practical guidance, and investing in infrastructure for continuous education and resource delivery.

Strategic partnerships with technology providers are essential to bridge the adoption gap, especially among solo, small firm, rural, and underserved practitioners. These partnerships can expand access to AI-powered tools like AI legal assistants, document automation platforms, and practice management systems, prioritizing affordability and ease of use.

According to the WSBA study, 70% of in-house counsel responding are using AI tools, but adoption drops to just 22% in small and mid-sized firms.

Vendor-led training can help members evaluate and adopt tools confidently, without creating added burdens for WSBA staff.

The WSBA should maintain transparency and fairness in vendor partnerships by offering a straightforward process for vendors to submit proposals to be offered to WSBA members. While the WSBA offers a discount network and has one preferred insurance provider, it does not broadly endorse specific legal technology tools. Future partnerships should support member access without favoritism, focusing on helping members evaluate tools independently, securely, and ethically. There must also be a system for ongoing evaluation of tools so members do not get stuck with outdated technology.

RECOMMENDATIONS

A **Expand and Tailor Member-Focused Technology Education:** The WSBA should collaborate with technology vendors, law schools, and other industry experts to develop and implement a core curriculum focused on AI literacy, cybersecurity, ethics, and technology best practices. Training should be practical, accessible in multiple formats (e.g. CLEs, webinars, on-demand videos, and written guides), and especially responsive to the needs of solo and small firm practitioners. The WSBA should also offer advanced CLEs for deeper engagement with specialized tools.

B **Launch Interactive Workshops:** Experimental learning is critical to raising competence in emerging technology. The WSBA should create interactive, hands-on workshops offering practical, low-risk opportunities for members to directly experience emerging legal technologies.

C **Establish Dedicated Technology Expertise:** The WSBA should evaluate staffing capacity to

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ensure adequate expertise and resources are available for monitoring legal tech trends and providing responsive, ongoing member support including one-on-one consultations through the Practice Management Program. The WSBA should also explore technology mentorship or peer learning groups focused on legal tech implementation.

D **Develop a Strategic Technology Plan:** The WSBA should publish a comprehensive, multi-year strategic plan outlining goals, timelines, and priorities for advancing technology competence across the profession. Regular progress reporting and member surveys should track improvements in adoption, training, and ethical integration.

E **Centralize Technology Resources:** The WSBA should create a user-friendly online Technology Resource Hub with resources such as curated checklists, sample policies, toolkits, vendor directories, FAQs, and training materials.

F **Expand and Maintain the Practice Management Discount Network:** The WSBA should strengthen its vendor partnerships by expanding the Practice Management Discount Network. This includes transparent vetting processes, clear evaluation standards, and vendor accountability, while maintaining neutrality and fairness in offerings. The WSBA should partner with vendors to expand access to affordable technology tools and offer demonstrations, CLEs, and interactive trainings.

G **Form a WSBA Technology Implementation Workgroup:** The WSBA should establish a time-limited workgroup to collaborate with WSBA staff and stakeholders on implementing technology-focused recommendations, including development of tools, training resources, and member engagement strategies.

H **Pilot a WSBA Technology Showcase Event:** The WSBA should organize a large-format event featuring legal tech vendors, CLE speakers, and hands-on demonstrations to help members explore emerging tools in an interactive environment.

3 Supporting Technology Competence: Meeting Diverse Practice Needs

The WSBA must meet members where they are by tailoring support and education to different practice settings and needs. Technology competence has become fundamental to legal practice, but the path to achieving it varies dramatically across the legal profession. The Survey reveals both universal needs and stark disparities: while 69% of respondents recognize their need for additional technology training, their ability to access and implement that training varies significantly by practice setting. The contrast is particularly striking between large organizations with dedicated IT support and small or rural practices managing technology alongside daily client demands.[11]

These disparities extend beyond resources to fundamental differences in how technology serves different practices. In-house counsel, with 70% AI adoption rates, need advanced training on emerging tools. Meanwhile, small and rural practitioners seek immediately applicable solutions for routine tasks like document drafting and calendaring. As one

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11. Abigail Peterson, *2024 Solo and Small Firm Tech Report*, American Bar Association (April 21, 2025), https://www.americanbar.org/groups/law_practice/resources/tech-report/2024/2024-solo-and-small-firm-techreport/.

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practitioner noted in the Survey, "We need practical tools that work in the real world, not theoretical knowledge about AI." This diversity of needs demands an approach to education and support that is both comprehensive in scope and flexible in delivery.

The Survey points toward a strategic, targeted approach to training and competency building. While 72% of respondents support a technology-focused MCLE requirement, their needs and preferences vary significantly.

RECOMMENDATIONS

A **Provide Free or Low-Cost Educational Opportunities:** The WSBA should offer programs covering technology basics, ethics (including confidentiality), cybersecurity, privacy, and licensing considerations for existing and emerging technologies.

B **Provide Free or Low-Cost Personalized Consultations:** The WSBA should offer personalized consultations focused on emerging technology, cybersecurity, and ethics, with a particular focus on reaching underserved communities, solos, and small firms.

C **Expand Advanced Programming:** The WSBA should offer content covering specific applications of existing and emerging technologies, offer hands-on training opportunities, and consider expanding certifications to technologies particularly suited to legal practice.

D **Recommend a Technology MCLE Requirement:** The WSBA should consider recommending that the Washington Supreme Court adopt an MCLE requirement focused on cybersecurity and technology competence.

E **Explore Adding Technology and the Law as an Area in the Bar Exam:** Emerging technology has profound implication for every substantive area of law. WSBA should work with area law schools to determine what implications this has for curriculum and how best to include technology competence in the bar exam.

While 72% of respondents support a technology-focused MCLE requirement, their needs and preferences vary significantly.

4 Building Ethical Frameworks for Technology Use: Supporting Professional Values in a Digital Age

Legal professionals need practical tools to evaluate and ethically implement new technologies, not just updated rules. The ethical implications of technology in legal practice extend far beyond any single tool or application. While only 25% of survey respondents believe current ethical rules adequately cover AI use, the Survey reveals a deeper challenge: practitioners need practical guidance on how to fulfill their professional obligations in an increasingly digital practice environment. This need is most acute among those using technology most extensively—notably, in-house counsel who report the highest AI adoption rates (nearly 70%) also express the least confidence in current ethical guidelines.

The WSBA's Committee on Professional Ethics (CPE) is developing specific guidance on AI use, focusing on core professional obligations including competence,

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confidentiality, supervision, and fees. This important work will help set baseline expectations, and the Task Force strongly supports the developing work in the CPE. However, the Survey and working group findings indicate that practitioners need more than revised Rules of Professional Conduct ('RPCs') or formal rule guidance[12]—they need practical frameworks for evaluating new technologies, implementing appropriate safeguards, and maintaining professional standards while embracing beneficial innovation.[13]

These frameworks must address several key challenges identified by the Task Force. Legal professionals need clear guidelines for protecting client confidentiality when using AI and other cloud-based tools. They need practical standards for supervising technology-assisted work, whether performed by legal professionals, staff, or automated systems. Most importantly, they need help understanding how to maintain their professional judgment and ethical obligations while leveraging technology to serve clients more effectively.[14]

RECOMMENDATIONS

A **Define Baseline Ethical Standards for Emerging Technologies:** The Board of Governors, through the CPE, and, where applicable, with approval of the Washington Supreme Court, should define baseline ethical standards for emerging technologies. This includes evaluating the sufficiency of existing RPCs, creating due diligence guidelines, and defining the enforceability of such guidance.

B **Publish Clear, Practical Ethics Guidance For Member Questions about Emerging Technologies:** The WSBA should expeditiously create and publish clear, accessible materials, including FAQs and practical content, to help members to quickly identify ethical risks prior to adoption of emerging technologies, including but not limited to confidentiality breaches, bias, inaccuracies, and lack of transparency. These need to be regularly reviewed and updated as technology advances.

C **Create an Ethical Evaluation Framework and Resources for Technology Use:** The WSBA should develop a practical, generalized Ethical Evaluation Framework to help practitioners in systematically assessing new and emerging technologies for compliance with ethical obligations.

5 Bridging the Cybersecurity Confidence Gap: From Confidence to Competence

A gap exists between legal professionals' confidence in their cybersecurity practices and their actual implementation. The WSBA must close this gap with standards, tools, and support. The Survey reveals a concerning paradox in how legal professionals approach cybersecurity. While 79% of respondents express confidence in their ability to protect client and organizational data, the actual implementation of basic security measures tells a different story. Only 34% conduct regular security audits, 37% use data

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12. Dennis Kennedy, *Handout from "Ethical Implications of Generative AI for the Michigan Lawyer" Presentation*, Dennis Kennedy Blog (Dec. 14, 2023), https://www.denniskennedy.com/blog/2023/12/handout-from-ethical-implications-of-generative-ai-for-the-michigan-lawyer-presentation/.
13. Jonathan H. Choi, Amy B. Monahan, and Daniel Schwarcz, *Lawyering in the Age of Artificial Intelligence*, Minnesota Law Review (Nov. 30, 2024), https://minnesotalawreview.org/article/lawyering-in-the-age-of-artificial-intelligence/.
14. Keith Robert Fisher, *ABA Ethics Opinion on Generative AI Offers Useful Framework*, American Bar Association (Oct. 3, 2024), https://www.americanbar.org/groups/business_law/resources/business-law-today/2024-october/aba-ethics-opinion-generative-ai-offers-useful-framework/.

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encryption, and even multi-factor authentication —considered a fundamental security practice by experts—is used by just 68% of respondents. This gap between confidence and implementation creates significant risk not just for individual practices, but for the entire legal system's ability to maintain client trust and confidentiality.[15] This is at a time when advances in AI allow more sophisticated methods of targeting confidential information. Legal professionals hold valuable client confidences—consumers are rarely in a position to evaluate data security of legal service providers, and there is limited consumer protection oversight in the area.[16]

The challenge is particularly acute for small firms and solo practitioners. While larger organizations, government agencies, and in-house legal departments generally report somewhat more robust security infrastructures, smaller practices often lack both the resources and expertise to implement basic protections.[17] This disparity isn't just about technology —it reflects fundamental differences in access to IT support, security expertise, and implementation resources. Yet these smaller practices often handle equally sensitive client information, making their security gaps a significant concern for the profession as a whole. This parallels the client-facing concerns raised in key point 9 regarding strengthening consumer protection in the digital era.

Making cybersecurity accessible and practical for all practice settings must be a priority. Legal professionals shouldn't need to become cybersecurity experts, but they do need clear standards, practical implementation tools, and accessible support. This includes basic security checklists, incident response playbooks, and emergency support resources. Many of these tools already exist through the WSBA,[18] the ABA,[19] and other sources, but awareness and adoption remain low. Moving from where we currently are to awareness, understanding, and implementation will take both resources and innovation from the WSBA. The profession needs both better awareness of existing resources and new, practice-specific tools that

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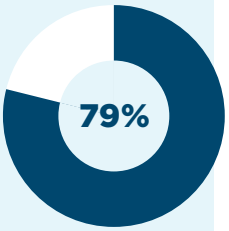
FAST FINDINGS

Cybersecurity by the numbers



79% of respondents express confidence in their ability to protect client and organizational data.

34% conduct regular security audits.

37% use data encryption.

68% of respondents use multi-factor authentication.

15. Sharon D. Nelson, *25% of Law Firms Have Been Breached*, ALPS (Jan. 11, 2022), https://www.alpsinsurance.com/blog/25-of-law-firms-have-been-breached.

16. *Formal Opinion 2024-3: Ethical Obligations Relating to a Cybersecurity Incident*, New York City Bar (July 18, 2024), https://www.nycbar.org/reports/formal-opinion-2024-3-ethical-obligations-relating-to-a-cybersecurity-incident/.

17. Abigail Peterson, *2024 Solo and Small Firm Tech Report,* American Bar Association (Apr. 21, 2025), www.americanbar.org/groups/law_practice/resources/tech-report/2024/2024-solo-and-small-firm-techreport/.

18. *The Law Firm Guide to Cybersecurity*, Washington State Bar Association (Oct. 8, 2021), https://www.wsba.org/for-legal-professionals/member-support/practice-management-assistance/guides/cybersecurity-guide.

19. *Cybersecurity Resources for Small Law Firms*, American Bar Association, https://www.americanbar.org/groups/cybersecurity/small-solo-resources/.

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make security implementation straightforward and manageable.

RECOMMENDATIONS

A **Establish Cybersecurity Expectations:** The WSBA should establish clear, and actionable cybersecurity standards for legal professionals, including minimum expectations such as multi-factor authentication, encryption, secure data storage, and regular audits. These standards should build upon existing WSBA cybersecurity resources and be regularly reviewed and updated to address evolving threats and technologies.

B **Provide Affordable Cybersecurity Assessments:** The WSBA should collaborate with cybersecurity experts, insurers, and malpractice carriers to provide low-cost, or free, cybersecurity assessments tailored to the needs of solo and small-firm legal practices.

C **Expand Cybersecurity Awareness, Training, and Support:** The WSBA should actively promote existing cybersecurity resources, expand those to meet practice specific needs, develop simplified checklists and step-by-step implementation guides tailored for solos and small firms, and deliver targeted, practice-oriented training through webinars, workshops, and on-demand resources.

D **Promote Cybersecurity Transparency With Clients:** The WSBA should formally recommend or require legal professionals to explicitly disclose their cybersecurity practices in client engagement letters, thereby strengthening client trust, transparency, and practitioner accountability.

6 Strengthening Court Capacity: Advancing Justice Through Digital Transformation

6.1 ADAPTING COURTS TO RAPID TECHNOLOGY CHANGE

The rule of law is dependent on ensuing our courts are fully equipped and supported so they can meet the technology changes. Washington's courts must modernize responsibly and equitably, balancing emerging technologies with protections to ensure justice, fairness, and access. The COVID pandemic has demonstrated both the necessity and possibility of remote proceedings, while the emergence of AI tools presents new opportunities and challenges for the administration of justice. The Survey reveals that legal professionals are divided on AI's impact on courts—40% express concerns about efficiency and fairness, while 38% see positive potential. This division underscores the need for a thoughtful, structured approach to court technology evolution.

AI presents both a threat and a major opportunity for closing the justice gap. The Washington Supreme Court's recent Order[20] enabling a Pilot for Entity-Based Regulation is a promising step. The Task Force supports implementation of the Pilot and encourages continued experimentation with technologies and business structures that can improve legal access.

Courts are facing increasingly complex and urgent challenges. As AI-generated evidence and fabricated citations become more common, courts, despite operating with limited resources, must still be equipped to assign accountability and ensure

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20. Order Approving the Adoption of a Pilot Project to Teach Entity Regulation, Order No. 25700-B-721 (Wash. Dec. 2024). www.courts.wa.gov/content/publicUpload/Supreme%20Court%20Orders/Order%2025700-B-721.pdf.

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accuracy.[21] They must balance remote access with procedural fairness. They must leverage technology to expand access while maintaining the integrity of judicial processes. The Administrative Office of the Courts (AOC) and local jurisdictions need appropriate staffing and funding to evaluate these tools and support courts in modernizing their technology infrastructure. But beyond resources, courts need adequate education, support. and clear frameworks for managing technology-driven change.[22]

Key priorities identified by the Task Force include providing uniform training and education for court personnel, consistent with education and training recommendations in key point 3 for legal professionals. Updating evidence rules to address AI-generated content, creating authentication standards for digital evidence, and implementing hyperlinked pleadings to help courts verify citations are also key priorities. Equally important is making court forms AI-compatible to support self-represented litigants while reducing the burden on court personnel. The courts must also address language access, with AI translation tools offering potential for routine communications while ensuring constitutional requirements are met for critical proceedings. Finally, the profession would benefit from high level guidance like that recently issued by the Illinois Supreme Court,[23] with a clear, pragmatic approach to AI, permitting its use while holding lawyers and judges accountable for accuracy, ethics, and confidentiality.

As AI-generated evidence and fabricated citations become more common, courts must still be equipped to assign accountability and ensure accuracy.

RECOMMENDATIONS

A **Provide Comprehensive Court Training on AI and Technology:** The Supreme Court and the AOC should establish and fund comprehensive training programs for judges, clerks, and court staff on the responsible use of AI and related courtroom technologies. These programs should include formal certifications and partnerships with trusted technology providers for training support.

B **Upgrade Courtroom Technology:** The WSBA should make it a priority to advocate for statewide funding to equip all Washington trial courts with essential courtroom technology, including reliable broadband access, stationary and movable microphones, audio amplification systems, high-resolution monitors, wall-mounted monitors, and video conferencing software.

C **Update Rules on Electronic Evidence:** The WSBA should work with the Washington Supreme Court to revise court rules governing the introduction of electronic evidence, specifically addressing foundation

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21. *AI-Generated Evidence: A Guide for Judges*, National Center for State Courts, https://www.ncsc.org/resources-courts/ai-generated-evidence-guide-judges.
22. Richard Susskind, *The Future of Courts*, Harvard Law School Center on the Legal Profession (August 2020), clp.law.harvard.edu/knowledge-hub/magazine/issues/remote-courts/the-future-of-courts/.
23. Illinois Supreme Court Policy on Artificial Intelligence (January 1, 2025), https://ilcourtsaudio.blob.core.windows.net/antilles-resources/resources/e43964ab-8874-4b7a-be4e-63af019cb6f7/Illinois%20Supreme%20Court%20AI%20Policy.pdf.

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requirements, authenticity, objections, and concerns related to transparency in algorithms and regarding AI-generated content, such as deepfake images and synthetic audio.

D **Implement AI Detection Tools:** The WSBA should advocate for courts to adopt processes, assisted by standardized tools, to evaluate the legitimacy of citations and legal arguments within motions, briefs, and legal memoranda.

E **Enhance Language Access through AI:** The WSBA should encourage courts to adopt advanced AI translation and transcription technologies to improve court hearings and routine communications, while ensuring compliance with constitutional language access requirements.

F **Simplify Court Forms and Filings:** The WSBA should advocate for, and potentially partner with the courts, to develop AI-powered tools, such as chatbots, to help self-represented litigants complete and fill standardized court forms. AI should be employed to translate these forms into various languages, with accuracy verified by qualified interpreters.

6.2 MODERNIZING FRAGMENTED, OUTDATED COURT DATA INFRASTRUCTURE TO IMPROVE EFFICIENCY AND ACCESS

Washington's courts operate on outdated and fragmented digital systems, which hinder transparency and public access, delay justice, and prevent cross-jurisdictional innovation. Washington courts currently operate without a unified digital system. Calendaring tools, case management systems, and e-filing platforms differ widely due to funding structures and jurisdiction—specific needs, and current local systems rely heavily on fragmented, decades-old technologies.[24] While the courts' flagship program Odyssey brings some commonality to data infrastructure, it is far from complete.

To realize the benefits of emerging technologies— and to avoid falling further behind—Washington's courts need consistent and compatible e-filing systems statewide. Their back-end systems must be able to share and analyze data across jurisdictions, enabling the use of AI tools to improve transparency. access, equity, and efficiency. This should be done in a way that cost barriers are removed or minimized for access to court records.

Achieving this will require significant state investment in new technology, particularly in rural and underfunded jurisdictions, as well as restructuring of data "ownership" models. It also involves addressing the inherent political tensions among the judiciary, legislative bodies, county governments including court clerks, and the broader public surrounding court records and data ownership. A modern statewide court data infrastructure, and resolution of the political question of data ownership, would reduce administrative burdens, improve transparency, and help jump start modern innovations such as AI-driven legal assistance, user-friendly digital services, and more equitable public access. Building this infrastructure will require long-term state funding and close coordination across stakeholders at all levels of government.

Without a fully unified digital system, courts face persistent inefficiencies, burdensome manual

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24. Moe K. Clark, *'It's an uphill battle': Decades-Long Effort to Unify Washington's Court System Again Falls Short*, InvestigateWest (March 20, 2025), https://www.investigatewest.org/investigatewest-reports/its-an-uphill-battle-decades-long-effort-to-unify-washingtons-court-system-again-falls-short-17840352.

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processes, and critical data gaps. These issues are consistently reported by legal practitioners across the state, including in the Survey, and fall especially hard on self-represented litigants and rural communities.

RECOMMENDATION

A **Advocate for Standardized, Statewide Court Data Infrastructure Fully Funded by the State:** The WSBA should strongly advocate for a standardized, modern statewide court data infrastructure fully funded by the State and designed to support integration, efficiency, and equitable access to justice.

7 Supporting Future Professionals: Transforming Legal Education for the Digital Era

To prepare students for modern legal practice, Washington's law schools must comprehensively integrate technology into curriculum, training, and culture, not as an add-on, but as a core component of legal education. The rapid evolution of technology is reshaping legal practice at every level, demanding fundamental shifts in legal education. To meet these demands, Washington's law schools must move beyond incremental updates to the curriculum and embrace comprehensive, transformative integration of technology and innovation. The next generation of legal professionals will enter a profession already deeply shaped by generative AI, advanced data analytics, cybersecurity demands, and digital innovation.[25] Traditional legal education models, emphasizing theory without adequate practical technological integration, no longer adequately prepare students for practice.

Law schools must comprehensively embed technology across curricula and educational experiences, building not just awareness, but deep technological proficiency.

Law schools must comprehensively embed technology across curricula and educational experiences, building not just awareness, but deep technological proficiency.[26] This includes providing hands-on experiences, real-world practical clinics, and explicit pathways toward technology-driven careers.[27] Crucially, these efforts must also include significant investments in faculty skills and confidence in emerging technologies, ensuring educators can effectively guide and inspire future lawyers. By fostering a culture of innovation, curiosity, and ethical technology use, Washington law schools play a pivotal role in equipping new lawyers not only to navigate technological change, but to become its responsible leaders.

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25. Anthony Davis, *The Future of Law Firms (and Lawyers) in the Age of Artificial Intelligence*, American Bar Association (Oct. 2, 2020), www.americanbar.org/groups/professional_responsibility/publications/professional_lawyer/27/1/the-future-law-firms-and-lawyers-the-age-artificial-intelligence/.

26. Raymond H. Brescia, *Teaching to the Tech: Law Schools and the Duty of Technology Competence*, Vol. 62 62 Washburn Law Journal p.507-540, (2023).

27. *CODEX*, Stanford Law School, https://law.stanford.edu/codex-the-stanford-center-for-legal-informatics/ (last visited July 8, 2025).

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RECOMMENDATIONS

A **Embrace a Technology Conscious Culture:** Washington law schools should foster a culture in which faculty, staff, and students are supported in navigating the challenges and opportunities presented by new technologies in legal education and in the rapidly changing legal services landscape.

B **Maintain a Practice-Ready Curriculum:** Washington law schools should ensure that impactful technologies are addressed in courses focusing on technology skills (e.g. document automation, contract review, and data analysis) and processes (e.g. e-discovery, digital evidence, and cybersecurity), as well as in traditional and core courses (e.g. professional responsibility and civil procedure), through independent study opportunities (e.g. online tutorials, webinars, technology-focused directed research), and in clinics and externships that allow experiential opportunities with technology in different settings.

C **Assess Student Progress:** Washington law schools should establish a requirement that students demonstrate technology competence before graduating, such as by completing certain technology-focused course work, by completing technology-focused projects, or through a reputable technology certification program. Schools should regularly assess student progress and identify areas needing additional training or support.

D **Ensure Post-Graduation Success:** The WSBA and Washington law schools should establish a mentorship program that pairs students with practitioners who are experienced in using technology in their law practice. They should also promote a career path focused on technology and law by providing students with guidance on how to pursue a career in this area.

E **Support Faculty:** Washington law schools should encourage faculty to develop their own technology skills and support them through regular training on software, hardware, and online platforms commonly used in legal services, so they can effectively teach and mentor students.

F **Influence Broader Law and Policy Development:** Washington law schools should support faculty scholarship and research related to technology, hold continuing legal education courses on technology, and maintain an institute or center that focuses on the intersection of law and technology to provide a hub for research, education, and innovation.

8 Advancing Ethical Innovation and Equitable Access: Leveraging AI to Close the Justice Gap

The public is increasingly turning to AI-driven tools for legal help, without attorney involvement, creating an urgent need for ethical standards, public education, and innovative delivery models that expand access to justice without compromising consumer protections A recent LexisNexis survey[28] found that 27% of consumers have used generative AI to answer legal questions on their own, a figure that closely parallels the 25% of legal professionals using generative AI in their practice, according to the Survey. This data underscores a critical shift: the public is turning to AI

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28. *Generative AI & the Legal Profession*, Lexis Nexis (April 2023), https://www.lexisnexis.com/pdf/ln_generative_ai_report.pdf.

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for legal help, often without the benefit of attorney oversight or guidance.

These tools present both an opportunity and risk. On one hand, AI-powered tools offer meaningful opportunities to expand access to justice by reducing costs, improving legal literacy,[29] and simplifying routine legal tasks for self-represented litigants[30] and communities.[31] On the other hand, these tools also pose serious risks if left unchecked. Without thoughtful regulation and professional engagement, they risk spreading misinformation, violating unauthorized practice of law (UPL) rules, and impacting the quality of legal guidance the public receives.

The WSBA, courts, and legal professionals must embrace their role in shaping the future of ethical legal technology by ensuring that AI-driven legal assistance supports, rather than undermines, meaningful access to justice. This means proactive investment in innovation, formation of strategic partnerships, and ensuring equitable technology access. The Washington Supreme Court's recent authorization of a regulatory pilot program for new business structures and entity-based regulation represents an essential step toward responsible innovation and enhanced access to legal services.[32]

Rather than viewing AI as a risk to legal service delivery, the profession should lead efforts to integrate these tools responsibly— developing standards, clarifying UPL boundaries, and creating AI applications that are accurate, ethical, and designed with public interest and trust in mind. Legal professionals are not only protectors of justice; they are also critical stakeholders in building a more inclusive and technologically responsive legal system.

RECOMMENDATIONS

A **Establish Ethical Boundaries for AI Legal Tools:** The WSBA, in collaboration with the Washington Supreme Court, should establish clear guidelines distinguishing appropriate from unauthorized or misleading uses of AI-generated legal advice to protect consumers from misleading or inaccurate information, reduce bias, and protect fundamental rights. Legal technology providers should be required to ensure transparency in how their systems function and to be accountable for their outputs.

B **Expand Court-Based AI Resources:** The WSBA should advocate that Washington courts invest in practical, user-centered AI tools, such as multilingual self-help portals and simplified online forms, to expand meaningful legal access for underserved communities.

C **Support Public-Facing AI Literacy:** The WSBA and Washington Courts should jointly develop public education materials to enhance consumer understanding of AI-based legal tools, empowering the public to use AI responsibly and with confidence.

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29. Drew Simshaw, *Access to A.I. Justice: Avoiding an Inequitable Two-Tiered System of Legal Services*, Vol. 24 Yale Journal of Law and Technology p.150-226, (2022).

30. Christopher L. Griffin, Jr., Cas Laskowski, and Samuel A. Thumma, *How to Harness AI for Justice*, Judicature International (July 23, 2024), https://judicature.duke.edu/articles/how-to-harness-ai-for-justice/.

31. Nicole Black, *Access to Justice 2.0: How AI-Powered Software Can Bridge the Gap*, ABA Journal (Jan. 24, 2025, 10:20am), https://www.abajournal.com/columns/article/access-to-justice-20-how-ai-powered-software-can-bridge-the-gap.

32. Order Approving the Adoption of a Pilot Project to Teach Entity Regulation, Order No. 25700-B-721 (Wash. Dec. 2024). www.courts.wa.gov/content/publicUpload/Supreme%20Court%20Orders/Order%2025700-B-721.pdf.

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D **Educate Legal Professionals on Inclusive AI Implementation:** The WSBA should partner with law schools and MCLE providers to offer targeted programs to equip legal practitioners to ethically use AI tools that genuinely benefit and are designed to serve underserved communities.

E **Foster Development of Affordable and Scalable Tools:** The WSBA should explore and promote funding mechanisms that expand the development of affordable, user-friendly technologies for small legal practices, public interest service providers, and individuals with limited resources.

9 Safeguarding Sensitive Legal Data: Strengthening Consumer Protection in a Digital Era

Legal professionals have a responsibility to protect sensitive legal data from misuse in a rapidly evolving digital landscape. They also are on the front lines where their clients suffer or face the rising misuse of technology. As legal information becomes increasingly commodified by AI tools and online platforms, stronger consumer protections, clearer regulations, and lawyer-led advocacy are urgently needed. Integrating AI into governance, constitutional systems, and judicial processes raises urgent questions about protecting consumer data from misuse, manipulation, or unauthorized access. It also requires the WSBA to be an active participant in updating key consumer protection laws.

Consumers are increasingly turning to online platforms for help with deeply legal issues—like health issues, financial challenges, immigration, or domestic violence—without realizing how their data may be tracked, shared, or sold.[33] If not thoughtfully managed, these advancements risk undermining the rule of law and democratic principles by exposing users to risks ranging from surveillance to fraud, to behavioral advertising to the commodification of legal needs. For example, when an individual visits an immigration law website, uses a chatbot that provides landlord tenant guidance, or installs an app that provides legal services for victims of domestic violence, hundreds of businesses may track and monetize that person's personal information, often including their location. The chatbot operator, for example, could sell the unique online identifiers or even the queries of its users to online advertising platforms who can use the personal information to target digital ads or to third party data aggregates. Increased default settings on apps allow sales of the information, including nature of inquiries and geolocation. Others allow cross-app tracking so information from a device is shared more broadly.

This risk also exists even earlier in the process: consumers who search for 'legal advice' in the app store on their phones can choose among hundreds of legal services apps available today—let alone understand what tracking or sharing of information is permitted by default under the app's terms of service? The Task Force believes the WSBA is well positioned to develop materials to help consumers evaluate such offerings, partner with other bars to develop a standard 'seal' to identify legal services websites and apps meeting certain criteria, and provide a mechanism for consumers to ask questions about such apps, and where, if appropriate, to report the

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33. Michelle Egbert, Comment, *Access to Freedom: Can Technology Improve Access to Justice for Survivors of Domestic Abuse?*, Vol. 36 Journal of the American Academy of Matrimonial Lawyers p.187-207, (2023). www.aaml.org/wp-content/uploads/7-MAT105.pdf.

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unauthorized practice of law.

According to the Survey, 68% of legal professionals believe existing consumer protections for AI are inadequate. Nearly 60% support the creation of AI-specific privacy protections, and over 50% favor measures requiring companies to disclose how consumer data is used and giving individuals the right to correct or delete data utilized by AI models. Without robust safeguards and oversight, AI-driven decision-making—whether in the private or public sector—can silently erode personal privacy and civil rights, especially when used to make decisions that have significant legal or similarly significant effects, such as benefits and housing eligibility or criminal justice outcomes.[34] These concerns are not theoretical: they implicate fundamental values like personal safety, due process, dignity, and equal treatment under the law.

To safeguard access to and the administration of justice, Washingtonians need greater privacy rights. In implementing groundbreaking protections for consumer health data in 2023 by enacting the Washington My Health My Data Act, the legislature found:

> ***"The people of Washington regard their privacy as a fundamental right and an essential element of their individual freedom. Washington's Constitution explicitly provides the right to privacy. Fundamental privacy rights have long been and continue to be integral to protecting Washingtonians and to safeguarding our democratic republic."***

Yet current protections focus primarily on health data. Legal data is similarly sensitive, directly linked to an individual's safety, freedom, and dignity. For instance, seeking information on protective orders or criminal defense services reveals deeply sensitive circumstances. Currently, Washingtonians' legal data lacks robust protections against behavioral profiling and targeted advertising. The WSBA should advocate for limitations on the use of consumers' legal data, as well as more comprehensive privacy rights.

AI and predictive analytics, fueled by vast amounts of seemingly routine data, can reveal highly sensitive personal information—including personality traits, health conditions and biometrics, political preferences, or purported intelligence levels derived from social media activity—potentially undermining privacy and dignity.

Washingtonians should have comprehensive privacy rights, including the right to know what information organizations collect, how it is used and a way to correct or challenge such data or information. They should also have the right to opt-out of automated decision making, particularly when their livelihoods are at stake. Additionally, organizations should have greater obligations when it comes to processing personal information, including an obligation to practice data minimization and to provide consumers with meaningful choice related to certain uses of information.

Washington's Rules of Professional Conduct explicitly charge lawyers with ensuring justice, fairness, and transparency amid technological change. Lawyers must therefore advocate for legislative improvements, adopt stronger internal data protections, and ensure their technology partners align with professional

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34. Olga Akselrod, *How Artificial Intelligence Can Deepen Racial and Economic Inequities*, American Civil Liberties Union (July 13, 2021), www.aclu.org/news/privacy-technology/how-artificial-intelligence-can-deepen-racial-and-economic-inequities.

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responsibility standards. By critically assessing AI's application in governance and consumer spaces and advocating for its alignment with ethical and constitutional principles, legal professionals can play a key role as essential guardians of the rule of law in a time of rapid technological and societal change. *Scope of WSBA Advocacy—The Task Force recognizes that WSBA's ability to advocate on public policy issues is limited by the Keller rule, which restricts activities funded by mandatory dues to matters directly related to regulating the legal profession or improving the quality of legal services. The Task Force identifies these issues as significant for Washington consumers and encourages legislative and policy consideration, while recommending WSBA advocacy only within the bounds of these permissible activities.*[35]

RECOMMENDATIONS

A **Advocate for Updated Consumer Protection Laws:** The WSBA should advocate, consistent with Keller limitations, for regular updates to state consumer protection laws and regulations that provide meaningful protections and address abuses enabled by AI and other digital technologies.

B **Advocate for Enhanced Consumer Privacy Protections:** The WSBA should advocate, within Keller limitations, for expanded privacy protections for sensitive information, including restrictions on the collection, use, and sale of personal data by legal technology providers.

C **Provide Title 7 RPC Guidance on Lawyer Advertising and Marketing:** The WSBA should update RPC Title 7 rules on advertising to clearly prohibit the sale or sharing of sensitive personal data collected by legal websites and applications.

D **Develop Consumer-Focused Certification Programs:** The WSBA should develop a consumer-facing certification program or standardized "seal" to help the public identify trustworthy legal-service websites and apps, and to enable consumers to report entities operating without authorization to practice law.

E **Provide Education on AI and Consumer Protection:** The WSBA should provide ongoing education to legal professionals on evolving AI-related consumer protection issues, laws, and regulations, explicitly covering algorithmic bias, data privacy, and remedies available to consumers impacted by automated decision-making.

10 Ensuring Regulatory Innovation and Stability: Future Expertise and Oversight

Rapidly evolving legal technologies—especially AI, automation, and virtual platforms—pose profound challenges and opportunities to traditional regulatory frameworks, underscoring the urgent need for dedicated oversight. Addressing these effectively requires ongoing, expert oversight. The recommendations in this report highlight the need for a stable, empowered body to provide review, expertise, oversight, and guidance into the future. The consensus within the Task Force is that new technologies—whether targeted to consumer legal services (for example an online service the provides legal advice for a divorce or estate planning) or simply horizontal platforms used by consumers to solve legal

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35. Wash. Rules of Pro. Conduct Pmbl. and scope (2021), https://www.courts.wa.gov/court_rules/pdf/RPC/GA_RPC_PREAMBLEANDSCOPE.pdf

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issues (using generalized services like ChatGPT)—will strain existing UPL frameworks, ethical frameworks, court capability, and enforcement capacity. The establishment of a Washington Supreme Court Board to address these issues would assure accountability and continuity. Without an institutional successor to the Task Force, the oversight of critical regulatory concerns surrounding the ever-evolving landscape of legal technology would be left to chance.

A Supreme Court-affiliated Board would provide authoritative guidance and continuity, effectively bridging court rulemaking, regulatory reform, and bar governance to ensure responsible innovation. The Washington Supreme Court's Practice of Law Board (POLB) has demonstrated capacity to work through complex regulatory issues and could be a suitable home for this work. However, this would require expanding its charter under GR 25 to explicitly include technology-related oversight and regulatory innovation and ensuring it had the requisite technological expertise and support.

Advocating for the Washington Supreme Court to create this Board—or for expanding scope of the POLB—aligns directly with WSBA's strategic priorities, including championing justice, fostering inclusion, and supporting professional excellence, and reflects broader national trends of proactive judicial and bar association leadership in regulatory innovation.

Establishing such a Board would proactively position Washington as a national leader, balancing technological innovation with robust consumer protection and regulatory clarity.

RECOMMENDATION

A **Petition for a Dedicated Technology Oversight Board or Expanded Practice of Law Board**

Mandate: The WSBA should petition the Washington Supreme Court to establish a Board for Legal Technology and Regulatory Innovation or broaden the scope of the Practice of Law Board with the following mission/goals:

- To collaborate with the WSBA, the Supreme Court, and other relevant stakeholders to develop rules, education, and policies supporting responsible regulatory reform and innovation.
- To ensure the profession and court system is equipped to continue to ensure the just and fair rule of law.
- To ensure that all legal technology innovations align with the legal profession's core values—integrity, public service, and administration of justice.

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Looking Forward

These ten key points focus less on narrow practices and more on capacity building, ethics, and education for a reason. The technology interface with law is rapidly evolving, and it is far too important to be stuffed into a static set of recommendations and left in a drawer.

The WSBA, the courts, and the profession will need to develop new abilities to handle technology changes and harmonize them with one of the most human processes in society—the way we deliver legal services to people across the state. As officers of the Court, we have the obligation not just to individual clients but to the system of justice and rule of law.

Lawyering is not just a learned profession, but a learning profession. We will find ways to learn, adapt, and excel in this changing environment. But doing so demands we are informed, intentional, and forward-looking about how technologies and the profession will dovetail to create improved results for Washingtonians—and that we leave no one behind. As the legal profession navigates technological change, we must recognize our unique role in shaping how these tools impact society. Legal professionals have a special responsibility to safeguard justice and ensure legal systems remain fair, transparent, and accountable. This means staying informed about and engaged with broader societal concerns—from environmental impact to algorithmic bias, from privacy protection to access. While AI will inevitably transform how legal work happens, our fundamental obligation is to ensure it does so in ways that strengthen rather than undermine the rule of law. By being deliberate in understanding how these technologies interact with societal values and institutional structures, we can help ensure they enhance rather than diminish access to justice and the quality of legal services for all.

A NOTE FROM THE TASK FORCE

In developing this report, the Task Force drafters worked iteratively with advancing versions of three main generative AI tools:

- ChatGPT (from OpenAI),
- Claude (from Anthropic), and
- CoPilot (from Microsoft).

In addition, the Task Force drafters benefited from help from Clearbrief (from Clearbrief.ai) in structuring and writing references. The Task Force members used these systems as a collaborative tool to support—rather than replace—the core work of legal analysis, strategic framing, and writing. The drafters provided subject-matter expertise, policy direction, legal analysis, editorial judgment, and extensive human-based research, while the generative AI tools served as responsive assistants—generating initial drafts, offering structural suggestions, surfacing alternative phrasings, and helping identify gaps or ambiguities. At every stage, decisions about content, tone, and framing remained firmly in human hands, and all information generated by the AI tools was reviewed for accuracy by Task Force members. This process reflects the approach the Task Force recommends for legal professionals: thoughtful, professional-led use of AI that enhances human capability without displacing professional responsibility, creativity, or control.

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APRIL 2025

WSBA Technology Survey Report: Preliminary Findings

This memo summarizes key findings from the WSBA Legal Technology Survey, providing an overview of the WSBA Legal Technology Task Force's (Task Force) analysis and next steps.

INTRODUCTION

We have also included in these findings the **Final WSBA Technology Survey Report**, an overview report by National Business Research Institute (NBRI), the vendor that ran the survey (the NBRI Report), together with a slide deck called "WSBA Tech Task Force Member Survey — results overview," containing additional analysis performed by the Task Force. The Survey was prepared by the Task Force with support from WSBA staff and NBRI, and administered by NBRI from September 30-October 23, 2024. The survey received responses from 516 members (5% response rate), yielding a 98% confidence level with a 5% margin of error. For additional methodology and demographic information from the survey, please see the NBRI Report.

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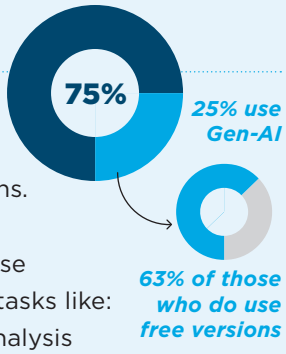
FAST FINDINGS

Current AI Usage



75% of WSBA members do not currently use Generative AI applications.

Of those who do, **63%** use free public versions for tasks like:

- Legal research and analysis
- Drafting and summarizing documents

The members surveyed prioritize legal research for technology improvements.

Ethics, Knowledge & Training Needs

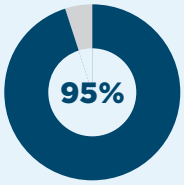
Members' self-assessed Gen-AI knowledge: **36%** rate as "Fair," **28%** as "Poor." Only **9%** rate themselves as "Good" or Better."

Members prefer CLEs and hands-on workshops to learn new technologies. **72%** support adding an MCLE requirement for technology.

A majority (**69%**) believe Generative AI will require additional training and skills.

Only **23%** of members believe ethical rules adequately cover the use of Gen-AI.

Courts, Court Rules & Procedures



95% of WSBA members have not encountered AI-related issues in their cases and 97% are not practicing in courts with specific AI rules. Members expressed interest in clearer guidelines for AI use in legal contexts.

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PURPOSE

The WSBA Board of Governors established the Task Force under one of WSBA's FY2023-2024 strategic priorities to "Assess technology-related opportunities and threats and determine WSBA's role vis-a-vis regulation, consumer protection, and support to legal professionals."

The Task Force is specifically tasked to:

- **assess the legal technology landscape, identifying threats and opportunities across various legal sectors, and**
- **make recommendations that support and strengthen the understanding and use of technology in members' practice, emphasizing effective, efficient, and ethical use of technology that enhances equitable access to justice.**

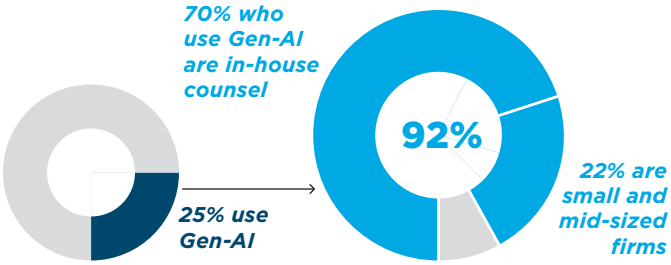
The Charter calls for identifying practical ways to integrate technology into legal services while supporting professionals across all practice settings. The initiative is not a review of technology for its own sake: at this critical point in technology development and growing legal needs, WSBA's strategic objectives aim to advance capabilities, quality, and availability for both legal professionals and those they serve.

As part of this mission, the Task Force developed a survey to evaluate how WSBA members are currently engaging with technology. Recognizing that technology adoption is becoming widespread in society, the survey aimed to assess WSBA members' use and awareness of technology, and how best to support them in the use of technology that benefits both them and the public they serve.

KEY SURVEY FINDINGS

The WSBA Technology Survey offers valuable data on how legal professionals in Washington State are engaging with technology, and the challenges and opportunities they face.

Highlights from the findings include:



Use of Artificial Intelligence (AI) within legal practice

AI usage remains limited, with only 25% of respondents reporting use on a regular basis. However, there are substantial differences between practice settings: for example usage is far higher among in-house counsel (70%) compared to small and mid-sized firms (22%).

- Early adopters cited improved efficiency, particularly in legal research and document drafting and summarization.
- Non-users expressed concerns about fundamental trust issues: accuracy, ethical implications, and data security. Some non-users also noted that they did not see a relevant use case for AI or believe it would add value to their work. In addition, some noted concerns about AI diminishing the value of legal expertise. Sentiment analysis of verbatim comments also indicates that some have a reluctance or skepticism regarding new technologies, possibly related to concerns about trust, security, and efficacy of these tools in a legal setting. Several indicated they had made

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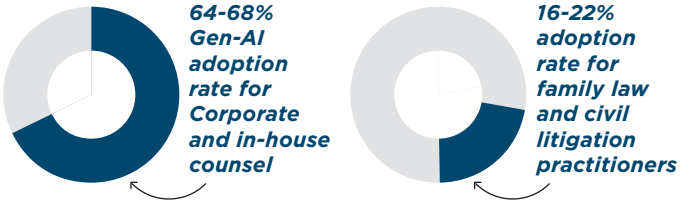
unsuccessful early attempts to use generative AI, informing their views on its utility.

- Of those who are using Generative AI applications, **63%** are using free public versions for tasks such as (a) legal research and analysis and (b) drafting and summarizing documents. Some respondents also found high utility in other uses such as training, risk assessment, and strategy development, in addition to more mundane tasks.
- Looking forward, members interested in using AI prioritized legal research as an area for technology improvement in their practice.
- Most respondents **(69%)** believe use of AI in the legal practice will require additional training and skills. Only about **26%** of respondents indicated their current knowledge of how to use AI was at least "good" — over **60%** indicated their knowledge was "fair" or "poor".
- Members prefer CLEs and hands-on workshops to learn new technologies. A substantial majority **(72%)** support adding an MCLE requirement for technology. A significant portion of members **(45%)** also favored WSBA support in the form of technology due diligence guidelines, checklists, and repositories of legal technology tools and resources.
- Only **25%** of members believe ethical rules adequately cover the use of Generative AI. Notably, the groups that use AI most in practice (in house) are least confident, by a modest margin, in current ethical rules and guidelines for legal professionals.



Practice Area Disparities in Technology Adoption

AI adoption and confidence varies substantially across practice areas. Corporate and in-house counsel show higher adoption rates (64-68%) compared to family law and civil litigation practitioners (16-22%).

- Self-reported knowledge gaps follow similar patterns: corporate and contracts practitioners rate their AI knowledge higher compared to civil litigation practitioners.
- These disparities extend to cybersecurity implementation, with smaller practices and specific practice areas showing lower adoption rates of essential security measures.

Cybersecurity Practices

Responses gave a mixed signal on cybersecurity. A substantial majority of members (79%) express confidence in their organization's ability to protect the organization and client data from cybersecurity threats.

- Despite high confidence levels among respondents, significant gaps remain in critical cybersecurity

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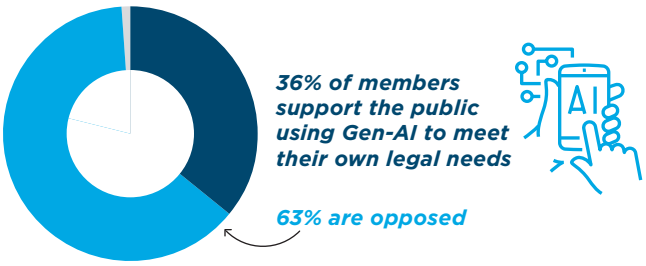
best practices (identified by NIST, CISA, ABA, and WSBA), indicated by lower rates of their use, including regular audits **(34%)** and data encryption **(37%)**. While multi-factor authentication (MFA) scored higher at **68%**, given the critical importance of this practice the response is concerning – see materials through the U.S. Cybersecurity & Infrastructure Security Agency (CISA), Federal Trade Commission (FTC), National Institute of Standards and Technology (NIST), American Bar Association, and WSBA's Law Firm Guide to Cybersecurity.

- Survey data reveals practice-specific variations in security measure implementation, with civil litigation and family law practices showing notably lower adoption rates of basic security tools compared to corporate and larger firms. Larger firms, government, and in-house practitioners had higher levels of cybersecurity infrastructure in place, compared to solo and small firms.
- The confidence-implementation gap is particularly pronounced in smaller practices and specific practice areas like family law, where actual implementation of common security measures is significantly lower than reported confidence levels.
- It is possible that some of these gaps are in reality smaller than indicated because respondents are unaware of cybersecurity technologies already included in their IT environment. Nonetheless the existence of the gaps and the relatively low reported usage rates of basic, recommended cybersecurity practices signals an area for focus, particularly in light of the important data practitioners receive from clients, and the trust placed in legal professionals to safeguard that data.

Non-AI Legal Technologies

Tools such as practice management systems, forms automation, and e-discovery platforms are underutilized, particularly in smaller and rural practices. Barriers include cost, lack of training, limited awareness, and a perception of low rate of return on investment.



Access to Justice

Members were slightly more positive (36%) in their support of the public using generative AI to meet their own legal needs (e.g., self-representative litigants) than the rate at which members themselves have adopted generative AI in their practices (25%), but those opposed (63%) held very strong views.

- Those supporting public use to meet their own legal needs said AI can help bridge the gap for individuals who cannot afford legal services, and that AI can serve as a cost-effective and highly available option, especially in rural or otherwise underserved areas, delivering legal services to those who would otherwise have no help.
- Those opposed echoed the same concerns cited by those concerned about use of generative AI directly in the legal profession: accuracy, reliability, and lack of ethical guidance or standards. In addition, they noted that the general public lacks the foundational legal knowledge to understand AI-generated information properly, what questions to ask, how to fact-check

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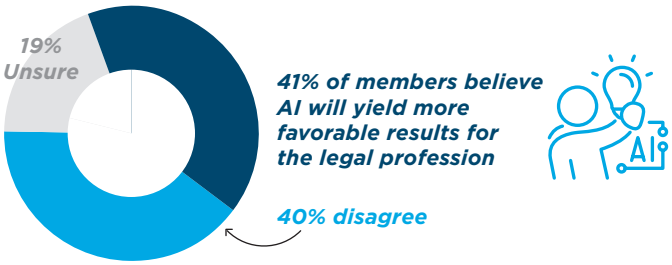
AI responses, or how to apply the information.

- Slightly more members supported the view that AI will yield more favorable results in narrowing the access to justice gap **(41%)** than those who disagreed **(38%)**. Responses of "unsure" were **18%**.



Impact on Legal Profession

Respondents generally have a favorable view of technology-driven changes in the legal profession, but opinions are divided on the impact of generative AI on the court system and the legal profession.

- Respondents had a generally favorable view about technology-driven change, with **55%** supporting the view that those changes will improve the experience of being a lawyer in Washington compared to the last two decades, **25%** not supporting the view, and **18%** unsure.
- At the same time, views were more divided about specific impacts of generative AI. A significant plurality **(about 40%)** disagreed with the statement "Generative AI will have a positive impact on the court system, both in terms of efficiency and fairness," with **38%** supporting the statement and **20%** unsure. Similarly, **41%** of respondents supported the statement that "Overall, I believe AI will yield more favorable results for the legal profession." About **40%** disagreed with the statement and **19%** were unsure.

The Final WSBA Technology Survey Report provides a full breakdown of the data, including visuals, demographic trends, and quantitative insights.

ANALYSIS AND KEY TAKEAWAYS

Building on the survey findings, the WSBA Technology Task Force has conducted an initial analysis, identifying areas where deeper consideration is needed:

1. **Technology understanding is a necessity — technology is not an end in itself.** Restating a key theme for the Task Force — the Task Force is not evaluating technology for its own sake, nor does the Task Force believe that any specific level, type, or application of technology adoption is necessary for all practice members. At the same time, as these technologies become increasingly ubiquitous in society, they are also critically important to understand, both as a part of what happens in our world as the subject of legal issues, disputes, contracts, and harms, and as a part of the toolkit that may be necessary to serve clients effectively. Generative AI is rapidly becoming both a tool for enhancing legal practice and an essential competence for legal professionals in this rapidly changing world. Understanding and usage of such technology could soon become a requirement for legal professionals to discharge a variety of ethical obligations to clients.

2. **WSBA members represent significant diversity in practice types, needs, and technology usage.** Survey responses reflect the varied nature of legal practices across Washington, from large in-house counsel teams to solo practitioners and rural firms. This diversity leads to widely differing technology requirements. For instance, while some members benefit from robust AI and data analytics tools, others prioritize basic practice management systems.

   The survey breakout data reveals that these differences are particularly pronounced between practice areas. While corporate and in-house counsel show higher technology adoption rates and confidence

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levels, civil litigation and family law practitioners consistently report lower adoption rates, knowledge levels, and implementation of security measures.

The survey supports the need for tailored approaches to technology resources and training. WSBA's technology support strategy needs to take into account differences in capabilities, supporting a spectrum of experiences, practice area, firm size, and geographic location.

3 **Diverse Needs Require Diverse Solutions.** The diversity of practices also means there is no universal "right" technology. Survey comments suggest that smaller firms and rural practitioners require simpler, cost-effective solutions, while larger organizations may demand sophisticated, scalable, or even bespoke platforms. This diversity underscores the importance of offering scalable and adaptable technology resources, consumable in different ways. It also means that driving awareness across the entire membership, not just part of it, will be an important part of next steps.

4 **Resources should include ready access and availability to small firms, rural practices, and solo practitioners.** Smaller and rural practices face significant barriers, including financial constraints, limited access to training, and resource gaps. These disparities were consistently highlighted in the survey as critical obstacles to technology adoption. Supporting these members will require targeted, affordable solutions that address their unique challenges.

5 **Members called out an interest in awareness and capabilities.** Survey responses centered on training and resources suggest that the biggest investment for WSBA should not be in technology itself but in the skills, awareness, and capabilities of its members. Practical training programs, clear guidelines, and accessible resources will support members as they navigate technological changes. Respondents emphasized the importance of practical, hands-on training opportunities, including CLEs, peer-led workshops, and tools tailored to their specific needs. A significant majority of respondents said they support a technology-related MCLE requirement.

6 **Bridging gaps will help with awareness and competence at key technology skills for legal professionals.** Understanding of AI remains limited among many segments of members, limiting use of potentially helpful tools. Many respondents, particularly those in small firms, indicated they are overwhelmed by day-to-day practice demands and lack the time and in-house support to explore and implement new tools. This highlights the need for targeted education and support to make AI and other technology adoption feasible and relevant.

7 **Trust is fundamental, especially in the legal profession.** Many respondents articulated fears about generative AI replacing lawyers entirely, overshadowing its potential as a tool to support and augment legal work. Respondents expressed a lack of understanding about effective use cases for generative AI, both within their practices and for potential use by the public to meet their own legal needs. Addressing fears of both members and the public and demonstrating valuable uses will be critical to help legal professionals gain improvements and efficiencies from these tools.

8 **Generative AI has a dual role for legal professionals — both as a tool in the practice and as an essential area in the subject matter of daily lives, and hence, the practice of law.** Generative AI is increasingly becoming part of daily life in business, in government, and in society. Its implications for the legal profession extend far

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beyond direct legal applications of technology. Even for those not using generative AI in their practice, understanding its operations and its role is critical for issues like evidence authentication, procedural rules, and overall professional competence. Note for example proposed new federal rules of evidence addressing AI, deepfakes, and machine generated evidence and a recent Florida state case allowing a virtual reality simulation of a crime scene reconstruction into evidence — with the judge viewing the scene through VR goggles. As technology evolves, basic fluency in AI will be a fundamental skill for legal representation.

9 **Many members are not confident the current Rules of Professional Conduct effectively address AI technologies, and are unsure they know how to spot and resolve ethical considerations in the use of generative AI.** Respondents frequently voiced concerns about ethical challenges, particularly around data privacy and client confidentiality. Many emphasized the need for clear, WSBA-led guidelines, checklists, and potentially even approved technologies to ensure AI tools are used responsibly and in compliance with ethical obligations under the Rules of Professional Conduct.

10 **Improved Cybersecurity readiness is both urgent and important.** A significant gap exists between members' confidence in their cybersecurity practices and the reality of their implementation. Many respondents lack foundational measures like multi-factor authentication and regular security audits. Solo practitioners and smaller firms are especially vulnerable due to resource limitations. The survey underscores the need for practical cybersecurity tools and education tailored to these groups. They also point to limited awareness of tools already available from WSBA, the ABA, and other resources.

11 **Using technology tools to improve access to justice requires developing public trust in the technology.** For technology to improve access to justice, it must earn the trust of the public, WSBA members, and the Courts. This is true whether the technology user is a legal professional or someone in the general public accessing legal information. Survey responses emphasized the importance of transparency, reliability, and ethical use of technology to avoid misuse or over-reliance. Public-facing legal tools must be rigorously tested and clearly communicated to build confidence among users, and to ensure consumer protection.

12 **WSBA members will need more assistance and support as additional tools and capabilities come on line — WSBA will need to develop robust, sustained capabilities to support members with these changes.** The technology environment continues to change. The needs expressed in the survey indicate training and support for members are not a "one and done" experience. WSBA will need to adapt to these needs, which are likely beyond current resourcing levels.

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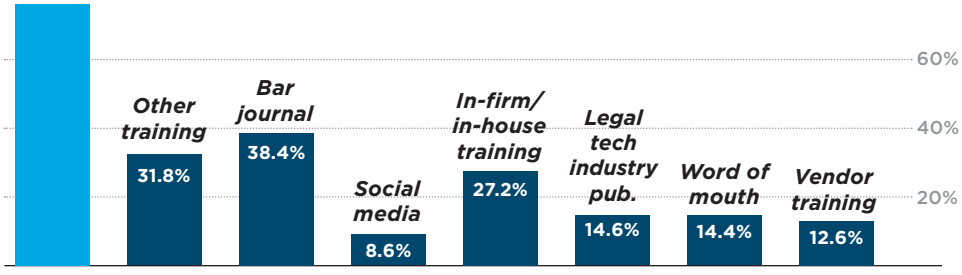
76.2%
CLEs

Survey question

How would you prefer to keep up with technology developments to learn about the benefits and risks ...?



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COMPARISON TO OTHER SURVEYS

The results from the WSBA Legal Technology Task Force Survey are generally in line with other recent technology surveys, both in the US and internationally, highlighting similar patterns in technology adoption (and costs/benefits), barriers, and opportunities across jurisdictions. Several industry players have also done surveys — those tend to focus on more specific segments of the legal technology market and have not been considered here.

- **AI Usage:** Nationally, the 2023 ABA Legal Technology Survey Report found generative AI usage among lawyers at approximately 10%, indicating a lower baseline nationally. However, recognizing the speed of uptake of generative AI since 2022, it is likely that adoption has grown since the report's publication, reflecting broader technological trends. That growth is mirrored in an ALPS study in 2024, finding that 20% of its lawyer respondents were using AI in their day to day business. In the UK, a 2023 survey found 13% of lawyers using AI, growing to 26% by 2024. Subsequent polling suggests that a significant portion of UK lawyers plan to adopt AI tools in the near future, pointing to rapid acceptance and integration.

  One recent consumer survey that included questions on use of AI for legal purposes from LexisNexis offered an interesting comparison point. While the WSBA Tech Task Force survey found 25% of legal professionals are using generative AI in their practice, the LexisNexis survey found that 27% of consumers have used generative AI to answer legal questions for themselves.

- **Barriers to adoption:** Similar barriers are reported in several surveys. In particular, the above referenced surveys from the ABA and the UK highlight cost, lack of expertise, and concerns about ethical implications as common challenges to the adoption of useful technology tools.

- **Cybersecurity Practices:** Similar to the WSBA Legal Technology Task Force Survey, the ABA's 2021 Legal Technology Survey Report underscores that many firms fail to implement fundamental security measures despite rising threats. Cybersecurity remains a universal challenge, particularly for smaller firms without dedicated IT resources.

- **Access to Justice:** Across jurisdictions, there is growing interest in using technology to enhance access to legal services. The UK surveys highlighted pilot projects aimed at leveraging AI for pro bono services and self-help resources, generally supported by bar members.

NEXT STEPS FOR THE TASK FORCE

The Task Force is using these findings and the underlying survey responses to help guide its priorities. The work is part of the Task Force's overall research and analysis to inform final recommendations for the WSBA Board of Governors. The Task Force has reviewed these results within its Working Groups and at the full Task Force level.

For additional survey results and quantitative analysis, please refer to the Final WSBA Technology Survey Report from NBRI and the slide deck called "WSBA Tech Task Force Member Survey – results overview."

Legal Tech TF - Policy Recommendations

INTRODUCTION

This document includes the BOG Legal Technology Taskforce Report policy recommendations. Policy recommendations appear in Key Points 2, 3, 6, 7, 8, 9, & 10.

The BOG will need to decide how to handle the policy recommendations. The BOG analysis requires assistance from WSBA staff (led by Kevin Plachy and Margeaux Green).

POLICY RECOMMENDATIONS BY KEY POINT

Key Point 1: Harnessing Potential – The Role of Practitioners

- *No policy recommendations*

Key Point 2: Building WSBA Capacity and Strategic Partnerships

- Develop a Strategic Technology Plan

Key Point 3: Supporting Technology Competence – Meeting Diverse Practice Needs

- Recommend a Technology MCLE Requirement
- Explore Adding Technology and the Law as an Area in the Bar Exam

Key Point 4: Building Ethical Frameworks

- *No policy recommendations*

Key Point 5: Bridging the Cybersecurity Confidence Gap – From Confidence to Competent

- *No policy recommendations*

Key Point 6: Strengthening Court Capacity – Advancing Justice Through Digital Transformation

- Provide Comprehensive Court Training on AI and Technology
- Upgrade Courtroom Technology
- Update Rules on Electronic Evidence
- Implement AI Detection Tools
- Enhance Language Access Through AI
- Simplify Court Forms and Filings
- Advocate for Standardized, Statewide Court Data Infrastructure Fully Funded by the State

Key Point 7: Law Schools

- Embrace a Technology Conscious Culture
- Maintain a Practice-Ready Curriculum
- Assess Student Progress
- Support Faculty
- Influence Broader Law and Policy Development

Key Point 8: Advancing Ethical Innovation and Equitable Access – Leveraging AI to Close the Justice Gap

- Establish Ethical Boundaries for AI Legal Tools – Regulatory
- Expand Court-Based AI Resources – Talk about this with the Court Capacity group
- Foster Development of Affordable and Scalable Tools

Key Point 9: Safeguarding Sensitive Legal Data – Strengthening Consumer Protection in a Digital Era

- Advocate for Updated Consumer Protection Laws (Legal)
- Advocate for Enhanced Consumer Privacy Protections (Legal)
- Develop Consumer-Focused Certification Programs

Key Point 10: Ensuring Regulatory Innovation and Stability – Future Expertise and Oversight

- Petition for a Dedicated Technology Oversight Board or Expanded Practice of Law Board

WASHINGTON STATE
BAR ASSOCIATION

WSBA Technology Implementation Workgroup Charter

Established by the Executive Director in May 2026

Purpose

The WSBA Technology Implementation Workgroup is an internal workgroup established under the authority of the WSBA Executive Director. Its purpose is to work collaboratively with WSBA staff to implement the approved operational recommendations from the 2025 WSBA Legal Technology Taskforce Report. The workgroup focuses on practical execution, resource development, implementation planning, and processes to support WSBA members in adopting technology effectively and ethically.

Background

In November 2023, the Board of Governors (BOG) acknowledged the significant impact of technology, especially artificial intelligence (AI), on the legal profession. They adopted a strategic priority for the 2023-24 fiscal year to assess technology-related opportunities and threats and define WSBA's role in regulation, consumer protection, and support for legal professionals. The creation of the Legal Technology Taskforce was a step towards this goal.

The taskforce's objectives were to evaluate the legal technology landscape, identify threats and opportunities, and make recommendations to enhance the use of technology in legal practice. Their focus was on promoting effective, efficient, and ethical technology use to improve access to justice. The BOG accepted the taskforce's final report in September 2025 and directed it to the Executive Committee for further evaluation and action. One key recommendation was to establish a WSBA Technology Implementation Workgroup to collaborate with WSBA staff on implementing approved recommendations.

Workgroup Objectives

The workgroup will collaborate with WSBA staff and stakeholders to begin implementing selected operational recommendations and develop plans for the WSBA staff to carry out remaining recommendations beyond the group's term.

Volunteer Roles

The workgroup will be staff-led by WSBA project leads. Topic based subgroups may have volunteer project leads who set subgroup meetings, coordinate draft materials, assign tasks to subgroup volunteers, and work collaboratively in guiding the work with WSBA staff project leads. Workgroup volunteers and volunteer project leads play an essential collaborative role in WSBA's work, while WSBA retains responsibility for final decision making.

Workgroup participants are expected to actively contribute subject matter expertise, drafting support, resource development, implementation planning, and related subgroup work. Subgroup work will include creating and reviewing draft resources, identifying member needs, evaluating implementation strategies, and collaborating with WSBA staff.

All final decisions will remain with WSBA staff and leadership, including WSBA programs, partnerships, publications, member benefits, implementation priorities, and official resources.

Prioritized Topic Areas and Subgroup Work

The workgroup will focus on five prioritized topic areas, addressed in the following order:

1. Artificial Intelligence
2. Cybersecurity
3. Ethics and Responsible Technology Use
4. Technology Tools, Vendors, and Member Benefits
5. Access to Justice and Inclusive Technology Use

These topic areas are intended to focus the workgroup's efforts on practical, member-facing resources for solo and small firm practitioners, particularly members with limited familiarity with emerging technology, cybersecurity, vendor evaluation, or technology-related ethical obligations.

The workgroup will use topic-based subgroups. Each subgroup will focus on one prioritized topic area and will be responsible for identifying member needs, developing and creating practical resources, recommending future programming, and creating a roadmap for continued work in that area. Subgroups may also coordinate with internal stakeholders and external subject matter experts as appropriate to support implementation planning and resource development. The work may be sequenced over time, with approximately two subgroups working at the same time, depending on staff capacity, volunteer availability, and project priorities.

Each subgroup should consider:

1. What practical questions are members likely to have about each topic?
2. What practical resources, guidance, or implementation support would be most useful for solo and small firm practitioners?
3. What existing WSBA resources can be gathered, updated, or repurposed?
4. What new resources should be developed, including checklists, guides, sample policies, FAQs, toolkits, vendor guidance, demonstrations, or implementation frameworks?
5. What CLEs, workshops, demonstrations, section programs, or other educational opportunities should be created during the workgroup's tenure and in the future?
6. What materials should ultimately be included in the new WSBA Technology Resource Hub?
7. What future implementation, advanced programming, or longer-term resource development be planned beyond the subgroups initial term?

These topic areas are not intended to be rigid silos. Several recommendations overlap across multiple areas, particularly resource development, ethics, education, vendor evaluation, member benefits, and the new Technology Resource Hub. The Technology Resource Hub, a new user-friendly WSBA online resource center, will include curated checklists, sample policies, toolkits, vendor directories, FAQs, and other training materials. Subgroups should identify overlap where appropriate and coordinate with staff project leads to avoid duplication.

1. ARTIFICIAL INTELLIGENCE

This topic area will focus on helping members understand, evaluate, and use AI tools in a practical and responsible way. The subgroup should address basic AI concepts, common legal and law firm management use cases, tool selection, AI firm policies, risk management, confidentiality, accuracy, bias, supervision, and other professional responsibility considerations related to AI-assisted work.

Focus areas may include:

- How should solo or small firm lawyers evaluate whether an AI tool is appropriate for their practice?
- What policies, guidance, or risk-management practices should firms consider when using AI tools?
- How can lawyers use AI tools while protecting client confidentiality and complying with professional obligations?
- What AI-focused CLEs, workshops, practical resources, or future educational programming would be most useful to members?

2. CYBERSECURITY

This topic area will focus on helping members understand and implement practical cybersecurity protections, particularly solo and small firm practitioners who may not have dedicated IT support. The subgroup should address basic cybersecurity practices, affordable risk assessments, training needs, cyber insurance or malpractice considerations, data protection, and simplified member-facing guidance.

Focus areas may include:

- What foundational cybersecurity practices should every solo or small firm lawyer understand?
- What practical guidance, assessment tools, or implementation support would help members protect client information and reduce risk?
- What practical steps can members take to protect client information?
- Should WSBA explore partnerships with cybersecurity experts, malpractice carriers, or vendors to provide discounted or free assessments?
- What current and future CLEs workshops or educational campaigns would be most useful to members?

3. ETHICS AND RESPONSIBLE TECHNOLOGY USE

This topic area will focus on practical ethics guidance related to technology use in legal practice. The subgroup should address confidentiality, competence, supervision, transparency, bias, security, inaccurate outputs, client communication, data issues, and other professional responsibility considerations related to emerging technologies.

Focus areas include:

- What ethical questions are members most likely to face when adopting new technologies?
- What practical frameworks, guidance, or evaluation tools would help members assess technology-related risks and obligations?
- What guidance should be provided regarding confidentiality, transparency, accuracy, supervision, bias, security, and responsible technology use?
- What ethics focused CLEs, practical resources, or educational materials would help members better understand technology related professional responsibility obligations?
- What ethics issues should be addressed specifically for AI tools?
- What ethics issues should be addressed across all technology, not just AI?
- What checklists, FAQs, short videos, training modules, CLE segments, or online resources would help members quickly understand their obligations?

4. TECHNOLOGY TOOLS, VENDORS, AND MEMBER BENEFITS

This topic area will focus on how the WSBA can help members evaluate, access, and adopt affordable technology tools. The subgroup may consider WSBA's internal evaluation process for technology

vendors and member benefits (including the Practice Management Discount Network), opportunities to expand access to affordable or low-cost technology tools, technology demonstrations, educational partnerships, and practical guidance for selecting and implementing tools.

Focus areas may include:

- What kinds of tools are useful to solo and small firm practitioners to practice law or manage a law firm business?
- What guidance would help members evaluate, compare, and implement legal technology tools appropriately within their practices?
- What criteria or processes should WSBA consider when evaluating potential vendor partnerships, discounts (Practice Management Discount Network), or other member benefits?
- How should WSBA explore free or discounted tools in areas such as AI, cybersecurity, practice management, or document management?
- How can WSBA maintain fairness, transparency, confidentiality, and accountability in vendor related programs?

5. ACCESS TO JUSTICE AND INCLUSIVE TECHNOLOGY USE

This topic area will focus on how technology can support access to justice, inclusive legal services, and practical support for members serving clients with diverse needs. The subgroup may consider client-facing technology issues, accessibility, digital barriers, inclusive technology use, plain-language communication, innovative legal service delivery models, and opportunities for collaboration with outside stakeholders.

Focus areas may include:

- How can technology help lawyers deliver legal services more effectively, accessibly, and inclusively?
- What barriers do lawyers or clients face when using legal technology, including accessibility or digital access barriers?
- What guidance or educational resources would help members better understand inclusive and ethical technology use?
- How can technology support innovative legal service delivery models, client communication, or broader access to justice goals?
- What partnerships, educational initiatives, or future programming opportunities should WSBA explore related to access to justice and inclusive technology use?

Timeline and Work Structure

The workgroup is expected to operate through topic-based subgroups or project teams working on designated implementation priorities. Subgroup work may occur concurrently or in phases depending on project scope, staff capacity, volunteer availability, and implementation priorities.

WSBA staff project leads may establish, modify, pause, conclude, or expand subgroup work over time as implementation needs evolve. Additional volunteers, subject matter experts, internal stakeholders, or ad hoc participants may be invited to support specific subgroup initiatives or deliverables as appropriate.

The workgroup's term is expected to continue for approximately 12 to 15 months, although individual subgroup timelines, participation, and deliverables may vary.

Composition

The workgroup may include volunteers, subject matter experts, and other participants with demonstrated experience, knowledge, or practical expertise in one or more of the following areas:

- Legal technology and law practice technology implementation,
- Artificial intelligence tools, governance, or responsible AI use,
- Cybersecurity, privacy, risk management, or data protection,
- Law firm operations, legal practice management, or legal business systems,
- Technology evaluation, procurement, or legal technology partnerships,
- Ethics and professional responsibility considerations related to technology use,
- Legal education, CLE development, or member training,
- Access to justice, accessibility, or inclusive technology initiatives, and
- Related operational, technical, or subject matter expertise relevant to the workgroup's priorities

Participants may include lawyers, legal professionals, technologists, consultants, educators, cybersecurity professionals, operational leaders, and other subject matter experts as appropriate.

Nominations and Appointment

The WSBA Executive Director, in collaboration with the WSBA Advancement Department Director and WSBA Practice Management Advisor, may appoint workgroup participants, subgroup participants, project leads, or other volunteers as appropriate to support the workgroup's implementation priorities.

Term

The workgroup is expected to operate for approximately 12 to 15 months or until designated implementation priorities are substantially completed. Individual participant involvement may vary depending on subgroup assignments, project timelines, implementation needs, and volunteer availability.

AI Disclosure: This document was generated in part and edited with Microsoft Copilot's AI and reviewed for accuracy by Margeaux Green

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Alexander R. Reaganson, FY26 Chair
Washington New Members Committee

Chelle Gegax, WNMC Staff Liaison
Washington State Bar Association

DATE:

RE: Proposed WNMC Charter

ACTION: Approve Washington New Members Committee Charter

The Washington New Members Committee seeks to formally articulate its purpose of supporting the professional development of new members of the Washington State Bar Association (WSBA) through mentorship, leadership opportunities, and resources that address critical challenges such as student debt, practical skills gaps, and pro bono/volunteering opportunities. The proposed charter establishes a defined structure, scope, and set of responsibilities for the committee, while addressing longstanding vacancy issues by transitioning from regional to congressional district representation, consistent with the structure of the WSBA Board of Governors. It further introduces a clear process for filling positions that remain vacant for more than six months, ensuring continuity and operational stability. By aligning the committee's framework with that of the Board of Governors, the charter enhances cross-entity collaboration, clarifies representational pathways, and strengthens alignment with organizational priorities. Committee performance will be evaluated through measures of new member satisfaction, participation in events and initiatives, communication and social media engagement, and consistent committee staffing and involvement. Continued coordination with the Board of Governors and other WSBA entities will serve as an additional indicator of success. The charter also maintains the committee's annual reporting obligations and establishes a five-year review cycle by the Board. Collectively, these provisions are intended to promote clarity, consistency, accountability, and alignment in the committee's work. The Washington New Members Committee respectfully requests that the Board of Governors review the proposed charter with the goal of implementing it on October 1, 2026.

Background

The issue has not previously been brought before the Board in its current form; however, elements of the Washington New Members Committee's work have been discussed in past years, primarily in connection with broader new-lawyer support initiatives. Since then, the committee has refined its structure, clarified its mandate, and developed a formal charter to address persistent operational challenges, including vacancies and inconsistent representation. Historically, WSBA has supported new members through programs such as mentorship initiatives, professional development offerings, and committee-based engagement, but the absence of a clearly defined governing charter has limited the committee's ability to operate with consistency and alignment. The need for a formalized structure became increasingly apparent through member feedback, participation data, recurring vacancy patterns, and direct observations from committee leadership regarding uneven representation across regions. In response, the committee undertook an extensive review of its operational history, examined structural models used by other WSBA entities, and evaluated alternative approaches—including maintaining the existing regional model—before determining that alignment with congressional districts would provide greater clarity and stability. An equity lens informed this analysis by highlighting the importance of consistent representation for underserved or geographically dispersed new members, ensuring that the committee's structure supports equitable access to mentorship, leadership opportunities, and resources. Potential barriers include the transition to the new representational model and the process for filling persistent vacancies; these challenges will be addressed through clearly defined appointment procedures, alignment with the Board of Governors' structure, and regular evaluation through charter reviews. Together, these efforts support a more accountable, equitable, and sustainable framework for new-member engagement within the WSBA.

Community Input

The decision will primarily affect new members of the Washington State Bar Association, with particular significance for individuals from historically underrepresented or marginalized communities, including people with disabilities, people of color, members of the LGBTQ community, women, and transgender and non-binary individuals. These groups often face compounded barriers to professional integration, mentorship access, and leadership opportunities, making a clear and equitable committee structure especially impactful for them. Their perspectives were meaningfully incorporated through ongoing member feedback, committee discussions, participation in listening sessions and engagement events, and the review of demographic and participation data that highlighted disparities in representation and engagement. This input informed both the identification of the underlying challenges and the development of the proposed solution, ensuring that the charter supports more consistent and equitable access to resources and leadership pathways. In line with that assessment, the three new proposed at-large positions on the committee additionally address issues and often

overlooked populations within the new member community, and WSBA priorities at-large. To bridge the gaps between those communities, it was determined by the committee that establishing roles to address Diversity, Equity, and Inclusion (DEI) issues, Pro Bono & Public Service connections, and liaison with new Solo & Small Practice practitioners was needed. This equity-centered approach reinforced the need for a stable structural model, clearer representational pathways, and mechanisms to reduce prolonged vacancies, all of which help ensure that marginalized groups are not unintentionally excluded. Potential barriers include ensuring adequate representation across geographically diverse congressional districts and maintaining engagement from members who may face systemic or logistical challenges. These will be addressed through intentional recruitment strategies, the newly defined vacancy-filling procedures, and ongoing evaluation to ensure the structure remains responsive and inclusive.

As for internal WSBA community input, the committee had previously sought review of a previous draft of this charter by the Equity & Justice Team and the Office of General Counsel.

Information for Fiscal Analysis

A review of existing WSBA programs indicates that no comparable initiative currently appears in the WSBA budget that specifically provides a formalized governance structure for the Washington New Members Committee; however, the committee's work intersects with broader new-lawyer programming historically supported by the organization. The proposed charter does not require the creation of a new program or specialized technology, and therefore no additional programmatic budget is anticipated beyond the minimal administrative support already allocated to WSBA committees. Implementation of the charter is expected to require a modest amount of staff time for onboarding, appointment coordination, and ongoing administrative facilitation, all of which fall within the ordinary scope of committee support functions. Because no new technology or system is required—and because comparable technological alternatives were assessed and deemed unnecessary, the proposal does not introduce new technology-related costs. While the charter is not designed as a revenue-generating initiative, increased clarity, structure, and member engagement may yield indirect organizational benefits, such as stronger participation in WSBA programs and leadership pathways. The proposal is not expected to produce direct cost savings, but its emphasis on structural stability, reduced vacancy periods, and alignment with the Board of Governors may improve operational efficiency, reduce administrative overhead associated with repeated vacancy management, and provide long-term value to both staff and the membership community.

Information for Equity Analysis

The factors influencing this issue disproportionately affect individuals and communities that have been historically underrepresented or marginalized within the legal profession, including people with disabilities, people of color, members of the LGBTQ community, women, and transgender and non-binary individuals. Existing institutional structures, legacy appointment practices, geographic disparities, and unequal access to mentorship or leadership pathways can deepen these inequities, particularly when committee vacancies or inconsistent representation limit opportunities for connection and engagement. Root causes include systemic barriers to inclusion within the profession, uneven distribution of professional networks, and the compounding effects of intersecting identities—for example, LGBTQ individuals of color who may face multiple layers of bias and structural exclusion. Based on available participation data and committee feedback, the proposed action is expected to benefit these communities by clarifying representational pathways, creating a more stable structure, and ensuring vacancies are filled in a timely and predictable manner. However, additional demographic and engagement data would strengthen the analysis, particularly regarding how various identity groups interact with committee programming and whether existing barriers persist. The action is designed to increase equity by creating a more consistent and accountable system, though potential unintended consequences—such as representational gaps within congressional districts or uneven access to leadership opportunities—should be continuously monitored. Strategies to improve equity include intentional outreach to marginalized groups, transparent appointment and recruitment processes, and ongoing evaluation of demographic participation trends. Implementation will incorporate mechanisms for accountability through annual reporting, periodic charter reviews, and regular consultation with communities most impacted. Success will be measured by increased engagement, improved satisfaction among underrepresented new members, and demonstrated stability and inclusivity in committee representation and operations. Additionally,

Conclusion

Since the COVID-19 pandemic, the Washington New Members Committee has continued to reorganize and push for a reinvigoration of the new members community, here in the State of Washington. The WNMC in recent years has taken the steps to expand and redefine what it means to be a "new member," reestablished our connections to the Board of Governors, Washington law schools, and other WSBA entities, and made our presence known on the national stage within the American Bar Association – Young Lawyers Division. In order to continue this improvement, the next logical step is to help formalize a structure for future committees to look to and work within. After careful consideration over the past six (6) months, the committee offers this

proposed charter as that structure. We are available to answer any questions and/or provide relevant commentary, as needed by the Board.

Sincerely,

Alexander R. Reaganson, WSBA# 59365
FY26 Chair, Washington New Members Committee
Charter Development Project, Team Lead

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

The risk analysis is included in the BOG's confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

There are a variety fiscal impacts to WSBA resulting from the proposed charter, which includes expanded costs for the size and make-up of the Committee and increased programming. The proposed charter adds two new committee positions, increasing the size from 18 to 20 members. This will result in additional Committee member expenses, such as travel, meals, and accommodations for in-person meetings, events, trainings, or conferences, which will be reimbursed according to rates and limitations outlined in WSBA's fiscal policies. The proposed charter also includes changes to the committee member representation from regions to congressional districts and increasing the number of at-large positions from 3 to 6. The switch from regions to congressional districts should not significantly affect costs, while the increased number of at-large positions could lead to varying expenses based on where those members are located since they aren't tied to a specific area. The charter also includes goals and objectives that can result in direct costs for programming, such as the development of new mentorship programs and expanding the number and type of outreach events. The cost will vary each year, depending on the workplan of the WNMC. The first draft of the FY 2027 budget was prepared with the proposed charter in mind and includes a total of $18,500 for New Member Outreach Events (increased from $5,000 in FY 2026) and $30,500 (increased from $15,000 in FY 2026). Additionally, the fiscal impact includes staff time used to assist in drafting the charter, incorporate the changes into relevant records and systems, communicate changes to stakeholders, and provide administrative support to additional volunteers. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analysis is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted by decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all.

The charter itself appears to be reasonably informed by the perspectives of communities that are underrepresented and marginalized in the Washington legal profession and are intended to address existing challenges with recruiting and retaining leadership diversity.

The substance of the proposed WNMC Charter will include changes to its structure and purposes that have a potential to increase transparency and consistency and improve the WSBA's ability to engage with and gather data to support the specific needs of new members.

Attachments

Exhibit A: *Washington New Members Committee Charter*
Exhibit B: *Committee Member Region vs. Congressional Comparison*
Exhibit C: *Proposed Congressional District Implementation*

WASHINGTON STATE
BAR ASSOCIATION

WASHINGTON NEW MEMBERS COMMITTEE (WNMC) CHARTER

Purpose:

Support the professional development of new members of the Washington State Bar Association (WSBA) by providing mentorship, leadership opportunities, and resources that address pressing challenges such as student debt and practical skills gaps. The committee aims to serve as a trusted resource for stakeholders and foster meaningful new member engagement within the legal community.

Goals, Objectives and Activities:

Goal 1. Be Data-Driven.

- *Objective A*. Collect and analyze data on new members' needs through post-licensure surveys and other evaluative forms.
    - *Activity 1*: Prepare and conduct regular surveys, including the following:
        - To regularly assess and provide opportunities for new members to express any needs and provide evaluative feedback, and;
        - To annually assess new admittees' early acclimation through new admittee surveys.
    - *Activity 2*: Produce reports and provide recommendations to the Board of Governors based on data-driven insights.
    - *Activity 3:* Regularly explore and develop independent committee projects and participate in projects across WSBA in line with appropriate data.

Goal 2: Advocate.

- *Objective A*. Represent, advise and advocate for new members within the WSBA Board of Governors and other decision-makers to ensure new member issues and voices are included in decision-making.
- *Objective B*. Address regular and emerging challenges unique to new members, such as student loan repayment and opportunities for practical skills development.

Goal 3. Grow and Connect.

- *Objective A*: Develop and/or promote formal and informal mentorship programs to facilitate development of legal practice skills
    - *Activity 1*: Research and review mentorship programs established by affinity bar associations and/or other state bar associations to guide current and future programs.
    - *Activity 2:* Engage in relevant networking to connect new members to additional mentorship opportunities.
    - *Activity 3:* Identify and pursue opportunities for practical skills development for new members.
- *Objective B*: strengthen connections with law schools, affinity bars and WSBA entities.
    - *Activity 1*: Host in-person meetings and outreach events at law schools.

    - *Activity 2:* Support and collaborate with all WSBA law student representatives to ensure effective student engagement.
    - *Activity 3:* Explore and seek out partnerships with affinity bar organizations and relevant WSBA entities on WNMC priorities and events.
- *Objective C*: Foster a positive culture and meaningful networks of support.
    - *Activity 1*: Maintain active communication through social media, relevant WSBA listservs, and other appropriate channels.

Goal 4: Pro Bono Empowerment.

- *Objective A*: Build and/or promote partnerships that enable new members to engage in pro bono work with malpractice coverage and supervision.
    - *Activity 1*: Maintain an active relationship with both the Access to Justice Board and WSBA Pro Bono & Public Service Committee.
    - *Activity 2:* Seek out and develop networks to allow new members to engage in pro bono and public service work.

Goal 5: Professional Development.

- *Objective A*: Promote CLEs, experiential learning, and leadership opportunities tailored to new members.
    - *Activity 1:* Coordinate professional development opportunities and CLE sessions tailored to the evolving needs of new members.
    - *Activity 2*: Engage with and advertise the WSBA Trial Advocacy Program and Practice Primers.
    - *Activity 3:* Participate in recruitment efforts for relevant leadership and subject-matter expert opportunities for new members, especially in WSBA New Member Education programs.
- *Objective B*: increase engagement through section liaison roles and other leadership opportunities.
    - *Activity 1*: Interview and nominate candidates for the WSBA Board of Governors New Member At-Large seat (when needed).
- *Objective C*: Establish robust pathways and partnerships to ensure new members feel supported in the profession.

Meetings

- Time and Place: The WNMC shall meet monthly, virtually, for one (1) hour unless otherwise noted by this Charter or at the discretion of the Chair;
    - One per quarter, meetings shall be held in-person/hybrid, for three (3) hours with an additional hour for lunch.
        - At least one (1) of the in-person/hybrid meetings shall be set for a time and place that aligns with the applicable regular Board of Governors meeting.
- Meeting Expectations:
    - All regular meetings of the WNMC shall comply with Art. VII(B) "Open Meeting Policy," of the WSBA Bylaws.
    - The Chair shall establish an agenda for each monthly meeting and ensure such agendas are distributed approx. one (1) week prior to each meeting, in coordination with the WNMC Staff Liaison(s).
    - If the Chair is unable to attend any scheduled meeting, the Chair-Elect shall assume the role and its responsibilities, for that meeting; if the Chair-Elect is also unavailable, then the Immediate Past Chair shall assume the same.

- It is expected that all members of the WNMC shall have no more than two (2) unexcused absences from regular meetings.
- It is expected that all members of the WNMC shall actively participate in at least one (1) project team.

Committee Membership

- Leadership Team:
  - The Chairs:
    - Chair
    - Chair-Elect, as Vice Chair
    - Immediate Past Chair
  - Governor, At-Large (New Members), WSBA Board of Governors, *ex-officio*
  - WNMC Staff Liaison(s), *ex officio*
- Congressional District Representatives (Eligibility based on either home or work address):
  - District 1
  - District 2
  - District 3
  - District 4
  - District 5
  - District 6
  - District 7 (North)[1]
  - District 7 (South)[2]
  - District 8
  - District 9
  - District 10
- Six (6) At-Large Representatives:
  - Diversity, Equity and Inclusion Representative
  - QLSP, Public Service Representative
  - Solo and Small Practice Representative
  - Three (3) General At-Large Representatives
- Terms:
  - The voting members of the WNMC shall be appointed for a term of three (3) years.
  - The terms of At-Large and District Representatives shall be staggered so no more than one-third (1/3) of these positions' terms end each year, categorized accordingly:
    - Class A (with terms beginning October 1, 2026):
      - At-Large: General Representative (Class A)
      - At-Large: Diversity, Equity and Inclusion Representative
      - District 2
      - District 5
      - District 7 (North)
      - District 10
    - Class B (with terms beginning October 1, 2027):
      - At-Large: General Representative (Class B)
      - At-Large: Public Service Representative
      - District 3
      - District 4

[1] As defined by zip code boundaries established in the District 7 (North) position on the WSBA Board of Governors.
[2] As defined by zip code boundaries established in the District 7 (South) position on the WSBA Board of Governors.

        - District 7 (South)
    - Class C (with terms beginning October 1, 2028)
        - At-Large: General Representative (Class C)
        - At-Large: Solo & Small Practice Representative
        - District 1
        - District 6
        - District 8
        - District 9

Nominations and Appointment

- The WSBA Executive Director will designate WSBA staff liaison(s) to support the WNMC, as the WNMC Staff Liaison(s).
- WNMC Committee members will be appointed by the Board of Governors in accordance with WSBA Bylaws Art. IX(B)(1), upon recommendation by the WNMC's Recommendations Subcommittee.
- **Recommendations Subcommittee:**
    - The purpose of the Recommendations Subcommittee shall be to review and consider all applicants to voting positions on the WNMC, as well as recommend qualifying candidates to the Board of Governors for appointment.
    - The Recommendations Subcommittee shall include all members of the WNMC Leadership Team.
        - Recommendation decisions shall be decided by a majority vote of the Subcommittee, with three total votes allocated accordingly:
            - One collective vote for the Chairs (Chair, Chair-Elect, Immediate Past Chair);
            - One collective vote for the WSBA Staff Liaisons, and;
            - One vote by the Governor At-Large, New Members.
        - It is understood that decisions by the Recommendations Subcommittee are preferred to be unanimous. However, should there be a significant split as to a recommendation, the Committee may vote to provide no more than two (2) recommendations for the Board of Governors to consider.
            - If such an event occurs, the Recommendations Subcommittee may inform the Board of Governors of each individual member's votes for each applicant.
    - *Chair-Elect Recommendations:* The Recommendations Subcommittee shall recommend a Chair-Elect, from amongst qualifying applicants for the position, no later than February 28th (or 29th during a Leap Year) of each year for service beginning October 1, following appointment by the WSBA-BOG President-Elect in accordance with WSBA Bylaws Art. IX(B)(1)(c).
        - Should a current district or at-large representative be appointed as Chair-Elect, the position of said representative shall become vacant and any remaining term shall be open for applications during the regular committee recruitment process (beginning in April of each year), unless the position is filled by a mid-term appointment in accordance with the WSBA Bylaws and this Charter.
        - The Chair-Elect will serve a three-year term, split accordingly: one (1) year as Chair-Elect; one (1) year as Chair, and; one (1) year as Immediate Past-Chair.
    - *At-Large, District Representative Recommendations:* The Recommendations Subcommittee shall recommend individuals to the at-large and district

representative positions based on factors which will achieve the broadest range of diversity, practice area, and experience possible.

- *Prolonged Vacancies:* If any at-large or district representative positions have not been filled after six (6) consecutive months of vacancy, the Recommendations Subcommittee may recommend to such position(s) any individual(s) that agree to represent the perspective of that position in good faith, regardless of the individual's practice area or district of residence/employment.

Success Criteria

- Data showing net-positive new member satisfaction and integration across current and relevant priorities.
- Increased evidence of new members regularly attending, engaging with, and providing evaluative feedback on WNMC events and initiatives.
- Regular communication with new members, with corresponding positive social media engagement analytics.
- A fully staffed and engaged committee both in terms of attendance and project team participation.
- Proactive engagement and consultation with the WNMC by the WSBA Board of Governors and other bar entities.

Reporting & Evaluation

- *Annual Report*. The committee will produce an annual report pursuant to the WSBA Bylaws.
- *Charter and Entity Evaluation*. The work of the committee and its charter should be reviewed and renewed by the Board of Governors every five years after approval of the original charter.

Approved by the FY26 Washington New Members Committee, this 16th Day of March, 2026

Alexander R. Reaganson

Alexander R. Reaganson, WSBA# 59365
2025-2026 Chair, Charter Team Lead

Janta Steele, WSBA# 60876
Chair-Elect, Charter Team

Mason Ji, WSBA# 58292
Imm. Past Chair, Charter Team

Ariel L. Cook, WSBA# 63105
Greater Olympia Rep., Charter Team

Mackenzie J. Lloyd, WSBA# 60238
Southeast Reg. Rep., Charter Team

Fatima Sami Al-Rikabi, WSBA# 63579
Snohomish Co. Rep., Charter Team

Matthew Rommelmann, WSBA# 60749
Northwest Representative

Chawisa Laicharoenwat, WSBA# 60882
At-Large Representative

Hanna Terra Harrison, WSBA# 58264
Greater Spokane Representative

Michelle Margaret Heese, WSBA# 62815
North Central Representative

Steven C. Brown, Jr., WSBA# 54096
At-Large Representative

Stephan Yhann, WSBA# 54230
At-Large Representative

Bethany Beal Nolan, WSBA# 55788
King Co. Representative

Mackenzie Spinks, WSBA# 62048
King Co. Representative

Thomas Lyle Garvey, WSBA# 57283
Peninsula Representative

Jordan Lee Couch, WSBA# 49684
New Member Gov. (At-Large), WSBA-BOG

Michelle Gegax
WNMC Staff Liaison

Vanessa Sweeny
WNMC Staff Support

Region to Congressional District Committee Membership Comparison:

Current Regions (Cong. Dist.), Current Occupant

Organized by Current Term End Date. (Term-Limited**)

- Oct. 2026
    - Southwest (CD: 3), Vacant
    - Northwest (CD: 2), Matt R.
    - North Central (CD: 4, 5, 8), Michelle H.
    - Greater Olympia (CDs: 3, 10), Ariel C.
    - Greater Spokane (CD: 5), Hanna H.
    - King County (1) (CDs: 1, 2, 7, 8, 9), Bethany N.
    - At-Large (1), Stephan Y.**
    - Southeast (CDs: 4, 5), Mackenzie L.
- Oct. 2027
    - King County (2) (CDs: 1, 2, 7, 8, 9), Makenzie S.
    - At-Large (2), Steven B.
    - Peninsula (CD: 6), Thomas G.
    - South Central (CDs: 4, 8), Vacant
    - Pierce (CDs: 6, 8, 10), Vacant
- Oct. 2028
    - Snohomish (CDs: 1, 2), Fatima Al-Rikabi
    - At-Large (3), Chawisa L.**

Implementation/Conversion Plan for Current Sitting Committee Members[1]

Class A (with terms beginning October 1, 2026)[2]:

- At-Large: General Representative (Class A): TBD with current cycle
- At-Large: Diversity, Equity and Inclusion Representative: TBD with current cycle
- District 2: TBD with current cycle
- District 5: TBD with current cycle
- District 7 (North): TBD with current cycle
- District 10: TBD with current cycle

Class B (with terms beginning October 1, 2027):

- At-Large: General Representative (Class B): Steven B.
- At-Large: Public Service Representative: Available for Interim Appt.[3]
- District 3: Available for Interim Appt.[4]
- District 4: Mackenzie L. (Interim, would be a one-year extension of current term)
- District 7 (South): Bethany N. (Interim, would be a one-year extension of current term)

Class C (with terms beginning October 1, 2028)

- At-Large: General Representative (Class C): Chawisa L.
- At-Large: Solo & Small Practice Representative: Available for Interim Appt.
- District 1: Fatima Al-Rikabi
- District 6: Thomas G. (Interim, would be a one-year extension of current term)
- District 8: Michelle H. (Interim, would be a two-year extension of current term)
- District 9: Makenzie S. (Interim, would be a one-year extension of current term)

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[1] The following plan was developed accounting for the most practical spread of congressional districts in a manner that allows for similar-sized "classes" that are geographically-diverse throughout the State of Washington. Current committee members' assignments or designations were made based on a review of their current positions related congressional districts, current term schedules, and eligibility for interim appointments based on completed terms of committee service. The suggested interim appointments were purposefully limited to those that would only see a one-year extension of their term, unless no other option was available for a district. (i.e. CD 8). If multiple persons were eligible for a particular interim appointment, preference was given to 1) individuals who have not previously been a member of WNMC Leadership, and; 2) those with a newer service history on the WNMC.

[2] For the purpose of this plan, no interim appointments were suggested regarding Class A as to allow for consideration of eligible applicants who participated in the regular volunteer recruiting period for FY 27. Pending approval of this draft charter by the Board of Governors, the WNMC is prepared to open up a second recruiting period and provide recommendations for approval to the Board prior to the start of FY 27.

[3] Given the inaugural nature of the new topic-focused at-large positions, no persons were selected as potential interim appointments for these positions. Pending charter approval, the WNMC plans to consider eligible applicants who participated in the regular recruitment period and, if necessary, open up a second recruiting period and provide recommendations for approval to these positions prior to the start of FY 27.

[4] The District 3 position was not assigned a potential interim appointment due to the fact that no eligible committee member currently resides/works within this district nor has substantial ties to the district.

Other Current Committee Members Eligibility for Other Interim Appointments

- Congressional District Appointments: (Reasons Therefore):
    - Ariel C.
        - District 3 (Minimal ties from previous regional role)[5];
        - District 7 (South) ("Home" zip code[6] is split between CD 7(S) & CD (9))
        - District 9 ("Home" zip code is split between CD 7(S) & CD 9))
    - Mason J.
        - District 7 (South) ("Home" Zip Code)
- For Interim At-Large Appointments (If not in a CD Role):
    - Ariel C.
    - Hanna H.
    - Michelle H.
    - Mason J.
    - Mackenzie L.
    - Bethany N.
    - Matt R.
- Members not eligible due to two-term limit, for FY 27:
    - Stephan Y.

[5] While Ariel C.'s current position does cover Lewis County, a county completely within CD 3, a review of WSBA data confirmed that only 16 of the 418 "new members" within CD 3 are attached to Lewis County, as of March 2026. Given that accounts for only approximately 3.8% of the new member population of CD 3, WNMC Chair/Charter Project Lead Alex Reaganson determined this link is not substantial enough for outright consideration of an interim appointment to represent CD 3.

[6] The "Home" zip code was determined by a review of the addresses listed on the members' WSBA Directory profiles.

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Andrew Yi, Chair, Court Rules and Procedures Committee

Nicole Gustine, Staff Liaison, Court Rules and Procedures Committee

Emily Crane, Staff Liaison, Court Rules and Procedures Committee

DATE: June 1, 2026

RE: Proposed Rule Changes to RAP 3.2 from the Court Rules and Procedures Committee

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ACTION: Approve the submission of the Court Rules and Procedures Committee's Proposed Rule Changes to RAP 3.2. to the Washington Supreme Court.

Background

As part of the Supreme Court's rules review cycle, the WSBA Court Rules and Procedures Committee (Committee) is actively reviewing the Criminal Rules for Superior Courts and the Criminal Rules for Courts of Limited Jurisdiction this year. The Committee is separated into subcommittees for each set of rules they are tasked with reviewing. Additionally, the Committee has a "Supreme Court Comment Subcommittee" that reviews the proposed rules currently before the Washington Supreme Court that are published for comment and "Subcommittee X" that considers out-of-cycle rule requests.

Subcommittee X is currently continuing the review of proposed rule changes from the prior fiscal year, including RAP 3.2. This rule change is proposed so that an adverse party is not required to move for substitution of parties in the event of a death or change of status in another party. The proposed language would thus read, "**Duty To Notify ~~Move for Substitution~~**. A party with knowledge of the death or declared legal disability of a party to review, or knowledge of the transfer of a party's interest in the subject matter of the review, shall promptly **suggest the death or other relevant circumstance on the record. A party to review may also** move for substitution of parties. The motion and all other documents must be served on all parties and on the personal representative or successor in interest of a party, within the time and in the manner provided for service on a party. If a party fails to promptly move for substitution, the personal representative of a deceased or legally disabled party, or the successor in interest of a party, should promptly move for substitution of parties." (proposed language in underline and bold, full copy attached).

The proposed amendments add clarification to the existing language to better align with language from existing rules. These changes better align with CR 25, as well as with Federal Rule of Appellate Procedure 43, both of which call for a death to be "suggest[ed] . . . []on the record." We ask that the Board of Governors to approve the submission of these proposed rule changes to RAP 3.2 to be submitted to the Washington Supreme Court.

Stakeholder Input

Subcommittee X reached out to a wide range of stakeholders. No feedback was received in response.

WSBA Risk Analysis

Risk analysis is included in the BOG's confidential materials.

WSBA Fiscal Analysis

The fiscal impact to WSBA resulting from the proposed rule changes is limited primarily to staff time used to draft the rule change language, incorporate the changes into relevant records, and communicate changes to stakeholders. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources.

WSBA Equity Analysis

The purpose of the equity analyses is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all. Without having more specific information like how adding clarification and alignment with existing rules will impact those most impacted by the amendment, and what kind of outreach was done and what stakeholders were contacted, it is difficult to do an equity analysis.

Attachment

Suggested Amendments to RAP 3.2

GR 9 COVER SHEET

Suggested Amendments
RAP 3.2
Submitted by the Washington State Bar Association

A. Name of Proponent:

WSBA Court Rules and Procedures Committee

B. Spokesperson:

Andrew Yi, Chair of the WSBA Court Rules and Procedures Committee

C. Purpose:

The primary purposes of the suggested amendments are to revise the rule so that an adverse party is not required to move for substitution of parties in the event of a death or change of status in another party. These changes better align the rule with CR 25, as well as with Federal Rule of Appellate Procedure 43, both of which call for a death to be "suggest[ed] . . . []on the record." The proposed language would thus read, "(b) Duty To **Notify** ~~**Move for Substitution**~~. A party with knowledge of the death or declared legal disability of a party to review, or knowledge of the transfer of a party's interest in the subject matter of the review, **shall promptly suggest the death or other relevant circumstance on the record. A party to review may also** move for substitution of parties. The motion and all other documents must be served on all parties and on the personal representative or successor in interest of a party, within the time and in the manner provided for service on a party. If a party fails to promptly move for substitution, the personal representative of a deceased or legally disabled party, or the successor in interest of a party, should promptly move for substitution of parties." (proposed language in underline and bold).

D. Hearing: A hearing is not requested.

E. Expedited Consideration: Expedited consideration is not requested.

RAP 3.2 SUBSTITUTION OF PARTIES

(a) No Change

(b) **Duty To Notify ~~Move for Substitution~~**. A party with knowledge of the death or declared legal disability of a party to review, or knowledge of the transfer of a party's interest in the subject matter of the review, shall promptly suggest the death or other relevant circumstance on the record. A party to review may also move for substitution of parties. The motion and all other documents must be served on all parties and on the personal representative or successor in interest of a party, within the time and in the manner provided for service on a party. If a party fails to promptly move for substitution, the personal representative of a deceased or legally disabled party, or the successor in interest of a party, should promptly move for substitution of parties.

(c) No Change

(d) No Change

(e) No Change

(f) No Change

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia, Chief Regulatory Counsel

DATE: June 15, 2026

RE: New License Type pursuant to United States Servicemember Civil Relief Act

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ACTION: Approve suggested amendments to the APR for submission to the Washington Supreme Court establishing a new lawyer license type to comply with the United States Servicemember Civil Relief Act.

Background

The United States Congress enacted the Servicemembers Civil Relief Act (SCRA) to "provide for, strengthen, and expedite the national defense" by enabling servicemembers "to devote their entire energy to the defense needs of the Nation." *See* U.S.C. § 3902(1). In 2023, Congress expanded the SCRA to allow "servicemembers and their spouses to use their professional licenses and certificates when they relocate due to military orders, in certain circumstances." *See* 50 U.S.C. § 4025a. Law licenses were excluded until December 2024, when Congress amended § 4025a. to remove the prior exclusion of law licenses. In keeping with the spirit of the Servicemembers Civil Relief Act, Washington should issue a license to a U.S. servicemember or servicemember's spouse who has an active license to practice law in another jurisdiction when the servicemember relocates to Washington for active duty.

Suggested New Rule APR 8(g)

Our proposal is to establish a new time-limited lawyer license type for servicemembers and their spouses who qualify under the SCRA. This license is designed to facilitate rapid authorization to practice in Washington, consistent with the SCRA's expectation that a license be recognized within 30 days of the application. Because the traditional admission process can take several months due to third-party background checks, the SCRA provides a streamlined pathway with fewer pre-admission requirements and no third-party background investigation, resulting in lower investigation fees for the servicemember or spouse. The WSBA will still carry out its internal character and fitness review.

Lawyers who obtain the new SCRA license will have no restrictions on their scope of practice as a lawyer and will be required to comply with the same licensing requirements as an active lawyer member except for compliance with MCLE requirements. They must maintain an active lawyer license in another U.S. jurisdiction and comply with all requirements imposed by that jurisdiction to remain in active status. The license will expire six months after the servicemember leaves active duty in Washington or the lawyer spouse is no longer married to the servicemember. The six-month period allows the lawyer time to adjust to the change in circumstance, whether that involves finalizing or transferring current client matters, finishing a school year for a child, applying to be a member of the WSBA, or managing other transition needs.

Repeal APR 3(c)(2) Military Spouse Admission by Motion

Expedited admission by motion for military spouses was introduced to assist lawyers relocating to Washington with their servicemember spouses. This rule was adopted at a time when the SCRA did not apply to law licenses. Because the SCRA now applies to law licenses and covers both the servicemember and the spouse, there will no longer be a need for a separate military spouse admission rule. Since adoption of the rule in 2019, only 22 licenses have been issued.

Although military spouse admission by motion currently results in admission as a member of the WSBA, key requirements were not included in order to assist the military family. The current rule does not have an "active legal experience" requirement nor does it require a third-party background investigation—both of which are required for general admission by motion. Out-of-state lawyers seeking admission as a member of the WSBA should have the same requirements as any other applicant for admission. Therefore, this rule should be repealed upon adoption of the SCRA license.

Information for Fiscal Analysis

We do not expect an increase in revenue from this proposal as demand for the license is based on military relocation orders and even without the proposal they would likely seek admission anyway. There may be some minor expenses related to creating an application for the online admission site.

Information for Equity Analysis

- This proposal reduces barriers or hardships placed on military families when relocating to Washington due to military orders; allowing the lawyer spouse to be able to secure employment without delay and saving the expense of a third-party background check.
- Provides the lawyer with freedom to choose either a temporary license or admission as a WSBA member.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

The risk analysis is in the BOG's confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The fiscal impact to WSBA resulting from the proposed criteria is limited but applies to both revenue and expense. Revenue may be generated through the establishment of the new license type. WSBA's existing fee structures will be applied to any applications and licenses issued. Under current rules, U.S. service members and their spouses who have an active license to practice law who wish to be licensed in Washington must pay an application fee, and if approved, a license fee under the existing process and requirements. As described above, the new license type would be expedited and have slightly different requirements to obtain the license. Therefore, it's possible we may have some increase in the number of people licensed than under the existing rules, which would result in additional revenue. In terms of expenses, the impact includes the cost of staff time used to draft rule change language, incorporate the changes into relevant records and systems, and communicate the criteria to stakeholders. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analysis is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all.

The proposed action has two main parts that are analyzed separately below:

1. The first part of this action will develop a new rule that will allow time-limited license types for U.S. servicemembers and servicemember spouses. This creates a streamlined authorization to practice law in Washington that recognizes the unique circumstances and needs of active duty servicemembers and their spouses.
2. The second part will repeal the existing rule related to admission by motion for military spouses. Very few people (only 22) have been admitted in this way, and it is unclear whether they were engaged in this process. However, in theory the new license type proposed in part 1 of this action will encompass servicemember spouses. Approved alongside the new rule, these changes will allow this group greater freedom of choice to pursue the license type that works for their personal circumstances, while also reducing inconsistencies in requirements for admission by motion that can help strengthen fairness and clarity in process.

Attachments

1. Suggested New Rule APR 8(g) – Markup Copy
2. Suggested Amendments to APR 3(c) – Markup Copy
3. Servicemembers Civil Relief Act, 50 USC § 4025a.

ADMISSION AND PRACTICE RULES

RULE 8. NON-MEMBER LAWYER LICENSES TO PRACTICE LAW

(a) – (f) [Unchanged.]

(g) Exception under Servicemembers Civil Relief Act. A lawyer admitted to the practice of law in another state or territory of the United States or the District of Columbia who is an active duty servicemember of the United States Uniformed Services as defined by the United States Department of Defense, or who is the spouse of an active duty servicemember of the United States Uniformed Services, may apply to the Bar for a license to practice law on a temporary basis in this state when the lawyer or the lawyer's spouse relocates residence or will relocate residence because the servicemember received military orders for military service in Washington.

(1) The lawyer shall apply by:

(A) filing an application in the form and manner that may be prescribed by the Bar;

(B) paying the application fees required of lawyer applicants for admission under APR 3;

(C) submitting proof of the servicemember's military orders for military service in Washington;

(D) submitting a copy of the marriage certificate if the applicant is the servicemember's spouse;

(E) furnishing whatever additional information or proof that may be required in the course of investigating the applicant; and

(F) submitting a notarized affidavit affirming, under penalty of perjury, that:

(i) the applicant is the person described and identified in the application;

(ii) all statements made in the application are true and correct and complete;

(iii) the applicant has read and understands the requirements to receive a license in Washington and the scope of practice;

(iv) the applicant meets and will comply with all requirements of the license being applied for in Washington;

(v) the applicant is in good standing in all states or territories of the United States or the District of Columbia in which the applicant holds or has held a license to practice law; and

(vi) the applicant has no lawyer disciplinary sanctions and no pending lawyer disciplinary or incapacity matters, investigations, or grievances in any United States jurisdiction in which the applicant has been licensed to practice law.

(2) Upon approval of the application by the Bar, the lawyer shall take the Oath of Attorney, pay the current year's annual license fee and any mandatory assessments in the full amount required of active lawyer members. The Bar shall transmit its recommendation to the Supreme Court which may enter an order granting the lawyer a license to practice law under this section.

(3) A lawyer licensed under this section shall pay to the Bar an annual license fee in the full amount required of active lawyer members and any mandatory assessments required of active lawyer members of the Bar but shall not be a member of the Bar.

(4) The practice of a lawyer licensed under this section shall be subject to the Rules of Professional Conduct, the Rules for Enforcement of Lawyer Conduct, and to all other laws and rules governing lawyers admitted to the active practice of law in this state, except for the requirements of APR 11 relating to mandatory continuing legal education. Jurisdiction shall continue whether or not the lawyer retains the license and irrespective of the residence of the lawyer.

(5) The lawyer shall promptly report to the Bar a change in the servicemember's active duty status in Washington, a change in marital status if the lawyer is the servicemember's spouse, a change in admission or license status in any jurisdiction where the applicant has

been admitted to the practice of law, or the commencement of any formal disciplinary proceeding in any jurisdiction where the applicant has been admitted to the practice of law.

(6) The license granted under this section shall be terminated by the Supreme Court six months after the date when:

(A) the servicemember is no longer on active duty in Washington, or

(B) the lawyer is no longer married to the servicemember if the lawyer is the servicemember's spouse.

(7) The license granted under this section shall be terminated by the Supreme Court when:

(A) the lawyer fails to comply with the terms of this rule,

(B) the lawyer fails to maintain an active license in good standing in at least one other jurisdiction in the United States where the lawyer has been admitted to the practice of law, or

(C) on suspension or disbarment for discipline in any jurisdiction where the lawyer has been admitted to the practice of law.

(8) The license shall be automatically terminated if the lawyer is admitted to the practice of law as a member of the Bar pursuant to APR 3.

ADMISSION AND PRACTICE RULES

RULE 3. APPLICANTS FOR ADMISSION TO PRACTICE LAW

(c) Lawyer Admission by Motion.

(1) Lawyers admitted to practice law in other states or territories of the United States or the District of Columbia are not required to sit for the lawyer bar examination if they:

(A) file a certificate from that jurisdiction certifying the lawyer's admission to practice, and the date thereof, and current good standing or the equivalent; and

(B) present satisfactory proof of active legal experience for at least one of the three years immediately preceding the filing of the application.

~~(2) *Military Spouse Admission by Motion.* A lawyer admitted to practice law in another state or territory of the United States or the District of Columbia who is the spouse of an active duty service member of the United States Uniformed Services, as defined by the United States Department of Defense, is not required to sit for the lawyer bar examination if the applicant meets the following requirements:~~

~~(A) the applicant's spouse is stationed in Washington or will be stationed in Washington within six months of filing the application, and the applicant resides or will reside in Washington as the spouse of that member of the United States Uniformed Services within six months of filing the application;~~

~~(B) the applicant files a certificate from each jurisdiction in which the applicant is admitted certifying the applicant's admission to practice and the date thereof, and current good standing or the equivalent; and~~

~~(C) the applicant has no lawyer disciplinary sanctions or pending lawyer disciplinary or incapacity matters in any jurisdiction in which the applicant has been admitted.~~

DRAFT

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50 USC 4025a: Portability of professional licenses of servicemembers and their spouses
Text contains those laws in effect on March 4, 2026

From Title 50-WAR AND NATIONAL DEFENSE
CHAPTER 50-SERVICEMEMBERS CIVIL RELIEF
SUBCHAPTER VII-FURTHER RELIEF

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§4025a. Portability of professional licenses of servicemembers and their spouses

(a) In general

If a servicemember or the spouse of a servicemember has a covered license and relocates residence because such servicemember receives military orders for military service in a State other than the State of the licensing authority that issued the covered license, such covered license shall be considered valid for the scope of practice in the State of the new residence if such servicemember or spouse submits to the licensing authority of such State an application described in subsection (c).

(b) Temporary licenses

If a licensing authority is required to consider a covered license valid under subsection (a) but cannot carry out such requirement during the 30 days after receiving an application described in subsection (c), the licensing authority may issue to the applicant a temporary license that confers the same rights, privileges, and responsibilities as a permanent license.

(c) Application

An application described in this subsection includes the following:
(1) Proof of military orders described in subsection (a).
(2) If the applicant is the spouse of a servicemember, a copy of the marriage certificate.
(3) A notarized affidavit affirming, under the penalty of law, that-
(A) the applicant is the person described and identified in the application;
(B) all statements made in the application are true and correct and complete;
(C) the applicant has read and understands the requirements to receive a license, and the scope of practice, of the State of the licensing authority;
(D) the applicant certifies that the applicant meets and shall comply with requirements described in subparagraph (C); and
(E) the applicant is in good standing in all States in which the applicant holds or has held a license.

(d) Background checks

A licensing authority that receives an application described in subsection (b) may conduct a background check of the applicant before carrying out subsection (a) or (b).

(e) Interstate compacts

If a servicemember or spouse of a servicemember has a covered license to operate in multiple States pursuant to an interstate compact described in section 1784 of title 10-
(1) the servicemember or spouse of a servicemember shall be subject to the requirements of such compact or the applicable provisions of law of the applicable State; and
(2) this section shall not apply to such servicemember or spouse of a servicemember.

(f) Definitions

In this section:
(1) The term "covered license" means a professional license that, with respect to a scope of practice- 303

(A) is in good standing with the licensing authority that issued such license;
(B) has not been revoked or had discipline imposed by any State;
(C) does not have an investigation relating to unprofessional conduct pending in any State relating to it; and
(D) has not been voluntarily surrendered while under investigation for unprofessional conduct in any State.

(2) The term "license" means any license, certificate, or other evidence of qualification that an individual is required to obtain before the individual may engage in, or represent himself or herself to be a member of, a particular profession.
(3) The term "licensing authority" means any State board, commission, department, or agency that-
(A) is established in the State for the primary purpose of regulating the entry of persons into or the conduct of persons within, a particular profession; and
(B) is authorized to issue licenses.

(4) The term "military orders" has the meaning given such term in section 3955 of this title.
(5) The term "scope of practice" means the defined parameters of various duties or services that may be provided by an individual under a license.

(Oct. 17, 1940, ch. 888, title VII, §705A, as added Pub. L. 117–333, §19(a), Jan. 5, 2023, 136 Stat. 6137 ; amended Pub. L. 118–159, div. A, title V, §587, Dec. 23, 2024, 138 Stat. 1912 .)

Editorial Notes

Amendments

2024-Pub. L. 118–159 amended section generally. Prior to amendment, section related to portability of professional licenses of servicemembers and their spouses.

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia de Carvalho, Chief Regulatory Counsel

DATE: June 4, 2026

RE: Proposed Amendment to the WSBA Admissions Policies Regarding the Deadline for Submitting a Testing-Accommodation Request for the Bar Exam

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ACTION: Presented for adoption are proposed amendments to the WSBA Admissions Policies relating to the deadline for submitting testing-accommodation requests for the NextGen Uniform Bar Exam.

The primary purpose of the proposed amendment is to change the filing deadline for testing-accommodation requests for the NextGen Uniform Bar Exam (NextGen UBE) to align with the current late filing deadlines for bar exam applications.[1]

Background

The WSBA provides reasonable and appropriate testing accommodations for bar-exam applicants with disabilities. Currently, requests for testing accommodations must be submitted no later than 80 days before the first day of the exam. WSBA staff, including the Admissions team and Regulatory Counsel, review each request and any supporting documentation submitted by the applicant. If the request cannot be granted immediately with the materials already submitted, WSBA staff will begin an interactive process with the applicant to determine what additional information is needed to evaluate the request. This process could include seeking additional information from the applicant or their treatment provider and consulting a WSBA-contracted specialist. After completing a review of a request, the WSBA notifies the applicant of the testing accommodations granted. For the legacy UBE, the WSBA would also have to order special exam materials from the National Conference of Bar Examiners (NCBE) for some, but not all, applicants granted accommodations.

For the July 2026 NextGen UBE, the WSBA has seen a significant increase in applicants requesting testing accommodations, and the NCBE requires the WSBA to provide the NCBE with accommodation information for all applicants earlier in the process. For these reasons, explained in more detail below, the WSBA is seeking an earlier deadline for applicants to submit their requests for testing accommodations to allow sufficient time to review, engage in the interactive process, and communicate accommodations granted to applicants and the NCBE. This will also give the WSBA more time to assess and procure any specialized equipment requested by applicants, secure and coordinate with venues, and hire proctors.

Below is a table with the current bar-exam application deadlines and the 80-day testing-accommodation request deadlines for the July 2026 NextGen UBE and the February 2027 NextGen UBE:

[1] Summer Bar Exam Late Filing Deadline is April 5. Winter Bar Exam Late Filing Deadline is November 5. Applicants who did not pass the immediately preceding Washington bar exam may file by May 5 for the summer bar exam and by December 5 for the winter bar exam.

Deadline Type	Summer Bar Exam (July 2026)	Winter Bar Exam (Feb 2027)
Applications accepted	February 1	September 1
First Deadline	March 5	October 5
Late Filing Deadline	April 5	November 5
Extended Deadline (only for those who failed the immediately preceding exam)	May 5	December 5
Testing Accommodation Request Deadline	**Monday, May 11, 2026**	**Monday, December 7, 2026**

Changing the filing deadline for testing-accommodation requests for the NextGen UBE to align with the current late filing deadlines for bar exam applications,[2] will give the WSBA approximately one additional month to complete the entire accommodation review and communication process.

Rationale for Deadline Change

Shifting Administrative Deadlines
Until the recent February 2026 legacy UBE, applicants were required to use the online testing portal provided by an outside vendor contracted by WSBA. This allowed our jurisdiction additional time to work with the vendor to provide applicant information including testing accommodations. However, starting with the July NextGen UBE, WA is required to use the secure, online assessment platform provided by the NCBE. The NCBE requires jurisdictions administering the NextGen UBE to provide the NCBE with information for all applicants, including approved testing accommodations, approximately 45 days prior to the first day of the exam. This requirement enables the NCBE to build applicant portals with the approved accommodations into their online assessment platform prior to the exam. This gives the WSBA less time to complete review of and engage in the interactive process on all testing-accommodations requests.

An earlier deadline for requesting testing accommodations will ensure that the WSBA has sufficient time to 1) review applicants' testing-accommodation requests and communicate with applicants as needed to complete that review; 2) timely communicate all necessary details to the NCBE; and 3) review, confirm and provide any corrections to the accommodations schedules inputted by the NCBE into the online assessment platform prior to the exam.

Increase in Accommodation Requests
There has been a significant increase in the number of accommodation requests submitted in recent bar exam cycles.[3] The WSBA had 140 requests for testing accommodations for the upcoming administration of the July NextGen UBE, which is significantly higher than the 82 requests for testing accommodations for the July 2025 legacy UBE in Washington and the 64 requests for July 2024 legacy UBE. As outlined above, WSBA staff must conduct a detailed review of each individual testing-accommodation request and the accompanying supporting documentation (if any) to determine whether the request is complete or requires additional documentation

[2] Summer Bar Exam Late Filing Deadline is April 5. Winter Bar Exam Late Filing Deadline is November 5. Applicants who did not pass the immediately preceding Washington bar exam may file by May 5 for the summer bar exam and by December 5 for the winter bar exam.

[3] The trend in increased testing accommodations is not unique to Washington. *See* Belkin, Douglas, *The Number of Law-School Grad Getting Extra Time for the Bar Exam Is Surging*, The Wall Street Journal (April 5, 2026, 7:00AM), https://www.wsj.com/us-news/education/bar-exam-extra-time-696cfd11

and/or specialist review. Moving the deadline up gives WSBA staff additional time to carefully review each application and engage in the interactive process with applicants as needed on an increasing number of accommodation requests.

Information for Fiscal Analysis

To support certain testing-accommodation requests, the Admissions office must order customized exam materials from the NCBE by specific dates. Customized materials are expensive and there are additional costs for orders past the NCBE deadline.

The WSBA also sets aside additional exam rooms in the convention center or nearby hotels for examinees needing reduced-distraction or private rooms. Early application review helps secure better rates for these rooms and prevents unnecessary expenses if accommodation needs change and we no longer require the extra space.

Information for Equity Analysis

Regardless of the deadline, the WSBA considers each request for testing accommodation on a case-by-case basis. The WSBA also makes efforts to reasonably accommodate an applicant whose disability arises after the application deadline.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

Provided as confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The fiscal impact to the WSBA resulting from the proposed amendments is limited primarily to staff time used to draft the amendment language, incorporate the amendment into relevant records and systems, and communicate changes to stakeholders. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources. Additionally, there may be additional cost savings as mentioned above for testing materials and exam rooms allowed under the current deadlines.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analysis is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted by decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all.

The changes outlined in this proposed action primarily impacts bar applicants with disabilities, who already face heightened barriers to entering and staying in the legal profession. This action has the potential for mixed positive and negative impacts on ensuring equity in the admissions process. The proposed action enables greater time for staff to ensure adequate staff capacity, resources, and compliance with the NCBE requirements to ensure accommodation requests are fulfilled. At the same time, the proposed action shortens the timeline by which those in need of accommodations can gather information and documentation to submit an accommodation request,

potentially causing test-takers going without needed accommodations or feeling discouraged from requesting accommodations if they missed the deadline to submit them. The potential negative impacts of this action may be mitigated if coupled with targeted outreach and engagement with impacted communities.

Attachments

- Admissions Policies Mark-Up Version

ADMISSIONS POLICIES OF THE WASHINGTON STATE BAR ASSOCIATION

Under the authority of, and consistent with, the Washington Supreme Court's Admission and Practice Rules (APR), the Board of Governors of the Washington State Bar Association (Bar) has adopted the following Admissions Policies in administering those rules. These policies apply to individuals seeking reinstatement under APR 25 or admission to the Bar as a lawyer, limited practice officer (LPO), house counsel or foreign law consultant. These policies supplement APR 3-5, 8(f), 14 and 20-25. Any discrepancy or conflict between these policies and the APR is unintentional and will be resolved in favor of strict compliance with the APR.

Adopted July 1, 2012. Amended July 28, 2017, amendments effective September 1, 2017.
Amended November 14, 2020, amendments effective December 1, 2020.
Amended January 13, 2022, amendments effective February 1, 2022.
Amended June 9, 2023, amendments effective September 1, 2023.
Amended July 15, 2024, by Court order, amendments effective September 1, 2024.
Correction approved March 21, 2025.
Correction on August 12, 2025, to section X in compliance with APR 3(d).
Amended and correction approved November 14, 2025, amendments effective February 1, 2026.
Amended May 1, 2026, amendments effective May 1, 2026.
Amended May 1, 2026, amendments effective September 1, 2026
Amended June 4, 2026, amendments effective September 1, 2026.

I. GENERAL PROVISIONS AND DEFINITIONS
[No Changes.]

II. APPLICATION REQUIREMENTS

A. [No Changes]

B. [No Changes]

C. [No Changes]

D. Other Deadlines

Request testing accommodations on bar exam ..... ~~80 days prior to first day of exam.~~ by applicable late filing deadline.*
Request testing accommodations on LPO exam ..... by late filing deadline for the LPO exam.
File all requested and/or additional items ..... 18 days prior to first day of exam.
Character and fitness resolution ..... 18 days prior to first day of exam.
Special requests for exam room..... 18 days prior to first day of exam.
Pay Technology Fee via NCBE Account..... 4 days prior to first day of exam.
Withdraw from exam with partial refund of WSBA application fee..... 18 days prior to first day of exam.
Withdraw from bar exam with NCBE Exam Fee refund only..... 4 days prior to first day of exam.

*Requests for testing accommodation must be submitted by April 5 for the summer bar exam and by November 5 for the winter bar exam; except, applicants who did not pass the immediately preceding bar exam in Washington must submit requests for testing accommodation by May 5 for the summer bar exam and by December 5 for the winter bar exam.

E. [No Changes]

III. – V. [No Changes]

VI. REQUESTS FOR TESTING ACCOMMODATIONS

Any bar exam applicant requesting testing accommodation for a disability must ask for such accommodation through the online admissions site ~~at least 80 days prior to the examination date.~~ by the applicable late application filing deadline. Any LPO exam applicant requesting testing accommodation for a disability must ask for such accommodation through the online admissions site by the late application filing deadline for that LPO exam. Applicants requesting testing accommodations must provide appropriate documentation of the disability and specify the extent to which they are requesting that the standard testing procedures need to be modified. The applicant is responsible for demonstrating their need for any requested accommodations. The Bar reserves the right to make final judgment concerning testing accommodations and may have any submitted documentation reviewed by a specialist. See the online admissions site for additional information regarding accommodation requests and required documentation.

Any testing accommodation may not compromise the integrity or security of the examination or affect

the standards set for the examination. After the Bar provides notice to an applicant of the testing accommodations granted to that applicant, the applicant must acknowledge that they read and understand the accommodations granted no less than 18 days prior to the first day of the examination.

VII – XI. [No Changes]

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia, Chief Regulatory Counsel

Bobby Henry, Associate Director for Regulatory Services

DATE: June 15, 2026

RE: Proposed Amendments to APR 3(d) & 4(d), and WSBA Bylaws Art. III Sec. D.1.a.3 and Sec. K.5

ACTION: Approve proposed amendments to the Admission and Practice Rules and the WSBA Bylaws that would eliminate the expiration of bar exam scores and remove the requirement to pass the bar exam for a current WSBA member returning to active status.

Purpose

The purpose for the proposed amendments is to reduce artificial or unnecessary barriers to obtaining an active license to practice law in Washington, for both new applicants and current members seeking to return to active status. The proposed amendments aim to promote consistent competence standards to all individuals seeking to practice law in Washington.

Proposal

The proposed amendments would:

1. remove the 40-month time limit on the validity of a Uniform Bar Exam (UBE) score for purposes of transferring the UBE score earned in another jurisdiction for admission in Washington;
2. remove the time restrictions on the validity of a Multistate Professional Responsibility Exam (MPRE) score for purposes of admission to practice law in Washington; and
3. remove the requirement for a current member to take and pass the bar exam to return to active status when the member has been inactive or suspended for more than ten consecutive years without any active legal experience (as defined in APR 1(e)).

The proposed amendments were discussed at the Board of Governors meeting on May 1, 2026. Concerns were raised about consistent standards for status changes and new admissions, but the proposal addresses this: both new lawyers transferring UBE scores older than six years and current WSBA members returning to active status after more than six years without active legal experience must complete 45 MCLE credits, including the Washington Refresher Course.

Admission by motion is different. It requires only one year of active legal experience; therefore, an additional MCLE requirement is not needed since active practice is already mandatory.

Additional information, including the fiscal, equity, and WSBA risk analyses are included in the attached memo.

Attachments

1. Proposed Amendments to APR 3(d) and 4(d) – Markup
2. Proposed Amendments to the WSBA Bylaws Art. III Sec. D.1.a.3) and Sec. K.5 – Markup
3. BOG Cover Memo, dated April 7, 2026

ADMISSION AND PRACTICE RULES

RULE 3. APPLICANTS FOR ADMISSION TO PRACTICE LAW

(a) – (c) [Unchanged.]

(d) Lawyer Admission by UBE Score Transfer. Persons with a Uniform Bar Examination score earned in another state or territory of the United States or the District of Columbia are not required to sit for the lawyer bar examination in Washington if they:

(1) file a transcript demonstrating that the applicant received a UBE score that is equal to or higher than the score required to pass the UBE in Washington~~, and it has been not more than 40 months since the date of the administration of the UBE in which the score was earned; and~~

(2) file a transcript demonstrating that the applicant received an MPRE score equal to or higher than the score required to pass the MPRE in Washington~~, and the score was received no earlier than three years prior to and no later than 40 months after the date of the administration of the UBE in which the applicant received the UBE score.~~; and

(3) complete and report 45 approved MCLE credits of which 15 credits must be from completing the WSBA Washington Law and Practice Refresher CLE course, if it has been more than six years since the date of the exam at which the UBE score was earned.

(e) – (i) [Unchanged.]

RULE 4. EXAMINATIONS FOR ADMISSION; NOTIFICATION OF RESULTS

(a) – (c) [Unchanged.]

(d) Lawyer Bar Examination. Unless otherwise provided by these rules, applicants for admission to practice as a lawyer must take and pass the National Conference of Bar Examiners' (NCBE) Uniform Bar Examination (UBE) and Multistate Professional Responsibility Examination (MPRE).

(1) Washington's minimum passing score for the legacy UBE is 260; the minimum passing score for the NextGen UBE is 610.

(2) Washington's MPRE minimum passing score is 85~~, which must be earned no earlier than three years prior to and no later than 40 months after the date of the administration of the UBE in which the applicant received the minimum passing score~~.

(3) The Bar may disclose the results of the lawyer bar examination to an applicant's law school and the NCBE.

(e) – (f) [Unchanged.]

PROPOSED AMENDMENTS TO THE WSBA BYLAWS

I. – II. [Unchanged.]

III. MEMBERSHIP

A. – C. [Unchanged.]

D. CHANGE OF MEMBERSHIP STATUS TO ACTIVE

1. Members may change membership status as provided below.

a. Transfer from Inactive to Active.

1) An Inactive member or Emeritus member may transfer to Active by:

(a) paying an application and/or investigation fee and completing and submitting an application form, all required licensing forms, and any other required information. The fee in this paragraph is not required from an LPO or LLLT who has been inactive for 90 days or less;

(b) paying any MCLE late fees owed;

(c) demonstrating active legal experience as defined in APR 1(e) for at least one year of the three years preceding the filing of the application or completing MCLE requirements as outlined in subsection (d) below. Regardless of demonstrating active legal experience, if the member has been Inactive or a combination of Inactive, Pro Bono, Suspended, or Judicial for one year or less as of the date the application was submitted, and the member was required to report during that time period, then the member must establish MCLE compliance for that reporting period.

(d) completing MCLE requirements as outlined below when a member cannot demonstrate active legal experience as described in subsection (c) above. A member may use MCLE comity to meet the MCLE requirements of this section as provided for in APR 11(c)(6).

i. If the member has been Inactive or a combination of Inactive, Pro Bono, Suspended, or Judicial for one year or less as of the date the application was submitted and the member was not required to report during that time period, or if the member is changing status during their first MCLE reporting period, then the member has no additional MCLE requirements.

ii. If the member has been Inactive or a combination of Inactive, Pro Bono, Suspended, or Judicial for one year or less as of the date the application was

submitted, and the member was required to report during that time period, then the member must establish MCLE compliance for that reporting period.

iii. If the member has been Inactive or a combination of Inactive, Pro Bono, Suspended, or Judicial for more than a year or up to six consecutive years as of the date the application was submitted, then the member must earn and report approved MCLE credits in a number and manner consistent with the requirements for one MCLE reporting period under APR 11 except that the credits required in this section must be earned no earlier than six years prior to the date the application is submitted.

(e) passing a character and fitness review essentially equivalent to that required of all applicants for admission to the Bar, pursuant to APR 20-24.3; and

(f) paying the current Active license fee, including any mandatory assessments, less any license fee (not including late fees) and assessments paid as an Inactive member for the same year.

2) If a member has been Inactive or any combination of Inactive, Pro Bono, or Suspended in Washington for more than six consecutive years as of the date the application was submitted, the member must, in addition to complying with subsection 1(c) or (d) above, complete a reinstatement/readmission course sponsored by the Bar, which must consist of education on law office management and professional responsibility (including the applicable RPC for the member's license type, proper handling of client funds and trust accounts, and client communications), legal research and writing, and changes in the law that apply to the member's license type, as follows:

(a) For lawyer members, a minimum of 15 MCLE credits, consisting of at least four credit hours on law office management and professional responsibility, at least three credit hours on legal research and writing, and the remaining credit hours on recent significant changes in the law;

(b) For LLLT members, a minimum of seven MCLE credits, consisting of at least two credit hours on law office management and professional responsibility, at least one credit hour on legal research and writing, and the remaining credit hours on recent significant changes in the law in approved LLLT practice or core educations areas;

(c) For LPO members, a minimum of seven MCLE credits, consisting of at least two credit hours on professional responsibility, and the remaining credit hours on recent significant changes in the law covered by the approved LPO Study Topics. The MCLE credits earned for the course will apply to the total credits required in subsection 1)(d) above. The member must comply with all registration, payment, attendance, and other

requirements for the course, and will be responsible for submitting proof of completion to the Bar.

~~3) Any member seeking to change to Active who was Inactive or any combination of Suspended and Inactive in Washington and does not have active legal experience as defined in APR 1(e) in any jurisdiction for more than ten consecutive years as of the date the application is submitted, must, in addition to the requirements in Art. III. Sec.D.1.a.(1)(a), (b), (e) and (f) above, take and pass the examinations required for admission to the Bar for the member's license type.~~

~~4~~3) A Disability Inactive status member may be reinstated to Active pursuant to the disciplinary rules applicable to their license type. Before being transferred to Active, after establishing compliance with the disciplinary rules, the member also must comply with the requirements in these Bylaws for Inactive members transferring to Active status.

~~5~~4) A member of any type who has transferred to Inactive status during the pendency of a grievance or disciplinary proceedings may not be transferred to Active except as provided herein and may be subject to such discipline by reason of any grievance or complaint as may be imposed under the ELC, ELPOC, or ELLLTC.

E. – J. [Unchanged.]

K. CHANGING STATUS AFTER SUSPENSION

1. Upon the completion of an ordered disciplinary or interim suspension, or at any time after entry of an order for an administrative suspension, a suspended member may seek to change status from suspended to any other membership status for which the member qualifies at the time the change in status would occur.

2. Before changing from suspended status, a member who is suspended pursuant to an interim or disciplinary suspension must comply with all requirements imposed by the Washington Supreme Court and/or the applicable disciplinary rules in connection with the disciplinary or interim suspension. Additionally, such member must comply with all other requirements as stated in these Bylaws and in the applicable APR.

3. All requirements associated with each reason for suspension must be met before the change from suspended status can occur.

4. Unless otherwise provided in the applicable APR, a suspended member may seek to change status by: a. paying the required license fee and any assessments for the licensing year in which the status change is sought, for the membership status to which the member is seeking to change. For members seeking to change to Active or any other status from suspension for nonpayment of license fees, the required license fee will be the current year's license fee and assessments, the assessments for the year of suspension, and double the amount of the

delinquent license fee and late fees for the license year that resulted in the member's suspension; b. completing and submitting to the Bar an application for change of status, any required or requested additional documentation, and any required application or investigation fee, and cooperating with any additional character and fitness investigation or hearing that may be required pursuant to APR 20-24.3; c. completing and submitting all licensing forms required for the license year for the membership status to which the member is seeking to change; d. paying any MCLE late fees owed; and e. demonstrating active legal experience as defined in APR 1(e) for at least one year of the three years preceding the filing of the application, or, complying with the MCLE requirements for members returning from Inactive to Active as set forth in Art. III Sec. D.1.a.(1)(d) and D.1.a.2).

~~5. Any member seeking to change to Active who was Suspended or any combination of Suspended and Inactive in Washington and does not have active legal experience as defined in APR 1(e) in any jurisdiction for more than ten consecutive years at the time the application is submitted, must, in addition to the requirements of Art. III, Sec. K.4.(a)-(d), above, take and pass the examinations required for admission to the Bar for the member's license type.~~

L. – O. [Unchanged.]

IV. – XVII. [Unchanged.]

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia, Chief Regulatory Counsel

Bobby Henry, Associate Director for Regulatory Services

DATE: April 7, 2026

RE: Proposed Amendments to APR 3(d) & 4(d), and WSBA Bylaws Art. III Sec. D.1.a.3) and Sec. K.5

DISCUSSION & FIRST READ: Presented for discussion are proposed amendments to the Admission and Practice Rules and the WSBA Bylaws that would eliminate the expiration of bar exam scores and remove the requirement to pass the bar exam for a current WSBA member returning to active status.

Purpose

The purpose for the proposed amendments is to reduce artificial or unnecessary barriers to obtaining an active license to practice law in Washington, for both new applicants and current members seeking to return to active status. The proposed amendments aim to promote consistent competence standards to all individuals seeking to practice law in Washington.

Background

As the WSBA and the Washington Supreme Court are implementing alternative admission pathways and experimental models intended to reduce barriers to licensure and enhance access to justice, it became clear that a full review of existing barriers to practicing law was needed to ensure consistent application of minimum competence standards across every access point to Washington law licensure, particularly for lawyer applicants.

Proposal

The proposed amendments would:

1. remove the 40-month time limit on the validity of a Uniform Bar Exam (UBE) score for purposes of transferring the UBE score earned in another jurisdiction for admission in Washington;
2. remove the time restrictions on the validity of a Multistate Professional Responsibility Exam (MPRE) score for purposes of admission to practice law in Washington; and
3. remove the requirement for a current member to take and pass the bar exam to return to active status when the member has been inactive or suspended for more than ten consecutive years without any active legal experience (as defined in APR 1(e)).

In other words, these amendments would allow a lawyer from another jurisdiction to apply by UBE score transfer regardless of how old the score is. The same applicant, or any applicant for admission as a lawyer, would be able to use their MPRE score regardless of how old the MPRE score is. And, the amendments would remove the burden of passing the bar exam again for a WSBA member seeking to return to active status.

Rationale

Competence, or being able to demonstrate continued competence, to practice law has been the primary reason for establishing expiration dates on the validity of exam scores or for imposing status change requirements such as

attending continuing legal education or retaking the bar exam. The bar exam does not test on all areas of the law nor does it test on all skills a lawyer might need. Rather, the bar exam is an opportunity for the individual to demonstrate minimum competence to practice law as a lawyer. The National Conference of Bar Examiners (NCBE) describes the content scope of the NextGen UBE as "testing the foundational concepts and principles and foundational lawyering skills" for new lawyers.[1]

Should lawyers be required to repeatedly demonstrate their minimum competence to practice law by retaking the bar exam because their original score is too old or they have not practiced law for several years? Once an individual has demonstrated minimum competence and is licensed, they carry an ongoing ethical obligation to provide competent representation. RPC 1.1. Does time away from active practice, by itself, mean that a lawyer no longer possesses the minimum competence to practice law? A lawyer may be out-of-practice or a bit "rusty" on some of the skills and knowledge they had prior but that alone should not prevent them from being able to seek a license to practice law or to return to active status.

Furthermore, the RPC do not dictate a specific method for acquiring or maintaining competence. Rather, the legal profession relies on a lawyer's ethical obligation to maintain and develop "the legal knowledge, skill, thoroughness and preparation reasonably necessary" for competent representation. RPC 1.1. In fact, the RPC explicitly recognize that a lawyer may competently handle a new area of law through adequate study. Comment [2] to RPC 1.1 provides in part, "A lawyer can provide adequate representation in a wholly novel field through necessary study." The same principle should apply to a lawyer returning to practice after a period of inactivity. With appropriate study and preparation, a lawyer who has already demonstrated minimum competence whether by bar exam or other alternative method, such as an experiential portfolio evaluation, can again provide competent representation.

Recognizing that extended periods of time away from the active practice of law may affect a lawyer's sharpness or familiarity with certain skills or areas of law, the proposed amendments require completion of 45 MCLE credits, including a two-day Washington law and practice refresher course, when an individual is seeking to transfer a UBE score from another jurisdiction and that score is more than six years old. This requirement mirrors the existing WSBA Bylaws provision for members returning to active status after six or more years on inactive or suspended status.

Illustrative Scenarios

The following are hypothetical scenarios based on fictitious individuals to help illustrate the inconsistencies that currently exist between the APR and the WSBA Bylaws for applicants for admission or for members returning to active status.

Sally and Maria

Sally is admitted to practice law in Washington. Sally raises children for 12 years and does not practice law or work in a position requiring a law license during that time period. Sally, however, maintains active status the entire time. Now that the children are older, Sally wants to practice law again. Sally is able to apply for lawyer jobs or open a law firm even though she has not practiced law for the 12 years since she was admitted.

Maria is admitted to practice law in Washington. Maria also stopped practicing law to raise children for 12 years. Unlike Sally, Maria places her license on inactive status. Now that the children are older, Maria wants to work.

[1] NextGen Content Scope | NCBE

Maria learns she must first retake and pass the bar exam in order to return to active status and practice law because she has been on inactive status for more than ten years without any active legal experience.

Jessica and Mariko
Jessica is admitted to practice law in Washington. Jessica decides to take a break from practicing law for six years and places her license on inactive status for the entire six years. Now Jessica wants to return to practicing law. She finds out she simply needs to do 45 MCLE credits, including the refresher course, in order to return to active status.

Mariko is admitted to practice law in Oregon. Mariko earned a 270 on the UBE, which qualifies for admission in Washington. Mariko also takes a break from practicing law for 6 years but she maintains an active license status, including required MCLE, in Oregon the entire time. Due to unforeseen circumstances, Mariko must move to Seattle and wants to return to practicing law. Mariko wants to transfer her UBE score of 270 for admission in Washington but finds out the score is older than the 40 months allowed. Mariko will need to take the bar exam again in order to be admitted in Washington (or go back to Oregon and get one year of active legal experience and apply for admission by motion).

Alberto and George
Alberto is admitted to practice law in Washington and Oregon. Alberto accepts a position unrelated to the practice of law and places his Washington license on inactive status, while keeping his Oregon license active. Eleven years later, Alberto takes a lawyer position in a law firm in Oregon and works for one year. Alberto's law firm wants him to return to active status in Washington. Alberto finds out he simply needs to do 45 MCLE credits, including the refresher course, in order to return to active status because he has one year of active legal experience in Oregon.

George is admitted to practice law in Washington. George takes an international policy job in a regulatory environment that involves analyzing rules and regulations but is not considered the practice of law and a law license is not required. George places his license on inactive status. Eleven years later, George wants to seek a lawyer position with a law firm. George finds out he must first retake and pass the bar exam in order to return to active status to use his license to practice law because it has been more than ten years without any active legal experience despite the highly regulatory work of his prior position.

Bill and Ted
Bill is seeking admission in Washington by taking the bar exam. Bill took the MPRE while in law school, before sitting for the bar. Because Bill needed multiple attempts to pass the bar exam, his MPRE score is now expired. As a result, Bill must retake and pass the MPRE in order to complete the admission process.

Ted is seeking admission in Washington by motion. Ted is licensed in Wisconsin, a jurisdiction that does not require the MPRE. Because Washington's admission by motion rule does not require submission of an MPRE score, Ted is able to become admitted in Washington without ever having taken the MPRE.

<u>Information for Fiscal Analysis</u>
The proposed amendments have very little financial impact on the WSBA. There will be some small expense for updating the application software with the new list of approved law schools as well as some staff time for communication updates.

Information for Equity Analysis

Adding additional law schools to the approved list reduces barriers and allows more people from diverse backgrounds to enter the legal profession in Washington.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

The risk analysis is available as confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The proposed amendments have a fiscal impact on a variety of areas. In terms of costs, there are indirect expenses for staff time dedicated to drafting the proposal, updating applicable records, and disseminating information regarding changes to stakeholders. These tasks fall within the routine responsibilities of current WSBA personnel and will not necessitate additional staffing or significant resources from other internal departments. As noted above, there will likely be a minimal amount of direct expenses to support software updates to the WSBA's admissions system for these amendments. Currently, some individuals keep their active license ($468/year) even if they aren't practicing, to avoid retaking the bar exam. The proposed changes would let them switch to inactive status ($200/year) and later return to active status without needing to retake the exam. While it's hard to predict how many will take this route, it could mean less revenue from license fees. There might also be fewer bar exam applications from those who previously needed to retake the exam, though this probably won't significantly affect overall revenue.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analyses is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all.

These amendments appear to reduce inconsistencies in how competence is assessed by the WSBA and reduce barriers for legal professionals seeking to return to the practice of law. These both have great potential to positively increase fair and equal application of admission and practice rules as well as to promote professional diversity and member retention, especially for WSBA members with caregiving responsibilities or other life changes that that may lead to breaks in employment or the practice of law.

Attachments

1. Proposed Amendments to APR 3(d) and 4(d) – Markup
2. Proposed Amendments to the WSBA Bylaws Art. III Sec. D.1.a.3) and Sec. K.5 – Markup

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia, Chief Regulatory Counsel

DATE: June 15, 2026

RE: Suggested Amendments to APR 3(b)(3) – Qualifications for Common Law Lawyers to Sit for the Bar Exam

---

ACTION: Approve suggested amendments to APR 3(b)(3) which eliminate outdated and exclusionary language and reduce the active legal experience required for a lawyer from a common law jurisdiction to sit for the bar exam in Washington.

Rule 3(b)(3) of the Admission and Practice Rules (APR) sets forth the qualifications to sit for the bar exam in Washington for lawyers from a jurisdiction "where the common law of England is the basis of its jurisprudence" and requires the applicant to have active legal experience for at least three of the five years preceding the filing of the application in order to sit for the bar exam.

The suggested amendments accomplish two objectives:

1. remove outdated and exclusionary language: "where the common law of England is the basis of its jurisprudence;" and,
2. reduce the active legal experience requirement for common law lawyers seeking admission by exam to one year out of the last three.

The suggested amendments were discussed at the Board of Governors meeting on May 1, 2026. There was some feedback suggesting that the one year of active legal experience criteria not be limited to lawyers from common law jurisdictions and instead be applied equally to lawyers from all jurisdictions regardless of legal system. There are several different legal systems around the world, including common law, civil law, religious law, socialist law and various pluralist or combination systems. Since this is a complex issue requiring extensive research for a well-informed recommendation, we advise proceeding with the current amendment to meet the GR 9 schedule for submitting rule amendments to the Washington Supreme Court. In the meantime, WSBA staff will continue exploring the inclusion of legal systems outside common law and will provide a recommendation in due course.

Additional information, including the fiscal, equity, and WSBA risk analyses are included in the attached memo.

Attachments

1. Suggested Amendments to APR 3(b)(3) – Markup
2. BOG Cover Memo, dated April 7, 2026

ADMISSION AND PRACTICE RULES

RULE 3. APPLICANTS FOR ADMISSION TO PRACTICE LAW

(a) [Unchanged.]

(b) Qualification for Lawyer Bar Examination. To qualify to sit for the lawyer bar examination, a person must not be eligible for admission by motion or UBE score transfer and must present satisfactory proof of:

(1) – (2) [Unchanged.]

(3) graduation from a university or law school in any common law jurisdiction ~~where the common law of England is the basis of its jurisprudence~~ with a degree in law that would qualify the applicant to practice law in that jurisdiction and admission to the practice of law in that same or other common law jurisdiction ~~where the common law of England is the basis of its jurisprudence~~, together with current good standing and active legal experience for at least ~~three~~ one of the ~~five~~ three years immediately preceding the filing of the application; or

(4) [Unchanged.]

(c) – (i) [Unchanged.]

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia, Chief Regulatory

DATE: April 7, 2026

RE: Suggested Amendments to APR 3(b)(3) – Qualifications for Common Law Lawyers to Sit for the Bar Exam

---

DISCUSSION/FIRST READ: Presented for first read and discussion are suggested amendments to APR 3(b)(3) which eliminate outdated and exclusionary language and reduce the active legal experience required for a lawyer from a common law jurisdiction to sit for the bar exam in Washington.

Rule 3(b)(3) of the Admission and Practice Rules (APR) sets forth the qualifications to sit for the bar exam in Washington for lawyers from a jurisdiction "where the common law of England is the basis of its jurisprudence" and requires the applicant to have active legal experience for at least three of the five years preceding the filing of the application in order to sit for the bar exam.

The suggested amendments accomplish two objectives:

1. Remove outdated and exclusionary language. The suggested amendments move away from archaic and historically rooted reference that is not necessary. The language describing the English common law jurisdiction, "where the common law of England is the basis of its jurisprudence" is now commonly referred to as simply a "common law" jurisdiction. The phrase "common law of England" reflects a colonial framing that is no longer aligned with a modern and global legal profession. The reference also creates ambiguity for applicants about whether English law has any relevance to eligibility to practice law in Washington. Eliminating this reference does not alter the standards for admission, it simply clarifies that the focus is on legal experience practicing in jurisdictions grounded in the common law system, regardless of geographical origin.
2. Aligning the active legal experience standard. The suggested amendments would apply the same standard for active legal experience to common law lawyers taking the bar exam as U.S. lawyers applying for admission by motion. The active legal experience for U.S. lawyers seeking admission by motion (reciprocity) is one year within the three years preceding the application. On the other hand, common law lawyers must have three years of active legal experience within the five years preceding the application simply to qualify to sit for the bar exam. The applicant would still need to pass the exam in order to be admitted. Given this distinction, it seems appropriate to reduce the active legal experience requirement for common law lawyers seeking admission by exam, especially since they are still required to pass the bar exam in order to be admitted.

Information for Fiscal Analysis

Very little fiscal impact. There might be a slight uptick in the number of applications for the bar exam from common law lawyers. There will be some staff time devoted to updating forms, webpages, instructions, etc.

Information for Equity Analysis

See discussion in #1 above. In addition, decreasing the active legal experience reduces barriers for admission to practice law in Washington.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

The risk analysis is available as confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The proposed amendments primarily have a fiscal impact on indirect expenses for staff time dedicated to drafting the proposal, updating applicable records, and disseminating information regarding changes to stakeholders. These tasks fall within the routine responsibilities of current WSBA personnel and will not necessitate additional staffing or significant resources from other internal departments. There may also be extra revenue from bar exam applications submitted by candidates who were previously considered ineligible, but this is unlikely to lead to a material increase.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analyses is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all.

The proposed amendments to APR3(b)(3) do not appear to present any significant equity concerns. The first change proposed in this action will eliminate unnecessary confusion caused by the reference to the common law of England, which has a net positive effect for all members seeking admission to the WSBA.

The second suggested change in this proposal will eliminate discrepancies in experience requirements between U.S. lawyers and common law lawyers seeking admission to the WSBA. The current rule requires common law lawyer applicants to have three times more active legal experience than U.S. lawyer applicants before they are able to qualify to sit for the bar exam, which they will still be required to pass in order to be admitted to the WSBA. These changes ensure consistency and fairness in evaluating active legal experience between these two types of applicants.

Attachment

Suggested Amendments to APR 3(b)(3) - Markup

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia, Chief Regulatory Counsel

DATE: June 15, 2026

RE: Suggested Amendments to APR 1(e) – Definition of Active Legal Experience

---

ACTION: Approve suggested amendments to APR 1(e) amending the definition of active legal experience.

Rule 1(e) of the Admission and Practice Rules (APR) defines the term "active legal experience." Active legal experience is used primarily for determining the experience required for someone who is applying for admission by motion (reciprocity).

APR 3(c), admission by motion, requires "active legal experience" for at least one of the three years preceding the application for admission. The one year of active legal experience in this case is one of only two substantive requirements to be admitted as a lawyer under this rule; the other being admission and good standing in another U.S. jurisdiction. Accordingly, it is important to have robust, precise standards for determining active legal experience.

The same standard is also used in the WSBA Bylaws for determining whether a WSBA member must satisfy MCLE requirements in order to return to active status. If proposed amendments to the WSBA Bylaws are adopted removing the bar exam requirement to return to active status, then the only consequence of not having enough active legal experience would be completion of additional MCLE credits.

Based on the above, we believe a clear, unambiguous definition best serves new lawyers, WSBA members, and WSBA staff analyzing applications.

The suggested amendments were discussed at the Board of Governors meeting on May 1, 2026. Based on feedback from the governors, there are two changes to the proposed definition of active legal experience.

The first is to include limited licenses to practice law as house counsel in common law jurisdictions as an eligible activity (APR 1(e)(1)(A)(i)c.). Our research found common law jurisdictions with a similar house counsel license as what is available in Washington and other U.S. jurisdictions. In fact, some have even more requirements to qualify than in Washington.

Second, eligible activity f., re judicial law clerks, now includes a provision for completion of a law office study program equivalent to the APR 6 law clerk program. This will allow judicial clerks who complete a law office study program in another U.S. jurisdiction to earn active legal experience.

Additional information, including the fiscal, equity, and WSBA risk analyses are included in the attached memo.

Attachments

1. Suggested Amendments to APR 1(e) – Markup
2. BOG Cover Memo, dated April 7, 2026

ADMISSION AND PRACTICE RULES

RULE 1. IN GENERAL; SUPREME COURT; PREREQUISITES TO THE PRACTICE OF LAW; COMMUNICATIONS TO THE BAR; CONFIDENTIALITY; DEFINITIONS

(a) – (d) [Unchanged.]

(e) Definitions. The following definitions apply throughout these Admission and Practice Rules except where otherwise stated:

(1) "Active legal experience"

(A) when used to describe a requirement for admission or licensure as, or otherwise regarding, a lawyer means experience in any combination of the eligible activities listed below. ~~the active practice of law as a lawyer, including practice as a Pro Bono Status Lawyer licensed under APR 3(g), or as a teacher at an approved law school, or as a judge of a court of general or appellate jurisdiction or any combination thereof, in a state or territory of the United States or in the District of Columbia or in any jurisdiction where the common law of England is the basis of its jurisprudence;~~

(i) Eligible activities for "active legal experience" are limited to the following:

a. employment, or volunteer service with a nonprofit organization, in a position that requires an active license to practice law as a lawyer in a state or territory of the United States, the District of Columbia, or any common law jurisdiction;

b. practice as a pro bono status lawyer licensed under APR 3(g) or equivalent lawyer status in another jurisdiction when the practice is in a state or territory of the United States, the District of Columbia, or any common law jurisdiction;

c. practice as house counsel when the house counsel is licensed, registered, or otherwise authorized to practice law as house counsel in a state or territory of the United States, the District of Columbia, or any common law jurisdiction and is admitted as a lawyer

in another state or territory of the United States, the District of Columbia, or any common law jurisdiction;

d. service as a judicial officer in the courts of the United States, any state or territory of the United States, the District of Columbia, any common law jurisdiction, or any federally recognized American Indian tribe or Alaska Native entity and the judicial officer is admitted as a lawyer in a state or territory of the United States, the District of Columbia, or any common law jurisdiction;

e. teacher at a law school approved by the Board of Governors and the teacher is admitted as a lawyer in a state or territory of the United States, the District of Columbia, or any common law jurisdiction;

f. employment as a judicial law clerk at a court of the United States, a state or territory of the United States, the District of Columbia, or any common law jurisdiction where a J.D., or equivalent law degree, or completion of the APR 6 law clerk program, or equivalent law office study program, is required to hold the position, and the clerk is admitted as a lawyer in a state or territory of the United States, the District of Columbia, or any common law jurisdiction; or

g. employment as an arbitrator or mediator in a state or territory of the United States, the District of Columbia, or any common law jurisdiction and the arbitrator or mediator has an active license to practice law as a lawyer in a state or territory of the United States, the District of Columbia, or any common law jurisdiction.

(ii) "Lawyer" for purposes of "active legal experience" means a person admitted, licensed, or otherwise authorized to practice law where the scope of practice is not limited or restricted to particular practice areas or areas of law.

(iii) One year for purposes of determining "active legal experience" is 12 consecutive or nonconsecutive months in which the lawyer regularly engaged in eligible

activities and engaged in eligible activities for at least 1,000 hours during the 12 month period of time.

(iv) Neither the pro se practice of law nor the unauthorized practice of law qualify as active legal experience.

(B) when used to describe a requirement for licensing as, or otherwise regarding, a LLLT, means active experience practicing law as an LLLT, including practice as a Pro Bono Status LLLT licensed under APR 3(g);

(C) when used to describe a requirement for licensing as, or otherwise regarding, a LPO means active experience practicing law as a LPO, including as a Pro Bono Status LPO licensed under APR 3(g).

(2) – (9) [Unchanged.]

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia, Chief Regulatory

DATE: April 7, 2026

RE: Suggested Amendments to APR 1(e) – Definition of Active Legal Experience

---

DISCUSSION & FIRST READ: Presented for discussion and first read are suggested amendments to APR 1(e) amending the definition of active legal experience.

Rule 1(e) of the Admission and Practice Rules (APR) defines the term "active legal experience." Active legal experience is used primarily for determining the experience required for someone who is applying for admission by motion (reciprocity). APR 3(c), admission by motion, requires "active legal experience" for at least one of the three years preceding the application for admission. The same standard is also used in the WSBA Bylaws for determining whether the member must satisfy MCLE requirements in order to return to active status.

The current definition, taken at its plain meaning as written, significantly restricts what activities can be considered active legal experience. In addition, the definition is vague and confusing. Over the years, the WSBA staff have struggled with interpreting and applying the definition to individual scenarios such as determining whether:

A. a specific activity or job falls under the "active practice of law as a lawyer;"
B. the lawyer must have an active license status (as opposed to inactive or other license status) when engaging in the activity for it to qualify under the definition;
C. a judge of a particular court qualifies under the definition; and
D. the amount of time engaged in the activity is sufficient to qualify as active legal experience.

Such difficulties can result in ambiguity and inconsistent application of the standard. The new definition addresses the above ambiguities by providing a succinct, yet detailed, list of activities that qualify as active legal experience. Each activity identifies the role and clearly sets forth any other requirements such as whether the activity must be undertaken while admitted as a lawyer, with an active license status or other status, and other details relevant to the activity.

The new definition also requires the lawyer to have engaged in the activity for at least 1,000 hours and during a 12-month period of time. This standard ensures the lawyer has regular active legal experience and prevents abuse of the standard by those who might seek to use nominal time to meet the requirement; for example, volunteering only one day a month at a legal clinic. The WSBA reviewed the requirements of other states regarding their standard for demonstrating active legal experience or similar term and found a minimum time requirement to be common among the jurisdictions.

Finally, the new definition explicitly excludes the pro se practice of law and the unauthorized practice of law. There have been rare instances where such experience has been claimed. Including this proviso in the rule provides clear

instruction to an applicant or member and also gives WSBA staff a simple and direct way to point out why such experience does not qualify.

Information for Fiscal Analysis
No fiscal impact. There will be some staff time devoted to updating forms, webpages, instructions, etc.

Information for Equity Analysis
A clear, detailed definition helps everyone understand exactly what qualifies as active legal experience and provides for equal and equitable application of the standard.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

The risk analysis is available as confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The proposed amendments primarily have a fiscal impact on indirect expenses for staff time dedicated to drafting the proposal, updating applicable records, and disseminating information regarding changes to stakeholders. These tasks fall within the routine responsibilities of current WSBA personnel and will not necessitate additional staffing or significant resources from other internal departments.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analyses is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all.

Based on the materials provided, the suggested amendments to APR 1(e) do not pose any significant equity concerns. The proposed changes will clarify what activities qualify as active legal experience, which would improve procedural fairness by removing administrative discretion required to interpret the current rule, ultimately reducing the potential for inconsistent and/or biased application of admission rules.

Attachments
1. Suggested Amendments to APR 1(e) - Markup

WASHINGTON STATE
BAR ASSOCIATION

Financial Reports

(Unaudited)

Year to Date March 31, 2026

Prepared by
Maggie Yu, Controller

Submitted by
Tiffany Lynch, Director of Finance
April 17, 2026

WASHINGTON STATE BAR ASSOCIATION

To: Board of Governors
Budget and Audit Committee

From: Terra Nevitt, Executive Director; Tiffany Lynch, Director of Finance; Maggie Yu, Controller

Re: Key Financial Benchmarks for the Preliminary Fiscal Year to Date (YTD) through March 31, 2026
As % of Completion to Annual Budget

	% of Year	Current Year % YTD	Current Year $ Difference Favorable/(Unfavorable)	Prior Year YTD	Comments
Total Salaries & Benefits	**50%**	**51 %**	**$(203,939)**	**50%**	**Unfavorable to budget due to variances in salaries, higher medical cost, and timing of annual payment for transportation allowance.**
Other Indirect Expenses*	**50%**	**44%**	**$298,373**	**49%**	**Favorable to budget due to timing of expenses for legal fees, workplace benefits, and IT direct expenses.**
Total Indirect Expenses	**50%**	**50%**	**$94,433**	**50%**	**Favorable to budget resulting from other indirect expenses described above.**
General Fund Revenues	**50%**	**56%**	**$1,402,082**	**56%**	**Favorable to budget due to higher license revenue from late fees and Law Clerks, and timing of collection of fees for summer bar and LPO exams MCLE, and reimbursement from sections.**
General Fund Indirect Expenses	**50%**	**50%**	**$97,495**	**50%**	**Favorable to budget as described for indirect expenses above.**
General Fund Direct Expenses	**50%**	**42%**	**$232,910**	**38%**	**Favorable to budget due to timing of program activities and meetings/events.**
General Fund Net	**50%**	**-239%**	**$1,732,487**	**-166%**	**Favorable to budget for the reasons described above.**
CLE Revenue	**50%**	**45%**	**$(78,353)**	**49%**	**Unfavorable to budget primarily due to lower seminar revenue.**
CLE Direct Expenses	**50%**	**34%**	**$69,445**	**14%**	**Favorable to budget due to timing of expenses for seminar activities.**
CLE Indirect Expenses	**50%**	**50%**	**$(3,180)**	**51%**	**Unfavorable to budget due to quarterly vacation accrual adjustments.**
CLE Net	**50%**	**59%**	**$(12,088)**	**199%**	**Unfavorable to budget due to lower seminar revenue as described above.**

*Workplace benefits, Human Resources, meeting support, rent, taxes, furniture & maintenance, office supplies, depreciation, insurance, equipment, insurance, professional fees (legal & audit), internet & telephone, postage, records management, bank fees, Technology, etc.

Washington State Bar Association Financial Summary
Compared to Fiscal Year 2026 Budget
For the Period from March 01, 2026 to March 31, 2026

Category	Actual Revenues	Budgeted Revenues	Actual Indirect Expenses	Budgeted Indirect Expenses	Actual Direct Expenses	Budgeted Direct Expenses	Actual Total Expenses	Budgeted Total Expenses	Actual Net Result	Budgeted Net Result
Access to Justice	-	-	122,471	253,348	26,876	116,100	149,346	369,448	(149,346)	(369,448)
Admissions/Bar Exam	1,278,535	1,479,440	525,560	1,089,992	214,036	459,830	739,596	1,549,822	538,939	(70,382)
Advancement FTE		-	157,658	315,609	140	6,600	157,798	322,209	(157,798)	(322,209)
Bar News	317,543	529,600	164,899	331,526	214,226	382,945	379,125	714,471	(61,582)	(184,871)
Board of Governors	-	-	118,460	238,885	139,442	417,665	257,901	656,550	(257,901)	(656,550)
Conference & Broadcasting Services	-	-	41,533	83,138	-	-	41,533	83,138	(41,533)	(83,138)
Character & Fitness Board	-	-	80,060	159,981	11,082	23,050	91,143	183,031	(91,143)	(183,031)
Communications Strategies	-	3,000	359,787	741,101	29,597	189,015	389,384	930,116	(389,384)	(927,116)
Communications Strategies FTE		-	130,572	257,458	-	-	130,572	257,458	(130,572)	(257,458)
Discipline	48,295	85,000	3,193,423	6,614,175	86,369	185,509	3,279,792	6,799,684	(3,231,497)	(6,714,684)
Diversity	135,000	135,000	155,698	342,071	10,781	59,075	166,479	401,146	(31,479)	(266,146)
Entity Regulation	15,000	75,500	58,088	115,083	2,021	27,973	60,109	143,055	(45,109)	(67,555)
Facilities & Operations	-	-	381,971	746,702	1,188	2,565	383,159	749,267	(383,159)	(749,267)
Finance	320,276	600,000	613,906	1,225,253	3,112	4,920	617,018	1,230,173	(296,742)	(630,173)
Foundation	-	-	88,391	175,440	4,869	19,185	93,261	194,625	(93,261)	(194,625)
Human Resources	-	-	343,016	540,066	-	-	343,016	540,066	(343,016)	(540,066)
Law Clerk Program	254,967	224,000	84,874	177,416	36,789	67,409	121,663	244,825	133,304	(20,825)
Legislative	-	-	131,798	270,801	13,163	24,790	144,962	295,591	(144,962)	(295,591)
Legal Lunchbox	30,266	34,000	29,673	59,925	4,422	8,100	34,095	68,025	(3,829)	(34,025)
Licensing and Membership Records	314,115	494,260	401,600	807,725	15,409	22,680	417,009	830,405	(102,894)	(336,145)
Licensing Fees	8,957,902	17,652,266	-	-	-	-	0	-	8,957,902	17,652,266
Limited License Legal Technician	9,003	17,287	33,525	68,332	1,304	10,000	34,829	78,332	(25,826)	(61,045)
Limited Practice Officers	95,530	182,000	45,544	92,656	9,282	32,704	54,826	125,360	40,704	56,640
Mandatory CLE	830,900	1,338,250	362,221	694,269	73,128	153,032	435,349	847,301	395,551	490,949
Member Wellness Program	2,000	9,000	122,327	242,930	1,633	13,100	123,960	256,030	(121,960)	(247,030)
Member Services & Engagement	6,000	15,300	156,323	309,044	15,056	125,020	171,380	434,064	(165,380)	(418,764)
Mini CLE	-	-	66,343	134,341	-	-	66,343	134,341	(66,343)	(134,341)
New Member Education	98,098	142,000	58,646	118,278	-	3,700	58,646	121,978	39,452	20,022
Office of General Counsel	1,000	-	530,982	1,116,772	6,789	26,750	537,771	1,143,522	(536,771)	(1,143,522)
Office of the Executive Director	-	-	471,761	932,020	110,643	142,635	582,405	1,074,655	(582,405)	(1,074,655)
OGC-Disciplinary Board	-	-	106,675	210,543	70,147	136,245	176,822	346,788	(176,822)	(346,788)
Practice of Law Board	-	-	49,260	98,855	197	16,200	49,457	115,055	(49,457)	(115,055)
Practice Management Assistance	39,349	62,000	77,727	152,525	89,281	95,695	167,008	248,220	(127,659)	(186,220)
Professional Responsibility Program	-	-	105,025	216,787	2,022	7,990	107,048	224,777	(107,048)	(224,777)
Public Service Programs	2,639	132,635	138,171	310,124	(3,257)	12,700	134,914	322,824	(132,275)	(190,189)
Publication and Design Services	-	-	61,644	124,205	4,756	5,000	66,400	129,205	(66,400)	(129,205)
Regulatory Services FTE			205,630	425,472	1,330	12,590	206,961	438,062	(206,961)	(438,062)
Regulatory Reform	-	-	84,733	167,255	8,828	57,000	93,561	224,255	(93,561)	(224,255)
Sections Administration	388,434	275,000	160,102	322,943	407	2,400	160,510	325,343	227,925	(50,343)
Volunteer Engagement	-	-	124,124	253,536	15,258	36,301	139,381	289,836.58	(139,381)	(289,837)
Technology	-	-	506,487	959,791	-	-	506,487	959,791	(506,487)	(959,791)
Subtotal General Fund	**13,144,851**	23,485,538	**10,650,690**	**21,496,370**	**1,220,327**	2,906,473	**11,871,017**	24,402,843	**1,273,835**	**(917,304)**
Expenses using Facilities Reserve funds					(372)		(372)	(744)	372	744
Expenses using Special Project Reserve funds			(84,733)		(8,828)		(93,561)	(224,255)	93,561	224,255
Total General Fund - Net Result from Operations	**13,144,851**		**10,565,957**		**1,211,499**		**11,777,084**	**24,177,844**	**1,367,768**	**(692,306)**
Percentage of Budget	**56%**		**50%**		**42%**		**49%**			
CLE-Seminars and Products	686,151	1,491,745	527,696	1,048,807	80,183	313,153	607,879	1,361,960	78,272	129,785
CLE - Deskbooks	33,928	105,120	120,891	242,008	69,138	124,380	190,029	366,387	(156,101)	(261,267)
Total CLE	720,079	1,596,865	648,587	1,290,814	149,321	437,533	797,908	1,728,347	(77,829)	(131,482)
Percentage of Budget	**45%**		**50%**		**34%**		**46%**		-	-
Expenses using Facilities Reserve funds							0		**(77,829)**	**(131,482)**
Total CLE Fund - Net Result from Operations			**648,587**				**797,908**	**1,728,347**		
Total All Sections	649,164	653,316	-	-	513,243	1,091,122	513,243	1,091,122	135,921	(437,806)
Bench Bar Press-Restricted	6,285	-	-	-	4,935	-	4,935	0	1,350	-
Client Protection Fund-Restricted	818,066	945,480	97,022	194,280	16,471	507,100	113,493	701,380	704,573	244,100
Expenses using Facilities Reserve funds							-		-	-
Total CPF Fund - Net Result from Operations			**97,022**				**113,493**	**701,380**	**704,573**	**244,100**
Totals	**15,332,161**	**26,681,199**	**11,396,299**	**22,981,465**	**1,899,362**	**4,942,227**	**13,295,661**	**27,923,692**	**2,037,850**	**(1,242,493)**
Totals Net of Use of Facilities Reserve Funds			-		(372)		(372)		372	
Totals Net of Use of Special Project Reserve Funds			(84,733)		(8,828)		(93,561)	**27,698,693**	93,561	**(1,017,494)**
			11,311,566		**1,890,534**		**13,201,728**		**2,131,783**	
Percentage of Budget	**57%**		**50%**		**38%**		**48%**			

Summary of Fund Balances:	Fund Balances Sept. 30, 2025	2026 Budgeted Fund Balances	Fund Balances Year to date
Restricted Funds:			
Client Protection Fund	5,307,092	5,551,192	6,011,665
Bench Bar Press	1,110	1,110	2,460
Board-Designated Funds (Non-General Fund):			
CLE Fund Balance	1,233,727	1,102,244	1,155,898
Section Funds	2,164,531	1,726,725	2,300,452
Board-Designated Funds (General Fund):			
Operating Reserve Fund	2,500,000	2,500,000	2,500,000
Facilities Reserve Fund	159,925	159,181	159,553
Special Projects and Innovation Fund	616,067	391,813	522,507
Unrestricted Funds (General Fund):			
Unrestricted General Fund	6,754,154	6,061,848	8,121,922
Total General Fund Balance	**10,030,146**	**9,112,841**	**11,303,981**
Net Change in Total General Fund Balance		**(917,304)**	**1,273,835**
Total Fund Balance	**18,736,606**	**17,494,113**	**20,774,456**
Net Change In Fund Balance		**(1,242,493)**	**2,037,850**

Washington State Bar Association
Analysis of Cash Investments
As of March 31, 2026

Checking & Savings Accounts

General Fund

Checking

Bank	Account	Amount
Wells Fargo	General	1,479,940
	Total	

Investments	Rate (yield)	Amount
Wells Fargo Money Market	3.60%	19,285,047
UBS Financial Money Market	3.40%	1,190,418
CDs/Treasuries	see list	7,000,000
	General Fund Total	**28,955,404**

Client Protection Fund

Checking

Bank	Amount
Wells Fargo	360,315

Investments	Rate (yield)	Amount
Wells Fargo Money Market	3.60%	5,296,575
CDs/Treasuries	see list	500,000
	Client Protection Fund Total	**6,156,890**
	Grand Total Cash & Investments	**35,112,295**

Washington State Bar Association
Analysis of Cash Investments
As of March 31, 2026

General Fund

Bank	Yield	Term Months	Trade Date	Settle Date	Maturity Date	Amount
Southstate Bank NA CD	4.40%	10	6/12/2025	6/18/2025	4/20/2026	250,000
Israel Discount k of NY CD	4.00%	12	4/22/2025	4/28/2025	4/28/2026	250,000
Northern Bank & Trust MA CD	4.20%	9	7/28/2025	7/30/2025	4/30/2026	250,000
Citizens N/B Bluffton CD	4.10%	10	7/28/2025	7/31/2025	5/29/2026	250,000
Merrick Bank CD	4.30%	12	6/12/2025	6/20/2025	6/18/2026	250,000
Simmons Bank/Pine Bluff CD	4.20%	12	6/12/2025	6/20/2025	6/18/2026	250,000
Goldman Sachs Bank CD	3.60%	6	12/30/2025	1/6/2026	7/6/2026	250,000
Bank of America CD	3.60%	6	12/30/2025	1/7/2026	7/7/2026	250,000
BCB Community Bank NY CD	4.05%	12	7/7/2025	7/18/2025	7/17/2026	250,000
Bank Hapoalim BM CD	4.15%	12	7/28/2025	7/31/2025	7/29/2026	250,000
Bridgewater Bank CD	3.70%	6	1/29/2026	2/6/2026	8/6/2026	250,000
Industrial & Com Bank CD	3.70%	6	1/29/2026	2/6/2026	8/6/2026	250,000
Morgan Stanley PVT Bank CD	4.05%	12	8/6/2025	8/13/2025	8/13/2026	250,000
Zions Bancorp NA CD	3.70%	9	1/29/2026	2/4/2026	11/4/2026	250,000
Cross River Bank CD	3.70%	9	1/29/2026	2/6/2026	11/6/2026	250,000
JP Morgan chase bank CD	3.60%	12	12/30/2025	1/7/2026	1/7/2027	250,000
Bank of Baroda CD	3.70%	12	1/23/2026	1/28/2026	1/28/2027	250,000
Ally Bank/UT CD	3.60%	12	1/23/2026	1/29/2026	1/29/2027	250,000
BMW Bank North America CD	3.65%	12	1/23/2026	1/30/2026	1/29/2027	250,000
CAPE & Coast Bank CD	3.65%	12	1/23/2026	1/30/2026	1/29/2027	250,000
Lake City Bank Warsaw CD	3.80%	12	2/10/2026	2/18/2026	2/18/2027	250,000
PCB Bank Primary CD	3.70%	12	2/26/2026	3/6/2026	3/5/2027	250,000
State Bank of India NY CD	3.75%	12	3/4/2026	3/9/2026	3/9/2027	250,000
Towne Bank Portsmouth VA CD	3.75%	12	3/4/2026	3/13/2026	3/12/2027	250,000
Associated BK Green Bay CD	3.80%	12	3/24/2026	3/27/2026	3/25/2027	250,000
First Reliance Bank CD	3.75%	12	3/24/2026	3/30/2026	3/30/2027	250,000
Ocean Bank/Miami FL CD	3.85%	12	3/24/2026	3/30/2026	3/30/2027	250,000
Seacoast National Bank CD	3.80%	12	3/24/2026	3/31/2026	3/31/2027	250,000
					Total	**7,000,000**

Client Fund Protection Fund

Bank	Yield	Term Months	Trade Date	Settle Date	Maturity Date	Amount
SOFI Bank NA Corp CD	3.70%	6	1/23/2026	2/4/2026	8/4/2026	250,000
SAFRA National Bank CD	3.65%	11	1/23/2026	1/29/2026	12/29/2026	250,000
					Total	**500,000**

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

LICENSE FEES

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
LICENSE FEES	17,652,266	1,631,824	8,957,902	8,694,364	51%	131,769
TOTAL REVENUE:	**17,652,266**	**1,631,824**	**8,957,902**	**8,694,364**	**51%**	**131,769**

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

ADMISSIONS

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
EXAM SOFTWARE REVENUE	9,500	-	-	9,500	0%	(4,750)
BAR EXAM FEES	1,395,000	383,565	1,252,295	142,705	90%	554,795
RULE 9/LEGAL INTERN FEES	13,000	850	2,650	10,350	20%	(3,850)
SPECIAL ADMISSIONS	61,940	6,660	23,590	38,350	38%	(7,380)
TOTAL REVENUE:	**1,479,440**	**391,075**	**1,278,535**	**200,905**	**86%**	**538,815**
DIRECT EXPENSES:						
POSTAGE	2,900	198	2,020	880	70%	(570)
STAFF TRAVEL/PARKING	24,000	607	9,139	14,861	38%	2,861
STAFF MEMBERSHIP DUES	495	-	245	250	49%	3
SUPPLIES	2,500	(380)	1,044	1,456	42%	206
FACILITY, PARKING, FOOD	150,985	-	46,969	104,016	31%	28,523
EXAM GRADING	43,750	-	21,750	22,000	50%	125
UBE EXMINATIONS	46,200	40,859	40,859	5,341	88%	(17,759)
BOARD OF BAR EXAMINERS	45,000	5,626	6,235	38,765	14%	16,265
BAR EXAM PROCTORS	10,000	7,710	8,486	1,514	85%	(3,486)
DISABILITY ACCOMMODATIONS	75,000	43,046	45,424	29,576	61%	(7,924)
CHARACTER & FITNESS INVESTIGATIONS	1,500	-	-	1,500	0%	750
LAW SCHOOL VISITS	1,500	-	23	1,477	2%	727
SOFTWARE HOSTING	45,000	4,583	26,488	18,512	59%	(3,988)
STAFF CONFERENCE & TRAINING	11,000	-	5,354	5,646	49%	146
TOTAL DIRECT EXPENSES:	**459,830**	**102,249**	**214,036**	**245,794**	**47%**	**15,879**
INDIRECT EXPENSES:						
SALARY EXPENSE (7.45 FTE) **	635,395	61,339	308,980	326,415	49%	8,717
BENEFITS EXPENSE	198,059	20,928	104,302	93,757	53%	(5,273)
OTHER INDIRECT EXPENSE	256,539	20,002	112,278	144,261	44%	15,992
TOTAL INDIRECT EXPENSES:	**1,089,992**	**102,269**	**525,560**	**564,433**	**48%**	**19,436**
TOTAL ALL EXPENSES:	**1,549,822**	**204,518**	**739,596**	**810,226**	**48%**	**35,315**
NET INCOME (LOSS):	**(70,382)**	**186,557**	**538,939**	**(609,321)**	**-766%**	**574,130**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

ADVANCEMENT FTE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
STAFF CONFERENCE & TRAINING	6,600	-	140	6,460	2%	3,160
TOTAL DIRECT EXPENSES:	**6,600**	**-**	**140**	**6,460**	**2%**	**3,160**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.41 FTE)	216,525	17,883	110,065	106,460	51%	(1,802)
BENEFITS EXPENSE	50,531	4,609	26,294	24,237	52%	(1,028)
OTHER INDIRECT EXPENSE	48,553	3,795	21,300	27,253	44%	2,977
TOTAL INDIRECT EXPENSES:	**315,609**	**26,286**	**157,658**	**157,951**	**50%**	**146**
TOTAL ALL EXPENSES:	**322,209**	**26,286**	**157,798**	**164,410**	**49%**	**3,306**
NET INCOME (LOSS):	**(322,209)**	**(26,286)**	**(157,798)**	**(164,410)**	**49%**	**3,306**

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
ACCESS TO JUSTICE						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
ATJ BOARD RETREAT	6,000	-	-	6,000	0%	3,000
LEADERSHIP TRAINING	10,000	-	3,450	6,550	34%	1,550
ATJ BOARD EXPENSE **	51,900	2,549	4,659	47,241	9%	21,291
STAFF TRAVEL/PARKING	2,800	59	298	2,503	11%	1,103
STAFF CONFERENCE & TRAINING	4,400	-	3,662	738	83%	(1,462)
PUBLIC DEFENSE **	11,000	-	4,106	6,894	37%	1,394
RECEPTION/FORUM EXPENSE	30,000	10,601	10,701	19,299	36%	4,299
TOTAL DIRECT EXPENSES:	**116,100**	**13,209**	**26,876**	**89,224**	**23%**	**31,174**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.61 FTE) **	152,635	15,030	74,953	77,682	49%	1,365
BENEFITS EXPENSE	45,272	4,098	23,065	22,207	51%	(429)
OTHER INDIRECT EXPENSE	55,440	4,326	24,452	30,988	44%	3,268
TOTAL INDIRECT EXPENSES:	**253,348**	**23,454**	**122,471**	**130,877**	**48%**	**4,203**
TOTAL ALL EXPENSES:	**369,448**	**36,663**	**149,346**	**220,102**	**40%**	**35,378**
NET INCOME (LOSS):	**(369,448)**	**(36,663)**	**(149,346)**	**(220,102)**	**40%**	**35,378**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

BENCH-BAR-PRESS

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
LUNCHEON REGISTRATION	-	-	4,485	(4,485)		4,485
BENCH-BAR-PRESS MEMBERSHIP DUES	-	-	1,800	(1,800)		1,800
TOTAL REVENUE:	**-**	**-**	**6,285**	**(6,285)**		**6,285**
DIRECT EXPENSES:						
BENCH-BAR-PRESS LUNCHEON	-	-	4,935	(4,935)		(4,935)
TOTAL DIRECT EXPENSES:	**-**	**-**	**4,935**	**(4,935)**		**(4,935)**
NET INCOME (LOSS):	**-**	**-**	**1,350**	**(1,350)**		**1,350**

Washington State Bar Association

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50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
BAR NEWS						
REVENUE:						
ROYALTIES	2,000	-	-	2,000	0%	(1,000)
BNEWS DISPLAY ADVERTISING	405,000	50,000	254,289	150,711	63%	51,789
BNEWS SUBSCRIPT/SINGLE ISSUES	100	36	140	(40)	140%	90
BNEWS CLASSIFIED ADVERTISING	2,500	(32)	2,773	(273)	111%	1,523
JOB TARGET ADVERSTISING	120,000	12,351	60,340	59,660	50%	340
TOTAL REVENUE:	**529,600**	**62,355**	**317,543**	**212,057**	**60%**	**52,743**
DIRECT EXPENSES:						
POSTAGE	135,000	16,369	82,591	52,409	61%	(15,091)
PRINTING, COPYING & MAILING	242,000	26,386	130,615	111,385	54%	(9,615)
DIGITAL/ONLINE DEVELOPMENT	2,000	21	21	1,979	1%	979
GRAPHICS/ARTWORK	1,000	-	-	1,000	0%	500
EDITORIAL ADVIS COMMITTEE EXP	300	-	-	300	0%	150
STAFF CONFERENCE & TRAINING	2,200	-	999	1,201	45%	101
STAFF MEMBERSHIP DUES	220	-	-	220	0%	110
SUBSCRIPTIONS	225	-	-	225	0%	113
TOTAL DIRECT EXPENSES:	**382,945**	**42,775**	**214,226**	**168,719**	**56%**	**(22,753)**
INDIRECT EXPENSES:						
SALARY EXPENSE (2.13 FTE)	199,151	17,535	101,776	97,375	51%	(2,200)
BENEFITS EXPENSE	59,029	5,472	30,950	28,079	52%	(1,436)
OTHER INDIRECT EXPENSE	73,346	5,732	32,173	41,173	44%	4,500
TOTAL INDIRECT EXPENSES:	**331,526**	**28,739**	**164,899**	**166,627**	**50%**	**864**
TOTAL ALL EXPENSES:	**714,471**	**71,515**	**379,125**	**335,346**	**53%**	**(21,889)**
NET INCOME (LOSS):	**(184,871)**	**(9,160)**	**(61,582)**	**(123,289)**	**33%**	**30,853**

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50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
BOARD OF GOVERNORS						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
BOG MEETINGS **	175,000	32,474	46,003	128,997	26%	41,497
BOG COMMITTEES' EXPENSES **	11,200	973	2,305	8,895	21%	3,295
BOG RETREAT	40,000	174	31,539	8,461	79%	(11,539)
BOG CONFERENCE ATTENDANCE	56,500	6,098	16,727	39,773	30%	11,523
BOG TRAVEL & OUTREACH **	70,000	5,329	42,518	27,482	61%	(7,518)
LEADERSHIP TRAINING	15,000	-	-	15,000	0%	7,500
BOG ELECTIONS **	26,900	-	-	26,900	0%	13,450
PRESIDENT'S DINNER	12,000	-	-	12,000	0%	6,000
NEW GOVERNOR ORIENTATION	7,000	-	-	7,000	0%	3,500
PRESIDENT'S PHOTO	3,300	-	-	3,300	0%	1,650
SUPPLIES	765	150	350	415	46%	33
TOTAL DIRECT EXPENSES:	**417,665**	**45,198**	**139,442**	**278,223**	**33%**	**69,391**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.73 FTE)	135,043	12,558	69,091	65,953	51%	(1,569)
BENEFITS EXPENSE	44,269	4,143	23,372	20,897	53%	(1,237)
OTHER INDIRECT EXPENSE	59,572	4,631	25,997	33,575	44%	3,789
TOTAL INDIRECT EXPENSES:	**238,885**	**21,332**	**118,460**	**120,425**	**50%**	**983**
TOTAL ALL EXPENSES:	**656,550**	**66,530**	**257,901**	**398,649**	**39%**	**70,374**
NET INCOME (LOSS):	**(656,550)**	**(66,530)**	**(257,901)**	**(398,649)**	**39%**	**70,374**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

CONFERENCE AND BROADCAST SERVICES

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
INDIRECT EXPENSES:						
SALARY EXPENSE (0.55 FTE)	49,269	4,401	25,327	23,942	51%	(693)
BENEFITS EXPENSE	14,930	1,382	7,893	7,037	53%	(428)
OTHER INDIRECT EXPENSE	18,939	1,481	8,314	10,625	44%	1,156
TOTAL INDIRECT EXPENSES:	**83,138**	**7,264**	**41,533**	**41,604**	**50%**	**36**
NET INCOME (LOSS):	**(83,138)**	**(7,264)**	**(41,533)**	**(41,604)**	**50%**	**36**

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

CHARACTER & FITNESS BOARD

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
CHARACTER & FITNESS BOARD EXP	12,000	1,333	5,139	6,861	43%	861
COURT REPORTERS	11,050	1,708	5,943	5,107	54%	(418)
TOTAL DIRECT EXPENSES:	**23,050**	**3,040.66**	**11,082**	**11,968**	**48%**	**443**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.85 FTE)	103,891	9,042	53,242	50,649	51%	(1,296)
BENEFITS EXPENSE	26,820	2,454	14,044	12,776	52%	(634)
OTHER INDIRECT EXPENSE	29,270	2,276	12,775	16,495	44%	1,860
TOTAL INDIRECT EXPENSES:	**159,981**	**13,772**	**80,060**	**79,921**	**50%**	**(70)**
TOTAL ALL EXPENSES:	**183,031**	**16,813**	**91,143**	**91,888**	**50%**	**373**
NET INCOME (LOSS):	**(183,031)**	**(16,813)**	**(91,143)**	**(91,888)**	**50%**	**373**

Washington State Bar Association

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For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

CONTINUING LEGAL EDUCATION (CLE)

(CLES - CLEP)

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
SEMINAR REGISTRATIONS	730,535	11,047	151,283	579,252	21%	(213,985)
SEMINAR REVENUE-OTHER	32,500	-	16,000	16,500	49%	(250)
SEMINAR SPLITS W/ CLE	(150,000)	-	-	(150,000)	0%	75,000
SHIPPING & HANDLING	210	9	36	174	17%	(69)
COURSEBOOK SALES	3,500	70	325	3,175	9%	(1,425)
DIGITAL VIDEO SALES	875,000	39,752	518,507	356,493	59%	81,007
TOTAL REVENUE:	**1,491,745**	**50,878**	**686,151**	**805,594**	**46%**	**(59,722)**
DIRECT EXPENSES:						
COURSEBOOK PRODUCTION	150	-	-	150	0%	75
ONLINE EXPENSES	54,000	6	17,851	36,149	33%	9,149
ACCREDITATION FEES	2,500	(60)	2,040	460	82%	(790)
FACILITIES	175,000	1,200	47,107	127,893	27%	40,393
DISABILITY ACCOMMODATIONS	7,000	-	2,211	4,789	32%	1,289
SPEAKERS & PROGRAM DEVELOP	45,700	200	6,666	39,034	15%	16,184
HONORARIA	3,000	-	-	3,000	0%	1,500
CLE SEMINAR COMMITTEE	200	-	-	200	0%	100
STAFF TRAVEL/PARKING	16,500	-	2,721	13,779	16%	5,529
STAFF CONFERENCE & TRAINING	3,700	-	-	3,700	0%	1,850
STAFF MEMBERSHIP DUES	1,500	-	1,091	409	73%	(341)
SUBSCRIPTIONS	1,300	-	-	1,300	0%	650
SUPPLIES	1,000	-	41	959	4%	459
COST OF SALES - COURSEBOOKS	300	2	27	273	9%	123
POSTAGE & DELIVERY-COURSEBOOKS	200	6	28	172	14%	72
IT EXPENSE DUE TO GF	1,103	74	400	703	36%	151
TOTAL DIRECT EXPENSES:	**313,153**	**1,427**	**80,183**	**232,970**	**26%**	**76,393**
INDIRECT EXPENSES:						
SALARY EXPENSE (7.95 FTE)	614,468	53,435	315,786	298,682	51%	(8,552)
BENEFITS EXPENSE	202,492	18,840	107,373	95,119	53%	(6,127)
OTHER INDIRECT EXPENSE	231,847	18,513	104,537	127,310	45%	11,386
TOTAL INDIRECT EXPENSES:	**1,048,807**	**90,789**	**527,696**	**521,111**	**50%**	**(3,292)**
TOTAL ALL EXPENSES:	**1,361,960**	**92,216**	**607,879**	**754,081**	**45%**	**73,101**
NET INCOME (LOSS):	**129,785**	**(41,338)**	**78,272**	**51,513**	**60%**	**13,379**

Washington State Bar Association

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50% OF YEAR COMPLETE

CLIENT PROTECTION FUND

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
DONATIONS	-	-	4,500	(4,500)		4,500
CPF RESTITUTION	10,000	621	3,352	6,648	34%	(1,648)
CPF MEMBER ASSESSMENTS	735,480	17,920	711,290	24,190	97%	343,550
INTEREST INCOME	200,000	15,735	98,924	101,076	49%	(1,076)
TOTAL REVENUE:	**945,480**	**34,276**	**818,066**	**127,414**	**87%**	**345,326**
DIRECT EXPENSES:						
BANK FEES	500	(24)	(94)	594	-19%	344
GIFTS TO INJURED CLIENTS	500,000	12,000	15,700	484,300	3%	234,300
CPF BOARD EXPENSES	2,000	132	864	1,136	43%	136
STAFF CONFERENCE & TRAINING	4,400	-	-	4,400	0%	2,200
STAFF MEMBERSHIP DUES	200	-	-	200	0%	100
TOTAL DIRECT EXPENSES:	**507,100**	**12,108**	**16,471**	**490,630**	**3%**	**237,080**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.23 FTE)	117,501	9,159	60,510	56,990	51%	(1,760)
BENEFITS EXPENSE	34,425	3,175	17,984	16,441	52%	(771)
OTHER INDIRECT EXPENSE	42,355	3,301	18,529	23,826	44%	2,649
TOTAL INDIRECT EXPENSES:	**194,280**	**15,635**	**97,022**	**97,258**	**50%**	**118**
TOTAL ALL EXPENSES:	**701,380**	**27,743**	**113,493**	**587,887**	**16%**	**237,197**
NET INCOME (LOSS):	**244,100**	**6,534**	**704,573**	**(460,473)**	**289%**	**582,523**

Washington State Bar Association

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50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
COMMUNICATION STRATEGIES						
REVENUE:						
50 YEAR MEMBER TRIBUTE LUNCH	1,000	-	-	1,000	0%	(500)
WSBA LOGO MERCHANDISE SALES	2,000	-	-	2,000	0%	(1,000)
TOTAL REVENUE:	**3,000**	**-**	**-**	**3,000**	**0%**	**(1,500)**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	5,895	198	1,188	4,707	20%	1,760
STAFF MEMBERSHIP DUES	1,800	-	537	1,263	30%	363
SUBSCRIPTIONS	4,520	227	1,157	3,363	26%	1,103
APEX	52,500	380	380	52,120	1%	25,870
BAR LEADERS SUMMIT	35,000	-	-	35,000	0%	17,500
50 YEAR MEMBER TRIBUTE LUNCH	38,000	-	-	38,000	0%	19,000
BAR OUTREACH	15,000	2,370	15,730	(730)	105%	(8,230)
COMMUNICATIONS OUTREACH	15,000	703	2,814	12,186	19%	4,686
STAFF CONFERENCE & TRAINING	11,300	-	7,791	3,510	69%	(2,141)
AMBASSADOR TRAINING & TOWN HALLS	10,000	-	-	10,000	0%	5,000
TOTAL DIRECT EXPENSES:	**189,015**	**3,878**	**29,597**	**159,418**	**16%**	**64,910**
INDIRECT EXPENSES:						
SALARY EXPENSE (5.39 FTE)	417,995	34,172	206,485	211,510	49%	2,512
BENEFITS EXPENSE	137,502	12,779	72,116	65,386	52%	(3,365)
OTHER INDIRECT EXPENSE	185,603	14,463	81,186	104,418	44%	11,616
TOTAL INDIRECT EXPENSES:	**741,101**	**61,414**	**359,787**	**381,314**	**49%**	**10,763**
TOTAL ALL EXPENSES:	**930,116**	**65,293**	**389,384**	**540,731**	**42%**	**75,674**
NET INCOME (LOSS):	**(927,116)**	**(65,293)**	**(389,384)**	**(537,731)**	**42%**	**74,174**

Washington State Bar Association

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50% OF YEAR COMPLETE

COMMUNICATION STRATEGIES FTE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
INDIRECT EXPENSES:						
SALARY EXPENSE (1.00 FTE)	183,193	16,851	94,767	88,426	52%	(3,171)
BENEFITS EXPENSE	39,830	3,628	20,681	19,149	52%	(766)
OTHER INDIRECT EXPENSE	34,435	2,694	15,124	19,311	44%	2,094
TOTAL INDIRECT EXPENSES:	**257,458**	**23,174**	**130,572**	**126,886**	**51%**	**(1,843)**
NET INCOME (LOSS):	**(257,458)**	**(23,174)**	**(130,572)**	**(126,886)**	**51%**	**(1,843)**

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50% OF YEAR COMPLETE

DESKBOOKS

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
DESKBOOK SALES	5,120	3,386	3,386	1,734	66%	826
LEXIS/NEXIS ROYALTIES	75,000	9,056	20,594	54,406	27%	(16,906)
SECTION PUBLICATION SALES	-	70	70	(70)		70
CASEMAKER ROYALTIES	25,000	-	9,878	15,122	40%	(2,622)
TOTAL REVENUE:	**105,120**	**12,512**	**33,928**	**71,192**	**32%**	**(18,632)**
DIRECT EXPENSES:						
COST OF SALES - DESKBOOKS	2,800	1,130	1,195	1,605	43%	205
DESKBOOK ROYALTIES	-	-	193	(193)		(193)
STAFF CONFERENCES & TRAINING	2,200	-	1,914	286	87%	(814)
POSTAGE & DELIVERY-DESKBOOKS	300	-	21	279	7%	129
OBSOLETE INVENTORY	118,700	65,597	65,597	53,103	55%	(6,247)
STAFF MEMBERSHIP DUES	330	-	218	112	66%	(53)
SUBSCRIPTIONS	50	-	-	50	0%	25
TOTAL DIRECT EXPENSES:	**124,380**	**66,727**	**69,138**	**55,242**	**56%**	**(6,948)**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.75 FTE)	145,047	13,461	73,735	71,312	51%	(1,212)
BENEFITS EXPENSE	45,925	4,276	24,091	21,834	52%	(1,128)
OTHER INDIRECT EXPENSE	51,036	4,085	23,065	27,970	45%	2,453
TOTAL INDIRECT EXPENSES:	**242,008**	**21,822**	**120,891**	**121,117**	**50%**	**113**
TOTAL ALL EXPENSES:	**366,387**	**88,549**	**190,029**	**176,358**	**52%**	**(6,835)**
NET INCOME (LOSS):	**(261,267)**	**(76,037)**	**(156,101)**	**(105,166)**	**60%**	**(25,467)**

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50% OF YEAR COMPLETE

DISCIPLINE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
AUDIT REVENUE	1,000	85	914	86	91%	414
RECOVERY OF DISCIPLINE COSTS	65,000	1,897	35,441	29,559	55%	2,941
DISCIPLINE HISTORY SUMMARY	19,000	1,920	11,940	7,060	63%	2,440
TOTAL REVENUE:	**85,000**	**3,902**	**48,295**	**36,705**	**57%**	**5,795**
DIRECT EXPENSES:						
PUBLICATIONS PRODUCTION	350	-	-	350	0%	175
STAFF TRAVEL/PARKING	15,000	3,085	9,548	5,452	64%	(2,048)
STAFF MEMBERSHIP DUES	7,659	300	7,456	203	97%	(3,627)
TELEPHONE	3,000	199	1,191	1,809	40%	309
COURT REPORTERS	66,200	2,777	24,357	41,843	37%	8,743
OUTSIDE COUNSEL/AIC	500	-	-	500	0%	250
LITIGATION EXPENSES	30,000	2,253	7,710	22,290	26%	7,290
DISABILITY EXPENSES	15,000	-	4,696	10,304	31%	2,804
TRANSLATION SERVICES	10,000	1,247	8,190	1,810	82%	(3,190)
STAFF CONFERENCE & TRAINING	37,800	3,068	23,220	14,580	61%	(4,320)
TOTAL DIRECT EXPENSES:	**185,509**	**12,928**	**86,369**	**99,140**	**47%**	**6,386**
INDIRECT EXPENSES:						
SALARY EXPENSE (39.00 FTE)	4,131,360	378,591	2,017,777	2,113,583	49%	47,903
BENEFITS EXPENSE	1,139,859	104,706	588,371	551,489	52%	(18,441)
OTHER INDIRECT EXPENSE	1,342,955	104,623	587,275	755,680	44%	84,202
TOTAL INDIRECT EXPENSES:	**6,614,175**	**587,921**	**3,193,423**	**3,420,752**	**48%**	**113,665**
TOTAL ALL EXPENSES:	**6,799,684**	**600,848**	**3,279,792**	**3,519,892**	**48%**	**120,050**
NET INCOME (LOSS):	**(6,714,684)**	**(596,946)**	**(3,231,497)**	**(3,483,187)**	**48%**	**125,845**

Washington State Bar Association

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50% OF YEAR COMPLETE

DIVERSITY

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
DONATIONS	135,000	-	135,000	-	100%	67,500
TOTAL REVENUE:	**135,000**	**-**	**135,000**	**-**	**100%**	**67,500**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	3,700	106	394	3,306	11%	1,456
STAFF MEMBERSHIP DUES	775	50	430	345	55%	(43)
DEI COUNCIL	7,600	-	1,917	5,683	25%	1,883
DIVERSITY EVENTS & PROJECTS **	33,600	150	5,091	28,509	15%	11,709
STAFF EQUITY LEADERSHIP LAB	6,000	1,010	2,949	3,051	49%	51
STAFF CONFERENCE & TRAINING	4,400	-	-	4,400	0%	2,200
CONSULTING SERVICES	3,000	-	-	3,000	0%	1,500
TOTAL DIRECT EXPENSE:	**59,075**	**1,316**	**10,781**	**48,294**	**18%**	**18,756**
INDIRECT EXPENSES:						
SALARY EXPENSE (2.24 FTE) **	198,124	18,583	88,344	109,780	45%	10,718
BENEFITS EXPENSE	66,814	5,514	30,944	35,869	46%	2,462
OTHER INDIRECT EXPENSE	77,134	6,000	36,410	40,724	47%	2,157
TOTAL INDIRECT EXPENSES:	**342,071**	**30,097**	**155,698**	**186,373**	**46%**	**15,338**
TOTAL ALL EXPENSES:	**401,146**	**31,413**	**166,479**	**234,667**	**42%**	**34,094**
NET INCOME (LOSS):	**(266,146)**	**(31,413)**	**(31,479)**	**(234,667)**	**12%**	**101,594**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

ENTITY REGULATION

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
APPLICATION FEES	28,000	7,000	15,000	13,000	54%	1,000
ANNUAL FEES	47,500	-	-	47,500	0%	(23,750)
TOTAL REVENUE:	**75,500**	**7,000**	**15,000**	**60,500**	**20%**	**(22,750)**
DIRECT EXPENSES:						
STAFF CONFERENCE & TRAINING	4,400	-	1,551	2,849	35%	649
INVESTIGATION	9,600	-	-	9,600	0%	4,800
OUTREACH & COMMUNICATION	10,000	-	-	10,000	0%	5,000
SOFTWARE HOSTING	3,973	81	471	3,502	12%	1,516
TOTAL DIRECT EXPENSES:	**27,973**	**81**	**2,021**	**25,951**	**7%**	**11,965**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.55 FTE) **	77,471	7,436	39,987	37,484	52%	(1,251)
BENEFITS EXPENSE	18,673	1,724	9,787	8,886	52%	(451)
OTHER INDIRECT EXPENSE	18,939	1,481	8,314	10,625	44%	1,156
TOTAL INDIRECT EXPENSES:	**115,083**	**10,640**	**58,088**	**56,995**	**50%**	**(546)**
TOTAL ALL EXPENSES:	**143,055**	**10,722**	**60,109**	**82,947**	**42%**	**11,419**
NET INCOME (LOSS):	**(67,555)**	**(3,722)**	**(45,109)**	**(22,447)**	**67%**	**(11,331)**

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50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
ETHICS, WELLNESS, & PRACTICE						
(MWP-PMA-PRP)						
REVENUE:						
DIVERSIONS	9,000	-	2,000	7,000	22%	(2,500)
ROYALTIES	62,000	-	39,349	22,651	63%	8,349
TOTAL REVENUE:	**71,000**	**-**	**41,349**	**29,651**	**58%**	**5,849**
DIRECT EXPENSES:						
STAFF MEMBERSHIP DUES	1,385	-	890	495	64%	(198)
MEMBER WELLNESS COUNCIL	4,500	39	39	4,461	1%	2,211
LEGAL TECH TASK FORCE	3,500	-	-	3,500	0%	1,750
STAFF TRAVEL/PARKING	7,700	327	2,391	5,309	31%	1,459
STAFF CONFERENCE & TRAINING	10,300	563	1,142	9,158	11%	4,008
SUBSCRIPTIONS	1,400	111	663	737	47%	37
CPE COMMITTEE	1,000	-	-	1,000	0%	500
VLEX FASTCASE	87,000	-	87,812	(812)	101%	(44,312)
TOTAL DIRECT EXPENSES:	**116,785**	**1,039**	**92,936**	**23,849**	**80%**	**(34,544)**
INDIRECT EXPENSES:						
SALARY EXPENSE (3.51 FTE)	385,777	33,428	197,201	188,576	51%	(4,313)
BENEFITS EXPENSE	105,599	9,660	55,039	50,560	52%	(2,239)
OTHER INDIRECT EXPENSE	120,866	9,413	52,840	68,026	44%	7,593
TOTAL INDIRECT EXPENSES:	**612,242**	**52,501**	**305,080**	**307,162**	**50%**	**1,041**
TOTAL ALL EXPENSES:	**729,027**	**53,540**	**398,016**	**331,010**	**55%**	**(33,503)**
NET INCOME (LOSS):	**(658,027)**	**(53,540)**	**(356,667)**	**(301,360)**	**54%**	**(27,653)**

Washington State Bar Association

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50% OF YEAR COMPLETE

FACILITIES & OPERATIONS

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	2,376	198	1,188	1,188	50%	-
STAFF MEMBERSHIP DUES	189	-	-	189	0%	95
TOTAL DIRECT EXPENSES:	**2,565**	**198**	**1,188**	**1,377**	**46%**	**95**
INDIRECT EXPENSES:						
SALARY EXPENSE (5.78 FTE)	406,195	37,620	218,375	187,820	54%	(15,278)
BENEFITS EXPENSE	141,474	13,535	76,631	64,843	54%	(5,894)
OTHER INDIRECT EXPENSE	199,033	15,493	86,965	112,068	44%	12,552
TOTAL INDIRECT EXPENSES:	**746,702**	**66,647**	**381,971**	**364,731**	**51%**	**(8,620)**
TOTAL ALL EXPENSES:	**749,267**	**66,845**	**383,159**	**366,108**	**51%**	**(8,525)**
NET INCOME (LOSS):	**(749,267)**	**(66,845)**	**(383,159)**	**(366,108)**	**51%**	**(8,525)**

Washington State Bar Association

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50% OF YEAR COMPLETE

FINANCE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
INTEREST INCOME	600,000	70,931	320,276	279,724	53%	20,276
TOTAL REVENUE:	**600,000**	**70,931**	**320,276**	**279,724**	**53%**	**20,276**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	3,750	458	2,882	868	77%	(1,007)
STAFF CONFERENCE & TRAINING	500	-	-	500	0%	250
STAFF MEMBERSHIP DUES	670	-	230	440	34%	105
TOTAL DIRECT EXPENSES:	**4,920**	**458**	**3,112**	**1,808**	**63%**	**(652)**
INDIRECT EXPENSES:						
SALARY EXPENSE (6.92 FTE)	777,786	70,829	398,571	379,215	51%	(9,678)
BENEFITS EXPENSE	209,178	19,506	111,135	98,043	53%	(6,546)
OTHER INDIRECT EXPENSE	238,288	18,563	104,200	134,088	44%	14,944
TOTAL INDIRECT EXPENSES:	**1,225,253**	**108,899**	**613,906**	**611,346**	**50%**	**(1,280)**
TOTAL ALL EXPENSES:	**1,230,173**	**109,357**	**617,018**	**613,154**	**50%**	**(1,932)**
NET INCOME (LOSS):	**(630,173)**	**(38,425)**	**(296,742)**	**(333,431)**	**47%**	**18,344**

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50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
FOUNDATION						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
CONSULTING SERVICES	3,350	-	3,350	-	100%	(1,675)
PRINTING & COPYING	1,000	-	-	1,000	0%	500
STAFF TRAVEL/PARKING	4,000	-	21	3,979	1%	1,979
SUPPLIES	2,000	-	11	1,989	1%	989
BOARD OF TRUSTEES	3,600	25	100	3,500	3%	1,700
EQUIPMENT/HARDWARE/SOFTWARE	2,635	220	1,318	1,317	50%	(1)
POSTAGE	400	-	-	400	0%	200
STAFF CONFERENCE & TRAINING	2,200	69	69	2,131	3%	1,031
TOTAL DIRECT EXPENSES:	**19,185**	**314**	**4,869**	**14,316**	**25%**	**4,723**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.05 FTE)	108,755	12,074	56,719	52,036	52%	(2,342)
BENEFITS EXPENSE	30,528	2,805	15,890	14,639	52%	(625)
OTHER INDIRECT EXPENSE	36,156	2,812	15,782	20,374	44%	2,296
TOTAL INDIRECT EXPENSES:	**175,440**	**17,691**	**88,391**	**87,049**	**50%**	**(671)**
TOTAL ALL EXPENSES:	**194,625**	**18,005**	**93,261**	**101,365**	**48%**	**4,052**
NET INCOME (LOSS):	**(194,625)**	**(18,005)**	**(93,261)**	**(101,365)**	**48%**	**4,052**

Washington State Bar Association

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50% OF YEAR COMPLETE

HUMAN RESOURCES

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	300	96	96	204	32%	54
STAFF MEMBERSHIP DUES	1,200	299	852	348	71%	(252)
SUBSCRIPTIONS	2,000	-	1,192	808	60%	(192)
STAFF TRAINING- GENERAL	29,300	100	3,764	25,536	13%	10,886
RECRUITING AND ADVERTISING	8,750	-	1,778	6,972	20%	2,597
HR INFORMATION SYSTEM	65,950	4,426	34,975	30,975	53%	(2,000)
SALARY SURVEYS	3,000	934	934	2,066	31%	566
CONSULTING SERVICES	1,000	-	-	1,000	0%	500
STAFF CONFERENCE & TRAINING	4,200	2,385	2,577	1,623	61%	(477)
TRANSFER TO INDIRECT EXPENSE	(115,700)	(8,241)	(46,168)	(69,532)	40%	(11,682)
TOTAL DIRECT EXPENSES:	-	-	-	-		-
INDIRECT EXPENSES:						
SALARY EXPENSE (4.00 FTE)	504,229	39,357	220,428	283,801	44%	31,687
ALLOWANCE FOR OPEN POSITIONS	(200,000)	-	-	(200,000)	0%	(100,000)
BENEFITS EXPENSE	98,098	11,237	62,305	35,793	64%	(13,256)
OTHER INDIRECT EXPENSE	137,739	10,739	60,283	77,456	44%	8,586
TOTAL INDIRECT EXPENSES:	**540,066**	**61,333**	**343,016**	**197,050**	**64%**	**(72,983)**
TOTAL ALL EXPENSES:	**540,066**	**61,333**	**343,016**	**197,050**	**64%**	**(72,983)**
NET INCOME (LOSS):	**(540,066)**	**(61,333)**	**(343,016)**	**(197,050)**	**64%**	**(72,983)**

Washington State Bar Association

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50% OF YEAR COMPLETE

LAW CLERK PROGRAM

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
LAW CLERK FEES	220,000	3,000	251,667	(31,667)	114%	141,667
LAW CLERK APPLICATION FEES	4,000	400	3,300	700	83%	1,300
TOTAL REVENUE:	**224,000**	**3,400**	**254,967**	**(30,967)**	**114%**	**142,967**
DIRECT EXPENSES:						
SUBSCRIPTIONS	331	-	-	331	0%	166
DEPRECIATION	37,278	2,908	17,448	19,830	47%	1,191
CHARACTER & FITNESS INVESTIGATIONS	100	-	-	100	0%	50
LAW CLERK BOARD EXPENSE	9,000	2,453	5,122	3,878	57%	(622)
SOFTWARE HOSTING	700	89	513	187	73%	(163)
LAW CLERK OUTREACH	20,000	13,561	13,705	6,295	69%	(3,705)
TOTAL DIRECT EXPENSES:	**67,409**	**19,011**	**36,789**	**30,620**	**55%**	**(3,084)**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.18 FTE) **	104,845	9,926	50,553	54,291	48%	1,869
BENEFITS EXPENSE	31,938	2,956	16,612	15,326	52%	(643)
OTHER INDIRECT EXPENSE	40,633	3,155	17,709	22,924	44%	2,608
TOTAL INDIRECT EXPENSES:	**177,416**	**16,037**	**84,874**	**92,542**	**48%**	**3,834**
TOTAL ALL EXPENSES:	**244,825**	**35,048**	**121,663**	**123,162**	**50%**	**750**
NET INCOME (LOSS):	**(20,825)**	**(31,648)**	**133,304**	**(154,129)**	**-640%**	**143,716**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

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50% OF YEAR COMPLETE

LICENSING & MEMBERSHIP RECORDS

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
STATUS CERTIFICATE FEES	29,000	2,775	17,174	11,826	59%	2,674
INVESTIGATION FEES	25,000	1,200	10,580	14,420	42%	(1,920)
PRO HAC VICE	435,000	49,140	281,982	153,018	65%	64,482
MEMBER CONTACT INFORMATION	5,000	1,405	4,055	945	81%	1,555
PHOTO BAR CARD SALES	260	72	324	(64)	125%	194
TOTAL REVENUE:	**494,260**	**54,592**	**314,115**	**180,145**	**64%**	**66,985**
DIRECT EXPENSES:						
POSTAGE	4,000	1,914	2,144	1,856	54%	(144)
SOFTWARE HOSTING	18,380	2,295	13,265	5,115	72%	(4,075)
INVESTIGATION	300	-	-	300	0%	150
TOTAL DIRECT EXPENSES:	**22,680**	**4,209**	**15,409**	**7,271**	**68%**	**(4,069)**
INDIRECT EXPENSES:						
SALARY EXPENSE (4.78 FTE) **	503,843	46,847	256,713	247,130	51%	(4,792)
BENEFITS EXPENSE	139,284	12,957	72,859	66,425	52%	(3,217)
OTHER INDIRECT EXPENSE	164,598	12,832	72,027	92,571	44%	10,272
TOTAL INDIRECT EXPENSES:	**807,725**	**72,636**	**401,600**	**406,126**	**50%**	**2,263**
TOTAL ALL EXPENSES:	**830,405**	**76,844**	**417,009**	**413,397**	**50%**	**(1,806)**
NET INCOME (LOSS):	**(336,145)**	**(22,253)**	**(102,894)**	**(233,251)**	**31%**	**65,179**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

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LIMITED LICENSE LEGAL TECHNICIAN PROGRAM

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
LLLT LICENSE FEES	17,000	1,395	8,012	8,988	47%	(488)
LLLT LATE LICENSE FEES	137	30	541	(404)	395%	472
MCLE LATE FEES	150	-	450	(300)	300%	375
TOTAL REVENUE:	**17,287**	**1,425**	**9,003**	**8,284**	**52%**	**359**
DIRECT EXPENSES:						
LLLT BOARD	9,000	462	1,304	7,696	14%	3,196
LLLT EDUCATION	1,000	-	-	1,000	0%	500
TOTAL DIRECT EXPENSES:	**10,000**	**462**	**1,304**	**8,696**	**13%**	**3,696**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.43 FTE) **	41,479	3,713	20,884	20,595	50%	(144)
BENEFITS EXPENSE	12,046	1,104	6,229	5,817	52%	(206)
OTHER INDIRECT EXPENSE	14,807	1,143	6,413	8,394	43%	991
TOTAL INDIRECT EXPENSES:	**68,332**	**5,960**	**33,525**	**34,807**	**49%**	**641**
TOTAL ALL EXPENSES:	**78,332**	**6,422**	**34,829**	**43,503**	**44%**	**4,337**
NET INCOME (LOSS):	**(61,045)**	**(4,997)**	**(25,826)**	**(35,219)**	**42%**	**4,696**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

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50% OF YEAR COMPLETE

LIMITED PRACTICE OFFICERS

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
INVESTIGATION FEES	1,000	-	500	500	50%	-
MCLE LATE FEES	3,000	2,250	5,400	(2,400)	180%	3,900
LPO EXAMINATION FEES	18,000	(100)	12,100	5,900	67%	3,100
LPO LICENSE FEES	158,000	12,743	74,080	83,920	47%	(4,920)
LPO LATE LICENSE FEES	2,000	1,110	3,450	(1,450)	173%	2,450
TOTAL REVENUE:	**182,000**	**16,003**	**95,530**	**86,470**	**52%**	**4,530**
DIRECT EXPENSES:						
FACILITY, PARKING, FOOD	9,500	-	2,696	6,804	28%	2,054
EXAM WRITING	15,000	-	4,200	10,800	28%	3,300
LPO BOARD	4,000	267	267	3,733	7%	1,733
LPO OUTREACH	500	-	-	500	0%	250
PRINTING & COPYING	200	-	65	135	32%	35
SUPPLIES	100	-	-	100	0%	50
SOFTWARE HOSTING	3,404	355	2,054	1,350	60%	(352)
TOTAL DIRECT EXPENSES:	**32,704**	**622**	**9,282**	**23,422**	**28%**	**7,070**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.58 FTE) **	56,369	5,086	28,318	28,051	50%	(134)
BENEFITS EXPENSE	16,315	1,502	8,490	7,825	52%	(332)
OTHER INDIRECT EXPENSE	19,972	1,556	8,736	11,236	44%	1,250
TOTAL INDIRECT EXPENSES:	**92,656**	**8,144**	**45,544**	**47,112**	**49%**	**784**
TOTAL ALL EXPENSES:	**125,360**	**8,767**	**54,826**	**70,534**	**44%**	**7,854**
NET INCOME (LOSS):	**56,640**	**7,236**	**40,704**	**15,936**	**72%**	**12,384**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

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LEGISLATIVE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	2,500	-	157	2,343	6%	1,093
STAFF MEMBERSHIP DUES	215	-	-	215	0%	108
JUD RECOMMEND COMMITTEE	3,250	-	1,096	2,154	34%	529
SUBSCRIPTIONS	2,000	-	1,990	10	99%	(990)
TELEPHONE	575	50	298	277	52%	(10)
CONTRACT LOBBYIST	12,500	3,125	9,375	3,125	75%	(3,125)
LEGISLATIVE REVIEW COMMITTEE	1,250	-	-	1,250	0%	625
BOG LEGISLATIVE COMMITTEE	300	-	-	300	0%	150
STAFF CONFERENCE & TRAINING	2,200	-	248	1,952	11%	852
TOTAL DIRECT EXPENSES:	**24,790**	**3,175**	**13,163**	**11,627**	**53%**	**(768)**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.70 FTE)	164,492	14,749	81,273	83,219	49%	973
BENEFITS EXPENSE	47,770	4,399	24,951	22,819	52%	(1,066)
OTHER INDIRECT EXPENSE	58,539	4,556	25,575	32,964	44%	3,695
TOTAL INDIRECT EXPENSES:	**270,801**	**23,704**	**131,798**	**139,002**	**49%**	**3,602**
TOTAL ALL EXPENSES:	**295,591**	**26,879**	**144,962**	**150,629**	**49%**	**2,834**
NET INCOME (LOSS):	**(295,591)**	**(26,879)**	**(144,962)**	**(150,629)**	**49%**	**2,834**

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50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
MANDATORY CONTINUING LEGAL EDUCATION						
REVENUE:						
ACTIVITY APPLICATION FEE	670,000	63,800	344,400	325,600	51%	9,400
ACTIVITY APPLICATION LATE FEE	250,000	23,700	129,500	120,500	52%	4,500
MCLE LATE FEES	232,000	44,600	238,975	(6,975)	103%	122,975
ANNUAL ACCREDITED SPONSOR FEES	36,250	-	36,250	-	100%	18,125
ATTENDANCE LATE FEES	120,000	6,000	55,500	64,500	46%	(4,500)
COMITY CERTIFICATES	30,000	875	26,275	3,725	88%	11,275
TOTAL REVENUE:	**1,338,250**	**138,975**	**830,900**	**507,350**	**62%**	**161,775**
DIRECT EXPENSES:						
DEPRECIATION	142,057	12,012	72,072	69,985	51%	(1,044)
STAFF MEMBERSHIP DUES	525	-	525	-	100%	(263)
MCLE BOARD EXPENSES	6,000	-	531	5,469	9%	2,469
STAFF TRAVEL/PARKING	50	-	-	50	0%	25
STAFF CONFERENCE & TRAINING	4,400	-	-	4,400	0%	2,200
TOTAL DIRECT EXPENSES:	**153,032**	**12,012**	**73,128**	**79,904**	**48%**	**3,388**
INDIRECT EXPENSES:						
SALARY EXPENSE (4.73 FTE)	407,360	41,312	224,665	182,695	55%	(20,985)
BENEFITS EXPENSE	124,032	11,940	66,374	57,658	54%	(4,358)
OTHER INDIRECT EXPENSE	162,876	12,681	71,182	91,694	44%	10,256
TOTAL INDIRECT EXPENSES:	**694,269**	**65,933**	**362,221**	**332,048**	**52%**	**(15,087)**
TOTAL ALL EXPENSES:	**847,301**	**77,945**	**435,349**	**411,952**	**51%**	**(11,698)**
NET INCOME (LOSS):	**490,949**	**61,030**	**395,551**	**95,398**	**81%**	**150,077**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
MEMBER SERVICES & ENGAGEMENT TEAM						
(LLB-MINI-MSE-NME)						
REVENUE:						
ROYALTIES	10,800	1,200	6,000	4,800	56%	600
NME PRODUCT SALES	120,000	3,821	90,654	29,346	76%	30,654
DIGITAL VIDEO SALES	25,000	1,176	21,266	3,734	85%	8,766
SPONSORSHIPS	11,500	-	9,000	2,500	78%	3,250
SEMINAR REGISTRATIONS	12,000	2,846	7,593	4,407	63%	1,593
TRIAL ADVOCACY PROGRAM	12,000	-	(149)	12,149	-1%	(6,149)
TOTAL REVENUE:	**191,300**	**9,043**	**134,364**	**56,936**	**70%**	**38,714**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	3,500	-	48	3,452	1%	1,702
STAFF CONFERENCE & TRAINING	2,700	-	(25)	2,725	-1%	1,375
SMALL TOWN AND RURAL COMMITTEE	7,500	-	-	7,500	0%	3,750
PRINTING & COPYING	1,600	1,502	1,502	98	94%	(702)
DISABILITY ACCOMMODATIONS	2,000	-	-	2,000	0%	1,000
HONORARIUM	1,500	-	-	1,500	0%	750
SUBSCRIPTIONS	400	-	-	400	0%	200
NEW MEMBER LIAISON SECTION PROGRAM	1,300	-	565	735	43%	85
SMALL TOWN AND RURAL COMMITTEE OUTREACH AND ACTIVITIES	70,000	-	3,000	67,000	4%	32,000
ON24 OVERAGE CHARGE	4,500	-	4,422	78	98%	(2,172)
MEMBER ENGAGEMENT COUNCIL	500	-	-	500	0%	250
NEW MEMBER OUTREACH EVENTS	5,000	-	938	4,062	19%	1,562
SPEAKERS & PROGRAM DEVELOP	100	-	-	100	0%	50
WASHINGTON NEW MEMBERS COMMITTEE	15,000	1,671	8,581	6,419	57%	(1,081)
TRIAL ADVOCACY EXPENSES	3,200	-	-	3,200	0%	1,600
LAW LIBRARY DESKBOOK ACCESS	10,000	-	-	10,000	0%	5,000
LAW SCHOOL OUTREACH	500	-	66	434	13%	184
RECEPTION/FORUM EXPENSE	1,000	-	17	983	2%	483
STAFF MEMBERSHIP DUES	1,020	-	-	1,020	0%	510
LIBRARY MATERIALS/RESOURCES	4,000	128	292	3,708	7%	1,708
SPEAKERS & PROGRAM DEVELOPMENT	500	-	-	500	0%	250
AWARDS	1,000	-	72	928	7%	428
TOTAL DIRECT EXPENSES:	**136,820**	**3,301**	**19,478**	**117,342**	**14%**	**48,932**
INDIRECT EXPENSES:						
SALARY EXPENSE (4.73 FTE)	341,638	31,780	177,850	163,788	52%	(7,031)
BENEFITS EXPENSE	117,073	10,912	61,954	55,119	53%	(3,417)
OTHER INDIRECT EXPENSE	162,876	12,681	71,182	91,695	44%	10,256
TOTAL INDIRECT EXPENSES:	**621,588**	**55,372**	**310,986**	**310,602**	**50%**	**(192)**
TOTAL ALL EXPENSES:	**758,408**	**58,674**	**330,464**	**427,944**	**44%**	**48,740**
NET INCOME (LOSS):	**(567,108)**	**(49,631)**	**(196,100)**	**(371,008)**	**35%**	**87,454**

Washington State Bar Association

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50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
OFFICE OF THE EXECUTIVE DIRECTOR						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
LEADERSHIP TRAINING	20,000	-	-	20,000	0%	10,000
WASHINGTON LEADERSHIP INSTITUTE	100,000	-	100,000	-	100%	(50,000)
ED TRAVEL & OUTREACH	6,000	324	3,010	2,990	50%	(10)
STAFF TRAVEL/PARKING	2,000	198	1,188	812	59%	(188)
STAFF CONFERENCE & TRAINING	13,300	1,718	5,500	7,800	41%	1,150
STAFF MEMBERSHIP DUES	1,335	-	945	390	71%	(278)
TOTAL DIRECT EXPENSES:	**142,635**	**2,240**	**110,643**	**31,992**	**78%**	**(39,326)**
INDIRECT EXPENSES:						
SALARY EXPENSE (4.23 FTE)	643,856	63,968	329,991	313,865	51%	(8,063)
BENEFITS EXPENSE	142,505	14,267	78,057	64,447	55%	(6,805)
OTHER INDIRECT EXPENSE	145,659	11,351	63,713	81,946	44%	9,116
TOTAL INDIRECT EXPENSES:	**932,020**	**89,586**	**471,761**	**460,259**	**51%**	**(5,751)**
TOTAL ALL EXPENSES:	**1,074,655**	**91,827**	**582,405**	**492,251**	**54%**	**(45,077)**
NET INCOME (LOSS):	**(1,074,655)**	**(91,827)**	**(582,405)**	**(492,251)**	**54%**	**(45,077)**

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

OFFICE OF GENERAL COUNSEL

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
RECOVERY OF DISCIPLINE COSTS	-	-	1,000	(1,000)		1,000
TOTAL REVENUE:	**-**	**-**	**1,000**	**(1,000)**		**-**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	3,500	-	1,614	1,886	46%	136
STAFF MEMBERSHIP DUES	2,500	-	2,004	497	80%	(754)
COURT RULES COMMITTEE	1,000	-	-	1,000	0%	500
CUSTODIANSHIPS	5,000	-	301	4,699	6%	2,199
WILLS	1,000	-	-	1,000	0%	500
LITIGATION EXPENSES	1,000	-	-	1,000	0%	500
DISABILITY ACCOMMODATIONS	2,500	-	58	2,442	2%	1,192
STAFF CONFERENCE & TRAINING	10,250	2,513	2,812	7,438	27%	2,313
TOTAL DIRECT EXPENSES:	**26,750**	**2,513**	**6,789**	**19,961**	**25%**	**6,586**
INDIRECT EXPENSES:						
SALARY EXPENSE (6.12 FTE)	718,300	59,357	343,003	375,296	48%	16,147
BENEFITS EXPENSE	187,732	16,918	95,734	91,998	51%	(1,868)
OTHER INDIRECT EXPENSE	210,741	16,433	92,245	118,495	44%	13,125
TOTAL INDIRECT EXPENSES:	**1,116,772**	**92,708**	**530,982**	**585,790**	**48%**	**27,404**
TOTAL ALL EXPENSES:	**1,143,522**	**95,221**	**537,771**	**605,752**	**47%**	**33,990**
NET INCOME (LOSS):	**(1,143,522)**	**(95,221)**	**(536,771)**	**(606,752)**	**47%**	**34,990**

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

OFFICE OF GENERAL COUNSEL - DISCIPLINARY BOARD

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSE:						
STAFF MEMBERSHIP DUES	100	-	-	100	0%	50
DISCIPLINARY BOARD EXPENSES	3,000	-	-	3,000	0%	1,500
CHIEF HEARING OFFICER	41,200	3,333	19,998	21,202	49%	602
COURT REPORTERS	33,100	22,484	23,830	9,270	72%	(7,280)
HEARING OFFICER EXPENSES	4,000	18	149	3,852	4%	1,852
HEARING OFFICER TRAINING	1,000	900	900	100	90%	(400)
APPOINTED COUNSEL	50,645	4,235	25,270	25,375	50%	53
DISCIPLINARY SELECTION PANEL	1,000	-	-	1,000	0%	500
STAFF CONFERENCE & TRAINING	2,200	-	-	2,200	0%	1,100
TOTAL DIRECT EXPENSES:	**136,245**	**30,970**	**70,147**	**66,098**	**51%**	**(2,024)**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.30 FTE)	128,774	12,509	67,438	61,336	52%	(3,051)
BENEFITS EXPENSE	37,003	3,473	19,627	17,376	53%	(1,125)
OTHER INDIRECT EXPENSE	44,765	3,494	19,610	25,155	44%	2,773
TOTAL INDIRECT EXPENSES:	**210,543**	**19,475**	**106,675**	**103,868**	**51%**	**(1,403)**
TOTAL ALL EXPENSES:	**346,788**	**50,446**	**176,822**	**169,966**	**51%**	**(3,428)**
NET INCOME (LOSS):	**(346,788)**	**(50,446)**	**(176,822)**	**(169,966)**	**51%**	**(3,428)**

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
PRACTICE OF LAW BOARD						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
PRACTICE OF LAW BOARD	16,000	-	197	15,803	1%	7,803
STAFF TRAVEL/PARKING	200	-	-	200	0%	100
TOTAL DIRECT EXPENSES:	**16,200**	**-**	**197**	**16,003**	**1%**	**7,903**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.55 FTE) **	63,145	5,901	32,194	30,951	51%	(621)
BENEFITS EXPENSE	16,771	1,546	8,753	8,018	52%	(368)
OTHER INDIRECT EXPENSE	18,939	1,481	8,314	10,625	44%	1,156
TOTAL INDIRECT EXPENSES:	**98,855**	**8,929**	**49,260**	**49,594**	**50%**	**167**
TOTAL ALL EXPENSES:	**115,055**	**8,929**	**49,457**	**65,598**	**43%**	**8,070**
NET INCOME (LOSS):	**(115,055)**	**(8,929)**	**(49,457)**	**(65,598)**	**43%**	**8,070**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
PUBLIC SERVICE PROGRAMS						
REVENUE:						
DONATIONS & GRANTS	132,635	-	2,639	129,996	2%	(63,679)
TOTAL REVENUE:	**132,635**	**-**	**2,639**	**129,996**	**2%**	**(63,679)**
DIRECT EXPENSES:						
DONATIONS/SPONSORSHIPS/GRANTS	-	-	(5,178)	5,178		5,178
STAFF TRAVEL/PARKING	2,000	-	39	1,961	2%	961
PRO BONO & PUBLIC SERVICE COMMITTEE	3,500	-	1,882	1,618	54%	(132)
STAFF CONFERENCE & TRAINING	3,200	-	-	3,200	0%	1,600
PRO BONO OUTREACH	4,000	-	-	4,000	0%	2,000
TOTAL DIRECT EXPENSES:	**12,700**	**-**	**(3,257)**	**15,957**	**-26%**	**9,607**
INDIRECT EXPENSES:						
SALARY EXPENSE (2.10 FTE) **	187,614	17,773	82,782	104,832	44%	11,025
BENEFITS EXPENSE	50,197	5,205	26,751	23,446	53%	(1,653)
OTHER INDIRECT EXPENSE	72,313	5,619	28,638	43,675	40%	7,519
TOTAL INDIRECT EXPENSES:	**310,124**	**28,597**	**138,171**	**171,953**	**45%**	**16,891**
TOTAL ALL EXPENSES:	**322,824**	**28,597**	**134,914**	**187,910**	**42%**	**26,498**
NET INCOME (LOSS):	**(190,189)**	**(28,597)**	**(132,275)**	**(57,914)**	**70%**	**(37,181)**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

PUBLICATION & DESIGN SERVICES

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
SUBSCRIPTIONS	200	-	-	200	0%	100
IMAGE LIBRARY	4,800	-	4,756	44	99%	(2,356)
TOTAL DIRECT EXPENSES:	**5,000**	**-**	**4,756**	**244**	**95%**	**(2,256)**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.89 FTE)	70,644	6,373	36,102	34,542	51%	(780)
BENEFITS EXPENSE	22,914	2,133	12,109	10,805	53%	(652)
OTHER INDIRECT EXPENSE	30,647	2,393	13,434	17,213	44%	1,890
TOTAL INDIRECT EXPENSES:	**124,205**	**10,899**	**61,644**	**62,560**	**50%**	**458**
TOTAL ALL EXPENSES:	**129,205**	**10,899**	**66,400**	**62,804**	**51%**	**(1,798)**
NET INCOME (LOSS):	**(129,205)**	**(10,899)**	**(66,400)**	**(62,804)**	**51%**	**(1,798)**

Washington State Bar Association

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50% OF YEAR COMPLETE

REGULATORY SERVICES FTE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
STAFF MEMBERSHIP DUES	490	-	490	-	100%	(245)
STAFF CONFERENCE & TRAINING	11,500	-	734	10,766	6%	5,016
STAFF TRAVEL/PARKING	600	-	106	494	18%	194
TOTAL DIRECT EXPENSES:	**12,590**	**-**	**1,330**	**11,260**	**11%**	**5,210**
INDIRECT EXPENSES:						
SALARY EXPENSE (2.00 FTE) **	288,255	25,538	140,610	147,646	49%	3,518
BENEFITS EXPENSE	68,347	6,145	34,959	33,388	51%	(786)
OTHER INDIRECT EXPENSE	68,870	5,356	30,061	38,808	44%	4,373
TOTAL INDIRECT EXPENSES:	**425,472**	**37,038**	**205,630**	**219,841**	**48%**	**7,106**
TOTAL ALL EXPENSES:	**438,062**	**37,038**	**206,961**	**231,101**	**47%**	**12,315**
NET INCOME (LOSS):	**(438,062)**	**(37,038)**	**(206,961)**	**(231,101)**	**47%**	**12,070**

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Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

REGULATORY REFORM

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
CONSULTING SERVICES	25,000	-	8,828	16,172	35%	3,672
OUTREACH EXPENSES	10,000	-	-	10,000	0%	5,000
MEETING EXPENSE	2,000	-	-	2,000	0%	1,000
SOFTWARE HOSTING	20,000	-	-	20,000	0%	10,000
TOTAL DIRECT EXPENSES:	**57,000**	**-**	**8,828**	**48,172**	**15%**	**-**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.85 FTE) **	110,346	11,355	57,534	52,812	52%	(2,361)
BENEFITS EXPENSE	27,639	2,574	14,424	13,215	52%	(604)
OTHER INDIRECT EXPENSE	29,270	2,276	12,775	16,495	44%	1,860
TOTAL INDIRECT EXPENSES:	**167,255**	**16,204**	**84,733**	**82,522**	**51%**	**(1,105)**
TOTAL ALL EXPENSES:	**224,255**	**16,204**	**93,561**	**130,694**	**42%**	**(1,105)**
NET INCOME (LOSS):	**(224,255)**	**(16,204)**	**(93,561)**	**(130,694)**	**42%**	**18,567**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

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50% OF YEAR COMPLETE

SECTIONS ADMINISTRATION

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
REIMBURSEMENTS FROM SECTIONS	275,000	6,675	388,434	(113,434)	141%	250,934
TOTAL REVENUE:	**275,000**	**6,675**	**388,434**	**(113,434)**	**141%**	**250,934**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	1,900	32	336	1,564	18%	614
SECTION/COMMITTEE CHAIR MTGS	500	-	71	429	14%	179
TOTAL DIRECT EXPENSES:	**2,400**	**32**	**407**	**1,993**	**17%**	**793**
INDIRECT EXPENSES:						
SALARY EXPENSE (2.53 FTE)	174,309	16,471	89,577	84,732	51%	(2,422)
BENEFITS EXPENSE	61,514	5,736	32,387	29,127	53%	(1,630)
OTHER INDIRECT EXPENSE	87,120	6,794	38,138	48,982	44%	5,422
TOTAL INDIRECT EXPENSES:	**322,943**	**29,001**	**160,102**	**162,841**	**50%**	**1,369**
TOTAL ALL EXPENSES:	**325,343**	**29,033**	**160,510**	**164,833**	**49%**	**2,162**
NET INCOME (LOSS):	**(50,343)**	**(22,358)**	**227,925**	**(278,268)**	**-453%**	**253,096**

Washington State Bar Association

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50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
SECTIONS OPERATIONS						
REVENUE:						
SECTION DUES	451,143	10,735	625,884	(174,741)	139%	400,313
SEMINAR PROFIT SHARE	157,850	1,498	1,498	156,352	1%	(77,427)
PUBLICATIONS REVENUE	1,250	-	-	1,250	0%	(625)
OTHER	43,073	1,485	21,782	21,291	51%	246
TOTAL REVENUE:	**653,316**	**13,718**	**649,164**	**4,152**	**99%**	**322,506**
DIRECT EXPENSES:						
DIRECT EXPENSES OF SECTION ACTIVITIES	810,582	14,228	124,809	685,773	15%	280,482
REIMBURSEMENT TO WSBA FOR INDIRECT EXPENSES	280,540	6,675	388,434	(107,895)	138%	(248,164)
TOTAL DIRECT EXPENSES:	**1,091,122**	**20,903**	**513,243**	**577,878**	**47%**	**32,318**
NET INCOME (LOSS):	**(437,806)**	**(7,185)**	**135,921**	**(573,727)**	**-31%**	**354,824**

Washington State Bar Association

Statement of Activities

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50% OF YEAR COMPLETE

TECHNOLOGY

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
CONSULTING SERVICES	1,019,797	121,034	386,511	633,286	38%	123,387
STAFF TRAVEL/PARKING	1,000	36	198	802	20%	302
STAFF MEMBERSHIP DUES	410	-	-	410	0%	205
TELEPHONE	90,000	7,006	46,960	43,040	52%	(1,960)
COMPUTER HARDWARE	65,000	684	41,040	23,960	63%	(8,540)
COMPUTER SOFTWARE	518,000	15,267	249,256	268,744	48%	9,744
HARDWARE SERVICE & WARRANTIES	50,000	-	14,413	35,587	29%	10,587
SOFTWARE MAINTENANCE & LICENSING	470,000	22,558	212,740	257,260	45%	22,260
THIRD PARTY SERVICES	177,600	2,274	104,166	73,434	59%	(15,366)
CLOUD INFRASTRUCTURE	130,000	10,267	25,643	104,357	20%	39,357
STAFF CONFERENCE & TRAINING	6,000	-	-	6,000	0%	3,000
TRANSFER TO INDIRECT EXPENSES	(2,527,807)	(179,126)	(1,080,926)	(1,446,881)	43%	(182,977)
TOTAL DIRECT EXPENSES:	-	-	-	-		-
INDIRECT EXPENSES:						
SALARY EXPENSE (5.00 FTE)	629,276	68,991	358,519	270,757	57%	(43,881)
BENEFITS EXPENSE	158,341	14,759	88,928	69,413	56%	(9,758)
CAPITAL LABOR & OVERHEAD	-	(9,146)	(16,181)	16,181		(16,181)
OTHER INDIRECT EXPENSE	172,174	13,401	75,221	96,953	44%	10,866
TOTAL INDIRECT EXPENSES:	**959,791**	**88,005**	**506,487**	**453,304**	**53%**	**(58,953)**
TOTAL ALL EXPENSES:	**959,791**	**88,005**	**506,487**	**453,304**	**53%**	**(58,953)**
NET INCOME (LOSS):	**(959,791)**	**(88,005)**	**(506,487)**	**(453,304)**	**53%**	**(26,591)**

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

VOLUNTEER ENGAGEMENT

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
POSTAGE	600	-	-	600	0%	300
STAFF MEMBERSHIP DUES	385	-	424	(39)	110%	(232)
STAFF CONFERENCE & TRAINING	4,500	1,653	1,653	2,847	37%	597
SUBSCRIPTIONS	816	-	358	458	44%	50
VOLUNTEER RECOGNITION	2,000	-	660	1,340	33%	340
REGULATORY SCHOOL	10,000	-	5,286	4,714	53%	(286)
ABA DELEGATES	18,000	6,804	6,876	11,124	38%	2,124
TOTAL DIRECT EXPENSES:	**36,301**	**8,457**	**15,258**	**21,043**	**42%**	**2,893**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.70 FTE)	149,220	14,204	74,519	74,700	50%	91
BENEFITS EXPENSE	45,777	4,228	24,055	21,722	53%	(1,167)
OTHER INDIRECT EXPENSE	58,539	4,552	25,550	32,990	44%	3,720
TOTAL INDIRECT EXPENSES:	**253,536**	**22,983**	**124,124**	**129,412**	**49%**	**2,644**
TOTAL ALL EXPENSES:	**289,837**	**31,440**	**139,381**	**150,455**	**48%**	**2,644**
NET INCOME (LOSS):	**(289,837)**	**(31,440)**	**(139,381)**	**(150,455)**	**48%**	**5,537**

Washington State Bar Association

Statement of Activities
For the Period from March 01, 2026 to March 31, 2026
50% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
INDIRECT EXPENSES:						
SALARIES	14,130,725	1,298,743	7,098,926	7,031,799	50%	(33,563)
TEMPORARY SALARIES	212,850	19,894	85,716	127,134	40%	20,709
CAPITAL LABOR & OVERHEAD	-	(9,146)	(16,181)	16,181		16,181
ALLOWANCE FOR OPEN POSITIONS	(200,000)	-	-	(200,000)	0%	(100,000)
EMPLOYEE ASSISTANCE PLAN	4,800	-	2,400	2,400	50%	-
EMPLOYEE SERVICE AWARDS	2,260	60	60	2,200	3%	1,070
FICA (EMPLOYER PORTION)	1,067,890	91,572	522,305	545,584	49%	11,639
L&I INSURANCE	65,406	15,160	29,051	36,355	44%	3,652
WA STATE FAMILY MEDICAL LEAVE (EMPLOYER PO	38,961	3,952	20,373	18,588	52%	(893)
MEDICAL (EMPLOYER PORTION)	1,959,293	190,651	1,089,424	869,869	56%	(109,777)
RETIREMENT (EMPLOYER PORTION)	778,534	65,676	388,282	390,252	50%	985
TRANSPORTATION ALLOWANCE	25,944	361	26,321	(377)	101%	(13,349)
UNEMPLOYMENT INSURANCE	73,419	9,794	37,303	36,116	51%	(593)
TOTAL SALARY & BENEFITS EXPENSE:	**18,160,082**	**1,686,717**	**9,283,980**	**8,876,102**	**51%**	**(203,939)**
WORKPLACE BENEFITS	60,150	2,094	11,410	48,740	19%	18,665
HUMAN RESOURCES POOLED EXP	115,700	8,241	46,168	69,532	40%	11,682
MEETING SUPPORT EXPENSES	9,950	132	3,200	6,750	32%	1,775
RENT	923,055	106,632	480,859	442,196	52%	(19,332)
PERSONAL PROP TAXES-WSBA	6,500	514	3,399	3,101	52%	(149)
FURNITURE, MAINT, LH IMP	48,450	9,678	17,206	31,244	36%	7,019
SAFETY & SECURITY	10,420	313	1,053	9,367	10%	4,157
OFFICE SUPPLIES & EQUIPMENT	19,635	1,314	7,636	11,999	39%	2,182
FURN, LH IMP, & OFFICE EQUIP DEPRECIATION	224,084	18,466	111,586	112,498	50%	456
COMPUTER HARDWARE DEPRECIATION	47,971	4,334	25,997	21,974	54%	(2,011)
COMPUTER SOFTWARE DEPRECIATION	36,319	2,606	21,190	15,129	58%	(3,031)
INSURANCE	273,491	22,171	133,027	140,464	49%	3,719
WORK HOME FURNITURE & EQUIP	10,500	174	1,666	8,834	16%	3,584
PROFESSIONAL FEES-AUDIT	43,500	-	41,695	1,805	96%	(19,945)
PROFESSIONAL FEES-LEGAL	250,000	775	35,221	214,779	14%	89,779
ONLINE LEGAL RESEARCH	89,000	12,457	45,223	43,777	51%	(723)
ACCOMODATIONS FUND	6,500	-	-	6,500	0%	3,250
TRANSLATION SERVICES	25,000	739	3,804	21,196	15%	8,696
TELEPHONE & INTERNET	33,600	2,730	16,140	17,460	48%	660
POSTAGE - GENERAL	12,000	601	4,024	7,976	34%	1,976
RECORDS MANAGEMENT	7,500	-	-	7,500	0%	3,750
BANK FEES	27,000	1,620	15,017	11,983	56%	(1,517)
PRODUCTION MAINTENANCE & SUPPLIES	13,250	1,535	6,271	6,979	47%	354
COMPUTER POOLED EXPENSES	2,527,807	179,052	1,080,526	1,447,281	43%	183,377
TOTAL OTHER INDIRECT EXPENSES:	**4,821,383**	**376,176**	**2,112,319**	**2,709,064**	**44%**	**298,373**
TOTAL INDIRECT EXPENSES:	**22,981,465**	**2,062,893**	**11,396,299**	**11,585,165**	**50%**	**94,433**

Washington State Bar Association

Statement of Activities

For the Period from March 01, 2026 to March 31, 2026

50% OF YEAR COMPLETE

SUMMARY PAGE	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE
ACCESS TO JUSTICE	(369,448)	(36,663)	(149,346)	(220,102)
ADMISSIONS/BAR EXAM	(70,382)	186,557	538,939	(609,321)
ADVANCEMENT FTE	(322,209)	(26,286)	(157,798)	(164,410)
BAR NEWS	(184,871)	(9,160)	(61,582)	(123,289)
BENCH BAR PRESS	-	-	1,350	(1,350)
BOARD OF GOVERNORS	(656,550)	(66,529.80)	(257,901)	(398,649)
CONFERENCE & BROADCAST SERVICES	(83,138)	(7,264)	(41,533)	(41,604)
CHARACTER & FITNESS BOARD	(183,031)	(16,813)	(91,143)	(91,888)
CLE - PRODUCTS	651,708	24,336	412,270	239,439
CLE - SEMINARS	(521,923)	(65,674)	(333,998)	(187,925)
CLIENT PROTECTION FUND	244,100	6,534	704,573	(460,473)
COMMUNICATIONS	(927,116)	(65,293)	(389,384)	(537,731)
COMMUNICATIONS FTE	(257,458)	(23,174)	(130,572)	(126,886)
DESKBOOKS	(261,267)	(76,037)	(156,101)	(105,166)
DISCIPLINE	(6,714,684)	(596,946)	(3,231,497)	(3,483,187)
DIVERSITY	(266,146)	(31,413)	(31,479)	(234,667)
ENTITY REGULATION	(67,555)	(3,722)	(45,109)	(22,447)
FACILITIES & OPERATIONS	(749,267)	(66,845)	(383,159)	(366,108)
FINANCE	(630,173)	(38,425)	(296,742)	(333,431)
FOUNDATION	(194,625)	(18,005)	(93,261)	(101,365)
HUMAN RESOURCES	(540,066)	(61,333)	(343,016)	(197,050)
LAW CLERK PROGRAM	(20,825)	(31,648)	133,304	(154,129)
LEGISLATIVE	(295,591)	(26,879)	(144,962)	(150,629)
LEGAL LUNCHBOX	(34,025)	(3,918)	(3,829)	(30,195)
LICENSE FEES	17,652,266	1,631,824	8,957,902	8,694,364
LICENSING AND MEMBERSHIP	(336,145)	(22,253)	(102,894)	(233,251)
LIMITED LICENSE LEGAL TECHNICIAN	(61,045)	(4,997)	(25,826)	(35,219)
LIMITED PRACTICE OFFICERS	56,640	7,236	40,704	15,936
MANDATORY CLE ADMINISTRATION	490,949	61,030	395,551	95,398
MEMBER WELLNESS PROGRAM	(247,030)	(21,343)	(121,960)	(125,070)
MINI CLE	(134,341)	(11,380)	(66,343)	(67,998)
MEMBER SERVICES & ENGAGEMENT	(418,764)	(30,929)	(165,380)	(253,384)
NEW MEMBER EDUCATION	20,022	(3,404)	39,452	(19,430)
OFFICE OF GENERAL COUNSEL	(1,143,522)	(95,221)	(536,771)	(606,752)
OFFICE OF THE EXECUTIVE DIRECTOR	(1,074,655)	(91,827)	(582,405)	(492,251)
OGC-DISCIPLINARY BOARD	(346,788)	(50,446)	(176,822)	(169,966)
PRACTICE OF LAW BOARD	(115,055)	(8,929)	(49,457)	(65,598)
PRACTICE MANAGEMENT ASSISTANCE	(186,220)	(14,871)	(127,659)	(58,561)
PROFESSIONAL RESPONSIBILITY PROGRAM	(224,777)	(17,327)	(107,048)	(117,729)
PUBLIC SERVICE PROGRAMS	(190,189)	(28,597)	(132,275)	(57,914)
PUBLICATION & DESIGN SERVICES	(129,205)	(10,899)	(66,400)	(62,804)
REGULATORY SERVICES FTE	(438,062)	(37,038)	(206,961)	(231,101)
REGULATORY REFORM	(224,255)	(16,204)	(93,561)	(130,694)
SECTIONS ADMINISTRATION	(50,343)	(22,358)	227,925	(278,268)
SECTIONS OPERATIONS	(437,806)	(7,185)	135,921	(573,727)
TECHNOLOGY	(959,791)	(88,005)	(506,487)	(453,304)
VOLUNTEER EDUCATION	(289,837)	(31,440)	(139,381)	(150,455)
INDIRECT EXPENSES	22,981,465	2,062,893	11,396,299	11,585,165
TOTAL OF ALL	**(21,738,972)**	**(2,093,731)**	**(13,434,149)**	**(8,304,823)**
NET INCOME (LOSS)	**(1,242,493)**	**30,838**	**2,037,850**	**(3,280,343)**

WASHINGTON STATE
BAR ASSOCIATION

Financial Reports

(Unaudited)

Year to Date May 31, 2026

Prepared by
Maggie Yu, Controller

Submitted by
Tiffany Lynch, Director of Finance
June 17, 2026

WASHINGTON STATE BAR ASSOCIATION

To: Board of Governors
Budget and Audit Committee

From: Terra Nevitt, Executive Director; Tiffany Lynch, Director of Finance; Maggie Yu, Controller

Re: Key Financial Benchmarks for the Preliminary Fiscal Year to Date (YTD) through May 31, 2026
As % of Completion to Annual Budget

	% of Year	Current Year % YTD	Current Year $ Difference Favorable/(Unfavorable)	Prior Year YTD	Comments
Total Salaries & Benefits	**67%**	**68%**	**$(279,229)**	**66%**	**Unfavorable to budget due to higher salaries, medical cost, and timing of annual payment for transportation allowance.**
Other Indirect Expenses*	**67%**	**58%**	**$422,290**	**63%**	**Favorable to budget due to timing of expenses for legal fees, workplace benefits, and HR and IT direct expenses.**
Total Indirect Expenses	**67%**	**66%**	**$143,060**	**66%**	**Favorable to budget resulting from other indirect expenses described above.**
General Fund Revenues	**67%**	**74%**	**$1,714,504**	**72%**	**Favorable to budget due to higher revenue for licensing late fees, Pro Hac Vice, Law Clerk fees, bar exam fees and MCLE late fees, and timing of collection of reimbursements from sections.**
General Fund Indirect Expenses	**67%**	**66%**	**$145,158**	**66%**	**Favorable to budget as described for indirect expenses above.**
General Fund Direct Expenses	**67%**	**56%**	**$318,772**	**53%**	**Favorable to budget due to timing of program activities and meetings/events.**
General Fund Net	**67%**	**-271%**	**$2,178,434**	**158%**	**Favorable to budget for the reasons described above.**
CLE Revenue	**67%**	**60%**	**$(106,722)**	**71%**	**Unfavorable to budget due to lower seminar revenue and timing of collection of deskbook royalty payments.**
CLE Direct Expenses	**67%**	**38%**	**$126,432**	**36%**	**Favorable to budget due to timing of expenses for seminar activities.**
CLE Indirect Expenses	**67%**	**67%**	**$(2,881)**	**65%**	**Slightly unfavorable to budget due to quarterly vacation accrual adjustments and higher cost of medical benefits.**
CLE Net	**67%**	**54%**	**$16,829**	**94%**	**Favorable to budget due to timing of direct expenses.**

*Workplace benefits, Human Resources, meeting support, rent, taxes, furniture & maintenance, office supplies, depreciation, insurance, equipment, insurance, professional fees (legal & audit), internet & telephone, postage, records management, bank fees, Technology, etc.

Washington State Bar Association Financial Summary
Compared to Fiscal Year 2026 Budget
For the Period from May 01, 2026 to May 31, 2026

Category	Actual Revenues	Budgeted Revenues	Actual Indirect Expenses	Budgeted Indirect Expenses	Actual Direct Expenses	Budgeted Direct Expenses	Actual Total Expenses	Budgeted Total Expenses	Actual Net Result	Budgeted Net Result
Access to Justice	-	-	163,045	253,348	35,927	116,100	198,973	369,448	(198,973)	(369,448)
Admissions/Bar Exam	1,634,585	1,479,440	703,714	1,089,992	234,633	459,830	938,347	1,549,822	696,238	(70,382)
Advancement FTE		-	210,222	315,609	140	6,600	210,363	322,209	(210,363)	(322,209)
Bar News	393,792	529,600	219,141	331,526	258,062	382,945	477,203	714,471	(83,411)	(184,871)
Board of Governors	-	-	159,143	238,885	228,813	417,665	387,956	656,550	(387,956)	(656,550)
Conference & Broadcasting Services	-	-	55,059	83,138	-	-	55,059	83,138	(55,059)	(83,138)
Character & Fitness Board	-	-	106,170	159,981	11,401	23,050	117,572	183,031	(117,572)	(183,031)
Communications Strategies	411	3,000	501,512	741,101	96,203	189,015	597,715	930,116	(597,304)	(927,116)
Communications Strategies FTE		-	172,988	257,458	-	-	172,988	257,458	(172,988)	(257,458)
Discipline	62,996	85,000	4,261,788	6,614,175	107,605	185,509	4,369,393	6,799,684	(4,306,397)	(6,714,684)
Diversity	135,000	135,000	209,485	342,071	12,613	59,075	222,098	401,146	(87,098)	(266,146)
Entity Regulation	20,000	75,500	77,217	115,083	2,710	27,973	79,926	143,055	(59,926)	(67,555)
Facilities & Operations	-	-	507,942	746,702	1,594	2,565	509,536	749,267	(509,536)	(749,267)
Finance	495,347	600,000	807,285	1,225,253	3,220	4,920	810,505	1,230,173	(315,158)	(630,173)
Foundation	-	-	117,712	175,440	5,882	19,185	123,594	194,625	(123,594)	(194,625)
Human Resources	-	-	445,307	540,066	-	-	445,307	540,066	(445,307)	(540,066)
Law Clerk Program	264,033	224,000	113,599	177,416	42,902	67,409	156,501	244,825	107,532	(20,825)
Legislative	-	-	161,078	270,801	16,387	24,790	177,466	295,591	(177,466)	(295,591)
Legal Lunchbox	32,030	34,000	39,450	59,925	4,422	8,100	43,872	68,025	(11,842)	(34,025)
Licensing and Membership Records	440,417	494,260	530,726	807,725	23,095	22,680	553,821	830,405	(113,404)	(336,145)
Licensing Fees	11,967,761	17,652,266	-	-	-	-	0	-	11,967,761	17,652,266
Limited License Legal Technician	11,944	17,287	43,297	68,332	2,666	10,000	45,963	78,332	(34,019)	(61,045)
Limited Practice Officers	122,241	182,000	59,060	92,656	10,175	32,704	69,236	125,360	53,005	56,640
Mandatory CLE	1,061,550	1,338,250	470,897	694,269	97,703	153,032	568,600	847,301	492,950	490,949
Member Wellness Program	4,250	9,000	163,287	242,930	4,684	13,100	167,972	256,030	(163,722)	(247,030)
Member Services & Engagement	9,200	15,300	208,391	309,044	65,470	125,020	273,861	434,064	(264,661)	(418,764)
Mini CLE	-	-	88,211	134,341	-	-	88,211	134,341	(88,211)	(134,341)
New Member Education	119,936	142,000	77,946	118,278	2,473	3,700	80,420	121,978	39,516	20,022
Office of General Counsel	1,000	-	707,071	1,116,772	9,520	26,750	716,591	1,143,522	(715,591)	(1,143,522)
Office of the Executive Director	-	-	626,476	932,020	117,632	142,635	744,109	1,074,655	(744,109)	(1,074,655)
OGC-Disciplinary Board	-	-	141,941	210,543	99,486	136,245	241,427	346,788	(241,427)	(346,788)
Practice of Law Board	-	-	64,086	98,855	1,461	16,200	65,547	115,055	(65,547)	(115,055)
Practice Management Assistance	68,452	62,000	102,488	152,525	90,187	95,695	192,675	248,220	(124,223)	(186,220)
Professional Responsibility Program	-	-	140,451	216,787	2,602	7,990	143,053	224,777	(143,053)	(224,777)
Public Service Programs	132,639	132,635	189,118	310,124	(1,934)	12,700	187,184	322,824	(54,545)	(190,189)
Publication and Design Services	-	-	81,799	124,205	4,756	5,000	86,555	129,205	(86,555)	(129,205)
Regulatory Services FTE			272,526	425,472	1,404	12,590	273,930	438,062	(273,930)	(438,062)
Regulatory Reform	-	-	112,682	167,255	8,828	57,000	121,510	224,255	(121,510)	(224,255)
Sections Administration	393,947	275,000	213,423	322,943	484	2,400	213,907	325,343	180,040	(50,343)
Volunteer Engagement	-	-	165,362	253,536	15,668	36,301	181,030	289,836.58	(181,030)	(289,837)
Technology	-	-	694,659	959,791	-	-	694,659	959,791	(694,659)	(959,791)
Subtotal General Fund	**17,371,530**	23,485,538	**14,185,755**	**21,496,370**	**1,618,876**	2,906,473	**15,804,632**	24,402,843	**1,566,898**	**(917,304)**
Expenses using Facilities Reserve funds					(496)		(496)	(744)	496	744
Expenses using Special Project Reserve funds			(112,682)		(8,828)		(121,510)	(224,255)	121,510	224,255
Total General Fund - Net Result from Operations	**17,371,530**		**14,073,073**		**1,610,048**		**15,682,625**	**24,177,844**	**1,688,905**	**(692,306)**
Percentage of Budget	**74%**		**66%**		**56%**		**65%**			
CLE-Seminars and Products	901,982	1,491,745	702,411	1,048,807	96,118	313,153	798,529	1,361,960	103,452	129,785
CLE - Deskbooks	55,873	105,120	161,013	242,008	69,138	124,380	230,151	366,387	(174,278)	(261,267)
Total CLE	957,854	1,596,865	863,424	1,290,814	165,256	437,533	1,028,680	1,728,347	(70,826)	(131,482)
Percentage of Budget	**60%**		**67%**		**38%**		**60%**		-	-
Expenses using Facilities Reserve funds							0		**(70,826)**	**(131,482)**
Total CLE Fund - Net Result from Operations			**863,424**				**1,028,680**	**1,728,347**		
Total All Sections	668,073	653,316	-	-	654,110	1,091,122	654,110	1,091,122	13,963	(437,806)
Bench Bar Press-Restricted	6,885	-	-	-	7,060	-	7,060	0	(175)	-
Client Protection Fund-Restricted	870,614	945,480	128,736	194,280	42,614	507,100	171,350	701,380	699,264	244,100
Expenses using Facilities Reserve funds							-		-	-
Total CPF Fund - Net Result from Operations			**128,736**				**171,350**	**701,380**	**699,264**	**244,100**
Totals	**19,868,071**	**26,681,199**	**15,177,916**	**22,981,465**	**2,480,856**	**4,942,227**	**17,658,772**	**27,923,692**	**2,209,124**	**(1,242,493)**
Totals Net of Use of Facilities Reserve Funds			-		(496)		(496)		496	
Totals Net of Use of Special Project Reserve Funds			(112,682)		(8,828)		(121,510)	**27,698,693**	121,510	**(1,017,494)**
			15,065,234		**2,472,028**		**17,536,766**		**2,331,130**	
Percentage of Budget	**74%**		**66%**		**50%**		**63%**			

Summary of Fund Balances:	Fund Balances Sept. 30, 2025	2026 Budgeted Fund Balances	Fund Balances Year to date
Restricted Funds:			
Client Protection Fund	5,307,092	5,551,192	6,006,356
Bench Bar Press	1,110	1,110	935
Board-Designated Funds (Non-General Fund):			
CLE Fund Balance	1,233,727	1,102,244	1,162,901
Section Funds	2,164,531	1,726,725	2,178,494
Board-Designated Funds (General Fund):			
Operating Reserve Fund	2,500,000	2,500,000	2,500,000
Facilities Reserve Fund	159,925	159,181	159,429
Special Projects and Innovation Fund	616,067	391,813	494,557
Unrestricted Funds (General Fund):			
Unrestricted General Fund	6,754,154	6,061,848	8,443,059
Total General Fund Balance	**10,030,146**	**9,112,841**	**11,597,044**
Net Change in Total General Fund Balance		**(917,304)**	**1,566,898**
Total Fund Balance	**18,736,606**	**17,494,113**	**20,945,730**
Net Change In Fund Balance		**(1,242,493)**	**2,209,124**

Washington State Bar Association
Analysis of Cash Investments
As of May 31, 2026

Checking & Savings Accounts

General Fund

Checking

Bank	Account	Amount
Wells Fargo	General	2,141,003
	Total	

Investments	Rate (yield)	Amount
Wells Fargo Money Market	3.54%	12,647,229
UBS Financial Money Market	3.48%	1,197,426
CDs/Treasuries	see list	10,250,000
	General Fund Total	**26,235,659**

Client Protection Fund

Checking

Bank	Amount
Wells Fargo	360,560

Investments	Rate (yield)	Amount
Wells Fargo Money Market	3.54%	5,327,543
CDs/Treasuries	see list	500,000
	Client Protection Fund Total	**6,188,103**

Grand Total Cash & Investments	**32,423,762**

Washington State Bar Association
Analysis of Cash Investments
As of May 31, 2026

General Fund

Bank	Yield	Term Months	Trade Date	Settle Date	Maturity Date	Amount
Merrick Bank CD	4.30%	12	6/12/2025	6/20/2025	6/18/2026	250,000
Simmons Bank/Pine Bluff CD	4.20%	12	6/12/2025	6/20/2025	6/18/2026	250,000
Goldman Sachs Bank CD	3.60%	6	12/30/2025	1/6/2026	7/6/2026	250,000
Bank of America CD	3.60%	6	12/30/2025	1/7/2026	7/7/2026	250,000
BCB Community Bank NY CD	4.05%	12	7/7/2025	7/18/2025	7/17/2026	250,000
Bank Hapoalim BM CD	4.15%	12	7/28/2025	7/31/2025	7/29/2026	250,000
Bridgewater Bank CD	3.70%	6	1/29/2026	2/6/2026	8/6/2026	250,000
Industrial & Com Bank CD	3.70%	6	1/29/2026	2/6/2026	8/6/2026	250,000
Morgan Stanley PVT Bank CD	4.05%	12	8/6/2025	8/13/2025	8/13/2026	250,000
Zions Bancorp NA CD	3.70%	9	1/29/2026	2/4/2026	11/4/2026	250,000
Cross River Bank CD	3.70%	9	1/29/2026	2/6/2026	11/6/2026	250,000
JP Morgan chase bank CD	3.60%	12	12/30/2025	1/7/2026	1/7/2027	250,000
Bank of Baroda CD	3.70%	12	1/23/2026	1/28/2026	1/28/2027	250,000
Ally Bank/UT CD	3.60%	12	1/23/2026	1/29/2026	1/29/2027	250,000
BMW Bank North America CD	3.65%	12	1/23/2026	1/30/2026	1/29/2027	250,000
CAPE & Coast Bank CD	3.65%	12	1/23/2026	1/30/2026	1/29/2027	250,000
BMO Bank NA Primary	3.85%	9	4/28/2026	4/30/2026	2/1/2027	250,000
Tristate Capital Bank	3.80%	9	4/28/2026	5/6/2026	2/8/2027	250,000
Lake City Bank Warsaw CD	3.80%	12	2/10/2026	2/18/2026	2/18/2027	250,000
PCB Bank Primary CD	3.70%	12	2/26/2026	3/6/2026	3/5/2027	250,000
State Bank of India NY CD	3.75%	12	3/4/2026	3/9/2026	3/9/2027	250,000
Towne Bank Portsmouth VA CD	3.75%	12	3/4/2026	3/13/2026	3/12/2027	250,000
Stearns Bank NA CD	3.90%	11	4/15/2026	4/20/2026	3/22/2027	250,000
Associated BK Green Bay CD	3.80%	12	3/24/2026	3/27/2026	3/25/2027	250,000
First Reliance Bank CD	3.75%	12	3/24/2026	3/30/2026	3/30/2027	250,000
Ocean Bank/Miami FL CD	3.85%	12	3/24/2026	3/30/2026	3/30/2027	250,000
Seacoast National Bank CD	3.80%	12	3/24/2026	3/31/2026	3/31/2027	250,000
Mission Valley Bank CD	3.80%	12	4/15/2026	4/17/2026	4/16/2027	250,000
Bank of India NY CD	3.90%	12	4/15/2026	4/23/2026	4/21/2027	250,000
Old National Bank CD	3.90%	12	4/15/2026	4/22/2026	4/22/2027	250,000
Shinhan Bank America CD	3.90%	12	4/15/2026	4/24/2026	4/26/2027	250,000
American Coml BK & TR CD	3.85%	12	4/15/2026	4/28/2026	4/28/2027	250,000
Flagstar Bank National CD	3.95%	12	4/28/2026	4/30/2026	4/30/2027	250,000
Regions BK Birmngham CD	3.80%	12	4/28/2026	5/5/2026	5/5/2027	250,000
Bank Hope Los Angeles CD	3.75%	12	4/28/2026	5/6/2026	5/6/2027	250,000
Eaglemark Savings Bank	3.95%	12	5/26/2026	5/27/2026	5/27/2027	250,000
Nelnet Bank Inc. CD	3.80%	12	5/26/2026	5/27/2026	5/27/2027	250,000
Bank of America CA CD	3.95%	12	5/26/2026	5/28/2026	5/28/2027	250,000
First-Citizens Bank/Trst CD	3.85%	12	5/26/2026	5/28/2026	5/28/2027	250,000
Mountainone Bank CD	3.80%	12	5/26/2026	5/29/2026	5/29/2027	250,000
Western Alliance Bank CD	3.85%	12	5/26/2026	5/29/2026	5/29/2027	250,000
					Total	**10,250,000**

Client Fund Protection Fund

Bank	Yield	Term Months	Trade Date	Settle Date	Maturity Date	Amount
SOFI Bank NA Corp CD	3.70%	6	1/23/2026	2/4/2026	8/4/2026	250,000
SAFRA National Bank CD	3.65%	11	1/23/2026	1/29/2026	12/29/2026	250,000
					Total	**500,000**

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
LICENSE FEES						
REVENUE:						
LICENSE FEES	17,652,266	1,495,314	11,967,761	5,684,505	68%	199,583
TOTAL REVENUE:	**17,652,266**	**1,495,314**	**11,967,761**	**5,684,505**	**68%**	**199,583**

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

ADMISSIONS

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
EXAM SOFTWARE REVENUE	9,500	-	7,205	2,295	76%	872
BAR EXAM FEES	1,395,000	131,980	1,588,620	(193,620)	114%	658,620
RULE 9/LEGAL INTERN FEES	13,000	4,500	10,000	3,000	77%	1,333
SPECIAL ADMISSIONS	61,940	2,040	28,760	33,180	46%	(12,533)
TOTAL REVENUE:	**1,479,440**	**138,520**	**1,634,585**	**(155,145)**	**110%**	**648,292**
DIRECT EXPENSES:						
POSTAGE	2,900	285	2,628	272	91%	(695)
STAFF TRAVEL/PARKING	24,000	-	9,139	14,861	38%	6,861
STAFF MEMBERSHIP DUES	495	-	245	250	49%	85
SUPPLIES	2,500	-	1,044	1,456	42%	622
FACILITY, PARKING, FOOD	150,985	-	46,969	104,016	31%	53,688
EXAM GRADING	43,750	-	21,750	22,000	50%	7,417
UBE EXAMINATIONS	46,200	-	40,859	5,341	88%	(10,059)
BOARD OF BAR EXAMINERS	45,000	418	8,012	36,988	18%	21,988
BAR EXAM PROCTORS	10,000	-	8,486	1,514	85%	(1,820)
DISABILITY ACCOMMODATIONS	75,000	5,853	51,277	23,723	68%	(1,277)
CHARACTER & FITNESS INVESTIGATIONS	1,500	-	-	1,500	0%	1,000
LAW SCHOOL VISITS	1,500	-	23	1,477	2%	977
SOFTWARE HOSTING	45,000	5,008	36,072	8,928	80%	(6,072)
STAFF CONFERENCE & TRAINING	11,000	655	8,127	2,873	74%	(794)
TOTAL DIRECT EXPENSES:	**459,830**	**12,219**	**234,633**	**225,197**	**51%**	**71,921**
INDIRECT EXPENSES:						
SALARY EXPENSE (7.45 FTE) **	635,395	54,313	415,922	219,473	65%	7,675
BENEFITS EXPENSE	198,059	17,726	139,444	58,615	70%	(7,405)
OTHER INDIRECT EXPENSE	256,539	12,039	148,348	108,191	58%	22,678
TOTAL INDIRECT EXPENSES:	**1,089,992**	**84,079**	**703,714**	**386,279**	**65%**	**22,948**
TOTAL ALL EXPENSES:	**1,549,822**	**96,297**	**938,347**	**611,476**	**61%**	**94,868**
NET INCOME (LOSS):	**(70,382)**	**42,223**	**696,238**	**(766,621)**	**-989%**	**743,160**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

ADVANCEMENT FTE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
STAFF CONFERENCE & TRAINING	6,600	-	140	6,460	2%	4,260
TOTAL DIRECT EXPENSES:	**6,600**	**-**	**140**	**6,460**	**2%**	**4,260**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.41 FTE)	216,525	18,420	146,802	69,723	68%	(2,452)
BENEFITS EXPENSE	50,531	4,507	35,278	15,253	70%	(1,590)
OTHER INDIRECT EXPENSE	48,553	2,284	28,143	20,410	58%	4,226
TOTAL INDIRECT EXPENSES:	**315,609**	**25,211**	**210,222**	**105,386**	**67%**	**183**
TOTAL ALL EXPENSES:	**322,209**	**25,211**	**210,363**	**111,846**	**65%**	**4,443**
NET INCOME (LOSS):	**(322,209)**	**(25,211)**	**(210,363)**	**(111,846)**	**65%**	**4,443**

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
ACCESS TO JUSTICE						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
ATJ BOARD RETREAT	6,000	-	-	6,000	0%	4,000
LEADERSHIP TRAINING	10,000	5,197	8,647	1,353	86%	(1,980)
ATJ BOARD EXPENSE **	51,900	-	4,677	47,223	9%	29,923
STAFF TRAVEL/PARKING	2,800	18	319	2,482	11%	1,548
STAFF CONFERENCE & TRAINING	4,400	-	3,662	738	83%	(729)
PUBLIC DEFENSE **	11,000	3,815	7,921	3,079	72%	(588)
RECEPTION/FORUM EXPENSE	30,000	-	10,701	19,299	36%	9,299
TOTAL DIRECT EXPENSES:	**116,100**	**9,030**	**35,927**	**80,173**	**31%**	**41,473**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.61 FTE) **	152,635	12,462	99,847	52,788	65%	1,910
BENEFITS EXPENSE	45,272	3,965	30,945	14,327	68%	(763)
OTHER INDIRECT EXPENSE	55,440	2,603	32,253	23,187	58%	4,707
TOTAL INDIRECT EXPENSES:	**253,348**	**19,030**	**163,045**	**90,303**	**64%**	**5,853**
TOTAL ALL EXPENSES:	**369,448**	**28,061**	**198,973**	**170,475**	**54%**	**47,326**
NET INCOME (LOSS):	**(369,448)**	**(28,061)**	**(198,973)**	**(170,475)**	**54%**	**47,326**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

BENCH-BAR-PRESS

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
LUNCHEON REGISTRATION	-	-	4,485	(4,485)		4,485
BENCH-BAR-PRESS MEMBERSHIP DUES	-	600	2,400	(2,400)		2,400
TOTAL REVENUE:	**-**	**600**	**6,885**	**(6,885)**		**6,885**
DIRECT EXPENSES:						
BENCH-BAR-PRESS LUNCHEON	-	-	7,060	(7,060)		(7,060)
TOTAL DIRECT EXPENSES:	**-**	**-**	**7,060**	**(7,060)**		**(7,060)**
NET INCOME (LOSS):	**-**	**600**	**(175)**	**175**		**(175)**

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
BAR NEWS						
REVENUE:						
ROYALTIES	2,000	-	-	2,000	0%	(1,333)
BNEWS DISPLAY ADVERTISING	405,000	-	306,786	98,214	76%	36,786
BNEWS SUBSCRIPT/SINGLE ISSUES	100	-	140	(40)	140%	74
BNEWS CLASSIFIED ADVERTISING	2,500	50	3,035	(535)	121%	1,368
JOB TARGET ADVERSTISING	120,000	10,802	83,831	36,169	70%	3,831
TOTAL REVENUE:	**529,600**	**10,852**	**393,792**	**135,808**	**74%**	**40,725**
DIRECT EXPENSES:						
POSTAGE	135,000	-	99,094	35,906	73%	(9,094)
PRINTING, COPYING & MAILING	242,000	-	157,616	84,384	65%	3,717
DIGITAL/ONLINE DEVELOPMENT	2,000	-	353	1,647	18%	981
GRAPHICS/ARTWORK	1,000	-	-	1,000	0%	667
EDITORIAL ADVIS COMMITTEE EXP	300	-	-	300	0%	200
STAFF CONFERENCE & TRAINING	2,200	-	999	1,201	45%	468
STAFF MEMBERSHIP DUES	220	-	-	220	0%	147
SUBSCRIPTIONS	225	-	-	225	0%	150
TOTAL DIRECT EXPENSES:	**382,945**	**-**	**258,062**	**124,883**	**67%**	**(2,766)**
INDIRECT EXPENSES:						
SALARY EXPENSE (2.13 FTE)	199,151	16,700	135,176	63,975	68%	(2,408)
BENEFITS EXPENSE	59,029	5,282	41,455	17,574	70%	(2,103)
OTHER INDIRECT EXPENSE	73,346	3,450	42,509	30,837	58%	6,388
TOTAL INDIRECT EXPENSES:	**331,526**	**25,432**	**219,141**	**112,386**	**66%**	**1,877**
TOTAL ALL EXPENSES:	**714,471**	**25,432**	**477,203**	**237,268**	**67%**	**(889)**
NET INCOME (LOSS):	**(184,871)**	**(14,579)**	**(83,411)**	**(101,460)**	**45%**	**39,836**

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
BOARD OF GOVERNORS						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
BOG MEETINGS **	175,000	28,457	74,825	100,175	43%	41,842
BOG COMMITTEES' EXPENSES **	11,200	1,813	4,118	7,082	37%	3,348
BOG RETREAT	40,000	-	31,539	8,461	79%	(4,872)
BOG CONFERENCE ATTENDANCE	56,500	5,737	51,799	4,701	92%	(14,133)
BOG TRAVEL & OUTREACH **	70,000	7,676	55,488	14,512	79%	(8,821)
LEADERSHIP TRAINING	15,000	-	-	15,000	0%	10,000
BOG ELECTIONS **	26,900	-	9,021	17,879	34%	8,913
PRESIDENT'S DINNER	12,000	1,674	1,674	10,326	14%	6,326
NEW GOVERNOR ORIENTATION	7,000	-	-	7,000	0%	4,667
PRESIDENT'S PHOTO	3,300	-	-	3,300	0%	2,200
SUPPLIES	765	-	350	415	46%	160
TOTAL DIRECT EXPENSES:	**417,665**	**45,357**	**228,813**	**188,852**	**55%**	**49,630**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.73 FTE)	135,043	12,881	93,431	41,613	69%	(3,402)
BENEFITS EXPENSE	44,269	4,060	31,363	12,906	71%	(1,851)
OTHER INDIRECT EXPENSE	59,572	2,788	34,349	25,223	58%	5,366
TOTAL INDIRECT EXPENSES:	**238,885**	**19,729**	**159,143**	**79,742**	**67%**	**114**
TOTAL ALL EXPENSES:	**656,550**	**65,086**	**387,956**	**268,594**	**59%**	**49,744**
NET INCOME (LOSS):	**(656,550)**	**(65,086)**	**(387,956)**	**(268,594)**	**59%**	**49,744**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

CONFERENCE AND BROADCAST SERVICES

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
INDIRECT EXPENSES:						
SALARY EXPENSE (0.55 FTE)	49,269	4,096	33,520	15,750	68%	(674)
BENEFITS EXPENSE	14,930	1,339	10,555	4,374	71%	(602)
OTHER INDIRECT EXPENSE	18,939	892	10,984	7,955	58%	1,642
TOTAL INDIRECT EXPENSES:	**83,138**	**6,327**	**55,059**	**28,078**	**66%**	**366**
NET INCOME (LOSS):	**(83,138)**	**(6,327)**	**(55,059)**	**(28,078)**	**66%**	**366**

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

CHARACTER & FITNESS BOARD

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	**-**	**-**	**-**	**-**		**-**
DIRECT EXPENSES:						
CHARACTER & FITNESS BOARD EXP	12,000	-	5,458	6,542	45%	2,542
COURT REPORTERS	11,050	-	5,943	5,107	54%	1,423
TOTAL DIRECT EXPENSES:	**23,050**	**-**	**11,401**	**11,649**	**49%**	**3,965**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.85 FTE)	103,891	8,686	70,528	33,364	68%	(1,267)
BENEFITS EXPENSE	26,820	2,373	18,763	8,057	70%	(883)
OTHER INDIRECT EXPENSE	29,270	1,369	16,879	12,390	58%	2,634
TOTAL INDIRECT EXPENSES:	**159,981**	**12,428**	**106,170**	**53,810**	**66%**	**484**
TOTAL ALL EXPENSES:	**183,031**	**12,428**	**117,572**	**65,459**	**64%**	**4,449**
NET INCOME (LOSS):	**(183,031)**	**(12,428)**	**(117,572)**	**(65,459)**	**64%**	**4,449**

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
CONTINUING LEGAL EDUCATION (CLE)						
(CLES - CLEP)						
REVENUE:						
SEMINAR REGISTRATIONS	730,535	96,633	279,573	450,962	38%	(207,450)
SEMINAR REVENUE-OTHER	32,500	11,950	27,950	4,550	86%	6,283
SEMINAR SPLITS W/ CLE	(150,000)	-	-	(150,000)	0%	100,000
SHIPPING & HANDLING	210	-	36	174	17%	(104)
COURSEBOOK SALES	3,500	-	325	3,175	9%	(2,008)
DIGITAL VIDEO SALES	875,000	18,842	594,097	280,903	68%	10,764
TOTAL REVENUE:	**1,491,745**	**127,425**	**901,982**	**589,763**	**60%**	**(92,515)**
DIRECT EXPENSES:						
COURSEBOOK PRODUCTION	150	-	-	150	0%	100
ONLINE EXPENSES	54,000	6	17,862	36,138	33%	18,138
ACCREDITATION FEES	2,500	(72)	1,896	604	76%	(229)
FACILITIES	175,000	5,200	55,307	119,693	32%	61,360
DISABILITY ACCOMMODATIONS	7,000	-	2,211	4,789	32%	2,455
SPEAKERS & PROGRAM DEVELOP	45,700	5,302	12,534	33,166	27%	17,933
HONORARIA	3,000	-	-	3,000	0%	2,000
CLE SEMINAR COMMITTEE	200	-	-	200	0%	133
STAFF TRAVEL/PARKING	16,500	1,098	3,820	12,680	23%	7,180
STAFF CONFERENCE & TRAINING	3,700	-	-	3,700	0%	2,467
STAFF MEMBERSHIP DUES	1,500	-	1,091	409	73%	(91)
SUBSCRIPTIONS	1,300	796	796	504	61%	71
SUPPLIES	1,000	-	41	959	4%	626
COST OF SALES - COURSEBOOKS	300	-	27	273	9%	173
POSTAGE & DELIVERY-COURSEBOOKS	200	-	28	172	14%	105
IT EXPENSE DUE TO GF	1,103	69	506	597	46%	229
TOTAL DIRECT EXPENSES:	**313,153**	**12,398**	**96,118**	**217,035**	**31%**	**112,651**
INDIRECT EXPENSES:						
SALARY EXPENSE (7.95 FTE)	614,468	52,203	419,858	194,610	68%	(10,213)
BENEFITS EXPENSE	202,492	18,224	143,563	58,929	71%	(8,568)
OTHER INDIRECT EXPENSE	231,847	10,231	138,990	92,857	60%	15,575
TOTAL INDIRECT EXPENSES:	**1,048,807**	**80,658**	**702,411**	**346,396**	**67%**	**(3,207)**
TOTAL ALL EXPENSES:	**1,361,960**	**93,057**	**798,529**	**563,431**	**59%**	**109,444**
NET INCOME (LOSS):	**129,785**	**34,368**	**103,452**	**26,333**	**80%**	**16,929**

Washington State Bar Association

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For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

CLIENT PROTECTION FUND

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
DONATIONS	-	-	5,539	(5,539)		5,539
CPF RESTITUTION	10,000	621	4,782	5,218	48%	(1,885)
CPF MEMBER ASSESSMENTS	735,480	7,400	727,330	8,150	99%	237,010
INTEREST INCOME	200,000	17,231	132,963	67,037	66%	(370)
TOTAL REVENUE:	**945,480**	**25,252**	**870,614**	**74,866**	**92%**	**240,294**
DIRECT EXPENSES:						
BANK FEES	500	3	(57)	557	-11%	390
GIFTS TO INJURED CLIENTS	500,000	20,300	40,050	459,950	8%	293,283
CPF BOARD EXPENSES	2,000	37	902	1,098	45%	432
STAFF CONFERENCE & TRAINING	4,400	1,519	1,519	2,881	35%	1,414
STAFF MEMBERSHIP DUES	200	-	200	-	100%	(67)
TOTAL DIRECT EXPENSES:	**507,100**	**21,860**	**42,614**	**464,486**	**8%**	**295,453**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.23 FTE)	117,501	9,759	80,028	37,473	68%	(1,694)
BENEFITS EXPENSE	34,425	3,218	24,227	10,198	70%	(1,277)
OTHER INDIRECT EXPENSE	42,355	1,986	24,481	17,873	58%	3,755
TOTAL INDIRECT EXPENSES:	**194,280**	**14,963**	**128,736**	**65,544**	**66%**	**784**
TOTAL ALL EXPENSES:	**701,380**	**36,823**	**171,350**	**530,030**	**24%**	**296,237**
NET INCOME (LOSS):	**244,100**	**(11,571)**	**699,264**	**(455,164)**	**286%**	**536,531**

Washington State Bar Association

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67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
COMMUNICATION STRATEGIES						
REVENUE:						
50 YEAR MEMBER TRIBUTE LUNCH	1,000	411	411	589	41%	(256)
WSBA LOGO MERCHANDISE SALES	2,000	-	-	2,000	0%	(1,333)
TOTAL REVENUE:	**3,000**	**411**	**411**	**2,589**	**14%**	**(1,589)**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	5,895	198	1,584	4,311	27%	2,346
STAFF MEMBERSHIP DUES	1,800	-	537	1,263	30%	663
SUBSCRIPTIONS	4,520	1,213	3,342	1,178	74%	(329)
APEX	52,500	-	380	52,120	1%	34,620
BAR LEADERS SUMMIT	35,000	26,935	26,935	8,065	77%	(3,601)
50 YEAR MEMBER TRIBUTE LUNCH	38,000	1,674	1,674	36,326	4%	23,660
BAR OUTREACH **	22,000	9,263	27,676	(5,676)	126%	(13,010)
COMMUNICATIONS OUTREACH **	8,000	3,738	6,553	1,447	82%	(1,219)
STAFF CONFERENCE & TRAINING	11,300	-	7,791	3,510	69%	(257)
AMBASSADOR TRAINING & TOWN HALLS	10,000	4,482	19,732	(9,732)	197%	(13,065)
TOTAL DIRECT EXPENSES:	**189,015**	**47,502**	**96,203**	**92,812**	**51%**	**29,807**
INDIRECT EXPENSES:						
SALARY EXPENSE (5.39 FTE)	417,995	43,965	297,876	120,120	71%	(19,212)
BENEFITS EXPENSE	137,502	12,112	96,370	41,132	70%	(4,702)
OTHER INDIRECT EXPENSE	185,603	8,706	107,267	78,337	58%	16,469
TOTAL INDIRECT EXPENSES:	**741,101**	**64,783**	**501,512**	**239,588**	**68%**	**(7,445)**
TOTAL ALL EXPENSES:	**930,116**	**112,285**	**597,715**	**332,400**	**64%**	**22,362**
NET INCOME (LOSS):	**(927,116)**	**(111,874)**	**(597,304)**	**(329,811)**	**64%**	**20,773**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

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67% OF YEAR COMPLETE

COMMUNICATION STRATEGIES FTE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
INDIRECT EXPENSES:						
SALARY EXPENSE (1.00 FTE)	183,193	15,266	125,299	57,894	68%	(3,171)
BENEFITS EXPENSE	39,830	3,522	27,706	12,124	70%	(1,152)
OTHER INDIRECT EXPENSE	34,435	1,621	19,982	14,452	58%	2,974
TOTAL INDIRECT EXPENSES:	**257,458**	**20,409**	**172,988**	**84,470**	**67%**	**(1,349)**
NET INCOME (LOSS):	**(257,458)**	**(20,409)**	**(172,988)**	**(84,470)**	**67%**	**(1,349)**

Washington State Bar Association

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67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
DESKBOOKS						
REVENUE:						
DESKBOOK SALES	5,120	-	3,386	1,734	66%	(27)
LEXIS/NEXIS ROYALTIES	75,000	10,164	30,757	44,243	41%	(19,243)
SECTION PUBLICATION SALES	-	-	70	(70)		70
CASEMAKER ROYALTIES	25,000	11,781	21,659	3,341	87%	4,992
TOTAL REVENUE:	**105,120**	**21,945**	**55,873**	**49,247**	**53%**	**(14,207)**
DIRECT EXPENSES:						
COST OF SALES - DESKBOOKS	2,800	-	1,195	1,605	43%	672
DESKBOOK ROYALTIES	-	-	193	(193)		(193)
STAFF CONFERENCES & TRAINING	2,200	-	1,914	286	87%	(447)
POSTAGE & DELIVERY-DESKBOOKS	300	-	21	279	7%	179
OBSOLETE INVENTORY	118,700	-	65,597	53,103	55%	13,537
STAFF MEMBERSHIP DUES	330	-	218	112	66%	2
SUBSCRIPTIONS	50	-	-	50	0%	33
TOTAL DIRECT EXPENSES:	**124,380**	**-**	**69,138**	**55,242**	**56%**	**13,782**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.75 FTE)	145,047	12,165	98,064	46,982	68%	(1,366)
BENEFITS EXPENSE	45,925	4,121	32,282	13,643	70%	(1,665)
OTHER INDIRECT EXPENSE	51,036	2,258	30,667	20,369	60%	3,357
TOTAL INDIRECT EXPENSES:	**242,008**	**18,543**	**161,013**	**80,995**	**67%**	**325**
TOTAL ALL EXPENSES:	**366,387**	**18,543**	**230,151**	**136,236**	**63%**	**14,107**
NET INCOME (LOSS):	**(261,267)**	**3,402**	**(174,278)**	**(86,989)**	**67%**	**(100)**

Washington State Bar Association

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67% OF YEAR COMPLETE

DISCIPLINE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
AUDIT REVENUE	1,000	128	1,126	(126)	113%	460
RECOVERY OF DISCIPLINE COSTS	65,000	6,207	45,820	19,180	70%	2,487
DISCIPLINE HISTORY SUMMARY	19,000	2,160	16,050	2,950	84%	3,383
TOTAL REVENUE:	**85,000**	**8,495**	**62,996**	**22,004**	**74%**	**6,330**
DIRECT EXPENSES:						
PUBLICATIONS PRODUCTION	350	-	-	350	0%	233
STAFF TRAVEL/PARKING	15,000	1,138	12,141	2,859	81%	(2,141)
STAFF MEMBERSHIP DUES	7,659	239	7,695	(36)	100%	(2,589)
TELEPHONE	3,000	225	1,614	1,386	54%	386
COURT REPORTERS	66,200	7,499	37,034	29,166	56%	7,099
OUTSIDE COUNSEL/AIC	500	-	-	500	0%	333
LITIGATION EXPENSES	30,000	1,525	10,572	19,428	35%	9,428
DISABILITY EXPENSES	15,000	-	4,696	10,304	31%	5,304
TRANSLATION SERVICES	10,000	874	10,132	(132)	101%	(3,465)
STAFF CONFERENCE & TRAINING	37,800	500	23,720	14,080	63%	1,480
TOTAL DIRECT EXPENSES:	**185,509**	**11,999**	**107,605**	**77,904**	**58%**	**16,067**
INDIRECT EXPENSES:						
SALARY EXPENSE (39.00 FTE)	4,131,360	336,693	2,696,007	1,435,353	65%	58,233
BENEFITS EXPENSE	1,139,859	101,104	789,843	350,017	69%	(29,936)
OTHER INDIRECT EXPENSE	1,342,955	62,978	775,938	567,017	58%	119,366
TOTAL INDIRECT EXPENSES:	**6,614,175**	**500,775**	**4,261,788**	**2,352,387**	**64%**	**147,662**
TOTAL ALL EXPENSES:	**6,799,684**	**512,775**	**4,369,393**	**2,430,291**	**64%**	**163,730**
NET INCOME (LOSS):	**(6,714,684)**	**(504,280)**	**(4,306,397)**	**(2,408,288)**	**64%**	**170,059**

Washington State Bar Association

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67% OF YEAR COMPLETE

DIVERSITY

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
DONATIONS	135,000	-	135,000	-	100%	45,000
TOTAL REVENUE:	**135,000**	**-**	**135,000**	**-**	**100%**	**45,000**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	3,700	131	591	3,109	16%	1,876
STAFF MEMBERSHIP DUES	775	175	605	170	78%	(88)
DEI COUNCIL	7,600	690	2,607	4,993	34%	2,460
DIVERSITY EVENTS & PROJECTS **	33,600	378	5,519	28,081	16%	16,881
STAFF EQUITY LEADERSHIP LAB	6,000	252	3,201	2,799	53%	799
STAFF CONFERENCE & TRAINING	4,400	90	90	4,310	2%	2,843
CONSULTING SERVICES	3,000	-	-	3,000	0%	2,000
TOTAL DIRECT EXPENSE:	**59,075**	**1,716**	**12,613**	**46,462**	**21%**	**26,770**
INDIRECT EXPENSES:						
SALARY EXPENSE (2.24 FTE) **	198,124	16,244	120,698	77,426	61%	11,384
BENEFITS EXPENSE	66,814	5,342	41,559	25,255	62%	2,983
OTHER INDIRECT EXPENSE	77,134	3,612	47,228	29,906	61%	4,195
TOTAL INDIRECT EXPENSES:	**342,071**	**25,198**	**209,485**	**132,586**	**61%**	**18,562**
TOTAL ALL EXPENSES:	**401,146**	**26,914**	**222,098**	**179,048**	**55%**	**45,333**
NET INCOME (LOSS):	**(266,146)**	**(26,914)**	**(87,098)**	**(179,048)**	**33%**	**90,333**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

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67% OF YEAR COMPLETE

ENTITY REGULATION

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
APPLICATION FEES	28,000	5,000	20,000	8,000	71%	1,333
ANNUAL FEES	47,500	-	-	47,500	0%	(31,667)
TOTAL REVENUE:	**75,500**	**5,000**	**20,000**	**55,500**	**26%**	**(30,333)**
DIRECT EXPENSES:						
STAFF CONFERENCE & TRAINING	4,400	-	1,551	2,849	35%	1,383
INVESTIGATION	9,600	-	-	9,600	0%	6,400
OUTREACH & COMMUNICATION	10,000	-	-	10,000	0%	6,667
SOFTWARE HOSTING	3,973	373	1,159	2,813	29%	1,489
TOTAL DIRECT EXPENSES:	**27,973**	**373**	**2,710**	**25,263**	**10%**	**15,939**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.55 FTE) **	77,471	6,684	53,125	24,346	69%	(1,478)
BENEFITS EXPENSE	18,673	1,672	13,108	5,566	70%	(659)
OTHER INDIRECT EXPENSE	18,939	892	10,984	7,955	58%	1,642
TOTAL INDIRECT EXPENSES:	**115,083**	**9,248**	**77,217**	**37,866**	**67%**	**(495)**
TOTAL ALL EXPENSES:	**143,055**	**9,621**	**79,926**	**63,129**	**56%**	**15,444**
NET INCOME (LOSS):	**(67,555)**	**(4,621)**	**(59,926)**	**(7,629)**	**89%**	**(14,890)**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

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	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
ETHICS, WELLNESS, & PRACTICE						
(MWP-PMA-PRP)						
REVENUE:						
DIVERSIONS	9,000	2,250	4,250	4,750	47%	(1,750)
ROYALTIES	62,000	29,102	68,452	(6,452)	110%	27,119
TOTAL REVENUE:	**71,000**	**31,352**	**72,702**	**(1,702)**	**102%**	**25,369**
DIRECT EXPENSES:						
STAFF MEMBERSHIP DUES	1,385	-	1,201	184	87%	(278)
MEMBER WELLNESS COUNCIL	4,500	1,433	1,850	2,650	41%	1,150
LEGAL TECH TASK FORCE	3,500	-	-	3,500	0%	2,333
STAFF TRAVEL/PARKING	7,700	-	2,391	5,309	31%	2,743
STAFF CONFERENCE & TRAINING	10,300	-	2,756	7,544	27%	4,111
SUBSCRIPTIONS	1,400	111	884	516	63%	50
CPE COMMITTEE	1,000	407	580	420	58%	87
VLEX FASTCASE	87,000	-	87,812	(812)	101%	(29,812)
TOTAL DIRECT EXPENSES:	**116,785**	**1,950**	**97,474**	**19,311**	**83%**	**(19,617)**
INDIRECT EXPENSES:						
SALARY EXPENSE (3.51 FTE)	385,777	33,411	262,790	122,987	68%	(5,605)
BENEFITS EXPENSE	105,599	9,338	73,622	31,977	70%	(3,223)
OTHER INDIRECT EXPENSE	120,866	5,666	69,815	51,051	58%	10,763
TOTAL INDIRECT EXPENSES:	**612,242**	**48,415**	**406,226**	**206,015**	**66%**	**1,935**
TOTAL ALL EXPENSES:	**729,027**	**50,364**	**503,700**	**225,326**	**69%**	**(17,682)**
NET INCOME (LOSS):	**(658,027)**	**(19,012)**	**(430,998)**	**(227,028)**	**65%**	**7,686**

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	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
FACILITIES & OPERATIONS						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	2,376	198	1,584	792	67%	-
STAFF CONFERENCE & TRAINING	-	10	10	(10)		(10)
STAFF MEMBERSHIP DUES	189	-	-	189	0%	126
TOTAL DIRECT EXPENSES:	**2,565**	**208**	**1,594**	**971**	**62%**	**116**
INDIRECT EXPENSES:						
SALARY EXPENSE (5.78 FTE)	406,195	36,199	290,727	115,468	72%	(19,930)
BENEFITS EXPENSE	141,474	12,846	102,314	39,160	72%	(7,998)
OTHER INDIRECT EXPENSE	199,033	9,327	114,901	84,132	58%	17,788
TOTAL INDIRECT EXPENSES:	**746,702**	**58,373**	**507,942**	**238,760**	**68%**	**(10,141)**
TOTAL ALL EXPENSES:	**749,267**	**58,581**	**509,536**	**239,731**	**68%**	**(10,025)**
NET INCOME (LOSS):	**(749,267)**	**(58,581)**	**(509,536)**	**(239,731)**	**68%**	**(10,025)**

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FINANCE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
INTEREST INCOME	600,000	83,772	495,347	104,653	83%	95,347
TOTAL REVENUE:	**600,000**	**83,772**	**495,347**	**104,653**	**83%**	**95,347**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	3,750	54	2,990	760	80%	(490)
STAFF CONFERENCE & TRAINING	500	-	-	500	0%	333
STAFF MEMBERSHIP DUES	670	-	230	440	34%	217
TOTAL DIRECT EXPENSES:	**4,920**	**54**	**3,220**	**1,700**	**65%**	**60**
INDIRECT EXPENSES:						
SALARY EXPENSE (6.92 FTE)	777,786	61,791	522,289	255,496	67%	(3,765)
BENEFITS EXPENSE	209,178	18,176	147,321	61,858	70%	(7,869)
OTHER INDIRECT EXPENSE	238,288	11,174	137,675	100,613	58%	21,184
TOTAL INDIRECT EXPENSES:	**1,225,253**	**91,141**	**807,285**	**417,968**	**66%**	**9,550**
TOTAL ALL EXPENSES:	**1,230,173**	**91,195**	**810,505**	**419,668**	**66%**	**9,610**
NET INCOME (LOSS):	**(630,173)**	**(7,424)**	**(315,158)**	**(315,015)**	**50%**	**104,957**

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	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
FOUNDATION						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
CONSULTING SERVICES	3,350	-	3,350	-	100%	(1,117)
PRINTING & COPYING	1,000	-	30	970	3%	637
STAFF TRAVEL/PARKING	4,000	207	312	3,688	8%	2,354
SUPPLIES	2,000	-	112	1,888	6%	1,221
BOARD OF TRUSTEES	3,600	150	250	3,350	7%	2,150
EQUIPMENT/HARDWARE/SOFTWARE	2,635	220	1,758	877	67%	(2)
POSTAGE	400	-	-	400	0%	267
STAFF CONFERENCE & TRAINING	2,200	-	69	2,131	3%	1,398
TOTAL DIRECT EXPENSES:	**19,185**	**577**	**5,882**	**13,303**	**31%**	**6,908**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.05 FTE)	108,755	9,828	75,554	33,201	69%	(3,051)
BENEFITS EXPENSE	30,528	2,744	21,306	9,223	70%	(954)
OTHER INDIRECT EXPENSE	36,156	1,693	20,852	15,305	58%	3,253
TOTAL INDIRECT EXPENSES:	**175,440**	**14,265**	**117,712**	**57,728**	**67%**	**(752)**
TOTAL ALL EXPENSES:	**194,625**	**14,842**	**123,594**	**71,032**	**64%**	**6,156**
NET INCOME (LOSS):	**(194,625)**	**(14,842)**	**(123,594)**	**(71,032)**	**64%**	**6,156**

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	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
HUMAN RESOURCES						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	300	-	114	186	38%	86
STAFF MEMBERSHIP DUES	1,200	-	852	348	71%	(52)
SUBSCRIPTIONS	2,000	-	1,192	808	60%	142
STAFF TRAINING- GENERAL	29,300	-	3,764	25,536	13%	15,769
RECRUITING AND ADVERTISING	8,750	60	1,913	6,837	22%	3,920
HR INFORMATION SYSTEM	65,950	4,294	44,517	21,433	68%	(550)
SALARY SURVEYS	3,000	-	934	2,066	31%	1,066
CONSULTING SERVICES	1,000	-	-	1,000	0%	667
STAFF CONFERENCE & TRAINING	4,200	-	2,895	1,305	69%	(95)
TRANSFER TO INDIRECT EXPENSE	(115,700)	(4,354)	(56,181)	(59,519)	49%	(20,952)
TOTAL DIRECT EXPENSES:	-	-	-	-		-
INDIRECT EXPENSES:						
SALARY EXPENSE (4.00 FTE)	504,229	32,020	283,658	220,571	56%	52,495
ALLOWANCE FOR OPEN POSITIONS	(200,000)	-	-	(200,000)	0%	(133,333)
BENEFITS EXPENSE	98,098	9,924	81,999	16,099	84%	(16,600)
OTHER INDIRECT EXPENSE	137,739	6,463	79,650	58,089	58%	12,176
TOTAL INDIRECT EXPENSES:	**540,066**	**48,407**	**445,307**	**94,759**	**82%**	**(85,263)**
TOTAL ALL EXPENSES:	**540,066**	**48,407**	**445,307**	**94,759**	**82%**	**(85,263)**
NET INCOME (LOSS):	**(540,066)**	**(48,407)**	**(445,307)**	**(94,759)**	**82%**	**(85,263)**

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

LAW CLERK PROGRAM

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
LAW CLERK FEES	220,000	1,000	259,333	(39,333)	118%	112,667
LAW CLERK APPLICATION FEES	4,000	200	4,700	(700)	118%	2,033
TOTAL REVENUE:	**224,000**	**1,200**	**264,033**	**(40,033)**	**118%**	**114,700**
DIRECT EXPENSES:						
SUBSCRIPTIONS	331	-	-	331	0%	221
DEPRECIATION	37,278	2,907	23,263	14,015	62%	1,589
CHARACTER & FITNESS INVESTIGATIONS	100	-	-	100	0%	67
LAW CLERK BOARD EXPENSE	9,000	-	5,238	3,762	58%	762
SOFTWARE HOSTING	700	95	696	4	99%	(230)
LAW CLERK OUTREACH	20,000	-	13,705	6,295	69%	(372)
TOTAL DIRECT EXPENSES:	**67,409**	**3,002**	**42,902**	**24,507**	**64%**	**2,037**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.18 FTE) **	104,845	8,599	67,939	36,905	65%	1,957
BENEFITS EXPENSE	31,938	2,835	22,263	9,675	70%	(971)
OTHER INDIRECT EXPENSE	40,633	1,901	23,397	17,236	58%	3,692
TOTAL INDIRECT EXPENSES:	**177,416**	**13,335**	**113,599**	**63,817**	**64%**	**4,678**
TOTAL ALL EXPENSES:	**244,825**	**16,337**	**156,501**	**88,324**	**64%**	**6,716**
NET INCOME (LOSS):	**(20,825)**	**(15,137)**	**107,532**	**(128,357)**	**-516%**	**121,416**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

LICENSING & MEMBERSHIP RECORDS

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
STATUS CERTIFICATE FEES	29,000	3,023	23,273	5,727	80%	3,939
INVESTIGATION FEES	25,000	2,400	14,180	10,820	57%	(2,487)
PRO HAC VICE	435,000	62,244	397,578	37,422	91%	107,578
MEMBER CONTACT INFORMATION	5,000	601	4,930	70	99%	1,597
PHOTO BAR CARD SALES	260	48	456	(196)	175%	283
TOTAL REVENUE:	**494,260**	**68,316**	**440,417**	**53,843**	**89%**	**110,910**
DIRECT EXPENSES:						
POSTAGE	4,000	2,966	5,110	(1,110)	128%	(2,443)
SOFTWARE HOSTING	18,380	2,464	17,985	395	98%	(5,732)
INVESTIGATION	300	-	-	300	0%	200
TOTAL DIRECT EXPENSES:	**22,680**	**5,430**	**23,095**	**(415)**	**102%**	**(7,975)**
INDIRECT EXPENSES:						
SALARY EXPENSE (4.78 FTE) **	503,843	40,135	338,221	165,622	67%	(2,325)
BENEFITS EXPENSE	139,284	12,302	97,339	41,945	70%	(4,483)
OTHER INDIRECT EXPENSE	164,598	7,724	95,166	69,433	58%	14,566
TOTAL INDIRECT EXPENSES:	**807,725**	**60,161**	**530,726**	**277,000**	**66%**	**7,758**
TOTAL ALL EXPENSES:	**830,405**	**65,591**	**553,821**	**276,585**	**67%**	**(217)**
NET INCOME (LOSS):	**(336,145)**	**2,725**	**(113,404)**	**(222,741)**	**34%**	**110,693**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
LIMITED LICENSE LEGAL TECHNICIAN PROGRAM						
REVENUE:						
LLLT LICENSE FEES	17,000	1,402	10,773	6,227	63%	(560)
LLLT LATE LICENSE FEES	137	30	571	(434)	417%	480
MCLE LATE FEES	150	-	600	(450)	400%	500
TOTAL REVENUE:	**17,287**	**1,432**	**11,944**	**5,343**	**69%**	**419**
DIRECT EXPENSES:						
LLLT BOARD	9,000	491	2,666	6,334	30%	3,334
LLLT EDUCATION	1,000	-	-	1,000	0%	667
TOTAL DIRECT EXPENSES:	**10,000**	**491**	**2,666**	**7,334**	**27%**	**4,001**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.43 FTE) **	41,479	2,259	26,544	14,935	64%	1,109
BENEFITS EXPENSE	12,046	1,000	8,282	3,764	69%	(251)
OTHER INDIRECT EXPENSE	14,807	689	8,472	6,335	57%	1,400
TOTAL INDIRECT EXPENSES:	**68,332**	**3,948**	**43,297**	**25,035**	**63%**	**2,257**
TOTAL ALL EXPENSES:	**78,332**	**4,439**	**45,963**	**32,369**	**59%**	**6,258**
NET INCOME (LOSS):	**(61,045)**	**(3,008)**	**(34,019)**	**(27,026)**	**56%**	**6,677**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

LIMITED PRACTICE OFFICERS

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
INVESTIGATION FEES	1,000	300	800	200	80%	133
MCLE LATE FEES	3,000	-	5,475	(2,475)	183%	3,475
LPO EXAMINATION FEES	18,000	-	11,900	6,100	66%	(100)
LPO LICENSE FEES	158,000	13,089	100,286	57,714	63%	(5,048)
LPO LATE LICENSE FEES	2,000	30	3,780	(1,780)	189%	2,447
TOTAL REVENUE:	**182,000**	**13,419**	**122,241**	**59,759**	**67%**	**907**
DIRECT EXPENSES:						
FACILITY, PARKING, FOOD	9,500	-	2,696	6,804	28%	3,637
EXAM WRITING	15,000	-	4,200	10,800	28%	5,800
LPO BOARD	4,000	163	430	3,570	11%	2,237
LPO OUTREACH	500	-	-	500	0%	333
PRINTING & COPYING	200	-	65	135	32%	69
SUPPLIES	100	-	-	100	0%	67
SOFTWARE HOSTING	3,404	382	2,785	619	82%	(515)
TOTAL DIRECT EXPENSES:	**32,704**	**544**	**10,175**	**22,529**	**31%**	**11,628**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.58 FTE) **	56,369	3,288	36,226	20,144	64%	1,354
BENEFITS EXPENSE	16,315	1,374	11,292	5,023	69%	(415)
OTHER INDIRECT EXPENSE	19,972	937	11,543	8,429	58%	1,772
TOTAL INDIRECT EXPENSES:	**92,656**	**5,599**	**59,060**	**33,596**	**64%**	**2,710**
TOTAL ALL EXPENSES:	**125,360**	**6,143**	**69,236**	**56,124**	**55%**	**14,338**
NET INCOME (LOSS):	**56,640**	**7,276**	**53,005**	**3,635**	**94%**	**15,245**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

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For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
LEGISLATIVE						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	2,500	-	157	2,343	6%	1,509
STAFF MEMBERSHIP DUES	215	-	-	215	0%	143
JUD RECOMMEND COMMITTEE	3,250	-	1,096	2,154	34%	1,071
SUBSCRIPTIONS	2,000	-	1,990	10	99%	(657)
TELEPHONE	575	50	397	178	69%	(13)
CONTRACT LOBBYIST	12,500	-	12,500	-	100%	(4,167)
LEGISLATIVE REVIEW COMMITTEE	1,250	-	-	1,250	0%	833
BOG LEGISLATIVE COMMITTEE	300	-	-	300	0%	200
STAFF CONFERENCE & TRAINING	2,200	-	248	1,952	11%	1,219
TOTAL DIRECT EXPENSES:	**24,790**	**50**	**16,387**	**8,403**	**66%**	**139**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.70 FTE)	164,492	7,481	95,737	68,755	58%	13,924
BENEFITS EXPENSE	47,770	3,342	31,551	16,219	66%	296
OTHER INDIRECT EXPENSE	58,539	2,743	33,791	24,748	58%	5,235
TOTAL INDIRECT EXPENSES:	**270,801**	**13,566**	**161,078**	**109,723**	**59%**	**19,456**
TOTAL ALL EXPENSES:	**295,591**	**13,616**	**177,466**	**118,125**	**60%**	**19,595**
NET INCOME (LOSS):	**(295,591)**	**(13,616)**	**(177,466)**	**(118,125)**	**60%**	**19,595**

Washington State Bar Association

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67% OF YEAR COMPLETE

MANDATORY CONTINUING LEGAL EDUCATION

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
ACTIVITY APPLICATION FEE	670,000	56,700	462,000	208,000	69%	15,333
ACTIVITY APPLICATION LATE FEE	250,000	22,400	175,050	74,950	70%	8,383
MCLE LATE FEES	232,000	19,050	283,975	(51,975)	122%	129,308
ANNUAL ACCREDITED SPONSOR FEES	36,250	-	35,750	500	99%	11,583
ATTENDANCE LATE FEES	120,000	11,250	76,300	43,700	64%	(3,700)
COMITY CERTIFICATES	30,000	625	28,475	1,525	95%	8,475
TOTAL REVENUE:	**1,338,250**	**110,025**	**1,061,550**	**276,700**	**79%**	**169,383**
DIRECT EXPENSES:						
DEPRECIATION	142,057	12,012	96,097	45,960	68%	(1,392)
STAFF MEMBERSHIP DUES	525	-	525	-	100%	(175)
MCLE BOARD EXPENSES	6,000	-	1,081	4,919	18%	2,919
STAFF TRAVEL/PARKING	50	-	-	50	0%	33
STAFF CONFERENCE & TRAINING	4,400	-	-	4,400	0%	2,933
TOTAL DIRECT EXPENSES:	**153,032**	**12,012**	**97,703**	**55,329**	**64%**	**4,318**
INDIRECT EXPENSES:						
SALARY EXPENSE (4.73 FTE)	407,360	29,565	288,519	118,841	71%	(16,945)
BENEFITS EXPENSE	124,032	11,048	88,329	35,703	71%	(5,641)
OTHER INDIRECT EXPENSE	162,876	7,634	94,049	68,828	58%	14,536
TOTAL INDIRECT EXPENSES:	**694,269**	**48,246**	**470,897**	**223,372**	**68%**	**(8,051)**
TOTAL ALL EXPENSES:	**847,301**	**60,258**	**568,600**	**278,701**	**67%**	**(3,733)**
NET INCOME (LOSS):	**490,949**	**49,767**	**492,950**	**(2,001)**	**100%**	**165,651**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

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67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
MEMBER SERVICES & ENGAGEMENT TEAM						
(LLB-MINI-MSE-NME)						
REVENUE:						
ROYALTIES	10,800	-	7,200	3,600	67%	-
NME PRODUCT SALES	120,000	3,862	98,519	21,481	82%	18,519
DIGITAL VIDEO SALES	25,000	931	23,030	1,970	92%	6,363
SPONSORSHIPS	11,500	2,000	11,000	500	96%	3,333
SEMINAR REGISTRATIONS	12,000	19	7,612	4,388	63%	(388)
TRIAL ADVOCACY PROGRAM	12,000	600	13,805	(1,805)	115%	5,805
TOTAL REVENUE:	**191,300**	**7,412**	**161,166**	**30,134**	**84%**	**33,633**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	3,500	41	89	3,411	3%	2,244
STAFF CONFERENCE & TRAINING	2,700	-	(25)	2,725	-1%	1,825
SMALL TOWN AND RURAL COMMITTEE	7,500	-	-	7,500	0%	5,000
PRINTING & COPYING	1,600	-	1,502	98	94%	(436)
DISABILITY ACCOMMODATIONS	2,000	-	-	2,000	0%	1,333
HONORARIUM	1,500	-	-	1,500	0%	1,000
SUBSCRIPTIONS	400	398	398	2	99%	(131)
NEW MEMBER LIAISON SECTION PROGRAM	1,300	-	565	735	43%	302
SMALL TOWN AND RURAL COMMITTEE OUTREACH AND ACTIVITIES	70,000	45,000	51,000	19,000	73%	(4,333)
ON24 OVERAGE CHARGE	4,500	-	4,422	78	98%	(1,422)
MEMBER ENGAGEMENT COUNCIL	500	-	-	500	0%	333
NEW MEMBER OUTREACH EVENTS	5,000	-	1,973	3,027	39%	1,361
SPEAKERS & PROGRAM DEVELOP	100	-	-	100	0%	67
WASHINGTON NEW MEMBERS COMMITTEE	15,000	701	9,282	5,718	62%	718
TRIAL ADVOCACY EXPENSES	3,200	622	2,473	727	77%	(340)
LAW LIBRARY DESKBOOK ACCESS	10,000	-	-	10,000	0%	6,667
LAW SCHOOL OUTREACH	500	-	66	434	13%	268
RECEPTION/FORUM EXPENSE	1,000	-	17	983	2%	649
STAFF MEMBERSHIP DUES	1,020	195	195	825	19%	485
LIBRARY MATERIALS/RESOURCES	4,000	25	335	3,665	8%	2,331
SPEAKERS & PROGRAM DEVELOPMENT	500	-	-	500	0%	333
AWARDS	1,000	-	72	928	7%	595
TOTAL DIRECT EXPENSES:	**136,820**	**46,981**	**72,365**	**64,455**	**53%**	**18,849**
INDIRECT EXPENSES:						
SALARY EXPENSE (4.73 FTE)	341,638	30,363	236,996	104,642	69%	(9,237)
BENEFITS EXPENSE	117,073	10,618	82,954	34,119	71%	(4,905)
OTHER INDIRECT EXPENSE	162,876	7,634	94,049	68,828	58%	14,536
TOTAL INDIRECT EXPENSES:	**621,588**	**48,615**	**413,999**	**207,589**	**67%**	**393**
TOTAL ALL EXPENSES:	**758,408**	**95,596**	**486,363**	**272,044**	**64%**	**19,242**
NET INCOME (LOSS):	**(567,108)**	**(88,184)**	**(325,197)**	**(241,910)**	**57%**	**52,874**

Washington State Bar Association

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67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
OFFICE OF THE EXECUTIVE DIRECTOR						
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
LEADERSHIP TRAINING	20,000	1,668	1,668	18,332	8%	11,665
WASHINGTON LEADERSHIP INSTITUTE	100,000	-	100,000	-	100%	(33,333)
ED TRAVEL & OUTREACH	6,000	358	3,434	2,566	57%	566
STAFF TRAVEL/PARKING	2,000	198	1,584	416	79%	(251)
STAFF CONFERENCE & TRAINING	13,300	442	9,826	3,474	74%	(959)
STAFF MEMBERSHIP DUES	1,335	175	1,120	215	84%	(230)
TOTAL DIRECT EXPENSES:	**142,635**	**2,841**	**117,632**	**25,003**	**82%**	**(22,542)**
INDIRECT EXPENSES:						
SALARY EXPENSE (4.23 FTE)	643,856	54,011	437,657	206,199	68%	(8,419)
BENEFITS EXPENSE	142,505	13,337	104,638	37,867	73%	(9,635)
OTHER INDIRECT EXPENSE	145,659	6,832	84,181	61,478	58%	12,925
TOTAL INDIRECT EXPENSES:	**932,020**	**74,180**	**626,476**	**305,544**	**67%**	**(5,129)**
TOTAL ALL EXPENSES:	**1,074,655**	**77,021**	**744,109**	**330,546**	**69%**	**(27,672)**
NET INCOME (LOSS):	**(1,074,655)**	**(77,021)**	**(744,109)**	**(330,546)**	**69%**	**(27,672)**

Washington State Bar Association

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67% OF YEAR COMPLETE

OFFICE OF GENERAL COUNSEL

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
RECOVERY OF DISCIPLINE COSTS	-	-	1,000	(1,000)		1,000
TOTAL REVENUE:	**-**	**-**	**1,000**	**(1,000)**		**-**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	3,500	1,011	2,625	875	75%	(291)
STAFF MEMBERSHIP DUES	2,500	-	2,004	497	80%	(337)
COURT RULES COMMITTEE	1,000	-	-	1,000	0%	667
CUSTODIANSHIPS	5,000	-	301	4,699	6%	3,032
WILLS	1,000	-	-	1,000	0%	667
LITIGATION EXPENSES	1,000	-	-	1,000	0%	667
DISABILITY ACCOMMODATIONS	2,500	53	495	2,005	20%	1,172
STAFF CONFERENCE & TRAINING	10,250	1,199	4,096	6,154	40%	2,737
TOTAL DIRECT EXPENSES:	**26,750**	**2,263**	**9,520**	**17,230**	**36%**	**8,314**
INDIRECT EXPENSES:						
SALARY EXPENSE (6.12 FTE)	718,300	56,995	456,834	261,465	64%	22,032
BENEFITS EXPENSE	187,732	16,392	128,356	59,376	68%	(3,201)
OTHER INDIRECT EXPENSE	210,741	9,891	121,881	88,860	58%	18,613
TOTAL INDIRECT EXPENSES:	**1,116,772**	**83,278**	**707,071**	**409,701**	**63%**	**37,444**
TOTAL ALL EXPENSES:	**1,143,522**	**85,541**	**716,591**	**426,932**	**63%**	**45,758**
NET INCOME (LOSS):	**(1,143,522)**	**(85,541)**	**(715,591)**	**(427,932)**	**63%**	**46,758**

Washington State Bar Association

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67% OF YEAR COMPLETE

OFFICE OF GENERAL COUNSEL - DISCIPLINARY BOARD

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSE:						
STAFF MEMBERSHIP DUES	100	-	-	100	0%	67
DISCIPLINARY BOARD EXPENSES	3,000	127	127	2,873	4%	1,873
CHIEF HEARING OFFICER	41,200	3,333	26,664	14,536	65%	803
COURT REPORTERS	33,100	10,282	37,310	(4,210)	113%	(15,243)
HEARING OFFICER EXPENSES	4,000	199	348	3,652	9%	2,319
HEARING OFFICER TRAINING	1,000	398	1,298	(298)	130%	(631)
APPOINTED COUNSEL	50,645	4,235	33,740	16,905	67%	23
DISCIPLINARY SELECTION PANEL	1,000	-	-	1,000	0%	667
STAFF CONFERENCE & TRAINING	2,200	-	-	2,200	0%	1,467
TOTAL DIRECT EXPENSES:	**136,245**	**18,573**	**99,486**	**36,759**	**73%**	**(8,656)**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.30 FTE)	128,774	11,146	89,730	39,044	70%	(3,881)
BENEFITS EXPENSE	37,003	3,354	26,302	10,702	71%	(1,633)
OTHER INDIRECT EXPENSE	44,765	2,103	25,909	18,856	58%	3,934
TOTAL INDIRECT EXPENSES:	**210,543**	**16,603**	**141,941**	**68,602**	**67%**	**(1,579)**
TOTAL ALL EXPENSES:	**346,788**	**35,177**	**241,427**	**105,361**	**70%**	**(10,235)**
NET INCOME (LOSS):	**(346,788)**	**(35,177)**	**(241,427)**	**(105,361)**	**70%**	**(10,235)**

Washington State Bar Association

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67% OF YEAR COMPLETE

PRACTICE OF LAW BOARD

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
PRACTICE OF LAW BOARD	16,000	232	1,265	14,735	8%	9,402
STAFF TRAVEL/PARKING	200	196	196	4	98%	(63)
TOTAL DIRECT EXPENSES:	**16,200**	**428**	**1,461**	**14,739**	**9%**	**9,339**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.55 FTE) **	63,145	4,045	41,451	21,694	66%	646
BENEFITS EXPENSE	16,771	1,424	11,651	5,120	69%	(471)
OTHER INDIRECT EXPENSE	18,939	892	10,984	7,955	58%	1,642
TOTAL INDIRECT EXPENSES:	**98,855**	**6,360**	**64,086**	**34,769**	**65%**	**1,817**
TOTAL ALL EXPENSES:	**115,055**	**6,788**	**65,547**	**49,508**	**57%**	**11,156**
NET INCOME (LOSS):	**(115,055)**	**(6,788)**	**(65,547)**	**(49,508)**	**57%**	**11,156**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
PUBLIC SERVICE PROGRAMS						
REVENUE:						
DONATIONS & GRANTS	132,635	-	132,639	(4)	100%	44,216
TOTAL REVENUE:	**132,635**	**-**	**132,639**	**(4)**	**100%**	**44,216**
DIRECT EXPENSES:						
DONATIONS/SPONSORSHIPS/GRANTS	-	-	(5,178)	5,178		5,178
STAFF TRAVEL/PARKING	2,000	-	66	1,934	3%	1,268
PRO BONO & PUBLIC SERVICE COMMITTEE	3,500	90	2,509	991	72%	(175)
STAFF CONFERENCE & TRAINING	3,200	-	669	2,531	21%	1,464
PRO BONO OUTREACH	4,000	-	-	4,000	0%	2,667
TOTAL DIRECT EXPENSES:	**12,700**	**90**	**(1,934)**	**14,634**	**-15%**	**10,401**
INDIRECT EXPENSES:						
SALARY EXPENSE (2.10 FTE) **	187,614	15,475	113,600	74,014	61%	11,476
BENEFITS EXPENSE	50,197	5,032	36,749	13,449	73%	(3,284)
OTHER INDIRECT EXPENSE	72,313	3,382	38,770	33,543	54%	9,439
TOTAL INDIRECT EXPENSES:	**310,124**	**23,889**	**189,118**	**121,006**	**61%**	**17,631**
TOTAL ALL EXPENSES:	**322,824**	**23,979**	**187,184**	**135,640**	**58%**	**28,032**
NET INCOME (LOSS):	**(190,189)**	**(23,979)**	**(54,545)**	**(135,644)**	**29%**	**72,248**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

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For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

PUBLICATION & DESIGN SERVICES

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
SUBSCRIPTIONS	200	-	-	200	0%	133
IMAGE LIBRARY	4,800	-	4,756	44	99%	(1,556)
TOTAL DIRECT EXPENSES:	**5,000**	**-**	**4,756**	**244**	**95%**	**(1,423)**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.89 FTE)	70,644	5,878	47,857	22,786	68%	(762)
BENEFITS EXPENSE	22,914	2,055	16,193	6,721	71%	(917)
OTHER INDIRECT EXPENSE	30,647	1,441	17,749	12,898	58%	2,682
TOTAL INDIRECT EXPENSES:	**124,205**	**9,374**	**81,799**	**42,406**	**66%**	**1,004**
TOTAL ALL EXPENSES:	**129,205**	**9,374**	**86,555**	**42,650**	**67%**	**(419)**
NET INCOME (LOSS):	**(129,205)**	**(9,374)**	**(86,555)**	**(42,650)**	**67%**	**(419)**

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

REGULATORY SERVICES FTE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
STAFF MEMBERSHIP DUES	490	-	490	-	100%	(163)
STAFF CONFERENCE & TRAINING	11,500	-	734	10,766	6%	6,932
STAFF TRAVEL/PARKING	600	18	180	420	30%	220
TOTAL DIRECT EXPENSES:	**12,590**	**18**	**1,404**	**11,186**	**11%**	**7,152**
INDIRECT EXPENSES:						
SALARY EXPENSE (2.00 FTE) **	288,255	22,536	186,018	102,237	65%	6,152
BENEFITS EXPENSE	68,347	5,926	46,790	21,557	68%	(1,226)
OTHER INDIRECT EXPENSE	68,870	3,225	39,718	29,152	58%	6,195
TOTAL INDIRECT EXPENSES:	**425,472**	**31,686**	**272,526**	**152,946**	**64%**	**11,122**
TOTAL ALL EXPENSES:	**438,062**	**31,704**	**273,930**	**164,131**	**63%**	**18,274**
NET INCOME (LOSS):	**(438,062)**	**(31,704)**	**(273,930)**	**(164,131)**	**63%**	**18,111**

**Budget reallocations apply to this line item. For details, see FY26 Budget Reallocations memo(s) included in the Board of Governors meeting materials.

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

REGULATORY REFORM

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
CONSULTING SERVICES	25,000	-	8,828	16,172	35%	7,839
OUTREACH EXPENSES	10,000	-	-	10,000	0%	6,667
MEETING EXPENSE	2,000	-	-	2,000	0%	1,333
SOFTWARE HOSTING	20,000	-	-	20,000	0%	13,333
TOTAL DIRECT EXPENSES:	**57,000**	**-**	**8,828**	**48,172**	**15%**	**-**
INDIRECT EXPENSES:						
SALARY EXPENSE (0.85 FTE) **	110,346	9,439	76,413	33,933	69%	(2,849)
BENEFITS EXPENSE	27,639	2,492	19,390	8,249	70%	(964)
OTHER INDIRECT EXPENSE	29,270	1,369	16,879	12,390	58%	2,634
TOTAL INDIRECT EXPENSES:	**167,255**	**13,301**	**112,682**	**54,572**	**67%**	**(1,179)**
TOTAL ALL EXPENSES:	**224,255**	**13,301**	**121,510**	**102,744**	**54%**	**(1,179)**
NET INCOME (LOSS):	**(224,255)**	**(13,301)**	**(121,510)**	**(102,744)**	**54%**	**27,993**

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Washington State Bar Association

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For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
SECTIONS ADMINISTRATION						
REVENUE:						
REIMBURSEMENTS FROM SECTIONS	275,000	2,063	393,947	(118,947)	143%	210,613
TOTAL REVENUE:	**275,000**	**2,063**	**393,947**	**(118,947)**	**143%**	**210,613**
DIRECT EXPENSES:						
STAFF TRAVEL/PARKING	1,900	-	336	1,564	18%	931
SECTION/COMMITTEE CHAIR MTGS	500	-	148	352	30%	186
TOTAL DIRECT EXPENSES:	**2,400**	**-**	**484**	**1,916**	**20%**	**1,116**
INDIRECT EXPENSES:						
SALARY EXPENSE (2.53 FTE)	174,309	15,289	119,597	54,712	69%	(3,391)
BENEFITS EXPENSE	61,514	5,580	43,436	18,079	71%	(2,426)
OTHER INDIRECT EXPENSE	87,120	4,090	50,391	36,729	58%	7,689
TOTAL INDIRECT EXPENSES:	**322,943**	**24,958**	**213,423**	**109,520**	**66%**	**1,872**
TOTAL ALL EXPENSES:	**325,343**	**24,958**	**213,907**	**111,436**	**66%**	**2,988**
NET INCOME (LOSS):	**(50,343)**	**(22,896)**	**180,040**	**(230,383)**	**-358%**	**213,602**

Washington State Bar Association

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For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
SECTIONS OPERATIONS						
REVENUE:						
SECTION DUES	451,143	3,339	634,963	(183,820)	141%	334,201
SEMINAR PROFIT SHARE	157,850	-	1,498	156,352	1%	(103,735)
PUBLICATIONS REVENUE	1,250	-	322	928	26%	(511)
OTHER	43,073	1,785	31,290	11,783	73%	2,575
TOTAL REVENUE:	**653,316**	**5,124**	**668,073**	**(14,757)**	**102%**	**232,529**
DIRECT EXPENSES:						
DIRECT EXPENSES OF SECTION ACTIVITIES	810,582	98,846	260,164	550,418	32%	280,224
REIMBURSEMENT TO WSBA FOR INDIRECT EXPENSES	280,540	2,063	393,947	(113,407)	140%	(206,920)
TOTAL DIRECT EXPENSES:	**1,091,122**	**100,909**	**654,110**	**437,011**	**60%**	**73,304**
NET INCOME (LOSS):	**(437,806)**	**(95,785)**	**13,963**	**(451,768)**	**-3%**	**305,833**

Washington State Bar Association

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For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

TECHNOLOGY

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
CONSULTING SERVICES	1,019,797	53,839	465,443	554,354	46%	214,421
STAFF TRAVEL/PARKING	1,000	13	301	699	30%	366
STAFF MEMBERSHIP DUES	410	-	-	410	0%	273
TELEPHONE	90,000	6,808	60,676	29,324	67%	(676)
COMPUTER HARDWARE	65,000	884	44,309	20,691	68%	(975)
COMPUTER SOFTWARE	518,000	489	294,036	223,964	57%	51,297
HARDWARE SERVICE & WARRANTIES	50,000	1,967	16,380	33,620	33%	16,953
SOFTWARE MAINTENANCE & LICENSING	470,000	819	414,733	55,267	88%	(101,400)
THIRD PARTY SERVICES	177,600	866	114,397	63,203	64%	4,003
CLOUD INFRASTRUCTURE	130,000	5,486	36,643	93,357	28%	50,024
STAFF CONFERENCE & TRAINING	6,000	-	-	6,000	0%	4,000
TRANSFER TO INDIRECT EXPENSES	(2,527,807)	(71,172)	(1,446,918)	(1,080,889)	57%	(238,286)
TOTAL DIRECT EXPENSES:	-	-	-	-		-
INDIRECT EXPENSES:						
SALARY EXPENSE (5.00 FTE)	629,276	71,227	497,486	131,790	79%	(77,968)
BENEFITS EXPENSE	158,341	16,518	121,707	36,634	77%	(16,146)
CAPITAL LABOR & OVERHEAD	-	-	(23,920)	23,920		(23,920)
OTHER INDIRECT EXPENSE	172,174	8,067	99,385	72,788	58%	15,397
TOTAL INDIRECT EXPENSES:	**959,791**	**95,812**	**694,659**	**265,132**	**72%**	**(102,637)**
TOTAL ALL EXPENSES:	**959,791**	**95,812**	**694,659**	**265,132**	**72%**	**(102,637)**
NET INCOME (LOSS):	**(959,791)**	**(95,812)**	**(694,659)**	**(265,132)**	**72%**	**(54,798)**

Washington State Bar Association

Statement of Activities

For the Period from May 01, 2026 to May 31, 2026

67% OF YEAR COMPLETE

VOLUNTEER ENGAGEMENT

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
REVENUE:						
TOTAL REVENUE:	-	-	-	-		-
DIRECT EXPENSES:						
POSTAGE	600	-	-	600	0%	400
STAFF MEMBERSHIP DUES	385	-	424	(39)	110%	(167)
STAFF CONFERENCE & TRAINING	4,500	-	1,653	2,847	37%	1,347
SUBSCRIPTIONS	816	-	744	72	91%	(200)
VOLUNTEER RECOGNITION	2,000	-	660	1,340	33%	673
REGULATORY SCHOOL	10,000	-	5,310	4,690	53%	1,357
ABA DELEGATES	18,000	-	6,876	11,124	38%	5,124
TOTAL DIRECT EXPENSES:	**36,301**	**-**	**15,668**	**20,633**	**43%**	**8,533**
INDIRECT EXPENSES:						
SALARY EXPENSE (1.70 FTE)	149,220	12,463	99,445	49,775	67%	35
BENEFITS EXPENSE	45,777	4,072	32,158	13,619	70%	(1,640)
OTHER INDIRECT EXPENSE	58,539	2,739	33,759	24,781	58%	5,267
TOTAL INDIRECT EXPENSES:	**253,536**	**19,274**	**165,362**	**88,174**	**65%**	**3,662**
TOTAL ALL EXPENSES:	**289,837**	**19,274**	**181,030**	**108,807**	**62%**	**3,662**
NET INCOME (LOSS):	**(289,837)**	**(19,274)**	**(181,030)**	**(108,807)**	**62%**	**12,195**

Washington State Bar Association

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For the Period from May 01, 2026 to May 31, 2026
67% OF YEAR COMPLETE

	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE	% USED OF BUDGET	YEAR TO DATE VARIANCE FAVORABLE/(UNFAVORABLE)
INDIRECT EXPENSES:						
SALARIES	14,130,725	1,178,748	9,455,559	4,675,166	67%	(35,075)
TEMPORARY SALARIES	212,850	15,231	121,909	90,941	57%	19,991
CAPITAL LABOR & OVERHEAD	-	-	(23,920)	23,920		23,920
ALLOWANCE FOR OPEN POSITIONS	(200,000)	-	-	(200,000)	0%	(133,333)
EMPLOYEE ASSISTANCE PLAN	4,800	-	2,400	2,400	50%	800
EMPLOYEE SERVICE AWARDS	2,260	200	698	1,562	31%	809
FICA (EMPLOYER PORTION)	1,067,890	88,286	699,342	368,548	65%	12,584
L&I INSURANCE	65,406	-	29,051	36,355	44%	14,553
WA STATE FAMILY MEDICAL LEAVE (EMPLOYER PO	38,961	3,798	27,991	10,970	72%	(2,017)
MEDICAL (EMPLOYER PORTION)	1,959,293	194,774	1,472,741	486,552	75%	(166,545)
RETIREMENT (EMPLOYER PORTION)	778,534	64,027	517,861	260,673	67%	1,161
TRANSPORTATION ALLOWANCE	25,944	252	26,713	(769)	103%	(9,417)
UNEMPLOYMENT INSURANCE	73,419	8,959	55,605	17,814	76%	(6,659)
TOTAL SALARY & BENEFITS EXPENSE:	**18,160,082**	**1,554,274**	**12,385,951**	**5,774,131**	**68%**	**(279,229)**
WORKPLACE BENEFITS	60,150	2,469	15,583	44,567	26%	24,517
HUMAN RESOURCES POOLED EXP	115,700	4,354	56,181	59,519	49%	20,952
MEETING SUPPORT EXPENSES	9,950	1,945	6,128	3,822	62%	505
RENT	923,055	72,565	641,560	281,495	70%	(26,190)
PERSONAL PROP TAXES-WSBA	6,500	514	4,428	2,072	68%	(94)
FURNITURE, MAINT, LH IMP	48,450	1,157	20,003	28,447	41%	12,297
SAFETY & SECURITY	10,420	371	1,424	8,996	14%	5,522
OFFICE SUPPLIES & EQUIPMENT	19,635	1,822	10,449	9,186	53%	2,641
FURN, LH IMP, & OFFICE EQUIP DEPRECIATION	224,084	18,570	148,621	75,463	66%	768
COMPUTER HARDWARE DEPRECIATION	47,971	4,792	35,120	12,851	73%	(3,139)
COMPUTER SOFTWARE DEPRECIATION	36,319	2,606	26,401	9,918	73%	(2,188)
INSURANCE	273,491	22,171	177,369	96,122	65%	4,958
WORK HOME FURNITURE & EQUIP	10,500	661	2,462	8,038	23%	4,538
PROFESSIONAL FEES-AUDIT	43,500	-	41,695	1,805	96%	(12,695)
PROFESSIONAL FEES-LEGAL	250,000	-	37,969	212,031	15%	128,697
ONLINE LEGAL RESEARCH	89,000	12,432	58,246	30,754	65%	1,087
ACCOMODATIONS FUND	6,500	-	-	6,500	0%	4,333
TRANSLATION SERVICES	25,000	3,084	10,232	14,768	41%	6,434
TELEPHONE & INTERNET	33,600	2,670	21,530	12,070	64%	870
POSTAGE - GENERAL	12,000	562	5,384	6,616	45%	2,616
RECORDS MANAGEMENT	7,500	-	-	7,500	0%	5,000
BANK FEES	27,000	1,475	18,186	8,814	67%	(186)
PRODUCTION MAINTENANCE & SUPPLIES	13,250	-	6,580	6,670	50%	2,254
COMPUTER POOLED EXPENSES	2,527,807	71,103	1,446,412	1,081,395	57%	238,792
TOTAL OTHER INDIRECT EXPENSES:	**4,821,383**	**225,325**	**2,791,966**	**2,029,417**	**58%**	**422,290**
TOTAL INDIRECT EXPENSES:	**22,981,465**	**1,779,600**	**15,177,916**	**7,803,549**	**66%**	**143,060**

Washington State Bar Association

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67% OF YEAR COMPLETE

SUMMARY PAGE	FISCAL 2026 BUDGET	CURRENT MONTH	YEAR TO DATE	REMAINING BALANCE
ACCESS TO JUSTICE	(369,448)	(28,061)	(198,973)	(170,475)
ADMISSIONS/BAR EXAM	(70,382)	42,223	696,238	(766,621)
ADVANCEMENT FTE	(322,209)	(25,211)	(210,363)	(111,846)
BAR NEWS	(184,871)	(14,579)	(83,411)	(101,460)
BENCH BAR PRESS	-	600	(175)	175
BOARD OF GOVERNORS	(656,550)	(65,086)	(387,956)	(268,594)
CONFERENCE & BROADCAST SERVICES	(83,138)	(6,327)	(55,059)	(28,078)
CHARACTER & FITNESS BOARD	(183,031)	(12,428)	(117,572)	(65,459)
CLE - PRODUCTS	651,708	5,233	458,460	193,248
CLE - SEMINARS	(521,923)	29,135	(355,008)	(166,915)
CLIENT PROTECTION FUND	244,100	(11,571)	699,264	(455,164)
COMMUNICATIONS	(927,116)	(111,874)	(597,304)	(329,811)
COMMUNICATIONS FTE	(257,458)	(20,409)	(172,988)	(84,470)
DESKBOOKS	(261,267)	3,402	(174,278)	(86,989)
DISCIPLINE	(6,714,684)	(504,280)	(4,306,397)	(2,408,288)
DIVERSITY	(266,146)	(26,914)	(87,098)	(179,048)
ENTITY REGULATION	(67,555)	(4,621)	(59,926)	(7,629)
FACILITIES & OPERATIONS	(749,267)	(58,581)	(509,536)	(239,731)
FINANCE	(630,173)	(7,424)	(315,158)	(315,015)
FOUNDATION	(194,625)	(14,842)	(123,594)	(71,032)
HUMAN RESOURCES	(540,066)	(48,407)	(445,307)	(94,759)
LAW CLERK PROGRAM	(20,825)	(15,137)	107,532	(128,357)
LEGISLATIVE	(295,591)	(13,616)	(177,466)	(118,125)
LEGAL LUNCHBOX	(34,025)	(3,636)	(11,842)	(22,183)
LICENSE FEES	17,652,266	1,495,314	11,967,761	5,684,505
LICENSING AND MEMBERSHIP	(336,145)	2,725	(113,404)	(222,741)
LIMITED LICENSE LEGAL TECHNICIAN	(61,045)	(3,008)	(34,019)	(27,026)
LIMITED PRACTICE OFFICERS	56,640	7,276	53,005	3,635
MANDATORY CLE ADMINISTRATION	490,949	49,767	492,950	(2,001)
MEMBER WELLNESS PROGRAM	(247,030)	(19,179)	(163,722)	(83,308)
MINI CLE	(134,341)	(10,258)	(88,211)	(46,130)
MEMBER SERVICES & ENGAGEMENT	(418,764)	(69,121)	(264,661)	(154,102)
NEW MEMBER EDUCATION	20,022	(5,169)	39,516	(19,495)
OFFICE OF GENERAL COUNSEL	(1,143,522)	(85,541)	(715,591)	(427,932)
OFFICE OF THE EXECUTIVE DIRECTOR	(1,074,655)	(77,021)	(744,109)	(330,546)
OGC-DISCIPLINARY BOARD	(346,788)	(35,177)	(241,427)	(105,361)
PRACTICE OF LAW BOARD	(115,055)	(6,788)	(65,547)	(49,508)
PRACTICE MANAGEMENT ASSISTANCE	(186,220)	17,472	(124,223)	(61,997)
PROFESSIONAL RESPONSIBILITY PROGRAM	(224,777)	(17,305)	(143,053)	(81,723)
PUBLIC SERVICE PROGRAMS	(190,189)	(23,979)	(54,545)	(135,644)
PUBLICATION & DESIGN SERVICES	(129,205)	(9,374)	(86,555)	(42,650)
REGULATORY SERVICES FTE	(438,062)	(31,704)	(273,930)	(164,131)
REGULATORY REFORM	(224,255)	(13,301)	(121,510)	(102,744)
SECTIONS ADMINISTRATION	(50,343)	(22,896)	180,040	(230,383)
SECTIONS OPERATIONS	(437,806)	(95,785)	13,963	(451,768)
TECHNOLOGY	(959,791)	(95,812)	(694,659)	(265,132)
VOLUNTEER EDUCATION	(289,837)	(19,274)	(181,030)	(108,807)
INDIRECT EXPENSES	22,981,465	1,779,600	15,177,916	7,803,549
TOTAL OF ALL	**(21,738,972)**	**(1,799,050)**	**(17,387,040)**	**(4,351,932)**
NET INCOME (LOSS)	**(1,242,493)**	**19,450**	**2,209,124**	**(3,451,617)**

WASHINGTON STATE
BAR ASSOCIATION

WSBA MISSION

The Washington State Bar Association's mission is to serve the public and the members of the Bar, to ensure the integrity of the legal profession, and to champion justice.

WSBA GUIDING PRINCIPLES

The WSBA will operate a well-managed association that supports its members and advances and promotes:

- **Access to the justice system.**
  Focus: Provide training and leverage community partnerships in order to enhance a culture of service for legal professionals to give back to their communities, with a particular focus on services to underserved low and moderate income people.
- **Diversity, equality, and cultural understanding throughout the legal community.**
  Focus: Work to understand the lay of the land of our legal community and provide tools to members and employers in order to enhance the retention of minority legal professionals in our community.
- **The public's understanding of the rule of law and its confidence in the legal system.**
  Focus: Educate youth and adult audiences about the importance of the three branches of government and how they work together.
- **A fair and impartial judiciary.**
- **The ethics, civility, professionalism, and competence of the Bar.**

MISSION FOCUS AREAS

Ensuring Competent and Qualified Legal Professionals

- Cradle to Grave
- Regulation and Assistance

Promoting the Role of Legal Professionals in Society

- Service
- Professionalism

PROGRAM CRITERIA

- Does the Program further either or both of WSBA's mission-focus areas?
- Does WSBA have the competency to operate the Program?
- As the mandatory bar, how is WSBA uniquely positioned to successfully operate the Program?
- Is statewide leadership required in order to achieve the mission of the Program?
- Does the Program's design optimize the expenditure of WSBA resources devoted to the Program, including the balance between volunteer and staff involvement, the number of people served, the cost per person, etc?

2016 – 2018 STRATEGIC GOALS

- **Equip members with skills for the changing profession**
- **Promote equitable conditions for members from historically marginalized or underrepresented backgrounds to enter, stay and thrive in the profession**
- **Explore and pursue regulatory innovation and advocate to enhance the public's access to legal services**

GR 12
REGULATION OF THE PRACTICE OF LAW

The Washington Supreme Court has inherent and plenary authority to regulate the practice of law in Washington. The legal profession serves clients, courts, and the public, and has special responsibilities for the quality of justice administered in our legal system. The Court ensures the integrity of the legal profession and protects the public by adopting rules for the regulation of the practice of law and actively supervising persons and entities acting under the Supreme Court's authority.

[Adopted effective September 1, 2017.]

GR 12.1
REGULATORY OBJECTIVES

Legal services providers must be regulated in the public interest. In regulating the practice of law in Washington, the Washington Supreme Court's objectives include: protection of the public; advancement of the administration of justice and the rule of law; meaningful access to justice and information about the law, legal issues, and the civil and criminal justice systems;

(a) transparency regarding the nature and scope of legal services To be provided, the credentials of those who provide them, and the availability of regulatory protections;

(b) delivery of affordable and accessible legal services;

(c) efficient, competent, and ethical delivery of legal services;

(d) protection of privileged and confidential information;

(e) independence of professional judgment;

(f) Accessible civil remedies for negligence and breach of other duties owed, disciplinary sanctions for misconduct, and advancement of appropriate preventive or wellness programs;

(g) Diversity and inclusion among legal services providers and freedom from discrimination for those receiving legal services and in the justice system.

[Adopted effective September 1, 2017.]

GR 12.2
WASHINGTON STATE BAR ASSOCIATION: PURPOSES, AUTHORIZED ACTIVITIES, AND PROHIBITED ACTIVITIES

In the exercise of its inherent and plenary authority to regulate the practice of law in Washington, the Supreme Court authorizes and supervises the Washington State Bar Association's activities. The Washington State Bar Association carries out the administrative responsibilities and functions expressly delegated to it by this rule and other Supreme Court rules and orders enacted or adopted to regulate the practice of law, including the purposes and authorized activities set forth below.

(a) Purposes: In General. In general, the Washington State Bar Association strives to:

(1) Promote independence of the judiciary and the legal profession.

(2) Promote an effective legal system, accessible to all.

(3) Provide services to its members and the public.

(4) Foster and maintain high standards of competence, professionalism, and ethics among its members.

(5) Foster collegiality among its members and goodwill between the legal profession and the public.

(6) Promote diversity and equality in the courts and the legal profession.

(7) Administer admission, regulation, and discipline of its members in a manner that protects the public and respects the rights of the applicant or member.

(8) Administer programs of legal education.

(9) Promote understanding of and respect for our legal system and the law.

(10) Operate a well-managed and financially sound association, with a positive work environment for its employees.

(11) Serve as a statewide voice to the public and to the branches of government on matters relating to these purposes and the activities of the association and the legal profession.

(b) Specific Activities Authorized. In pursuit of these purposes, the Washington State Bar Association may:

(1) Sponsor and maintain committees and sections, whose activities further these purposes;

(2) Support the judiciary in maintaining the integrity and fiscal stability of an independent and effective judicial system;

(3) Provide periodic reviews and recommendations concerning court rules and procedures;

(4) Administer examinations and review applicants' character and fitness to practice law;

(5) Inform and advise its members regarding their ethical obligations;

(6) Administer an effective system of discipline of its members, including receiving and investigating complaints of misconduct by legal professionals, taking and recommending appropriate punitive and remedial measures, and diverting less serious misconduct to alternatives outside the formal discipline system;

(7) Maintain a program, pursuant to court rule, requiring members to submit fee disputes to arbitration;

(8) Maintain a program for mediation of disputes between members and others;

(9) Maintain a program for legal professional practice assistance;

(10) Sponsor, conduct, and assist in producing programs and products of continuing legal education;

(11) Maintain a system for accrediting programs of continuing legal education;

(12) Conduct examinations of legal professionals' trust accounts;

(13) Maintain a fund for client protection in accordance with the Admission and Practice Rules;

(14) Maintain a program for the aid and rehabilitation of impaired members;

(15) Disseminate information about the organization's activities, interests, and positions;

(16) Monitor, report on, and advise public officials about matters of interest to the organization and the legal profession;

(17) Maintain a legislative presence to inform members of new and proposed laws and to inform public officials about the organization's positions and concerns;

(18) Encourage public service by members and support programs providing legal services to those in need;

(19) Maintain and foster programs of public information and education about the law and the legal system;

(20) Provide, sponsor, and participate in services to its members;

(21) Hire and retain employees to facilitate and support its mission, purposes, and activities, including in the organization's discretion, authorizing collective bargaining;

(22) Establish the amount of all license, application, investigation, and other related fees, as well as charges for services provided by the Washington State Bar Association, and collect, allocate, invest, and disburse funds so that its mission, purposes, and activities may be effectively and efficiently discharged. The amount of any license fee is subject to review by the Supreme Court for reasonableness and may be modified by order of the Court if the Court determines that it is not reasonable;

(23) Administer Supreme-Court-created boards in accordance with General Rule 12.3.

(c) Activities Not Authorized. The Washington State Bar Association will not:

(1)) Take positions on issues concerning the politics or social positions of foreign nations;

(2)) Take positions on political or social issues which do not relate to or affect the practice of law or the administration of justice; or

(3) Support or oppose, in an election, candidates for public office.

[Adopted effective July 17, 1987; amended effective December 10, 1993; September 1, 1997; September 1, 2007; September 1, 2013; September 1, 2017.]

GR 12.3
WASHINGTON STATE BAR ASSOCIATION ADMINISTRATION OF SUPREME COURT-CREATED BOARDS AND COMMITTEES

The Supreme Court has delegated to the Washington State Bar Association the authority and responsibility to administer certain boards and committees established by court rule or order. This delegation of authority includes providing and managing staff, overseeing the boards and committees to monitor their compliance with the rules and orders that authorize and regulate them, paying expenses reasonably and necessarily incurred pursuant to a budget approved by the Board of Governors, performing other functions and taking other actions as provided in court rule or order or delegated by the Supreme Court, or taking other actions as are necessary and proper to enable the board or committee to carry out its duties or functions.

[Adopted effective September 1, 2007; amended effective September 1, 2017.]

GR 12.4
WASHINGTON STATE BAR ASSOCIATION ACCESS TO RECORDS

(a) Policy and Purpose. It is the policy of the Washington State Bar Association to facilitate access to Bar records. A presumption of public access exists for Bar records, but public access to Bar records is not absolute and shall be consistent with reasonable expectations of personal privacy, restrictions in statutes, restrictions in court rules, or as provided in court orders or protective orders issued under court rules. Access shall not unduly burden the business of the Bar.

(b) Scope. This rule governs the right of public access to Bar records. This rule applies to the Washington State Bar Association and its subgroups operated by the Bar including the Board of Governors, committees, task forces, commissions, boards, offices, councils, divisions, sections, and departments. This rule also applies to boards and committees under GR 12.3 administered by the Bar. A person or entity entrusted by the
Bar with the storage and maintenance of Bar records is not subject to this rule and may not respond to a request for access to Bar records, absent express written authority from the Bar or separate authority in rule or statute to grant access to the documents.

(c) Definitions.

(1)) "Access" means the ability to view or obtain a copy of a Bar record.

(2)) "Bar record" means any writing containing information relating to the conduct of any Bar function prepared, owned, used, or retained by the Bar regardless of physical form or characteristics. Bar records include only those records in the possession of the Bar and its staff or stored under Bar ownership and control in facilities or servers. Records solely in the possession of hearing officers, non-Bar staff members of boards, committees, task forces, commissions, sections, councils, or divisions that were prepared by the hearing officers or the members and in their sole possession, including private notes and working papers, are not Bar records and are not subject to public access under this rule. Nothing in this rule requires the Bar to create a record that is not currently in possession of the Bar at the time of the request.

(3) "Writing" means handwriting, typewriting, printing, photostating, photographing, and every other means of recording any form of communication or representation in paper, digital, or other format.

(d) Bar Records--Right of Access.

(1) The Bar shall make available for inspection and copying all Bar records, unless the record falls within the specific exemptions of this rule, or any other state statute (including the Public Records Act, chapter 42.56 RCW) or federal statute or rule as they would be applied to a public agency, or is made confidential by the Rules of Professional Conduct, the Rules for Enforcement of Lawyer Conduct, the Admission to Practice Rules and associated regulations, the Rules for Enforcement of Limited Practice Officer Conduct, General Rule 25, court orders or protective orders issued under those rules, or any other state or federal statute or rule. To the extent required to prevent an unreasonable invasion of personal privacy interests or threat to safety or by the above-referenced rules, statutes, or orders, the Bar shall delete identifying details in a manner consistent with those rules, statutes, or orders when it makes available or publishes any Bar record; however, in each case, the justification for the deletion shall be explained in writing.

(2) In addition to exemptions referenced above, the following categories of Bar records are exempt from public access except as may expressly be made public by court rule:

(A) Records of the personnel committee, and personal information in Bar records for employees, appointees, members, or volunteers of the Bar to the extent that disclosure would violate their right to privacy, including home contact information (unless such information is their address of record), Social Security numbers, driver's license numbers, identification or security photographs held in Bar records, and personal data including ethnicity, race, disability status, gender, and sexual orientation. Membership class and status, bar number, dates of admission or licensing, addresses of record, and business telephone
numbers, facsimile numbers, and electronic mail addresses (unless there has been a request that electronic mail addresses not be made public) shall not be exempt, provided that any such information shall be exempt if the Executive Director approves the confidentiality of that information for reasons of personal security or other compelling reason, which approval must be reviewed annually.

(B) Specific information and records regarding

(i) internal policies, guidelines, procedures, or techniques, the disclosure of which would reasonably be expected to compromise the conduct of disciplinary or regulatory functions, investigations, or examinations;

(ii) application, investigation, and hearing or proceeding records relating to lawyer, Limited Practice Officer, or Limited License Legal Technician admissions, licensing, or discipline, or that relate to the work of ELC 2.5 hearing officers, the Board of Bar Examiners, the Character and Fitness Board, the Law Clerk
Board, the Limited Practice Board, the MCLE Board, the Limited License Legal Technician Board, the Practice of Law Board, or the Disciplinary Board in conducting investigations, hearings or proceedings; and

(iii) the work of the Judicial Recommendation Committee and the Hearing Officer selection panel, unless such records are expressly categorized as public information by court rule.

(C) Valuable formulae, designs, drawings, computer source code or object code, and research data created or obtained by the Bar.

(D) Information regarding the infrastructure, integrity, and security of computer and telecommunication networks, databases, and systems.

(E) Applications for licensure by the Bar and annual licensing forms and related records, including applications for license fee hardship waivers and any decision or determinations on the hardship waiver applications.

(F) Requests by members for ethics opinions to the extent that they contain information identifying the member or a party to the inquiry.

Information covered by exemptions will be redacted from the specific records sought. Statistical information not descriptive of any readily identifiable person or persons may be disclosed.

(3) Persons Who Are Subjects of Records.

(A) Unless otherwise required or prohibited by law, the Bar has the option to give notice of any records request to any member or third party whose records would be included in the Bar's response.

(B) Any person who is named in a record, or to whom a record specifically pertains, may present information opposing the disclosure to the applicable decision maker.

(C) If the Bar decides to allow access to a requested record, a person who is named in that record, or to whom the records specifically pertains, has a right to initiate review or to participate as a party to any review initiated by a requester. The deadlines that apply to a requester apply as well to a person who is a subject of a record.

(e) Bar Records--Procedures for Access.

(1) General Procedures. The Bar Executive Director shall appoint a Bar staff member to serve as the public records officer to whom all records requests shall be submitted. Records requests must be in writing and delivered to the Bar public records officer, who shall respond to such requests within 30 days of receipt. The Washington State Bar Association must implement this rule and adopt and publish on its website the public records officer's work mailing address, telephone number, fax number, and e-mail address, and the procedures and fee schedules for accepting and responding to records requests by the effective date of this rule. The Bar shall acknowledge receipt of the request within 14 days of receipt, and shall communicate with the requester as necessary to clarify any ambiguities as to the records being requested. Records requests shall not be directed to other Bar staff or to volunteers serving on boards, committees, task forces, commissions, sections, councils, or divisions.

(2) Charging of Fees.

(A) A fee may not be charged to view Bar records.

(B) A fee may be charged for the photocopying or scanning of Bar records according to the fee schedule established by the Bar and published on its web site.

(C) A fee not to exceed $30 per hour may be charged for research services required to fulfill a request taking longer than one hour. The fee shall be assessed from the second hour onward.

(f) Extraordinary Requests Limited by Resource Constraints. If a particular request is of a magnitude or burden on resources that the Bar cannot fully comply within 30 days due to constraints on time, resources, and personnel, the Bar shall communicate this information to the requester along with a good faith estimate of the time needed to complete the Bar's response. The Bar must attempt to reach

agreement with the requester as to narrowing the request to a more manageable scope and as to a timeframe for the Bar's response, which may include a schedule of installment responses. If the Bar and requester are unable to reach agreement, the Bar shall respond to the extent practicable, clarify how and why the response differs from the request, and inform the requester that it has completed its response.

(g) Denials. Denials must be in writing and shall identify the applicable exemptions or other bases for denial as well as a written summary of the procedures under which the requesting party may seek further review.

(h) Review of Records Decisions.

(1) Internal Review. A person who objects to a record decision or other action by the Bar's public records officer may request review by the Bar's Executive Director.

(A) A record requester's petition for internal review must be submitted within 90 days of the Bar's public records officer's decision, on such form as the Bar shall designate and make available.

(B) The review proceeding is informal, summary, and on the record.

(C) The review proceeding shall be held within five working days. If that is not reasonably possible, then within five working days the review shall be scheduled for the earliest practical date.

(2) External Review. A person who objects to a records review decision by the Bar's Executive Director may request review by the Records Request Appeals Officer (RRAO) for the Bar.

(A) The requesting party's request for review of the Executive Director's decision must be deposited in the mail and postmarked or delivered to the Bar not later than 30 days after the issuance of the decision, and must be on such form as the Bar shall designate and make available.

(B)) The review will be informal and summary, but in the sole discretion of the RRAO may include the submission of briefs no more than 20 pages long and of oral arguments no more than 15 minutes long.

(C) Decisions of the RRAO are final unless, within 30 days of the issuance of the decision, a request for discretionary review of the decision is filed with the Supreme Court. If review is granted, review is conducted by the Chief Justice of the Washington Supreme Court or his or her designee in accordance with procedures established by the Supreme Court. A designee of the Chief Justice shall be a current or former elected judge. The review proceeding shall be on the record, without additional briefing or argument unless such is ordered by the Chief Justice or his or her designee.

(D) The RRAO shall be appointed by the Board of Governors. The Bar may reimburse the RRAO for all necessary and reasonable expenses incurred in the completion of these duties, and may provide compensation for the time necessary for these reviews at a level established by the Board of Governors.

(i) Monetary Awards Not Allowed. Attorney fees, costs, civil penalties, or fines may not be awarded under this rule.

(j) Effective Date of Rule.

(1) This rule goes into effect on July 1, 2014, and applies to records that are created on or after that date.

(2) Public access to records that are created before that date are to be analyzed according to other court rules, applicable statutes, and the common law balancing test; the Public Records Act, chapter 42.56 RCW, does not apply to such Bar records, but it may be used for nonbinding guidance.

[Adopted effective July 1, 2014; amended effective September 1, 2017.]

GR 12.5
IMMUNITY

All boards, committees, or other entities, and their members and personnel, and all personnel and employees of the Washington State Bar Association, acting on behalf of the Supreme Court under the Admission and Practice Rules, the Rules for Enforcement of Lawyer Conduct, or the disciplinary rules for limited practice officers and limited license legal technicians, shall enjoy quasi-judicial immunity if the Supreme Court would have immunity in performing the same functions.

[Adopted effective January 2, 2008; amended effective September 1, 2017.]

WASHINGTON STATE
BAR ASSOCIATION

2025-2026 WSBA BOARD OF GOVERNORS MEETING SCHEDULE

MEETING DATE	LOCATION	DESCRIPTION	EXECUTIVE COMMITTEE MEETING	MATERIALS DEADLINE
October 24-25, 2025	Icicle Village Resort Leavenworth, WA	Team Building Retreat		n/a
November 14-15, 2025	WSBA Conference Center Seattle, WA	BOG Meeting	October 22, 2025	October 14, 2025
January 16-17, 2026	WSBA Conference Center Seattle, WA	BOG Meeting KCBA MLK Luncheon Jan. 16	December 18, 2025	December 9, 2025
March 6-7, 2026	Great Wolf Lodge, Grand Mound, WA	BOG Meeting	February 19, 2026	February 10, 2026
May 1-2, 2026	Wenatchee Convention Center Wenatchee, WA	BOG Meeting	April 16, 2026	April 7, 2026
July 23 - 24, 2026 July 25, 2026	Tulalip Resort Casino Marysville, WA	BOG Meeting BOG Planning Retreat	June 25, 2026	June 15, 2026
September 24-25, 2026	Davenport Grand Hotel Spokane, WA	BOG Meeting	September 3, 2026	August 25, 2026

All proposed agenda items and materials must be submitted by the deadline stated above. Materials can be submitted through 1) a staff liaison, 2) staff supervisor or department director, 3) staff member identified by the Office of the Executive Director or, if none of those are applicable, 4) directly to the Executive Director (terran@wsba.org). Submitters will be notified of the status of their request after the materials deadline. All meeting materials will be published appx. two weeks prior to the meeting.

Materials should include: 1) a cover memo, 2) additional/supplemental materials, 3) be inclusive of all WSBA analyses, if relevant and, 4) be in final form suitable for publication. Click here for more information.

BASIC CHARACTERISTICS OF MOTIONS

From: ***The Complete Idiot's Guide to Robert's Rules***
The Guerilla Guide to Robert's Rules

MOTION	PURPOSE	INTERRUPT SPEAKER?	SECOND NEEDED?	DEBATABLE?	AMENDABLE?	VOTE NEEDED
1. Fix the time to which to adjourn	Sets the time for a continued meeting	No	Yes	No[1]	Yes	Majority
2. Adjourn	Closes the meeting	No	Yes	No	No	Majority
3. Recess	Establishes a brief break	No	Yes	No[2]	Yes	Majority
4. Raise a Question of Privilege	Asks urgent question regarding to rights	Yes	No	No	No	Rules by Chair
5. Call for orders of the day	Requires that the meeting follow the agenda	Yes	No	No	No	One member
6. Lay on the table	Puts the motion aside for later consideration	No	Yes	No	No	Majority
7. Previous question	Ends debate and moves directly to the vote	No	Yes	No	No	Two-thirds
8. Limit or extend limits of debate	Changes the debate limits	No	Yes	No	Yes	Two-thirds
9. Postpone to a certain time	Puts off the motion to a specific time	No	Yes	Yes	Yes	Majority[3]
10. Commit or refer	Refers the motion to a committee	No	Yes	Yes	Yes	Majority
11. Amend an amendment (secondary amendment)	Proposes a change to an amendments	No	Yes	Yes[4]	No	Majority
12. Amend a motion or resolution (primary amendment)	Proposes a change to a main motion	No	Yes	Yes[4]	Yes	Majority
13. Postpone indefinitely	Kills the motion	No	Yes	Yes	No	Majority
14. Main motion	Brings business before the assembly	No	Yes	Yes	Yes	Majority

1 Is debatable when another meeting is scheduled for the same or next day, or if the motion is made while no question Is pending

2 Unless no question is pending

3 Majority, unless it makes question a special order

4 If the motion it is being applied to is debatable

Discussion Protocols
Board of Governors Meetings

Philosophical Statement:

"We take serious our representational responsibilities and will try to inform ourselves on the subject matter before us by contact with constituents, stakeholders, WSBA staff and committees when possible and appropriate. In all deliberations and actions we will be courageous and keep in mind the need to represent and lead our membership and safeguard the public. In our actions, we will be mindful of both the call to action and the constraints placed upon the WSBA by GR 12 and other standards."

Governor's Commitments:

1. Tackle the problems presented; don't make up new ones.
2. Keep perspective on long-term goals.
3. Actively listen to understand the issues and perspective of others before making the final decision or lobbying for an absolute.
4. Respect the speaker, the input and the Board's decision.
5. Collect your thoughts and speak to the point – sparingly!
6. Foster interpersonal relationships between Board members outside Board events.
7. Listen and be courteous to speakers.
8. Speak only if you can shed light on the subject, don't be repetitive.
9. Consider, respect and trust committee work but exercise the Board's obligation to establish policy and insure that the committee work is consistent with that policy and the Board's responsibility to the WSBA's mission.
10. Seek the best decision through quality discussion and ample time (listen, don't make assumptions, avoid sidebars, speak frankly, allow time before and during meetings to discuss important matters).
11. Don't repeat points already made.
12. Everyone should have a chance to weigh in on discussion topics before persons are given a second opportunity.
13. No governor should commit the board to actions, opinions, or projects without consultation with the whole Board.
14. Use caution with e-mail: it can be a useful tool for debating, but e-mail is not confidential and does not easily involve all interests.
15. Maintain the strict confidentiality of executive session discussions and matters.

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BOARD OF GOVERNORS

WSBA VALUES

Through a collaborative process, the WSBA Board of Governors and Staff have identified these core values that shall be considered by the Board, Staff, and WSBA volunteers (collectively, the "WSBA Community") in all that we do.

To serve the public and our members and to promote justice, the WSBA Community values the following:

- Trust and respect between and among Board, Staff, Volunteers, Members, and the public
- Open and effective communication
- Individual responsibility, initiative, and creativity
- Teamwork and cooperation
- Ethical and moral principles
- Quality customer-service, with member and public focus
- Confidentiality, where required
- Diversity and inclusion
- Organizational history, knowledge, and context
- Open exchanges of information

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BOARD OF GOVERNORS

GUIDING COMMUNICATION PRINCIPLES

In each communication, I will assume the good intent of my fellow colleagues; earnestly and actively listen; encourage the expression of and seek to affirm the value of their differing perspectives, even where I may disagree; share my ideas and thoughts with compassion, clarity, and where appropriate confidentiality; and commit myself to the unwavering recognition, appreciation, and celebration of the humanity, skills, and talents that each of my fellow colleagues bring in the spirt and effort to work for the mission of the WSBA. Therefore, I commit myself to operating with the following norms:

- I will treat each person with courtesy and respect, valuing each individual.
- I will strive to be nonjudgmental, open-minded, and receptive to the ideas of others.
- I will assume the good intent of others.
- I will speak in ways that encourage others to speak.
- I will respect others' time, workload, and priorities.
- I will aspire to be honest and open in all communications.
- I will aim for clarity; be complete, yet concise.
- I will practice "active" listening and ask questions if I don't understand.
- I will use the appropriate communication method (face-to-face, email, phone, voicemail) for the message and situation.
- When dealing with material of a sensitive or confidential nature, I will seek and confirm that there is mutual agreement to the ground rules of confidentiality at the outset of the communication.
- I will avoid triangulation and go directly to the person with whom I need to communicate. (If there is a problem, I will go to the source for resolution rather than discussing it with or complaining to others.)
- I will focus on reaching understanding and finding solutions to problems.
- I will be mindful of information that affects, or might be of interest or value to, others, and pass it along; err on the side of over-communication.
- I will maintain a sense of perspective and respectful humor.

BOARD OF GOVERNORS

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- When dealing with material of a sensitive or confidential nature, I will seek and confirm that there is mutual agreement to the ground rules of confidentiality at the outset of the communication.
- I will avoid triangulation and go directly to the person with whom I need to communicate. (If there is a problem, I will go to the source for resolution rather than discussing it with or complaining to others.)
- I will focus on reaching understanding and finding solutions to problems.
- I will be mindful of information that affects, or might be of interest or value to, others, and pass it along; err on the side of over-communication.
- I will maintain a sense of perspective and respectful humor.

BOARD OF GOVERNORS

Anthony David Gipe
President

phone: 206.386.4721
e-mail: adgipeWSBA@gmail.com

November 2014

BEST PRACTICES AND EXPECTATIONS

- **Attributes of the Board**
  - Competence
  - Respect
  - Trust
  - Commitment
  - Humor

- **Accountability by Individual Governors**
  - Assume Good Intent
  - Participation/Preparation
  - Communication
  - Relevancy and Reporting

- **Team of Professionals**
  - Foster an atmosphere of teamwork
    - Between Board Members
    - The Board with the Officers
    - The Board and Officers with the Staff
    - The Board, Officers, and Staff with the Volunteers
  - We all have common loyalty to the success of WSBA

- **Work Hard and Have Fun Doing It**

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- **Work Hard and Have Fun Doing It**

WASHINGTON STATE
BAR ASSOCIATION

TO: WSBA Board of Governors

CC: Terra Nevitt, Executive Director

FROM: Renata Garcia, Chief Regulatory Counsel

DATE: June 15, 2026, updated June 30, 2026

RE: New License Type pursuant to United States Servicemember Civil Relief Act

---

ACTION: Approve suggested amendments to the APR for submission to the Washington Supreme Court establishing a new lawyer license type to comply with the United States Servicemember Civil Relief Act.

Background

The United States Congress enacted the Servicemembers Civil Relief Act (SCRA) to "provide for, strengthen, and expedite the national defense" by enabling servicemembers "to devote their entire energy to the defense needs of the Nation." *See* U.S.C. § 3902(1). In 2023, Congress expanded the SCRA to allow "servicemembers and their spouses to use their professional licenses and certificates when they relocate due to military orders, in certain circumstances." *See* 50 U.S.C. § 4025a. Law licenses were excluded until December 2024, when Congress amended § 4025a. to remove the prior exclusion of law licenses. In keeping with the spirit of the Servicemembers Civil Relief Act, Washington should issue a license to a U.S. servicemember or servicemember's spouse who has an active license to practice law in another jurisdiction when the servicemember relocates to Washington for active duty.

Suggested New Rule APR 8(g)

Our proposal is to establish a new time-limited lawyer license type for servicemembers and their spouses who qualify under the SCRA. This license is designed to facilitate rapid authorization to practice in Washington, consistent with the SCRA's expectation that a license be recognized within 30 days of the application. Because the traditional admission process can take several months due to third-party background checks, the SCRA provides a streamlined pathway with fewer pre-admission requirements and no third-party background investigation, resulting in lower investigation fees for the servicemember or spouse. The applicant will be required to submit a notarized affidavit, attesting that their lawyer license in another jurisdiction qualifies as a "covered license" as defined in the SCRA and to other statements provided for under the SCRA. *See* 50 U.S.C. § 4025a(c)(3) & (f)(1). The WSBA will still carry out its internal character and fitness review.

Lawyers who obtain the new SCRA license will have no restrictions on their scope of practice as a lawyer and will be required to comply with the same licensing requirements as an active lawyer member except for compliance with MCLE requirements. They must maintain an active lawyer license in another U.S. jurisdiction and comply with all requirements imposed by that jurisdiction to remain in active status. The license will expire six months after the servicemember leaves active duty in Washington or the lawyer spouse is no longer married to the servicemember. The six-month period allows the lawyer time to adjust to the change in circumstance, whether that involves finalizing or transferring current client matters, finishing a school year for a child, applying to be a member of the WSBA, or managing other transition needs.

Repeal APR 3(c)(2) Military Spouse Admission by Motion
Expedited admission by motion for military spouses was introduced to assist lawyers relocating to Washington with their servicemember spouses. This rule was adopted at a time when the SCRA did not apply to law licenses. Because the SCRA now applies to law licenses and covers both the servicemember and the spouse, there will no longer be a need for a separate military spouse admission rule. Since adoption of the rule in 2019, only 22 licenses have been issued.

Although military spouse admission by motion currently results in admission as a member of the WSBA, key requirements were not included in order to assist the military family. The current rule does not have an "active legal experience" requirement nor does it require a third-party background investigation—both of which are required for general admission by motion. Out-of-state lawyers seeking admission as a member of the WSBA should have the same requirements as any other applicant for admission. Therefore, this rule should be repealed upon adoption of the SCRA license.

Information for Fiscal Analysis
We do not expect an increase in revenue from this proposal as demand for the license is based on military relocation orders and even without the proposal they would likely seek admission anyway. There may be some minor expenses related to creating an application for the online admission site.

Information for Equity Analysis

- This proposal reduces barriers or hardships placed on military families when relocating to Washington due to military orders; allowing the lawyer spouse to be able to secure employment without delay and saving the expense of a third-party background check.
- Provides the lawyer with freedom to choose either a temporary license or admission as a WSBA member.

WSBA RISK ANALYSIS: *This section is to be completed by the Office of General Counsel, with input from the proposing entity or individual.*

The risk analysis is in the BOG's confidential materials.

WSBA FISCAL ANALYSIS: *This section is to be completed by the Finance Department, with input from the proposing entity or individual.*

The fiscal impact to WSBA resulting from the proposed criteria is limited but applies to both revenue and expense. Revenue may be generated through the establishment of the new license type. WSBA's existing fee structures will be applied to any applications and licenses issued. Under current rules, U.S. service members and their spouses who have an active license to practice law who wish to be licensed in Washington must pay an application fee, and if approved, a license fee under the existing process and requirements. As described above, the new license type would be expedited and have slightly different requirements to obtain the license. Therefore, it's possible we may have some increase in the number of people licensed than under the existing rules, which would result in additional revenue. In terms of expenses, the impact includes the cost of staff time used to draft rule change language, incorporate the changes into relevant records and systems, and communicate the criteria to

stakeholders. The staff time that would be allocated to this work is included in the overall duties of existing WSBA staff and does not require additional staff or allocation of resources from other internal sources.

WSBA EQUITY ANALYSIS: *This section is to be completed by the Equity and Justice Team, with input from the proposing entity or individual.*

The purpose of the equity analysis is to understand how entities incorporated an equity lens into proposed action items presented to the Board of Governors. Applying an equity lens includes 1) identifying and centering people and communities most impacted decisions and/or 2) meeting people and communities according to their specific needs to produce fair and equal outcomes for all.

The proposed action has two main parts that are analyzed separately below:

1. The first part of this action will develop a new rule that will allow time-limited license types for U.S. servicemembers and servicemember spouses. This creates a streamlined authorization to practice law in Washington that recognizes the unique circumstances and needs of active duty servicemembers and their spouses.
2. The second part will repeal the existing rule related to admission by motion for military spouses. Very few people (only 22) have been admitted in this way, and it is unclear whether they were engaged in this process. However, in theory the new license type proposed in part 1 of this action will encompass servicemember spouses. Approved alongside the new rule, these changes will allow this group greater freedom of choice to pursue the license type that works for their personal circumstances, while also reducing inconsistencies in requirements for admission by motion that can help strengthen fairness and clarity in process.

Attachments

1. Suggested New Rule APR 8(g) – Markup Copy
2. Suggested Amendments to APR 3(c) – Markup Copy
3. Servicemembers Civil Relief Act, 50 USC § 4025a.

SUGGESTED NEW RULE 8(g) OF THE ADMISSION AND PRACTICE RULES

ADMISSION AND PRACTICE RULES

RULE 8. NON-MEMBER LAWYER LICENSES TO PRACTICE LAW

(a) – (f) [Unchanged.]

(g) Exception under Servicemembers Civil Relief Act. A lawyer admitted to the practice of law in another state or territory of the United States or the District of Columbia who is an active duty servicemember of the United States Uniformed Services as defined by the United States Department of Defense, or who is the spouse of an active duty servicemember of the United States Uniformed Services, may apply to the Bar for a license to practice law on a temporary basis in this state when the lawyer or the lawyer's spouse relocates residence or will relocate residence because the servicemember received military orders for military service in Washington.

(1) The lawyer shall apply by:

(A) filing an application in the form and manner that may be prescribed by the Bar;

(B) paying the application fees required of lawyer applicants for admission under APR 3;

(C) submitting proof of the servicemember's military orders for military service in Washington;

(D) submitting a copy of the marriage certificate if the applicant is the servicemember's spouse; and

(E) submitting a notarized affidavit affirming, under penalty of perjury, that:

(i) the applicant is the person described and identified in the application;

(ii) all statements made in the application are true and correct and complete;

(iii) the applicant has read and understands the requirements to receive a license in Washington and the scope of practice;

(iv) the applicant meets and will comply with all requirements of the license being applied for in Washington;

Washington State Bar Association
1325 4th Ave Ste 600
Seattle, WA 98101-2539

(v) the applicant is in good standing in all states or territories of the United States or the District of Columbia in which the applicant holds or has held a license to practice law; and

(vi) the applicant has no lawyer disciplinary sanctions and no pending lawyer disciplinary or incapacity matters, investigations, or grievances in any United States jurisdiction in which the applicant has been licensed to practice law.

(2) Upon approval of the application by the Bar, the lawyer shall take the Oath of Attorney, pay the current year's annual license fee and any mandatory assessments in the full amount required of active lawyer members. The Bar shall transmit its recommendation to the Supreme Court which may enter an order granting the lawyer a license to practice law under this section.

(3) A lawyer licensed under this section shall pay to the Bar an annual license fee in the full amount required of active lawyer members and any mandatory assessments required of active lawyer members of the Bar but shall not be a member of the Bar.

(4) The practice of a lawyer licensed under this section shall be subject to the Rules of Professional Conduct, the Rules for Enforcement of Lawyer Conduct, and to all other laws and rules governing lawyers admitted to the active practice of law in this state, except for the requirements of APR 11 relating to mandatory continuing legal education. Jurisdiction shall continue whether or not the lawyer retains the license and irrespective of the residence of the lawyer.

(5) The lawyer shall promptly report to the Bar a change in the servicemember's active duty status in Washington, a change in marital status if the lawyer is the servicemember's spouse, a change in admission or license status in any jurisdiction where the applicant has been admitted to the practice of law, or the commencement of any formal disciplinary proceeding in any jurisdiction where the applicant has been admitted to the practice of law.

SUGGESTED NEW RULE 8(g) OF THE ADMISSION AND PRACTICE RULES

(6) The license granted under this section shall be terminated by the Supreme Court six months after the date when:

(A) the servicemember is no longer on active duty in Washington, or

(B) the lawyer is no longer married to the servicemember if the lawyer is the servicemember's spouse.

(7) The license granted under this section shall be terminated by the Supreme Court when:

(A) the lawyer fails to comply with the terms of this rule,

(B) the lawyer fails to maintain an active license in good standing in at least one other jurisdiction in the United States where the lawyer has been admitted to the practice of law, or

(C) on suspension or disbarment for discipline in any jurisdiction where the lawyer has been admitted to the practice of law.

(8) The license shall be automatically terminated if the lawyer is admitted to the practice of law as a member of the Bar pursuant to APR 3.

Washington State Bar Association
1325 4th Ave Ste 600
Seattle, WA 98101-2539

CLIENT PROTECTION FUND

Trustees' Annual Report: Fiscal Year 2025

LAWYERS' INDEMNITY FUND, EST. 1960 | CLIENT PROTECTION FUND, EST. 1994

WASHINGTON STATE BAR ASSOCIATION
1325 Fourth Avenue, Suite 600, Seattle, WA 98101-2539
206.727.8200 | www.wsba.org

PURPOSE OF THE CLIENT PROTECTION FUND

"The purpose of this rule is to create a Client Protection Fund, to be maintained and administered as a trust by the Washington State Bar Association (WSBA), in order to promote public confidence in the administration of justice and the integrity of the legal profession. [...] Funds accruing and appropriated to the Fund may be used for the purpose of relieving or mitigating a pecuniary loss sustained by any person by reason of the dishonesty of, or failure to account for money or property entrusted to, any member of the WSBA as a result of or directly related to the member's practice of law (as defined in GR 24), or while acting as a fiduciary in a matter directly related to the member's practice of law. Such funds may also, through the Fund, be used to relieve or mitigate like losses sustained by persons by reason of similar acts of an individual who was at one time a member of the WSBA but who was at the time of the act complained of under a court ordered suspension."

Admission and Practice Rules 15(a) and (b).

FY 2025 TRUSTEES

WSBA Board of Governors (2024-2025)

Sunitha Anjilvel, *President*	Redmond
Daniel Clark, *Past President*	Yakima
Francis Adewale	Spokane
Tom Ahearne	Seattle
Todd Bloom	Port Orchard
Jordan Couch	University Place
Matthew Dresden	Seattle
Kevin Fay	Bellevue
Kristina Larry	Tukwila
Nam Nguyen	Olympia
Kari Petrasek	Mukilteo
Mary Rathbone	Ephrata
Alain Villeneuve	Seattle
Parvin Price	Bothell
Allison Widney	Oklahoma
Emily Arneson	

FY 2025 CLIENT PROTECTION BOARD

Carrie Umland, *Chair*	University Place
Joanne Abelson	Mercer Island
Luis Beltrán	Tacoma
Andrew Benjamin	Seattle
Mackenzie Bretz	Bothell
Carla Higginson	Friday Harbor
Efrem Krisher	Bellevue
Dana Laverty	Covington
Sarah Moen	Seattle
Mark Stiefel	Kirkland
Ruthanna Walker	Renton
Brandon West	Spokane
Kathy Yue	Newcastle

WSBA STAFF TO CLIENT PROTECTION BOARD

Nicole Gustine	Assistant General Counsel; CPF Liaison/Secretary
Brenda Jackson	CPF Specialist

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and Sept. 30, 2025, Fund Balance Sheet (Audited) 20

SECTION I

History and Establishment of the Client Protection Fund

Washington is fortunate to have a history of maintaining a stable Client Protection Fund (CPF) that is strongly supported by the Washington Supreme Court and the Washington State Bar Association (WSBA). Washington was one of the first states to establish what was then called a Lawyers' Indemnity Fund in 1960. Since that time, WSBA members have compensated victims of the few dishonest members who have misappropriated or failed to account for client funds or property.

The current CPF was established by the Washington Supreme Court in 1994 at the request of the WSBA by the adoption of **Rule 15** of the Admission to Practice Rules (APR), now called the Admission and Practice Rules. Prior to the adoption of that rule, the WSBA had voluntarily maintained a clients' security or indemnity fund out of the Bar's general fund. Similar funds are maintained in every jurisdiction in the United States, as well as Canada, Australia, New Zealand, and other countries.

The CPF helps accomplish important goals shared by the Court and the WSBA — client protection, public confidence in the administration of justice, and maintaining the integrity of the legal profession. Under APR 15, CPF payments are gifts, not entitlements. An annual assessment paid by certain Washington licensees finances all CPF gifts. Gifts are not financed by public funds.

On January 4, 2024, the Court approved the WSBA Board of Governor's (BOG) recommendation to increase the CPF assessment for the 2025 calendar year from $15 to $20. On July 17, 2025, the Court approved the BOG's recommendation to maintain the CPF assessment for the 2026 calendar year at $20.

Currently, WSBA lawyers on active status, lawyers with pro hac vice admissions, in-house counsel, house counsel, foreign law consultants, and Limited Licensed Legal Technicians (LLLTs) pay an annual assessment to the Fund. The following chart shows key statistical trends from the past 10 years.

CLIENT PROTECTION FUND APPLICATIONS 2016-2025

FISCAL YEAR	NO. OF MEMBERS	NO. OF MEMBERS WITH APPROVED APPLICATIONS*	NO. OF APPLICATIONS RECEIVED	NO. OF APPLICATIONS APPROVED	GIFTS APPROVED
2016	32,969	16	56	44	$253,228
2017	33,357	19	72	47	$439,273
2018	33,858	18	119	46	$926,434
2019	34,388	18	61	48	$419,488
2020	34,905	16	57	33	$586,266
2021	34,839	18	107	29	$491,737
2022	33,121	13	49	33	$587,815
2023	33,383	14	41	42	$342,424
2024	33,600	13	165	25	$436,328
2025	33,920	7	94	37	$412,963

* **NOTE:** *Through Dec. 31, 2018, only lawyers on Active status, pro hac vice, in-house counsel, house counsel, and foreign law consultants paid the assessment. Effective Jan. 1, 2019, Limited Licensed Legal Technicians (LLLTs), also paid the assessment.*

SECTION II

Fund Procedures

The CPF is governed by **Admission and Practice Rule (APR) 15** and **CPF (APR 15) Procedural Regulations** adopted by the Board of Governors and approved by the Supreme Court.

> **Administration:** The members of the Board of Governors of the WSBA serve as Trustees of the Fund. The Trustees appoint and oversee the Board, comprised of 11 lawyers and two community representatives. The Board is authorized to consider all CPF applications, make gift recommendations to the Trustees, submit an annual report on Board activities to the Trustees, and make such other reports and publicize Board activities as the Court or the Trustees may deem advisable. Two WSBA staff members help to ensure the smooth functioning of the Board's work. WSBA Client Protection Fund Specialist Brenda Jackson performs a wide variety of tasks to help members of the public and the Board in processing and analyzing CPF applications. WSBA Assistant General Counsel Nicole Gustine acts as staff liaison, provides legal advice, and serves as Secretary to the Board.

> **Application:** Clients of WSBA members that allege a dishonest taking of, or failure to account for, funds or property by a WSBA member, in connection with that member's practice of law, can apply for a gift from the CPF. To be eligible, clients must file a disciplinary grievance against the member, unless the member has resigned in lieu of discipline, been disbarred, or is deceased. Because most applications involve members who are the subject of disciplinary grievances and proceedings, action on Fund applications normally awaits resolution of the disciplinary process.[1] This means that most applicants wait for the discipline process to be complete before the Board reviews their application. To increase efficiency, application review takes place in the order that an applicant filed their grievance (if applicable). Otherwise, an application is processed and reviewed in the order of receipt.

> **Eligibility:** To be eligible for payment, an applicant must show by a clear preponderance of the evidence that they suffered a loss of money or property through the dishonest acts of, or failure to account, by a WSBA member. Dishonesty includes, in addition to theft, embezzlement, and conversion, the refusal to return unearned fees as required by Rule 1.16 of the Rules of Professional Conduct.

> ***The Fund is not available to compensate for member malpractice or professional negligence. It also cannot compensate for loan, investment, or other business transactions unrelated to the member's practice of law.***

When an application is received, it is initially reviewed to determine whether it appears eligible for recovery from the Fund. If the application is ineligible on its face, the applicant is advised of the reasons for its ineligibility. If the application passes the initial intake process and appears potentially eligible for payment, Fund staff investigates the application. When the application is ripe for consideration by the Board, staff prepare a report and recommendation.

> **Board and Trustee Review:** On applications for less than $25,000, or where the recommendation for payment is less than $25,000, the Board's decision is final. Board recommendations on applications where the applicant seeks more than $25,000, or where the Board recommends payment of more than $25,000 or involving payment of more than $25,000 be

CONTINUED >

1. APR 15 Regulation 6(h). In addition, Rule 3.4(i) of the Rules for Enforcement of Lawyer Conduct provides that otherwise confidential information obtained during the course of a disciplinary investigation may be released to the Client Protection Fund concerning applications pending before it. Such information is to be treated as confidential by the Board and Trustees.

Fund Procedures

CONTINUED >

made to applicants regarding any one licensed legal professional, are reviewed by the Trustees.

The maximum gift amount is $150,000.[2] There is no limit on the aggregate amount that may be paid on claims regarding a single member. Any payments from the Fund are gifts and are at the sole discretion of the Fund Board and Trustees.

> **Legal Fees:** Members may not charge a fee for assisting with an application to the Fund, except with the consent and approval of the Trustees.

> **Assignment of Rights and Restitution:** As part of accepting a gift from the Fund, applicants are required to sign a subrogation agreement for the gift. The Fund attempts to recover its payments from the members or former members on whose behalf gifts are made, when possible. Recovery is generally successful when it is a condition of a criminal sentencing, or when a member petitions for reinstatement to the Bar after disbarment.[3] To date, the Fund (and its predecessors) has recovered approximately $637,994.

> **Difficult Claims:** One of the more difficult claim areas for the Board and Trustees involves fees paid to a member for which questionable service was performed. The Board is not in a position to evaluate the quality of services provided, nor to determine whether the fee charged was reasonable. Therefore, such applications may be denied as a fee dispute. (The denial may also include other bases, such as malpractice or negligence.) However, where it appears that there is a pattern of conduct which establishes that a member knew or should have known at the time the member accepted fees from a client that the member would be unable to perform the service for which he or she was employed, or the member simply performs no service of value to the client, and does not return unearned fees, the Board has concluded that such conduct may be either dishonesty or failure to account, within the context of the purposes of the Fund, and will consider such applications. Similarly, if a member withdraws from representing a client or abandons a client's case without refunding any unearned fee, the Board may conclude that the member has engaged in dishonest conduct or has failed to account for client funds.

Another difficult claim area concerns loans or investments made to or through members. In instances where there is an existing client/licensed legal practitioner relationship through which the member learns of his or her client's financial information, persuades the client to loan money or to invest with the member without complying with the disclosure and other requirements of RPC 1.8,[4] and does not return the client's funds as agreed, the Board may consider that a dishonest act for purposes of the Fund.

2. In June 2026, the Supreme Court ordered that the maximum gift amount be increased to $250,000, effective September 1, 2026.
3. Admission and Practice Rule 25.1(d) provides that no disbarred lawyer may petition for reinstatement until amounts paid by the CPF to indemnify against losses caused by the conduct of the disbarred lawyer have been repaid to the CPF, or a payment agreement has been reached.
4. In relevant part, RPC 1.8 provides:
   (a) A lawyer shall not enter into a business transaction with a client or knowingly acquire an ownership, possessory, security or other pecuniary interest adverse to a client unless:
      (1) the transaction and terms on which the member acquires the interest are fair and reasonable to the client and are fully disclosed and transmitted in writing in a manner that can be reasonably understood by the client;
      (2) the client is advised in writing of the desirability of seeking and is given a reasonable opportunity to seek the advice of independent legal counsel on the transaction; and
      (3) the client gives informed consent, in a writing signed by the client, to the essential terms of the transaction and the lawyer's role in the transaction, including whether the lawyer is representing the client in the transaction.
   (b) A member shall not use information relating to representation of a client to the disadvantage of the client unless the client gives informed consent, expect as permitted or required by these Rules.

SECTION III

Finances

The Fund is financed by an assessment as described in Section II: Fund Procedures. The Fund is maintained as a trust, separate from other funds of the WSBA. In addition, interest on the balance accrues to the Fund, and any restitution paid by members is added to the Fund balance. The Fund is self-sustaining; administrative costs of the Fund, such as Board expenses and WSBA staff support, are paid from the Fund.

FISCAL YEAR	PENDING APPLICATIONS AT START OF FY	CPF BEGINNING BALANCE[5]	CPF REVENUES RECEIVED	BOARD EXPENSES AND OVERHEAD[6]	RESTITUTION RECEIVED	GIFTS RECOGNIZED FOR PAYMENT
2016	$13,203,653	$2,144,289	$1,001,198	$129,553	$2,970	$371,452[7]
2017	$1,463,914	$2,646,222	$1,024,954	$113,672	$3,709	$318,584
2018	$2,045,175	$3,242,299	$1,040,498	$166,969	$28,255	$917,051[8]
2019	$3,206,880	$3,227,988	$1,110,963	$146,618	$8,347	$379,818
2020	$3,342,227	$3,816,143	$1,099,237	$141,514	$15,351	$591,449[9]
2021	$4,690,958	$4,193,130	$368,170	$151,055	$137,971	$499,637
2022	$4,252,961	$4,046,246	$740,321	$162,100	$8,906	$587,815
2023	$1,583,390	$4,063,501	$961,358	$173,059	$9,177	$342,424
2024	$5,094,587	$4,513,398	$816,420	$180,831	$27,839	$436,328
2025	$5,883,120	$4,759,353	$952,453	$180,007	$20,766	$412,963

5. It is important for the Fund to maintain a sufficient balance to meet anticipated future needs. It is impossible to predict from year to year how many meritorious claims injured applicants will make.
6. Board expenses and overhead include WSBA staff time to administer the Fund, including processing of applications, helping members of the public, investigating claims, and making recommendations to the Board.
7. The amount of gifts recognized in the FY 2016 financial statements overstates by $115,000 due to a duplicate recording of approved gifts, correct in FY 2017. This explains the substantial difference between the amounts listed for FY 2016 and FY 2017 under this column as compared with the "Gifts Approved" column on page 1.
8. The amount of gifts recognized in the FY 2018 financial statements understates by $9,383 due to unclaimed CPF gifts that expired in FY 2018.
9. The amount of gifts recognized in the FY 2020 financial statements overstates by $5,183, due to interest owed to an applicant and a payment voided in FY 2021. This explains the difference between the amounts listed for FY 2020 under this column as compared with the "Gifts Approved" column on page 1.

SECTION IV

Board and Trustee Meetings and Activities

Board: The Client Protection Board met four times this past fiscal year:

- November 4, 2024;
- February 3, 2025;
- May 5, 2025, and
- August 4, 2025.

The Board considered 43 applications to the CPF involving 12 members and approved 37 applications involving 7 members.

Fund Trustees: The Trustees reviewed the Board's recommendations on applications for more than $25,000, or for payment of more than $25,000, and approved the 2024 Annual Report for submission to the Supreme Court pursuant to APR 15(g).

PUBLIC INFORMATION ONLINE

The Client Protection Fund maintains a website at: https://www.wsba.org/Legal-Community/Committees-Boards-and-Other-Groups/Client-Protection-Board that provides information about the CPF, its procedures, and a downloadable application form.

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SECTION V

Applications and Payments

At the beginning of FY 2025, there were 231 pending applications to the Fund. During FY 2025, the Fund received 94 additional applications. The Board and Trustees acted on 43 applications concerning 12 licensed legal practitioners and approved 37 applications concerning 7 licensed legal practitioners. The total amount in approved payments is $412,963.

Applications Denied in FY 2025

Application denials are for reasons such as fee disputes, no evidence of dishonesty, alleged malpractice, restitution already paid in full, no attorney client relationship, and other reasons.

6

Applications Approved for Payment in FY 2025

Applications approved for payment arose from the member's dishonest acts such as theft or conversion, failure to return or account for unearned legal fees, and investments or loans with members.

37

APPLICATIONS IN DETAIL

Applications Pending as of October 1, 2025	**231**[10]
Applications Received During FY 2025	**94**
Applications Acted Upon by Board and Trustees	**44**
Applications Carried Over to FY 2026	**281**

APPROVED APPLICATIONS

ATTORNEY	NO. OF APPLICATIONS APPROVED	DOLLAR AMOUNT OF APPLICATIONS APPROVED*	PAGE NUMBER
Corey, Barbara, WSBA #11778	1	$4,300	7
Jakeman, David, WSBA #39332	3	$11,000	7
King, Christina, WSBA #39431	13	$69,770	8-11
Moceri, Mike, WSBA #47787	2	$6,500	12
Pimpleton, Kristi, WSBA #34419	11	$178,054	13-17
Rivera, Aurora Lynn, WSBA #846LPO	1	$2,800	17-18
Taylor-Manning, Robert, WSBA #21890	6	$140,539	18-19
TOTALS	**37**	**$412,963**	

**Rounded to the nearest dollar*

10. Applications received or pending are still in investigation, not yet ripe, or temporarily stayed. All approved applications receive initial payments of up to $5,000, with the balance reserved for possible proration against 75% of the CPF balance at fiscal year-end.

SECTION V

The following summarizes the gifts and recommendations made by the Board:

ATTORNEY BARBARA COREY

WSBA #11778 – DECEASED

APPLICANT: 22-032	DECISION: $4,300

In November 2017, Applicant hired Corey to represent him in a criminal matter, paying $4,790. Corey performed some work, however due to her illness, she was often unavailable. Prior to her death, Corey requested that the prosecutor file a petition pursuant to SB 6164, seeking a resentencing, prior to filing for a Personal Restraint Petition (PRP). Corey's request was denied. Since the PRP was never filed, Applicant sought relief for the balance of the fees paid to Corey.

The Board approved a gift of $4,300.

ATTORNEY DAVID JAKEMAN

WSBA #39332 – RESIGNED IN LIEU OF DISCIPLINE

APPLICANT: 21-099	DECISION: $4,000

In July 2018, Applicant hired Jakeman to represent him in an immigration matter, paying a flat fee of $7,000. Applicant agreed to make monthly payments. Jakeman's scope of work included attending Applicant's final merits hearing on his request for asylum in the United States. In October 2020, Applicant received a letter from Beacon Immigration informing him of the office closure and bankruptcy. Though Jakeman did prepare some work of value, he did not refund the remainder of unearned fees.

The Board approved a gift of $4,000.

APPLICANT: 21-102	DECISION: $2,000

In October 2017, Applicant hired Jakeman for representation in an immigration matter, paying $7,000. Applicant signed a fee agreement for Jakeman to prepare and apply for cancellation of removal and represent Applicant at all "master calendar" hearings and one "individual calendar" (merits) hearing. In October 2020, Beacon Immigration offices closed. At the time of closure, Jakeman had performed some work in Applicant's matter. However, the merit hearing had not been scheduled. Applicant never received a refund for the unearned fees.

The Board approved a gift of $2,000.

APPLICANT: 22-027	DECISION: $5,000

In October 2018, Applicant hired Jakeman to represent him in an immigration matter, paying a flat fee of $7,000. The scope of Jakeman's work was to prepare and represent Applicant in his removal proceeding before the Seattle Immigration Court. Applicant's final hearing was scheduled for January 2022. In October 2020, Applicant was informed of Beacon Immigration office's closure. In December 2020, Applicant hired new counsel to complete his immigration case. Jakeman had prepared and filed Applicant's application for Cancellation of Removal, and an associate from Jakeman's office attended a preliminary hearing before the Seattle Immigration Court. The work that remained to be done in Applicant's case at the time of Beacon Immigration's closure was preparation of a brief, evidence, and witnesses for trial. Applicant never received a refund for the unearned fees.

The Board approved a gift of $5,000.

SECTION V

The following summarizes the gifts and recommendations made by the Board:

ATTORNEY CHRISTINA KING

WSBA #39431 – DISABILITY INACTIVE

APPLICANT: 24-009	DECISION: $4,700

In May 2023, Applicant hired King to represent her in a Committed Intimate Relationship (CIR) matter, paying a total of $5,000. Applicant hired King to assist with evicting Applicant's ex-boyfriend from her home. After the initial meeting with King, Applicant drafted an eviction email to her ex-boyfriend for King's review. King reviewed and made edits to the email and sent it back to Applicant, along with additional eviction documents. Applicant sent the email and eviction notice to her ex-boyfriend, including the date by which he was to vacate Applicant's home. As the eviction date approached, Applicant sent King several emails, with no return response. Applicant's ex-boyfriend complied and moved out on the date set in the notice. Applicant sent King an email to terminate representation and to request a refund of unearned fees. King never sent the refund of the unearned fees.

The Board approved a gift of $4,700.

APPLICANT: 24-010	DECISION: $5,000

In July 2023, Applicant hired King to represent him in a family law matter, paying a total of $5,000. King's scope of work was to represent Applicant in his divorce and to fight a protection order Applicant's wife had filed against him. Applicant states that though it became difficult to communicate with King, he trusted that things were going well and assumed that she was busy working on his case. Applicant states that the protection order hearings were continued four times, and the dissolution matter had yet to be heard. In October 2023, Applicant received a text message regarding King's office closure, the possibility of a refund, and the waiver of outstanding balances. Applicant had a court hearing scheduled in two days and had to hire new counsel. When Applicant and his new counsel tried to contact King, King blocked each of their phone numbers. Applicant never received a refund of the unearned fees.

The Board approved a gift of $5,000.

APPLICANT: 24-016	DECISION: $3,500

In June 2023, Applicants hired King to represent them in a family law matter, paying a total of $3,500. Applicants signed a fee agreement with King to represent them in obtaining guardianship of their granddaughters. Thereafter, it became difficult for Applicants to communicate with King. In October 2023, when King's office closed, Applicants were informed by the Whatcom County Clerk's Office that nothing had ever been filed with the court on their behalf. The Whatcom County Guardianship Facilitator reviewed Applicant's paperwork and informed them that it was not complete. Applicants never received a refund of the unearned fees.

The Board approved a gift of $3,500.

APPLICANT: 24-017	DECISION: $3,750

In November 2021, Applicant hired King to represent her in a family law matter, paying

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The following summarizes the gifts and recommendations made by the Board:

ATTORNEY CHRISTINA KING

WSBA #39431 – DISABILITY INACTIVE

a total of $3,750. The scope of King's work was to finalize Applicant's parenting plan. During the representation, King was unavailable for appointments and never returned phone calls. Applicant received notice of King's office closure. Applicant states that King performed no work on her case and that she still does not have a finalized parenting plan. During the time she hired King to finalize her parenting plan, she also requested child support modification through the state. Because King was her attorney of record, the filings were automatically sent to King. Applicant provided copies of the documents filed by the prosecutor's office on her behalf for the child support modification. King did not perform any work on the modification. Applicant never received a refund of the unearned fees.

The Board approved a gift of $3,750.

APPLICANT: 24-023	DECISION: $11,000

In August 2023, Applicant hired King to represent her in family law matter, paying a total of $11,000. The scope of King's representation was to assist Applicant with the final stages of her dissolution. Prior to King's representation, Applicant already had a court date scheduled, as King was aware. King was supposed to meet with Applicant prior to the hearing to go over the case, but King kept cancelling the meetings. King arrived in court unprepared and argued for the wrong motion. King never provided a fee agreement and when Applicant requested an itemized billing statement, King gave excuses, blamed the bookkeeper, and assured Applicant that they were working on her case. Applicant continued to pay King when they requested additional payment for representation through arbitration. Thereafter, King was unreachable, did not show up or prepare for the arbitration, and refused to refund unearned fees.

The Board approved a gift of $11,000.

APPLICANT: 24-025	DECISION: $5,250

In June 2023, Applicant hired King to represent her in a family law matter, paying a total of $5,250. King agreed to represent Applicant at her custody trial. Thereafter, King became unreachable. King failed to appear for a "Motion for Revision" hearing, which King had filed. Since King failed to appear, alternate counsel helped Applicant at the hearing. King never refunded the unearned fees.

The Board approved a gift of $5,250.

APPLICANT: 24-030	DECISION: $5,000

In May 2023, Applicant hired King to represent him in a family law matter, paying a total of $5,000. Applicant states that "it was difficult to communicate with King from the start." At Applicant's first court date, King had to request a continuance because they did not have the proper information in court documents. The court gave King 30 days to correct the paperwork. King did not make the corrections or file new paperwork, resulting in Applicant being ordered to pay more in child support. King stopped answering Applicant's phone calls and emails. Applicant states that

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SECTION V

The following summarizes the gifts and recommendations made by the Board:

ATTORNEY CHRISTINA KING

WSBA #39431 – DISABILITY INACTIVE

he never received an accounting of the retainer he paid. In October 2023, Applicant was informed of King's office closure. The custodian assigned to King's files informed Applicant that there was no money in King's trust account, no records of funds being received, and no insurance.

The Board approved a gift of $5,000.

APPLICANT: 24-031	DECISION: $6,000

In September 2023, Applicant hired King to represent her in a family law matter, paying a total of $6,000. Applicant met with King and paid $300 for an initial one-hour consultation. After agreeing to take her case for $5,700, King continued the meeting for an additional hour to complete paperwork. Weeks later, Applicant learned that King never filed anything in her matter. Applicant was informed of King's office closure and possible refund from an automated email reply. King provided no work of value and never refunded the unearned fees.

The Board approved a gift of $6,000.

APPLICANT: 24-032	DECISION: $5,000

In June 2023, Applicant hired King to represent her in a Committed Intimate Relationship (CIR) matter, paying a total of $5,000. Applicant met with King prior to a District Court hearing, where they would file a notice of appearance. King and opposing counsel agreed to have the case moved to Superior Court to determine if a CIR existed. Applicant met with King at their office to discuss next steps. Applicant sent King a text to ask when the response to the Motion for Summary Judgement was due, as the hearing date approached. King responded with the response date. Applicant texted King again to check the status of the response. Applicant again sent King a text and received an automatic message stating: "the law office of Christina King is closing immediately due to a medical emergency. I will arrange refunds for private clients as soon as possible, if there is an outstanding balance it will be waived." Applicant contacted the court clerk, the judicial assistant, and opposing counsel; and the hearing was stricken. Applicant received King's Notice of Intent to Withdraw. Thereafter, applicant contacted WSBA, who put her in contact with the custodian assigned to disperse King's client files. King provided no work of value and never refunded the unearned fees.

The Board approved a gift of $5,000.

APPLICANT: 24-035	DECISION: $5,000

In February 2023, Applicant hired King to represent him in a family law matter, paying a total of $5,000. After Applicant paid the retainer in full, communications with King stopped. Applicant states that he never received an invoice, and that no progress was made in his case. King appeared late to court to file a notice of appearance, resulting in a finding of contempt and a $1,470 fine for Applicant to pay the opposing party. King sent Applicant a text asking for more money.

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The following summarizes the gifts and recommendations made by the Board:

ATTORNEY CHRISTINA KING

WSBA #39431 – DISABILITY INACTIVE

Applicant refused, stating that there should still be funds left from the retainer fee. Thereafter, King went silent. Applicant found out about King's office closure through an automated reply, just days before his settlement conference. Applicant settled his case on his own. King provided no work of value and never refunded the unearned fees.

The Board approved a gift of $5,000.

APPLICANT: 24-041	DECISION: $6,510.11

In March 2022, Applicant hired King to represent her in a family law matter, paying a total of $6,510.11. The original matter began in 2011. However, King was hired to represent Applicant to finalize a contempt of court action, which led to the need for a modification to an existing parenting plan. In August 2023, King sent Applicant an email of proposed orders from opposing counsel. Applicant verified, signed and sent the documents back to King. In October 2023, when King closed her office, Applicant discovered that there was a trial date, and that King had not filed the agreed orders, nor had they been forwarded to opposing counsel. Applicant was left to find new counsel to finalize her case. King provided no work of value and never refunded the unearned fees.

The Board approved a gift of $6,510.11.

APPLICANT: 24-046	DECISION: $5,000

In July 2023, Applicant hired King to represent him in a family law matter, paying a total of $5,000. Applicant initially met King for a free consultation. King had a plan on how to handle Applicant's case and instructed Applicant on which programs to complete. Applicant completed the programs as suggested. King showed up for three hearings, each lasting 15-20 minutes, and each being continued. Applicant provided King with a completed parenting plan, which he had filed in Pierce County; where Applicant lives. However, because Applicant's child lives in Whatcom County, King said that they would need to complete new forms to file in Whatcom County. There is no record of King completing and filing the new parenting plan in Whatcom County. During this time King's law office closed without proper notice. King provided no work of value and never refunded the unearned fees.

The Board approved a gift of $5,000.

APPLICANT: 24-088	DECISION: $4,060

In October 2021 and in March 2022, Applicant hired King to represent her in family law matters paying a total of $4,060 in flat fees on two fee agreements. Applicant and King began to work on Applicant's divorce case. However, King suddenly stopped performing any work and there was little to no communication regarding the status of the case. Applicant made several attempts to contact King with no return response. After months of no communication from King or her office, Applicant discovered that nothing had been filed in her case and that King had closed her practice. Applicant hired new counsel who found that King performed no work of value in either of the matters. King never refunded the unearned fees.

The Board approved a gift of $4,060.

SECTION V

The following summarizes the gifts and recommendations made by the Board:

ATTORNEY MIKE MOCERI

WSBA #47787 – SUSPENDED

APPLICANT: 22-024	DECISION: $5,000

In September 2021, Applicant hired Moceri to represent her in a family law matter, paying $5,000. Prior to hiring Moceri, Applicant filed and served documents to terminate the parental rights of her child's biological father and to initiate adoption by the man who helped raise the child. During her consult with Moceri, Applicant informed him that she had already filed and served the necessary documents. Applicant emailed the documents to Moceri. Moceri replied to the email stating that he would review them within a week and get back to her. Applicant sent Moceri an email to check on the status of his review. Moceri replied to the email stating that he was researching and would be drafting a memorandum and needed another week. Moceri emailed Applicant stating that he had completed the work. Applicant and Moceri met by phone, where Applicant had to repeat the same case information that was previously covered in emails, phone calls, and court documents. Moceri had not taken the time he claimed he had taken with her case. Thereafter, Applicant reached out when Moceri failed to follow up, as promised. Moceri made excuses for his failure to follow through. Applicant requested a copy of her case file and an itemized billing statement, which Moceri never provided. Applicant received no further communication from Moceri and discovered that he had never filed anything with the court. Moceri provided no work of value and never refunded the unearned fees.

The Board approved a gift of $5,000.

APPLICANT: 25-001	DECISION: $1,500

In January 2021, Applicant hired Moceri to represent her in a family law matter paying $1,500. After Applicant made an initial payment, she reached out to the firm's paralegal. The paralegal informed her that he left the Moceri Law Group and asked her to contact the firm directly. A few days later, another firm representative contacted Applicant requesting information that Applicant had already provided. Applicant grew suspicious but was desperate for representation and did not feel comfortable going to trial unrepresented. Applicant felt that she was being misled and expressed her urgency and frustration with the firm. She requested a refund so that she could seek other representation. Thereafter, Moceri's office contacted her enough to keep her on as a client. Applicant continued to grow more confused with inconsistent information from the firm, as her trial date was drawing near. In May 2021, Smith received a letter stating that Moceri Law Group was permanently closing. Applicant was informed at the pre-trial conference that the opposing counsel was never contacted by Moceri Law Group regarding mediation. Applicant requested a continuance, which was granted, and she represented herself at trial. Moceri never refunded the unearned fee.

The Board approved a gift of $1,500.

SECTION V

The following summarizes the gifts and recommendations made by the Board:

ATTORNEY KRISTI PIMPLETON

WSBA #34419 – DISBARRED

APPLICANT: 24-004	DECISION: $13,522.50

In December 2020, Applicant hired Pimpleton to represent her in an employment matter, paying a total of $13,522.50. Applicant met with Pimpleton and paid a consultation fee of $1,522.50. Thereafter, Applicant signed a fee agreement, paying Pimpleton another $6,500. Pimpleton sent Applicant's employer a letter of representation, with hopes that the employer would settle the matter. In response to Pimpleton's representation letter, Applicant's employer instructed Pimpleton to contact their corporate office. Thereafter, Pimpleton told Applicant that it would be an additional charge of $5,500 to move forward with filing the matter with the court. After paying the additional fee, it became difficult for Applicant to contact Pimpleton. Pimpleton performed no work of value and did not return any unearned fees.

The Board approved a gift of $13,522.50.

APPLICANT: 24-027	DECISION: $7,500

In February 2023, Applicant hired Pimpleton for representation in an employment matter, paying $7,500. Pimpleton told Applicant that she would complete a draft of a demand letter within the week. Thereafter, Pimpleton became unresponsive to Applicant's emails requesting the status of the demand letter, and questions about billing. Finally, Applicant received a draft of the demand letter. However, Applicant learned that Pimpleton had been suspended from the practice of law. Pimpleton performed no work of value in Applicant's case, as the work listed on the invoices misrepresented the work product. Even the draft demand letter was of no value to Applicant. Pimpleton never refunded the unearned fees.

The Board approved a gift of $7,500.

APPLICANT: 24-033	DECISION: $8,000

In September 2021, Applicant hired Pimpleton to represent him in an employment matter, paying a total of $8,000. Pimpleton drafted a demand letter to Applicant's employer, which Applicant discovered was never sent. After many unsuccessful attempts to contact Pimpleton by phone, texts, and registered mail, Applicant filed a WSBA grievance and application to the Fund. Pimpleton never refunded the unearned fees.

The Board approved a gift of $8,000.

APPLICANT: 24-034	DECISION: $2,500

In May 2023, Applicant hired Pimpleton to represent him in an employment matter paying a total of $2,500. Pimpleton met with Applicant at an initial consultation, agreeing to the representation for a retainer fee of $4,000; $2,000 down payment, and $2,000 due in 30 days. Applicant paid Pimpleton $2,500 for the consultation fee and down payment. Thereafter, Applicant did not hear from Pimpleton. Applicant grew unhappy with the lack of communication. Applicant terminated Pimpleton's

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The following summarizes the gifts and recommendations made by the Board:

ATTORNEY KRISTI PIMPLETON

WSBA #34419 – DISBARRED

representation and requested a refund of the unearned fee. Pimpleton sent a response, stating that she had been in depositions and that she had begun to work on the demand letter, but that she would be closing his file and follow-up with him about a possible refund. Applicant never heard from Pimpleton again nor did he receive a refund.
The Board approved a gift of $2,500.

APPLICANT: 24-037	DECISION: $12,642

In October 2021, Applicant hired Pimpleton to represent him in a wrongful termination matter, paying a total of $12,642. Applicant and Pimpleton entered into a fee agreement consisting of an hourly fee and retainer of $6,000. The scope of service included investigation of the termination, settlement negotiations, and litigation. Applicant paid the retainer fee by credit card through QuickBooks. Pimpleton resubmitted the charge through Square. Applicant disputed the second charge, and Pimpleton opposed the dispute. By March 2022, the dispute was resolved, and Applicant recovered the $6,000 charged through Square. Pimpleton continued to bill Applicant for additional fees throughout the course of the representation. Pimpleton sent Applicant a draft of the demand letter, which Applicant approved. Counsel for Applicant's former employer received the demand letter. Pimpleton sent billing invoices to Applicant reflecting that Pimpleton spoke with opposing counsel on three separate occasions. This was false. It became difficult for Applicant to contact Pimpleton. Finally, Pimpleton sent Applicant an email stating that she spoke with opposing counsel and was waiting to hear back. This was false. Pimpleton continually failed to communicate and made false statements about the case. Opposing counsel sent Pimpleton an email and received an automatic reply that Pimpleton was preparing for trial and would respond as soon as she was able. This was the last contact opposing counsel had with Pimpleton. Pimpleton sent Applicant a billing invoice for $6,550; $6,000 retainer fee, $250 telephone call with opposing counsel, $200 to respond to the payment dispute, and $100 for emails to Applicant. In Applicant's response, she reiterated that QuickBooks never voided the first credit card charge and offered to show Pimpleton the statements. Applicant also questioned being charged for Pimpleton's opposition to the credit card dispute and pointed out that there had been no progress on her case for six months. In April 2022, Applicant terminated representation and filed a WSBA grievance and application to the Fund. Pimpleton performed no work of value and never returned the unearned fees.
The Board approved a gift of $12,642.

APPLICANT: 24-038	DECISION: $10,000

In December 2019, Applicant hired Pimpleton to represent her in an employment matter, paying a flat fee of $10,000. The scope of representation included writing a demand letter, negotiating with the opposing party, and drafting and finalizing a settlement and release agreement. The fee agreement stated that if the representation terminated before Pimpleton provided all services, Applicant may be

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The following summarizes the gifts and recommendations made by the Board:

ATTORNEY KRISTI PIMPLETON

WSBA #34419 – DISBARRED

entitled to a refund of all or part of the flat fee. The agreement did not set forth how a refund would be calculated. In March 2020, Pimpleton emailed a demand letter but received no response. Pimpleton told Applicant that the demand letter would be served on the opposing party in June 2020. Pimpleton also informed Applicant that, if they were to file a lawsuit, Applicant would have to enter into a new fee agreement, which would give her a credit of $5,000 (half of the $10,000 flat fee), because the opposing party did not negotiate. Pimpleton did not make any attempts to negotiate, nor did she draft or finalize any settlement or release agreements. Applicant decided against filing a lawsuit and requested a partial refund of the $10,000 flat fee. In August 2020, Pimpleton sent Applicant an email agreeing to the partial refund but stated that she needed to review the time spent on the case to determine the refund amount. Thereafter, Applicant was unsuccessful in obtaining the partial refund. Applicant filed a WSBA grievance and application to the Fund.

The Board approved a gift of $10,000.

APPLICANT: 24-039	DECISION: **$41,389.50**

In August 2020, the Applicants hired Pimpleton to assist them with a litigation matter, paying a total of $41,389.50. Initially, they paid $1,000 for coaching and counseling, and $7,500 for settlement negotiations. In February 2021, Pimpleton sent opposing party's counsel a demand letter offering to settle Applicants' legal claim for $91,714.10. When the demand did not result in a settlement, Applicants hired Pimpleton to represent them in a lawsuit. In July 2021, Applicants and Pimpleton entered into a flat fee agreement that covered legal representation from the initiation of a lawsuit through trial, with fees assigned to specific phases of the litigation; $7,500 for the initiation of the lawsuit, $7,500 for written discovery, $7,500 for depositions, $5,000 for dispositive motions and summary judgment, $3,000 for pre-trial, $5,000 for mediation, and $10,000 for trial. In August 2021, Pimpleton filed the lawsuit. In February 2022, opposing counsel served First Interrogatories and Requests for Production. Pimpleton received the Interrogatories and Requests for Production, but she did not respond by the due date. Opposing counsel emailed Pimpleton requesting a date and time for a CR 26(i) conference and stated that if he did not hear from Pimpleton, he would call at 9:00 a.m. on March 22, 2022. Pimpleton did not respond, nor did she answer when opposing counsel called. Thereafter, unbeknownst to Applicants, Pimpleton remained unresponsive to opposing counsel's requests, failed to appear at scheduled hearings, and failed to obey court sanctions and fees. When Applicants discovered the court's order, they made several attempts to contact Pimpleton with no return response. In February 2023, Pimpleton withdrew from the representation, stating that she would evaluate Applicants' account to determine if a refund was warranted. Pimpleton did not file the notice of withdrawal with the court, nor did she ever refund any of the unearned fees. According to the fee agreement, Pimpleton did not perform any work of value nor in accordance with the specific phases of the litigation.

The Board approved a gift of $41,389.50.

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SECTION V

The following summarizes the gifts and recommendations made by the Board:

ATTORNEY KRISTI PIMPLETON

WSBA #34419 – DISBARRED

APPLICANT: 24-049	DECISION: $2,500

In September 2022, Applicant hired Pimpleton to represent her in an employment matter paying $2,500. Applicant and Pimpleton entered into a fee agreement with a retainer fee provision stating that in addition to the contingency fee, Applicant would pay Pimpleton a non-refundable fee of $2,500. The scope of Pimpleton's representation was to recover Applicant's commission payments from her former employer, with a demand letter and negotiations. If negotiations were to fail, Pimpleton would advise Applicant regarding filing a lawsuit. Pimpleton sent Applicant an invitation to upload documents to Dropbox. Applicant uploaded several files, and tried to contact Pimpleton by email, phone, and website to confirm that the documents were received. Pimpleton became unresponsive. Applicant went to Pimpleton's business address in Mill Creek and discovered that the address was a virtual mailbox service, which had been closed for non-payment. Applicant filed a WSBA grievance. The Office of Disciplinary Counsel sent Pimpleton a copy of the grievance and requested a response. Finally, Pimpleton sent Applicant a draft demand letter and message via Dropbox, apologizing for the delay. Applicant responded, noting that Pimpleton's contact information was no longer valid. She asked to speak with Pimpleton by phone, however, when she called, Pimpleton did not answer. Pimpleton sent Applicant a letter stating that, because Applicant did not edit the demand letter, Pimpleton was closing the file and that though the $2,500 retainer was non-refundable, she was willing to refund $600. Applicant ceased communications with Pimpleton and moved forward with her WSBA grievance, and application to the Fund. *The Board approved a gift of $2,500.*

APPLICANT: 24-085	DECISION: $9,000

In August 2021, Applicant hired Pimpleton for representation in an employment matter, paying a flat fee of $9,000. Although Applicant is a former Illinois lawyer, Applicant did not specialize in employment matters. However, Applicant drafted a demand letter and prepared documentation of a sequence of events, regarding a wrongful termination case against their former employer. Subsequently, Applicant also had a workers' compensation claim with Washington Labor and Industries (L&I). Another law firm represented Applicant in the L&I claim, as Pimpleton did not specialize in workers' compensation. Since Pimpleton's website promoted her expertise in employment law, Applicant hoped that Pimpleton could handle the case. Applicant paid a fee of $1,500 for an initial file review, case assessment, and discussion of the course of action. The $1,500 fee would be credited toward the fee arrangement package of Applicant's choice. Applicant paid an additional $7,500 for drafting and negotiating a settlement agreement with Applicant's former employer. Pimpleton's scope of work was to coincide with the L&I claim. Pimpleton sent Applicant's drafted demand letter and documentation, neither of which she reviewed or edited prior to sending to opposing counsel. Thereafter, Pimpleton became unresponsive and difficult to reach. In February

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SECTION V

The following summarizes the gifts and recommendations made by the Board:

ATTORNEY KRISTI PIMPLETON

WSBA #34419 – DISBARRED

2022, opposing counsel reached out to Pimpleton regarding Applicant's case. Pimpleton never responded. From February 2022 through the summer of 2022, Applicant made many unsuccessful attempts to contact Pimpleton. In response to her lack of communication, Pimpleton often sent blanket emails to all clients, with excuses as to why she had been unreachable. In August 2022, Pimpleton sent Applicant a letter terminating representation and did not refund any unearned fees. Pimpleton performed no work of value in Applicant's case and caused significant harm. Her lack of work resulted in Applicant missing the statute of limitations in the wrongful termination matter.
The Board approved a gift of $9,000.

APPLICANT: 24-091	DECISION: $6,000

In July 2019, Applicant hired Pimpleton for representation in a timber trespass matter, paying $6,000 for the dispositive motion phase of litigation. After two years, the motion had not been filed and no work had been performed. Applicant requested a refund of $6,000 and wanted to discuss settlement options. Pimpleton refused to refund Applicant the unearned fee and informed Applicant that she was withdrawing from his case regardless of whether he signed a liability waiver. In June 2021, Pimpleton withdrew, abandoning Applicant at a critical phase of his case. Applicant settled the case himself Pro Se.
The Board approved a gift of $6,000.

APPLICANT: 25-010	DECISION: $65,000

In August 2021, Applicant hired Pimpleton for representation in an employment matter, paying $65,000. Soon after paying the retainer, it became difficult for Applicant to communicate with Pimpleton. When Pimpleton responded, she made excuses for her lack of communication and work. Pimpleton eventually became entirely unresponsive, abandoning Applicant's case and never refunding the unearned fees. Applicant hired new counsel, who states that when he took over Applicant's case, he found that Pimpleton's work consisted only of emails to opposing party that did not advance Applicant's case.
The Board approved a gift of $65,000.

LIMITED PRACTICE OFFICER (LPO) A. LYNN RIVERA

WSBA #846LPO – VOLUNTARY CANCELLATION

APPLICANT: 24-048	DECISION: $2,800

Rivera was the owner of Escrow Services of Washington, LLC. Rivera's sole responsibility is to supervise escrow transactions and escrow accounts. In October 2021, Rivera's bank issued two Notice of Insufficient Funds for her trust account. In September and October of 2021, Rivera knowingly made multiple unauthorized disbursements of client and third person escrow funds via wire transfers to unknown parties unrelated to the clients and third parties. The total loss of clients' and third persons' escrow funds is estimated to be $1,968,869.50. Among the unauthorized disbursements were the proceeds of a

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SECTION V

The following summarizes the gifts and recommendations made by the Board:

LIMITED PRACTICE OFFICER (LPO) A. LYNN RIVERA

WSBA #846LPO – VOLUNTARY CANCELLATION

real estate purchase and sale. Funds were wired to Escrow Services between October 1 and 12, 2021, for an estate. Applicant is the estate fund administrator. The funds were intended to pay costs associated with the purchase and sale totaling $430,956.12. The estate was ready to be closed. However, due to Rivera's failure to pay, and follow the escrow instructions, interest, penalties, and charges continued to accrue. The Board determined that while various creditors received some compensation from insurance claims, a balance of $2,800 was due directly to the estate.

The Board approved a gift of $2,800.

ATTORNEY ROBERT TAYLOR-MANNING

WSBA #21890 – DISBARRED

APPLICANT: 23-039 | **DECISION: $111,038.60**

In August 2021, Applicant hired Taylor-Manning to represent him in a dissolution, paying $250 a month. In February 2023, Applicant's automatic payments from his bank account to Taylor-Manning were being returned. Applicant had paid Taylor-Manning a total of $4,250. Applicant contacted Taylor-Manning's office to inquire, with no return response. After making several attempts to resolve the issue, Applicant had no choice but to cancel the auto payments. In July 2022, Applicant's daughter moved him to her home in Niagara Falls, NY, after he suffered a stroke. Applicant's daughter is his Power of Attorney. In October 2022, Taylor-Manning told Applicant's daughter that Applicant's divorce should be concluded by December 2022 or at the latest January 2023, since the paperwork was being finalized. In December 2022, Applicant's family home sold and the proceeds of the sale were sent to each parties' counsel to be deposited into their trust accounts ($111,038.60 each). Taylor-Manning never informed Applicant of the sale. Applicant learned of the sale when his realtor congratulated him. Applicant contacted the title company and confirmed that his proceeds were sent to Taylor-Manning. Applicant's wife received her portion of the proceeds of the sale from her counsel. Taylor-Manning continued to be unreachable and failed to appear at court dates in Applicant's proceeding. Applicant was informed by the court that Taylor-Manning also failed to appear for other clients and was encouraged to contact opposing counsel. Opposing counsel and Applicant, along with his daughter, worked to finalize the divorce.

The Board approved a gift of $111,038.60.

APPLICANT: 24-012 | **DECISION: $3,000**

In December 2021, Applicant hired Taylor-Manning to assist her family with an elder law matter. Applicant's husband has Parkinson's disease and resides in an assisted living facility. Applicant signed a fee agreement and paid an advance fee of $3,000. The fee agreement also gave Taylor-Manning permission to communicate with her children on her behalf. Taylor-Manning told Applicant that to obtain power of attorney for her husband, she needed a letter from his doctor documenting his diminished capacity. Taylor-Manning emailed the executive director of the assisted living facility to request a letter from the doctor regarding Applicant's husband's

CONTINUED >

SECTION V

The following summarizes the gifts and recommendations made by the Board:

ATTORNEY ROBERT TAYLOR-MANNING

WSBA #21890 – DISBARRED

health condition, treatment and capacity to manage finances and personal care. In January 2022, Applicant took the requested documents to Taylor-Manning's office. Her daughter also sent him an email with the documents attached. Taylor-Manning received both hand-delivered and emailed documents. Taylor-Manning did nothing with the documents. Thereafter, neither Applicant nor her children ever heard from Taylor-Manning again; all calls and email attempts to reach Taylor-Manning were unsuccessful. In March 2022, Applicant sent Taylor-Manning a letter terminating representation and requesting a refund of the unearned fees. Between December 2021 and August 2022, Taylor-Manning withdrew Fields's money from his trust account, and never refunded the unearned fees.

The Board approved a gift of $3,000.

APPLICANT: 24-019	DECISION: $5,000

In January 2020, Applicant hired Taylor-Manning to prepare his estate plan, paying $5,000. Taylor-Manning did not complete the estate planning work, nor did he perform any work of value. After terminating representation, and failed attempts seeking a refund, Applicant filed a small claims case against Taylor-Manning. The court granted Applicant a judgment of $5,095. Taylor-Manning has failed to satisfy the judgment.

The Board approved a gift of $5,000.

APPLICANT: 24-026	DECISION: $18,000

In May 2023, Applicant hired Taylor-Manning to represent her in an estate matter, paying $18,000 cash. Taylor-Manning filed a notice of appearance and an incomplete Trust and Estate Dispute Resolution Act (TEDRA) petition. Thereafter, Applicant never heard from Taylor-Manning again. Applicant realized that Taylor-Manning had taken her money without performing any work and filed a WSBA grievance and application to the Fund.

The Board approved a gift of $18,000.

APPLICANT: 25-002	DECISION: $1,000

In January 2024, Applicant hired Taylor-Manning to make a change to his will, paying $1,000. Thereafter, it became difficult to communicate with Taylor-Manning. Applicant learned of Taylor-Manning's disbarment, and never received a refund of the unearned fee.

The Board approved a gift of $1,000.

APPLICANT: 25-003	DECISION: $2,500

In January 2023, Applicants hired Taylor-Manning to draft wills and estate planning documents, paying $2,500. Applicants never signed a fee agreement with Taylor-Manning. Soon after hiring Taylor-Manning, it became difficult to contact him. Applicants never received any formal documents, and no work of value was performed. Taylor-Manning never informed Applicants of his disbarment, and he did not refund the unearned fee.

The Board approved a gift of $2,500.

APPENDIX

CPF Balance Sheet

STATEMENT OF FINANCIAL POSITION

ASSETS

Audited as of September 30, 2025

Checking Account	$188,318
Accrued Interest Receivable	$34,006
Money Market	$3,423,559
Investments	$2,224,540
TOTAL ASSETS	**$5,870,423**

LIABILITIES AND NET ASSETS

Approved gifts to injured clients payable	$392,335
Liability to WSBA general fund	$170,996
Net Assets	$5,307,092
TOTAL LIABILITIES AND NET ASSETS	**$5,870,423**

STATEMENT OF FINANCIAL POSITION

REVENUE

Audited as of September 30, 2025

Donations	$2,000
Restitution	$20,766
Member Assessment	$732,050
Interest	$220,403
TOTAL REVENUE	**$975,219**

EXPENSES

Misc.	($3,317)
Gifts to Injured Clients	$249,483
CPF Board	$553
Staff Membership Dues	$200
Indirect (overhead)	$180,560
TOTAL EXPENSE	**$427,479**
Net Income (Expense)	$547,740

STATEMENT OF CHANGES IN NET ASSETS

Balance on September 30, 2024	$4,759,353
Net Income as of September 30, 2025	$547,740
BALANCE ON SEPTEMBER 30, 2025	**$5,307,092**

WASHINGTON STATE BAR ASSOCIATION
1325 Fourth Avenue, Suite 600, Seattle, WA 98101-2539
206.727.8200 | www.wsba.org

SEATTLE UNIVERSITY SCHOOL OF LAW

SCHOOL OF LAW
UNIVERSITY of WASHINGTON

GONZAGA UNIVERSITY
SCHOOL OF LAW

July 6, 2026

Washington State Bar Association Board of Governors
Washington State Bar Association
1325 Fourth Avenue, Suite 600
Seattle, WA 98101-2539

RE: Proposed Policy Change – Non-ABA Graduates' Eligibility for Washington State Bar Exam

Dear WSBA Board of Governors:

As the three current and one former Washington law school deans, we have expertise and experience in legal education, accreditation standards, and access to the profession. We write collectively today regarding the May 1, 2026, video-recorded hearing in which the Board of Governors considered a policy change to our state's definition of a law school, which would permit out-of-state non-ABA accredited law school graduates to sit for the Washington State Bar exam as their first bar exam, and potentially to be admitted to practice through a portfolio. To date we have declined all media requests to comment on this proposed change.

Instead, we are seeking a collaborative opportunity to address the substantive concerns raised by some Board members during the May 1st hearing, a hearing where no substantive data was provided and considered. We share a deep concern for consumer awareness and consumer protection and believe the relevant data of non-ABA accredited law schools should be made available and analyzed by the Board as well as other relevant stakeholders, to support an evidence-based decision for the State of Washington. This potential change would be a rule of *first impression* in any jurisdiction within the United States. Additionally, a heightened inquiry is necessary because (1) this change in admission standards was not disclosed as part of recent changes to alternative pathways to practice, and analysis of the interaction of these two areas is needed before proceeding further; and (2) the new bar exam is untested and may not adequately protect the public from unqualified lawyers.

It is our joint recommendation that the Board pause and reconsider this matter fully beginning at its July 24th meeting where this policy change is on the agenda. There is no compelling reason to rush to decision on such an important matter that has previously served our state well for over 50 years in its current form. The purported problem of "too few lawyers in Washington" that this change is said to solve has yet to have any evidence presented to support it nor has this policy change had any evidence presented to support it as the best solution even assuming, arguendo, the asserted problem is real.

We have attached relevant data regarding non-ABA accredited law schools. In our view, the data is an essential beginning point for thoughtful discussion of any policy change. One finding from the data highlights an important point raised by one of the Governors in the May 1st hearing, *i.e.*, that not all non-ABA law schools are the same. The data indicates *significant* variations in entering credentials, enrollment size, attrition, tuition, curriculum (especially regarding experiential learning), transparency, and bar passage. Given that our current Washington State Bar Association neither regulates nor monitors law schools, it is hard to imagine how the WSBA could ensure quality control to protect the public. Washington's current rules are built on the foundation

of a national accreditation system which includes real monitoring and safeguards for consumer protection of legal clients as well as prospective law students.

We attach our preliminary report, as we continue to gather additional related data. We applaud and share the value of access that we trust has motivated this initiative. At the same time, it is critical that we reduce unfair and unnecessary barriers to access, not fair and justifiable barriers that protect clients, especially those who are most vulnerable to exploitation and most injured by incompetent representation.

We welcome the opportunity to present to the Board and collaboratively discuss these weighty issues in depth.

Warm regards,

Tamara F. Lawson, Toni Rembe Dean and Professor of Law, University of Washington School of Law

Agnieszka McPeak, Acting Dean; Associate Dean for Academic Affairs and Program Innovation; The Rita G and Norman L Roberts Faculty Scholar; and Professor of Law, Gonzaga University School of Law

Kellye Testy, former Dean and Dean Emerita, University of Washington School of Law and Seattle University School of Law

Anthony E. Varona, Dean and Professor of Law, Seattle University School of Law

Cc: Hon. Debra Stephens
Terra Nevitt

WASHINGTON STATE
BAR ASSOCIATION

Regulatory Services Department

July 14, 2026

Via Email Only

Board of Governors
Washington State Bar Association

RE: Board Decision to Expand Law School Approval Beyond ABA Accreditation

Dear Members of the Board of Governors,

After receipt of the Deans' letter and report titled *Comprehensive Analysis Report, ABA vs. Non-ABA Law School Comparison Matrix*, we wanted to take an opportunity to examine the concerns raised and provide additional information to support your assessment of the issue. We are therefore pleased to submit the attached report.

First and foremost, we remain firmly convinced that the Board's previous decision to broaden the definition of approved law schools was the right decision for the future of Washington's legal profession and a logical extension of our longstanding rule and practice of allowing graduates of non-ABA-accredited schools to practice in Washington through admission by motion. The Board's decision does not fundamentally change who may ultimately practice law in Washington.

Simply put, the Board's decision resolves an inconsistency. Washington already allows graduates from non-ABA accredited law schools to enter the legal profession after practicing for just a single year elsewhere but does not permit them to sit for the bar exam or participate in Rule 9 supervised practice.

We sincerely appreciate the Washington Law School Deans' input and information. Their feedback has provided a valuable opportunity to pressure-test our assumptions and provide the data needed for a comprehensive analysis.

To be clear, this policy change does not diminish the vital role of traditional ABA-accredited law schools, which remain the predominant model of legal education in our country and our state. Rather, this policy acknowledges what Washington has already accepted for years: that ABA accreditation is not the only pathway capable of preparing competent and ethical legal practitioners. By recognizing alternative models, we are widening the door to the profession without diminishing the high standards of our existing institutions.

The attached report provides additional data and context that further support the wisdom of the Board's decision. Most saliently, the analysis reveals that a majority (83%) of the evaluated state-approved law schools are already bound by rigorous U.S. Department of Education institutional accreditation, subjecting their law programs to the exact same federal standards of academic and financial accountability required of traditional regional universities. Furthermore, the report highlights that Washington does not need to build an expensive oversight infrastructure from scratch; instead, it can rely on established regulatory frameworks in California, Tennessee, Massachusetts, and Alabama that monitor education quality and outcomes.

Additionally, the attached report contextualizes attrition, admissions, and bar passage rates and demonstrates that affordable legal education programs often serve non-traditional and working-class and lower income students.

Ultimately, the Board's recent decision to recognize more than one accreditation model does not diminish the value of traditional legal education or lower admission standards; it maintains high standards while increasing access to the legal profession.

Sincerely,

Jordan Couch
WSBA Governor At-Large

Renata de Carvalho Garcia
WSBA Chief Regulatory Counsel

Encl: Report on Washington's Expansion of Law School Approval Beyond ABA Accreditation

Cc: Honorable Debra L. Stephens
Terra Nevitt, WSBA Executive Director

WASHINGTON STATE
BAR ASSOCIATION

Report on Washington's Expansion of Law School Approval Beyond ABA Accreditation

Prepared by: WSBA Governor Jordan Couch
and Chief Regulatory Counsel Renata de Carvalho Garcia

Date: July 14, 2026

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I. Executive Summary

This report responds to findings in the July 2, 2026 *Comprehensive Analysis Report, ABA vs. Non-ABA Law School Comparison Matrix* (July 2 Report), which evaluates 24 state-approved law schools that are not accredited by the American Bar Association (ABA) solely based on ABA standards. The July 2 Report overlooks goals like broadening access and reducing unnecessary barriers to the legal profession. In response, this report does not attempt to equate ABA accreditation with state-level approval or accreditation. Instead, this report presents data showing that the Board's decision to expand the definition of approved law schools safely increases and diversifies the state's licensed legal professional applicant pool while protecting the public.

II. Washington Already Licenses Graduates from Non-ABA Law Schools

Washington already licenses individuals who did not attend ABA accredited law schools. Lawyers licensed elsewhere who have practiced for more than one year in another state, regardless of what law school they attended, are eligible for licensure through admission by motion. The Board's expansion of the definition of approved law schools removes a

barrier to other applicants seeking to practice in Washington and lets the admissions process determine applicant qualifications from the start. In addition, graduates from non-ABA law schools are able to transfer their bar exam score from another jurisdiction and become licensed in Washington without any practice experience at all.

III. State-Approved Law Schools & Consumer Protection

Concerns that Washington lacks the infrastructure to oversee law schools that are not accredited by the ABA overlooks the fact that no new oversight system needs to be created. That is not the goal. Washington already relies on established approval and accreditation systems from other states, and this approach has proven effective.

California's Committee of Bar Examiners, for example, has accredited and monitored law-school programs since 1937, providing nearly a century of consistent consumer protection.[1] California programs are heavily regulated by the State Bar of California, which mandates a strict five-year minimum cumulative bar passage baseline of 40% to maintain ongoing accreditation status.[2] Furthermore, this localized oversight is not unique to California, as Tennessee, Massachusetts, and Alabama maintain their own robust, long-standing statutory systems to regulate [3] programs.[4]

In addition, a vast majority of the programs evaluated in this report already operate under robust, dual layers of regulatory oversight. Out of the 24 programs listed below, 20 (83%) hold institutional accreditation from agencies recognized by the U.S. Department of Education (USDOE), such as the WASC Senior College and University Commission (WSCUC) or the Higher Learning Commission (HLC). Because these law programs are imbedded within accredited universities, federal accreditation standards require thorough review of curriculum, faculty qualifications, and student learning outcomes. This ensures

[1] CALS | California Accredited Law Schools, https://calawschools.org/
[2] Rule 4.160(D)(6) of the Accredited Law School Rules, https://www.calbar.ca.gov/sites/default/files/portals/0/documents/rules/Rules_Title4_Div2-Acc-Law-Sch.pdf

[4] In Tennessee, the Board of Law Examiners rigorously regulates non-ABA institutions under Tennessee Supreme Court Rule 7, enforcing strict educational baselines and maintaining the explicit authority to strip a school of its approval if academic standards fall short. Massachusetts utilizes a comprehensive judicial vetting system through its Board of Bar Examiners and the Supreme Judicial Court under Rule 3:01. Through that regulatory framework, the Massachusetts Board of Higher Education imposes substantial administrative, operational, and financial requirements on the Massachusetts School of Law, ensuring their program meets demanding educational quality and practice-readiness benchmarks. Similarly, the Alabama State Bar operates a formal Registry of Unaccredited Law Schools under strict legislative and judicial rules, requiring regular reporting to verify that institutions are adequately preparing candidates for the practice of law. Collectively, these diverse state frameworks prove that robust, independent consumer protection has been successfully managed by state-level bar authorities across the country for decades.

that the law programs meet the same academic, financial, and structural accountability standards applied to all programs within those institutions.

While ABA and state-accreditors impose additional requirements, law schools accredited by USDOE-recognized institutional accreditors are already subject to extensive federal oversight. Washington does not need to build a new framework for accrediting law schools. The policy change that the Board of Governors adopted at its May 2026 meeting simply recognizes and continues to rely on accreditation systems that are already functioning effectively in other jurisdictions.

On page 31, the July 2 Report highlights findings indicating that five specific schools require "priority follow-up review" due to fluctuating bar passage performance metrics. Crucially, the regulatory mechanisms required to monitor these programs and protect consumer quality already exist at the state and federal levels.

The Tennessee-approved program (Nashville School of Law) is strictly overseen by the Tennessee Board of Law Examiners pursuant to Tenn. Sup. Ct. R. 7, Article 17, which explicitly mandates ongoing review of bar passage rates and grants the Board full authority to suspend institutional approval if articulated standards are unmet. Meanwhile, the three California programs operate under regulatory authority of the State Bar of California, which mandates a strict minimum cumulative bar passage baseline of 40% for ongoing accreditation.[5] Furthermore, one of these institutions, the University of West Los Angeles, is subject to an additional layer of comprehensive institutional oversight through WSCUC, a U.S. Department of Education-recognized accreditor. Similarly, the Alabama State Bar operates a formal Registry of Unaccredited Law Schools under strict legislative and judicial rules, requiring regular reporting to verify that institutions are adequately preparing candidates for the practice of law. Because these sophisticated state and federal regulatory frameworks are already functional, Washington can safely rely on these existing regulatory frameworks rather than constructing a costly legal education accreditation infrastructure from scratch.

IV. Existing Oversight Structures for State-Approved Law Programs

To illustrate the structural oversight governing state-approved law schools, the table below outlines the accreditation framework for all 24 programs in the dataset, detailing both their state bar approval authority and their federal USDOE-recognized institutional accreditor status.

[5] Rule 4.160(D)(6) of the Accredited Law School Rules, https://www.calbar.ca.gov/sites/default/files/portals/0/documents/rules/Rules_Title4_Div2-Acc-Law-Sch.pdf

Table 1.

School / Program Name	State Bar Approval Authority	USDOE-Recognized Institutional Accreditor Status
1. Purdue Global School of Law (CA)[6]	State Bar of California (CALS)	**Accredited** (Higher Learning Commission)
2. St. Francis School of Law (CA) [7]	State Bar of California (CALS)	**Accredited** (HLC)
3. JFK School of Law at National University (CA) [8]	State Bar of California (CALS)	**Accredited** (WSCUC)
4. Monterey College of Law (CA) [9]	State Bar of California (CALS)	**Accredited** (WSCUC)
5. Empire College of Law (MCL Branch) (CA) [10]	State Bar of California (CALS)	**Accredited** (WSCUC)
6. Kern County College of Law (MCL Branch) (CA) [11]	State Bar of California (CALS)	**Accredited** (WSCUC)
7. San Luis Obispo College of Law (MCL Branch) (CA) [12]	State Bar of California (CALS)	**Accredited** (WSCUC)
8. San Joaquin College of Law (CA) [13]	State Bar of California (CALS)	**Accredited** (WSCUC)
9. Humphreys University Drivon School of Law (CA) [14]	State Bar of California (CALS)	**Accredited** (WSCUC)

[6] Purdue Global Law School Accreditation, https://www.purduegloballawschool.edu/about/accreditation
[7] Accreditation | St. Francis School of Law, https://stfrancislaw.com/accreditation/
[8] Accreditation | The JFK School of Law at National University, https://law.nu.edu/accreditation/
[9] Consumer Information, https://montereylaw.edu/admissions/accreditation.html
[10] *Id*.
[11] *Id*.
[12] *Id*.
[13] SJCL Accreditor Information, https://www.sjcl.edu/about-sjcl/accreditation
[14] Accreditation | Humphreys University, https://www.humphreys.edu/drivon-law/accreditation/

School / Program Name	State Bar Approval Authority	USDOE-Recognized Institutional Accreditor Status
10. The Colleges of Law (Santa Barbara) (CA) [15]	State Bar of California (CALS)	**Accredited** (WSCUC)
11. The Colleges of Law (Ventura) (CA) [16]	State Bar of California (CALS)	**Accredited** (WSCUC)
12. Thomas Jefferson School of Law (CA) [17]	State Bar of California (CALS)	**Accredited** (WSCUC)
13. Trinity Law School (CA) [18]	State Bar of California (CALS)	**Accredited** (HLC)
14. University of La Verne College of Law (CA) [19]	State Bar of California (CALS)	**Accredited** (WSCUC)
15. University of West Los Angeles (Inglewood) and University of West Los Angeles (Chatsworth) (CA) [20]	State Bar of California (CALS)	**Accredited** (WSCUC)
16. Golden Gate University School of Law (CA)[21]	State Bar of California (CALS)	**Accredited** (WSCUC)
17. Massachusetts School of Law (MA)[22]	Massachusetts Board of Bar Examiners	**Accredited** (NECHE)

[15] Accreditation & Bar Eligibility, https://www.collegesoflaw.edu/about/accreditation/
[16] *Id*.
[17] Accreditation - Thomas Jefferson School of Law, https://www.tjsl.edu/admissions/accreditation/
[18] Accreditation - Trinity Law School, https://www.tiu.edu/law/history/accreditation/
[19] College of Law and Public Service Accreditation | University of La Verne, https://law.laverne.edu/accreditation/
[20] Home - Accreditation - University of West Los Angeles, https://www.uwla.edu/apps/pages/index.jsp?uREC_ID=321729&type=d
[21] Accreditation | Golden Gate University, effective in the fall of 2026, https://ggu.edu/accreditation/
[22] Accreditation and Bar Eligibility - Massachusetts School of Law, https://www.mslaw.edu/accreditation-and-bar-eligibility/

School / Program Name	State Bar Approval Authority	USDOE-Recognized Institutional Accreditor Status
18. Cal Northern School of Law (CA)[23]	State Bar of California (CALS)	**Accredited** (WSCUC)
19. Lincoln Law School of Sacramento (CA)[24]	State Bar of California (CALS)	**Accredited** (WSCUC)
20. Lincoln Law School of San Jose (CA) [25]	State Bar of California (CALS)	**Accredited** (WSCUC)
21. Northwestern California University (CA)[26]	State Bar of California (CALS)	n/a
22. Birmingham School of Law (AL)[27]	Alabama State Bar Registry	n/a
23. Miles Law School (AL)[28]	Alabama State Bar Registry	n/a
24. Nashville School of Law (AL)[29]	Tennessee Board of Law Examiners	n/a

V. How State-Approval Models Broaden Access and Increase Diversity in the Legal Profession

First, it is important to avoid the assumption that these schools are unable to qualify for ABA accreditation. In many cases, they intentionally choose not to pursue ABA approval to offer a more affordable legal education to students who might otherwise be unable to afford law school. ABA accreditation is cost-prohibitive for many institutions. The application alone is $100,000[30] which poses a significant barrier that could directly impact

[23] Institutional Research in Chico, CA | Cal Northern School of Law, https://calnorthern.edu/about-us/#accreditation
[24] Accreditation – Lincoln Law School of Sacramento, https://lincolnlaw.edu/about/accreditation/
[25] *Id*.
[26] Accreditation | Northwestern California University School of Law, https://nwculaw.edu/accreditation
[27] Home - Birmingham School of Law, https://bsol.com/
[28] Miles Law School - Birmingham, Alabama, https://mlaw.edu/
[29] About – Nashville School of Law, https://nsl.law/about/
[30] Schedule of Law School Fees, https://www.americanbar.org/groups/legal_education/accreditation/fees/

tuition levels. It is equally important to combat the misconception that these programs are inherently inferior. Their decision not to seek ABA accreditation often reflects a deliberate commitment to accessibility and affordability, not a lack of academic or institutional quality. As Cal Northern School of Law publicly states, “In keeping with our mission to offer an affordable quality legal education, the School of Law has not sought approval from the American Bar Association.”[31]

In addition, the "fragmented" or lower admission standards cited in the July 2 Report are an intentional feature of the state-approval model, not an operational failure. By offering paths that do not require rigid standardized testing or a bachelor's degree (accepting 60 semester units instead), these schools deliberately lower historical gatekeeping barriers and expand entry points into the legal profession. This design creates a critical educational opportunity for non-traditional, working-class, and other students who are historically impacted by systemic barriers, including those embedded in ABA admissions standards, thereby expanding access and increasing the diversity of the legal profession.

As one of the founding figures of Miles Law School, Judge Pearson states: “The law school’s motto of “Striving to Balance” directly relates to the imbalance, disparity and disproportionality of black lawyers and of the underserved minority populace that existed in this state. Since the first graduates in 1978, the law school’s sons and daughters have made tremendous strides in closing the gap”[32]

According to the 2023 California Accredited and Registered Unaccredited Law School Performance Report, 57% of students enrolled at CALS are people of color.[33] Notably, Latinos comprise more than one-quarter (27%) of CALS students.[34] Furthermore, the intersectional analysis reveals that women of color represent the largest group of students at CALS (35%), underscoring the growing representation of historically underrepresented groups in California’s law school population.[35] This experience demonstrates how alternative, access-driven education models can meaningfully expand representation within the profession. Washington can similarly leverage state-approved program pathways to address its own longstanding disparities by welcoming communities historically excluded from the traditional pipeline.

[31] Institutional Research in Chico, CA | Cal Northern School of Law, https://calnorthern.edu/about-us/#accreditation
[32] About 1 — Miles Law
[33] 2023 California Accredited and Registered Unaccredited Law School Performance Report June 14, 2024 at page 7, https://www.calbar.ca.gov/sites/default/files/portals/0/documents/reports/2024/2023-California-Accredited-and-Registered-Unaccredited-Law-School-Performance-Report.pdf.
[34] *Id*.
[35] *Id*. at 9

VI. Assessing Competence Beyond Bar Passage Rates

Washington's ongoing modernization of legal admissions and licensure recognizes that the bar exam is not the sole measure of an applicant's competence. The recent work of the Washington Bar Licensure Task Force and the development of the Portfolio Evaluation pathway demonstrate the state's commitment to assessing professional readiness through multiple, evidence-based ways. As such, any reliance on bar passage rates should be contextualized within Washington's broader approach to measuring competence.

The July 2 Report notes that high bar passage percentages in some of the state-approved programs are partly "denominator-driven," meaning early attrition removes students who are not meeting academic benchmarks, resulting in a smaller but more prepared group of exam-takers. Rather than evidencing a flaw, this structural filtration demonstrates that the curriculum itself is functioning as a rigorous academic gatekeeper. The students who advance to graduation have already met demanding internal standards, and their strong performance on the bar exam validates this demonstrated competence.

Based on data published by the State Bar of California, every state-accredited school fully satisfies the state-mandated five-year minimum cumulative passing rate of 40%, proving that state accreditation already establishes and enforces standards independent of ABA accreditation and oversight.[36] Even though the California Bar's passage rate floor is 40%, seven out of 16 schools meet or exceed the ABA's 75% bar passage benchmark, six have passage rates at or above 60% and no school has a passage rate below 53%.[37] This proves that state-approved programs possess the instructional capability to prepare students for legal licensure.

Because Washington is moving toward a more holistic system that recognizes different pathways to demonstrating competence, state-approved program bar passage outcomes should be contextualized within this broader philosophy.

VII. Attrition in the Context of Cost, Access, and Equity

According to the ABA, a cumulative non-transfer attrition rate above 20% for a class "creates a rebuttable presumption that the law school is not in compliance" with the standard.[38] To keep attrition low, schools are encouraged to adopt admissions policies and practices that take into consideration "admission test scores, undergraduate course of study and grade point average, extracurricular activities, work experience, performance

[36] 2025 Minimum Cumulative Five-Year Bar Examination Pass Rates for California Accredited Law Schools (MPR), https://www.calbar.ca.gov/sites/default/files/2025-10/Minimum-Pass-Rate-Standard-Cumulative-Pass-Rates-2025.pdf

[37] Id.

[38] ABA Standard 501 Interpretations. 2018-2019_ABA standards and rules of procedure_omni_8-14-2018 at page 2, https://www.americanbar.org/content/dam/aba/publications/misc/legal_education/Standards/2018-2019ABAStandardsforApprovalofLawSchools/2018-2019-aba-standards-chapter5.pdf

in other graduate or professional programs, relevant demonstrated skills, and obstacles overcome."[39] These credentials are far more accessible to people who have not faced institutional and structural barriers. By contrast, more flexible state admissions standards acknowledge these disparities and create pathways for students with reduced educational and economic opportunities.

Additionally, the lower cost of state-approved programs changes the impact of attrition. When tuition is affordable, schools are better positioned to give students a chance to prove themselves academically without exposing them to financial harm if they do not make it through the program. By comparison, attrition at ABA-accredited schools can leave students with tens of thousands of dollars in non-dischargeable debt, resulting in withdrawal having a much more disastrous financial impact. In other words, the affordability of state-approved programs mitigates the risk of attrition and allows schools to prioritize access and opportunity.

VIII. Expanding Access Through Affordability

One of the most significant and practical benefits of the Board's decision to expand the definition of approved law school to include state-approved schools is the expansion of affordable pathways to legal education. While tuition costs vary among institutions, current published tuition data demonstrates that state-approved law schools generally offer substantially lower tuition than Washington's ABA-approved law schools.

Table 2.

	Average Estimated Total Tuition
Washington Law Schools	$172,251[40]
CA, AL and MA state-approved schools	$77,226[41]

This difference represents increased access for prospective lawyers who may otherwise be unable to pursue a legal education due to financial constraints. Lower tuition can translate into reduced student debt, greater socioeconomic diversity within the profession, and

[39] *Id*.

[40] The average estimated total tuition was calculated using information obtained from each school website: the University of Washington School of Law, with annual resident tuition of $47,073 (total cost $141,219) https://www.law.uw.edu/admissions/financing/tuition; Gonzaga University School of Law, with a semester cost of $30,429 (total cost $182,574) https://www.gonzaga.edu/admission/tuition-scholarships-aid/student-accounts/tuition-fees/law-programs; and Seattle University School of Law, with annual tuition of $64,320 (total cost $192,960), https://law.seattleu.edu/student-life/student-services/student-financial-services/tuition-and-fees/.

[41] The average estimated total tuition was calculated using information obtained from each school website as outlined in Table 3.

expanded opportunities for students from rural, working-class, military, first-generation, and other historically underrepresented backgrounds.

Importantly, affordability does not come at the expense of Washington's standards for admission. Regardless of where applicants obtain their legal education or how much they pay for it, those seeking admission in Washington must still satisfy all admissions and licensure requirements including passing the bar exam and demonstrating the requisite character and fitness to practice law. The Board's decision therefore expands educational opportunities without lowering legal licensure standards or compromising public protection.

The tuition comparison table included below illustrates the practical impact of the Board's policy. The Board's recognition of these state-approved schools is consistent with the Board's longstanding commitment to improving access to the legal profession while continuing to protect the public through Washington's independent admissions process.

Table 3.

School / Program Name	**Estimated Total Program Cost (Tuition & Fees)**
1. Purdue Global School of Law (CA)	$52,900[42]
2. St. Francis School of Law (CA)	$52,000[43]
3. JFK School of Law at National University (CA)	$68,224[44]
4. Monterey College of Law (CA)	$98,000[45]
5. Empire College of Law (MCL Branch) (CA)	$98,000[46]
6. Kern County College of Law (MCL Branch) (CA)	$98,000[47]

[42] Tuition and Fees - Purdue Global Law School, https://www.purduegloballawschool.edu/tuition/jd-and-ejd-students
[43] Online Law School Tuition & Materials | St. Francis School of Law, https://stfrancislaw.com/admissions/tuition/
[44] Detailed Tuition & Fees Information | JFK School of Law, https://law.nu.edu/tuition-fees/
[45] Tuition Rates, https://montereylaw.edu/currentstudent/financial/tuitionandaid.html
[46] *Id*.
[47] *Id*.

School / Program Name	Estimated Total Program Cost (Tuition & Fees)
7. San Luis Obispo College of Law (MCL Branch) (CA)	$98,000[48]
8. San Joaquin College of Law (CA)	$86,430[49]
9. Humphreys University Drivon School of Law (CA)	$75,000[50]
10. The Colleges of Law (Santa Barbara) (CA)	$85,596[51]
11. The Colleges of Law (Ventura) (CA)	$85,596[52]
12. Thomas Jefferson School of Law (CA)	$114,750[53]
13. Trinity Law School (CA)	$99,900[54]
14. University of La Verne College of Law (CA)	$102,520[55]
15. University of West Los Angeles (Inglewood) and University of West Los Angeles (Chatsworth) (CA)	$105,825[56]
16. Golden Gate University School of Law (CA)	$Not available[57]
17. Massachusetts School of Law (MA)	$87,750[58]

[48] *Id*.
[49] SJCL Law Catalog.pdf, https://www.sjcl.edu/images/stories/Prospective_Students/SJCL%20Law%20Catalog.pdf
[50] Drivon Tuition | Humphreys University, https://www.humphreys.edu/drivon-law/tuition/
[51] Tuition and Financial Aid at The Colleges of Law, https://www.collegesoflaw.edu/admissions/tuition-financial-aid/
[52] Id.
[53] Tuition - Thomas Jefferson School of Law, https://www.tjsl.edu/financial-aid/tuition/
[54] Tuition - Trinity Law School, https://www.tiu.edu/law/tuition/
[55] 2026-2027 College of Law and Public Service Tuition and Fees | University of La Verne, https://www.laverne.edu/tuition/2025-2026-college-of-law-and-public-service-tuition-and-fees-2/
[56] Tuition & Fees - School of Law Admissions - University of West Los Angeles at https://www.uwla.edu/apps/pages/index.jsp?pREC_ID=606606&type=d&uREC_ID=321740
[57] Golden Gate law school was previously ABA-approved and will be teaching out its currently enrolled students in the ABA-approved program through 2027. Its California accredited JD program will begin in fall 2026. CALS Law School Directory available at https://www.calbar.ca.gov/admissions/law-schools/law-schools-directory?combine=golden&node_id=5099.
[58] Financial Aid/Tuition - Massachusetts School of Law, https://www.mslaw.edu/financial-aid/

School / Program Name	Estimated Total Program Cost (Tuition & Fees)
18. Cal Northern School of Law (CA)	$71,148[59]
19. Lincoln Law School of Sacramento (CA)	$88,000[60]
20. Lincoln Law School of San Jose (CA)	$88,000[61]
21. Northwestern California University (CA)	$19,920[62]
22. Birmingham School of Law (AL)	$30,600[63]
23. Miles Law School (AL)	$23,400[64]
24. Nashville School of Law (AL)	$46,640[65]

Estimated program costs were calculated using each school's current published tuition schedule and required program length. Sources for each school are provided in the footnotes.

IX. Licensure Portability Across State Regulatory Systems

The July 2 Report highlights that state-approved programs have geographic limitations on where their graduates can practice law. However, these limits arise from the fact that the practice of law is regulated on a state level, rather than from a graduate's ability to practice law. In fact, portability limitations are not unique to state-approved program pathways. Similar limitations exist for those who complete their legal education through the Washington Law Clerk Program governed by Rule 6 of the Washington Supreme Court Admission and Practice Rules (APR). Their ability to practice law in other jurisdictions is likewise determined by each state's admissions policies rather than by the quality of their clerkship training or competence.

[59] Scholarship & Loan Programs in Chico, CA | Cal Northern School of Law, https://calnorthern.edu/financial-information/
[60] Tuition and Fees | Lincoln Law School of San Jose, https://lincolnlawschool.edu/tuition-and-fees/
[61] *Id*.
[62] 2026 school catalog, Tuition and Finances, p. 21, https://www.nwculaw.edu/pdf/school_catalog.pdf
[63] Tuition & Fees - Birmingham School of Law, https://bsol.com/admissions/tuition-fees-2/
[64] Tuition rate is $260 per semester hour and the curriculum consists of 90 semester hours. Frequently Asked Questions — Miles Law, https://mlaw.edu/frequently-asked-questions and https://static1.squarespace.com/static/6433e066a08ddd5faa91ca69/t/69aa23b820bcc1253b9854cc/1772757945015/Curriculum+Form-Recovered+copy.pdf.
[65] Tuition and Financial Aid – Nashville School of Law, https://nsl.law/tuition-and-financial-aid/

Because each jurisdiction sets its own rules about licensure, these types of portability issues are bound to exist. Washington cannot control how other jurisdictions determine who is eligible for licensure, but this potential portability limitation should not prevent broadening pathways available to those who wish to join the legal profession in Washington.

As to consumer protection concerns, California-approved law schools operate under strict regulatory and statutory disclosure mandates, such as California Business & Professions Code § 6061.7, requiring them to explicitly inform students that they are not ABA-accredited.[66] These disclosures help prospective students understand how their degree may be recognized across different jurisdictions and allow them to make informed decisions based on their goals and personal circumstances.

X. Institutional Visibility and Student Equity

Prior to this policy change, students enrolled in state-approved, non-ABA, programs, many of which are online and provide vital access for non-traditional students, were ineligible for the foundational resources, mentorship networks, and opportunities readily available to their peers at ABA-accredited institutions and the APR 6 Law Clerk Program.

Most critically, these students have historically been ineligible for an APR 9 supervised legal intern license, preventing them from participating in the very experiential learning opportunities that develop practical skills, professional judgment, and competence. This is particularly striking because Washington already recognizes the competence of these graduates. Under existing rules, graduates from these schools may become Washington lawyers without taking the bar exam in Washington after either (1) obtaining licensure in another jurisdiction and practicing there for only one year or (2) transferring their exam score from another jurisdiction without any practice experience at all[67]. If we ultimately recognize them as qualified to enter the profession, it is difficult to justify denying them access to supervised practice opportunities while they are law students.

Excluding an entire category of future lawyers from these foundational experiences creates a structural equity issue. With one hand we welcome them into the profession, while with the other we deny them the same educational opportunities or institutional support as their peers at an ABA law school.

Expanding the policy to include state-approved law schools does not diminish the ABA's important role as the nation's primary accrediting body, nor does it reduce opportunities

[66] CA Bus. & Prof. Code § 6061.7(b)(3) states: "Any law school that is not approved by the American Bar Association shall include the standardized information report as part of the annual compliance report required to be submitted to the State Bar by all law schools that are not approved by the American Bar Association and are regulated by the examining committee of the State Bar."
[67] All of the states with state approved law schools, except California, administer the Uniform Bar Exam (UBE). California is considering adopting the NextGen UBE by July 2028.

for students educated at ABA-approved law schools. Instead, it ensures that every future Washington lawyer who satisfies our admissions standards has access to the same professional development, supervised practice experiences, and institutional support needed to serve the public. Most importantly, it recognizes these individuals for what they are: law students and future lawyers, deserving of the same opportunities to learn and succeed.

XI. Conclusion

The Board's May 2026 decision balances expanding opportunity and protecting the public. It preserves existing oversight standards, including the bar exam and character and fitness review process, while eliminating unnecessary barriers to affordable legal education and supervised practice training. It aligns Washington's longstanding policies to expand access to the legal profession with existing admissions rules, promotes consistency and fairness, and broadens pathways into the profession for individuals from diverse backgrounds. By maintaining this policy, the Board advances a more accessible, inclusive, and well-prepared legal profession without compromising standards that protect the public.

Comprehensive Analysis Report

ABA vs. Non-ABA Law School Comparison Matrix

Prepared by: Sarah Maginnis | Date: July 2, 2026

Dataset: 24 Non-ABA law schools across California, Alabama, Massachusetts, and Tennessee
Benchmarks Applied: ABA Standards 301, 303, 309, 316, 501–503, 509 | CA B&P §6061.7
All findings are grounded exclusively in data contained in the comparison matrix.

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I. Executive Summary

This report presents a comprehensive analysis of 24 non-ABA-accredited law schools operating across four U.S. states: California (20), Alabama (2), Massachusetts (1), and Tennessee (1). The dataset was compiled by researchers applying ABA accreditation standards as a benchmarking framework to evaluate how state-accredited and statute-authorized schools compare on key consumer-protection and academic-quality dimensions. All findings below derive exclusively from the comparison matrix of the companion workbook.

The analysis yields nine principal findings:

1. Admission Standards Are Highly Inconsistent. Among the 24 schools, only 25% (6/24) require a bachelor's degree. Nearly 60% of California CALS schools do not require a bachelor's degree, accepting applicants with as few as 60 semester units. Admission-test requirements are similarly fragmented: approximately 7 schools require a standardized test, while 9 explicitly do not.

2. Bar Passage Rates Vary Widely and Most Schools Fall Below the ABA Standard. For the 17 California CALS schools with 5-year cumulative bar passage rate (MPR) data, the mean is 70.5% and the range spans 53.1% (Lincoln Law School of San Jose) to 85.1% (San Joaquin College of Law). Only 8 of 17 schools (47%) meet or exceed the ABA's 75% 2-year ultimate rate benchmark. All 17 exceed California's 40% minimum. Non-CA schools show extremely volatile first-time rates (Birmingham: 0%–52%; Miles Law: 0% across all four administrations).

3. Attrition Is a Systemic Problem at Several Schools. Northwestern California University (NWCU) reports 38–53% annual attrition, with 60–68% of first-year students failing to reach second year. JFK School of Law loses approximately 75–80% of each entering class before second year. Lincoln Sacramento shows ~50–66% cohort drop-off. These figures far exceed the ABA's 20% red-flag threshold under Interpretive Rule 501-3.

4. Bar Pass Rates Are Partly Denominator-Driven. Schools with the highest 5-year MPRs (San Joaquin at 85.1%; NWCU at 82%) achieve those rates through very different mechanisms. SJCL front-loads academic exclusions in year one, eliminating 30–50% of each class, then graduates ~90–100% of survivors. NWCU achieves high MPRs on a small, self-selected cohort that survives a ~60% 1L→2L dropout rate. This denominator effect is analytically critical.

5. Experiential Requirements Fall Below ABA Standards at Most Schools. The ABA requires a minimum of 6 experiential credits (Standard 303(a)(3)). Only two CA schools unambiguously meet this floor: NWCU (6 required, though satisfiable via a writing course) and St. Francis (9 quarter units ≈ 6 semester units). Most schools fall well below, with Drivon reporting zero required experiential credits.

6. Tuition Ranges Nearly Tenfold Across the Dataset. Total program costs range from ~$9,360 (Miles Law School, AL) to ~$93,550 (Monterey College of Law, CA). The five cheapest

programs are all outside California ($9,360–$56,400). Within California, the range is $19,920–$93,550, with no clear correlation between cost and bar outcomes.

7. Transparency Standards Are Mixed. 12 of 24 schools (50%) publish formal learning outcomes. Most California CALS schools file the required CA B&P §6061.7(a) consumer disclosure, but quality varies. Four schools publish no learning outcomes whatsoever. The non-CA schools in Alabama and Tennessee show the most incomplete documentation in the dataset and require subsequent researcher review and verification.

8. Portability Is Severely Limited for All Non-ABA Graduates. Every school in the dataset carries a restricted geographic scope for bar eligibility. Purdue Global is the sole outlier, holding specific approvals in Connecticut (through 2027) and Indiana (by petition), with pathways to North Carolina and Wisconsin after licensure, making it the most portable non-ABA program in the dataset, though still far narrower than an ABA degree.

9. Several Schools Show Serious Warning Indicators. Three schools warrant heightened scrutiny: (1) University of West Los Angeles (UWLA), whose first-time bar pass rate fell to 7.7% in July 2025 and has a 5-year MPR of 57.6%; (2) Miles Law School, which recorded 0% first-time bar passage across all four administrations reviewed; and (3) Lincoln Law School of San Jose, whose total JD enrollment has collapsed from 67 to 21 students across 2022–2025 alongside a 53.1% 5-year MPR.

II. Dataset Overview & Methodology

2.1 Dataset Composition

The dataset contains 24 law schools, none of which hold ABA accreditation. The schools are distributed across four states and three accreditation frameworks:

State	# Schools	Accreditation Framework	Notes
California	20	CALS – Committee of Bar Examiners (state-accredited)	Includes 3 MCL branches & 1 closing school
Alabama	2	Authorized by state statute	Data incomplete; research status: Needs review
Massachusetts	1	State-authorized by statute	Operates its own aptitude test (MSLAT)
Tennessee	1	State-accredited	LSAT required; limited data collected

Of the 24 schools, 22 are currently active and admitting students. Two are not: Empire College School of Law (CA) is voluntarily closing and no longer admitting students, and Golden Gate University School of Law (CA) discontinued its ABA JD in November 2023 and is in a teach-out phase with no new JD admissions. GGU's data in the matrix largely reflects its prior ABA-era program and is used only where labeled as such.

2.2 Analytical Framework

Researchers used ABA accreditation standards as benchmarks for comparison, not as legal requirements applicable to the non-ABA schools. The following ABA standards were used as reference points:

ABA Standard / Benchmark	Dimension Assessed
Std 301/302	Published learning outcomes and curriculum design
Std 303(a)(2)/(3)	Required 1L legal writing course; minimum 6 experiential credits
Std 303(b)(1)	Clinics and field placements
Std 309	Academic advising and bar-passage support
Std 316	75% 2-year ultimate bar passage rate
Std 501–503	Admissions (character, bachelor's degree, test requirement)
Std 509 / Int. 501-3	Consumer disclosures; >20% attrition as a red flag
CA B&P §6061.7	California-specific consumer disclosure obligation for CALS schools
CA CALS MPR	40% minimum 5-year cumulative bar passage rate (California only)

All data cited in this report is drawn directly from the comparison matrix of the companion workbook. Where the matrix notes that data is incomplete, contested, or requires verification, those caveats are preserved in this report. Research status for most records is

coded 'Needs review.' The four non-California schools (Birmingham, Miles, MSL Andover, Nashville) have substantially less complete data and their analysis is treated as preliminary.

III. Accreditation Landscape

3.1 Types of Non-ABA Accreditation Represented

Non-ABA law school accreditation in the United States takes several forms, and the dataset reflects three distinct models:

- California CALS (Committee of Bar Examiners, State Bar of California): The largest category — 17 independent schools plus three branch campuses. CALS schools are accredited by the California State Bar under California Rules of Court and Business & Professions Code §6060. Several also hold regional institutional accreditation (WSCUC/WASC), including Humphreys (Drivon), JFK/National University, Monterey College of Law, Purdue Global, and San Joaquin.
- Alabama Statute-Authorization: Birmingham School of Law and Miles Law School operate under Alabama Code §34-3-2.1, which permits graduates to sit for the Alabama bar without ABA accreditation. The matrix notes uncertainty about whether these schools are technically 'accredited' or merely 'authorized/recognized' — a critical distinction that remains unresolved in the data.
- Massachusetts Statute-Authorization: Massachusetts School of Law at Andover (MSL) is authorized by state statute. Massachusetts allows graduates of MSL to sit for the MA bar directly. Notably, MSL operates its own admissions test (the MSLAT) in lieu of the LSAT.
- Tennessee State Accreditation: Nashville School of Law is state-accredited in Tennessee, which permits graduates to sit for the TN bar. Nashville requires both a bachelor's degree and the LSAT.

3.2 Institutional Accreditation Overlap

Several CALS schools also hold regional institutional accreditation from WSCUC (Western Association of Schools and Colleges), which applies to the parent institution rather than the law school program itself. This matters for federal financial aid eligibility (Title IV). Purdue Global School of Law is Title IV-eligible (as part of Purdue University Global), allowing students to access federal student loans — a significant differentiator from peers like NWCU (no federal or private loan programs at all) and Monterey College of Law (not Title IV-eligible).

3.3 Notable Transition: Golden Gate University

Golden Gate University School of Law represents the dataset's only institution transitioning from ABA-accredited to a prospective CALS status. Its November 2023 decision to discontinue the ABA JD provides a natural comparison point: GGU's ABA-era program generated full Standard 509 consumer disclosures, a Standard 316 ultimate bar passage history, extensive clinical offerings, and 4 attorney-counselors in Career Services — all benchmarks that current CALS schools do not reach. The prospective CALS JD (reportedly beginning Fall 2026) had not been confirmed as admitting students as of the research date.

IV. Admission Requirements

4.1 Bachelor's Degree Requirement

ABA Standard 502(a) requires a bachelor's degree from a USDE-accredited institution as a prerequisite for JD admission. The dataset reveals a stark contrast between the California CALS schools and the non-CA schools on this dimension.

School	State	Bach. Req'd	Notes
Purdue Global School of Law	CA	Y	No 60-unit/CLEP path; requires bachelor's + entrance exam + interview
St. Francis School of Law	CA	Y	Requires bachelor's, master's, or doctoral degree, min. 2.5 GPA
Birmingham School of Law	AL	Y	Bachelor's from accredited institution required
Miles Law School	AL	Y	Bachelor's with min. 2.8 GPA required
Massachusetts School of Law at Andover	MA	Y	U.S.-equivalent bachelor's required
Nashville School of Law	TN	Y	Bachelor's from accredited institution required
Cal Northern School of Law	CA	N	60 sem / 90 qtr units minimum; CLEP path for 'Special' students
Lincoln Law School of Sacramento	CA	N	60 units OR bachelor's; 'Special' path via CLEP + LSAT
Humphreys University Drivon	CA	N	60 units OR bachelor's; LSAT required for Special students
JFK School of Law at National University	CA	N	AA/AS OR 60 units acceptable; Special path via LSAT + CLEP
Lincoln Law School of San Jose	CA	N	Bachelor's OR AA/AS OR 60 units acceptable
Monterey College of Law	CA	N	60 units minimum; CLEP path available; LSAT waivable
Northwestern California University	CA	N	Bachelor's OR AA/AS OR 60 units; master's-only NOT eligible
San Joaquin College of Law	CA	N	Bachelor's OR 60 units; 'Special' path for exceptional applicants
University of La Verne	CA	N	Minimum 60 semester / 90 quarter hours required
UWLA	CA	N	AA with satisfactory GPA acceptable; Special CLEP path exists

Key finding: 6 of 24 schools (25%) require a bachelor's degree. The 14 California CALS schools that do not require a bachelor's permit enrollment with as few as 60 semester units — approximately two years of college — or via CLEP examination pathways for applicants with even less academic preparation. This is a foundational divergence from ABA Standard 502(a).

4.2 Admission Test Requirements

ABA Standard 503 requires law schools to use an ABA-approved admission test. Non-ABA schools are not subject to this standard, and admission test policies vary widely:

Summary of Admission Test Policies (Selected Schools):

Cal Northern School of Law: LSAT required (all applicants)

Golden Gate University (ABA era): LSAT required (historical)

Lincoln Law School of San Jose: LSAT, GRE, OR school-written evaluation

Purdue Global School of Law: School's own exam (being retired Aug 2026); LSAT/GRE/JD-Next from Jan 2027

University of La Verne: LSAT if taken; GRE/GMAT/MCAT alternatives; can waive on merit

Massachusetts School of Law: Proprietary MSLAT (replaces LSAT entirely)

Nashville School of Law: LSAT required

Lincoln Law School of Sacramento: LSAT optional for regular students; required for 'Special' students

Humphreys University Drivon: LSAT required for all (strictest among bachelor's-not-required CA schools)

San Joaquin College of Law: LSAT or GRE required

JFK School of Law at National University: LSAT 'highly encouraged but not required' for standard admits

Monterey College of Law: LSAT not required; waivable on multiple grounds

Northwestern California University: No LSAT required; test-blind in practice (§1e reports N/A)

St. Francis School of Law: Test-optional; LSAT/GRE not required

Birmingham School of Law: Not required (unless foreign bachelor's); strongly encouraged for GPA <2.75

Miles Law School: Not required

University of West Los Angeles: LSAT required (Performance Program for low scorers)

Pattern: Non-CA schools are split — Nashville requires the LSAT while Birmingham and Miles do not. Within California, NWCU is the most permissive (completely test-blind), while Cal Northern and UWLA are among the most demanding (LSAT required). MSL Andover's proprietary MSLAT is an anomaly — no standardized external benchmark applies. Purdue Global's interim proprietary exam carried a real cut score (approximately 51% of test-takers were disqualified in 2024–25), functioning as a genuine screening gate even without the LSAT.

V. Bar Passage Analysis

5.1 Five-Year Cumulative Bar Passage Rate (MPR) — California CALS

California's Committee of Bar Examiners maintains a Minimum Passing Rate (MPR) standard: CALS schools must achieve a 5-year cumulative passage rate of at least 40% among all first-time California bar examination takers from the school (California Rules of Court, Rule 4.160(D)). This is the operative California standard. For comparison, ABA Standard 316 requires a 75% 2-year ultimate bar pass rate. Both benchmarks are used below.

Table: 5-Year Cumulative MPR Rankings (CA CALS Schools with Available Data)

School	5-Yr MPR	vs. ABA 75%	Notes
San Joaquin College of Law	**85.1%**	✓ ABA	Highest in cohort; front-loaded academic exclusions
Empire College School of Law	**83.1%**	✓ ABA	CLOSING — no new students; historical figure
Northwestern California University	**82.0%**	✓ ABA	⚠ Severe attrition (~60% 1L→2L loss); denominator effect
Lincoln Law School of Sacramento	**81.4%**	✓ ABA	Despite ~50–66% cohort drop-off
University of La Verne	**81.0%**	✓ ABA	Strong MPR; high first-time volatility noted
Cal Northern School of Law	**78.4%**	✓ ABA	Small cohorts; individual-year rates volatile
Purdue Global School of Law	**76.8%**	✓ ABA	MPR rising; selective admissions gate
Golden Gate University	**75.0%**	✓ ABA	Teach-out cohort only; ABA-era program
Humphreys University Drivon	73.1%	✗ ABA	Below 75% ABA threshold
The Colleges of Law (SB+V)	68.1%	✗ ABA	Limited data; 'Not started' status
St. Francis School of Law	66.7%	✗ ABA	Small n; first-time rates very volatile
Thomas Jefferson School of Law	61.4%	✗ ABA	Consistently below ABA threshold
Monterey College of Law	61.2%	✗ ABA	Highest clinical count (13) yet mid-low MPR
JFK School of Law at National University	60.0%	✗ ABA	75–80% 1L→2L dropout; lowest of fully-documented CALS
University of West Los Angeles	57.6%	✗ ABA	⚠ RED FLAG: 7.7% first-time rate, July 2025
Trinity Law School	53.8%	✗ ABA	Below both thresholds; limited data
Lincoln Law School of San Jose	53.1%	✗ ABA	⚠ Lowest MPR; enrollment collapse 67→21 students

Statistical Summary (17 CA CALS schools with MPR data):

- Mean MPR: 70.5%
- Median MPR: ~68.1% (The Colleges of Law)
- Minimum MPR: 53.1% (Lincoln Law School of San Jose)
- Maximum MPR: 85.1% (San Joaquin College of Law)
- Standard Deviation: approximately 9.5 percentage points
- Schools meeting CA 40% minimum: 17/17 (100%)
- Schools meeting ABA 75% threshold: 8/17 (47%)
- Schools below 60%: 5/17 (29%) — JFK/National, UWLA, Trinity, Lincoln SJ, Thomas Jefferson

5.2 First-Time Bar Pass Rates — Recent Administrations

First-time pass rates are calculated per administration and are highly volatile, particularly for schools with small graduating cohorts (n < 30). The following table presents rates extracted from the matrix for February 2025, July 2025, and February 2026 administrations, where available.

School	Feb 2025	Jul 2025	Feb 2026
Cal Northern School of Law	n/a (n<11, suppressed)	n/a (n<11, suppressed)	n/a (n<11, suppressed)
Lincoln Law School of Sacramento	n/a (suppressed)	45.9% (n=37)	n/a (suppressed)
Monterey College of Law	66.7% (n=15)	46.7% (n=15)	23.8% (n=21)
NWCU School of Law	84.6% (n=13)	50.0% (n=14)	20.0% (n=15)
Purdue Global School of Law	69.0% (n=29)	37.5% (n=32)	33.3% (n=30)
San Joaquin College of Law	n/a (suppressed)	61.8% (n=34)	n/a (suppressed)
The Colleges of Law (SB+V)	58.8% (n=17)	22.2% (n=18)	43.6% (n=39)
Thomas Jefferson School of Law	45.8% (n=24)	29.3% (n=41)	28.6% (n=21)
Trinity Law School	66.7% (n=12)	28.6% (n=28)	27.8% (n=18)
University of La Verne	75.0% (n=20)	36.8% (n=68)	17.6% (n=17)
University of West Los Angeles	34.8% (n=23)	7.7% (n=39)	12.1% (n=33)
Birmingham School of Law	33.33%	0%	51.92%
Miles Law School	0%	0%	0%
MSL Andover	42.1%	51.85%	45.45%
Nashville School of Law	44.44%	68.75%	0%
St. Francis School of Law	33% (n=3)	n/a	29% (n=7)
GGU (teach-out only)	n/a	42.1% (n=19)	n/a

Critical Observations from First-Time Rate Data:

- Extreme Volatility: Schools with small cohorts (n<20) show swings of 40+ percentage points between administrations. Cal Northern, Humphreys Drivon, JFK/National, Lincoln SJ, and St. Francis all had fewer than 11 first-time takers per administration, qualifying for State Bar data suppression, making trend analysis statistically unreliable.

- UWLA's Persistent Low Performance: UWLA shows first-time rates of 34.8%, 7.7%, and 12.1% across three consecutive administrations. The July 2025 figure (7.7%, n=39) is the single lowest first-time rate in the dataset on a sample large enough (n≥30) to be meaningful. This is a statistically significant indicator of systemic concern.
- Miles Law School with Zero Across All Administrations: Miles Law recorded 0% first-time passage in all four administrations reviewed (July 2024 through February 2026). While sample sizes are not confirmed, four consecutive zero results constitute an extreme anomaly warranting urgent scrutiny.
- NWCU's February Cliff: NWCU went from 84.6% (Feb 2025) to 20.0% (Feb 2026), a 64.6-point drop. Both samples are small (n=13–15), reinforcing the denominator-effect concern. The high Feb 2025 figure likely reflects a cohort of particularly resilient survivors; the Feb 2026 drop may reflect a weaker cohort reaching the bar after prior years' attrition.
- La Verne's February 2026 Collapse: La Verne posted a 75.0% first-time rate in February 2025 (n=20), meeting the ABA threshold — but fell to 17.6% in February 2026 (n=17). The 57.4-point swing on small samples illustrates why single-administration rates cannot substitute for the 5-year cumulative MPR as a stability measure.
- Nashville's February 2026 Zero: Nashville School of Law recorded 0% in February 2026. Whether this reflects a small-n anomaly or a structural concern is unclear given incomplete data.

VI. Attrition Patterns

Under ABA Interpretive Rule 501-3, an annual non-transfer attrition rate exceeding 20% is treated as a red flag warranting scrutiny of whether a school's admissions standards appropriately select for students capable of completing the program. The non-ABA schools in this dataset are not formally subject to this standard, but it is applied here as an analytical benchmark.

6.1 Extreme Attrition Schools

Northwestern California University School of Law (NWCU)

NWCU is the most extreme case in the dataset. Total annual attrition counts reached 327 (2022), 458 (2023), 421 (2024), and 466 (2025) against a total enrollment of approximately 880 students — representing roughly 38–53% annual departure rates. The 1L→2L cohort collapse is especially severe: approximately 540 students enroll each year, but only 170–212 reach second year — a loss rate of approximately 60–68% per cohort. The school notes transfers-out as 'unknown,' suggesting even these figures may be incomplete. NWCU is a fully online, no-LSAT, no-bachelor's-required program with no structured academic support program, making it the dataset's clearest example of the 'wide door, little scaffolding' admissions model Std 501 is designed to scrutinize.

JFK School of Law at National University

JFK/National documents approximately 75–80% loss from 1L to 2L in recent cohorts: 92 first-year students in 2022 produced only 17 second-year students in 2023; 53 first-years in 2023 produced 18 second-years in 2024; 66 first-years in 2024 produced only 15 second-years in 2025. Despite this, JFK/National offers the most robust academic support infrastructure in the CALS cohort — BarBri bundled from enrollment, two embedded Extended Bar Review courses (LAW-798 A/B), university-scale support services, and a Director of Student and Bar Success. The persistence of extreme attrition alongside strong support infrastructure suggests the pipeline problem lies upstream (admissions) rather than downstream (curriculum/support).

Lincoln Law School of Sacramento

Lincoln Sacramento documents a Fall 2022 entering class of 128 students of which only 44 reached second year (~66% loss). Published graduation rates of 43–60% confirm that approximately half of all entrants do not complete the degree. Annual attrition counts were 44 (2021), 56 (2022), 41 (2023), and 50 (2024) across all class years.

Lincoln Law School of San Jose

While attrition counts are smaller, the enrollment trajectory is alarming: total JD enrollment collapsed from 67 (2022) to 40 (2023) to 27 (2024) to 21 (2025), with first-year enrollment at just 4 students in 2024. The school's accreditation was reportedly lost and regained in

2025 (per the matrix's 'regained 2025' notation), though this was not independently verified by researchers. With 0 full-time faculty, 23 part-time faculty, and average required-course class size of 7, the program's operational viability warrants close scrutiny.

6.2 Moderate-to-Low Attrition Schools

In contrast, several schools demonstrate stable or declining attrition:

University of West Los Angeles (UWLA): UWLA shows the lowest annual attrition rates in the dataset: 3.07% (2022), 4.01% (2023), 4.12% (2024), and 2.33% (2025) — far below the ABA 20% threshold. Enrollment is also growing (293→386 total JD students). This makes UWLA's persistently low bar passage rates (MPR 57.6%; July 2025 first-time rate 7.7%) all the more concerning: the school retains most students yet produces poor bar outcomes.

University of La Verne: La Verne's attrition rates are similarly modest: 5.26% (2020), 9.41% (2021), 10.49% (2022), and 10.27% (2023). Total enrollment of 285–331 students is stable. This profile — low attrition, reasonable 5-year MPR (81.0%) — is the most favorable overall picture among the larger CALS schools.

Humphreys University Drivon: Drivon reports annual attrition of just 6–10 students against a total enrollment of 62–107, representing rough annual rates of 6–10%. These are among the most conservative attrition figures in the California cohort.

Monterey College of Law: Monterey's attrition was 36 in 2022 but fell sharply to 13 (2023), 9 (2024), and 25 (2025). Against total enrollment of approximately 240–258 students, the annual rates approximate 17%, 5%, 3%, and 10% respectively — moderate and improving after 2022.

6.3 SJCL's Distinctive Front-Loaded Attrition Model

San Joaquin College of Law presents a statistically important outlier in the attrition-to-bar-passage relationship. SJCL deliberately front-loads academic exclusions in first year: published Student Achievement data shows that 30–50% of entering students are academically excluded or withdraw in year one (first-year retention rates of 40–61% across reported cohorts). However, the 'retained graduation rate' — the proportion of first-year survivors who ultimately graduate — is 90–100%. In other words, SJCL operates a hard academic filter at entry, then supports survivors through to completion with near-certainty. The result is the highest 5-year MPR in the CALS cohort (85.1%). This is the clearest documented example in the dataset of the mathematical relationship between pre-bar-exam attrition and reported bar passage rates.

VII. Curriculum & Experiential Requirements

7.1 Legal Writing Requirements

ABA Standard 303(a)(2) requires at least one rigorous legal writing course in the first year. The dataset shows that essentially all schools with documented curricula include at least one legal research and writing course, though rigor, sequencing, and depth vary considerably:

- Strongest LARW sequences (multi-year scaffolded): Lincoln Sacramento (LWI–LWII across 4 years); Monterey College of Law (Legal Writing I A/B, Legal Research, Legal Writing II A/B, Appellate Writing, Moot Court with prerequisite chains and pass-to-advance gates); San Joaquin (Legal Methods I & II, Appellate Advocacy, Moot Court, and Advanced Research & Writing).
- Standard sequences: Cal Northern (103 Legal Research + 104 Legal Writing, 1L, plus 4L advanced courses); Purdue Global (CL600/601 Introduction to Legal Analysis I & II, CL727, CL728/729); St. Francis (LAW 2010 Intro to Legal Research & Writing + LAW 2020 Advanced Legal Writing in year 2).
- Thin or one-course sequences: NWCU (single combined 'Introduction to Law, Legal Analysis, and Legal Research,' 4 units, 1L); Humphreys Drivon (LAW 100 Intro to Law + LAW 101 Legal Research and Writing I, though LAW 430 Advanced Legal Writing is required in 4L).
- Non-CA schools: All four document at least one legal research and writing course (Birmingham: Law 521; Miles: Course 603; Nashville: Legal Skills & Values; MSL Andover: Writing & Legal Reasoning).

7.2 Experiential Credit Requirements vs. ABA Standard 303(a)(3)

ABA Standard 303(a)(3) mandates at least 6 experiential credits for ABA-accredited students. The following table summarizes each documented school's required experiential floor against this benchmark:

School	Required Experiential	vs. ABA 6cr	Notes
NWCU School of Law	6 units required	✓ Meets floor	BUT: satisfiable via legal writing course; not clinics/simulation
St. Francis School of Law	9 qtr units (~6 sem)	✓ Meets floor	Professional skills courses; externship elective; 0 school clinics
Lincoln Law School of San Jose	~7 units (simulation)	✓ Meets floor	Moot Court + Negotiation + Trial Practice — all simulation, no live-client
Purdue Global School of Law	Embedded (unconfirmed)	⚠ Unclear	CL740 Modern Law Practice embedded; rich elective menu; thin required floor
Monterey College of Law	~4 units required	✗ Below floor	2 clinical + 2 mediation + Moot Court; strongest required experiential in CALS
Cal Northern School of Law	5 units required	✗ Below floor	Required clinic (3u) + Trial Advocacy (2u)

San Joaquin College of Law	4 units required	✗ Below floor	Moot Court (2u) + Appellate Advocacy (2u); 6u only in 3-yr accelerated track
Lincoln Law School of Sacramento	3 units required	✗ Below floor	Trial Advocacy only (simulation); no required clinic
JFK School of Law at National University	~1 unit required	✗ Below floor	Required 60-hr public interest internship (1u); no clinic
Humphreys University Drivon	0 units required	✗ Below floor	All experiential coursework elective; 0 school-sponsored clinics
Birmingham School of Law	One 3-credit skills course	⚠ Partial	Arbitration, Negotiation, Mediation, or Trial Advocacy — one required
Nashville School of Law	Trial Practice Series (not quantified)	⚠ Partial	2-credit classes offered; required count unclear from available data
MSL Andover	Judicial Internship (elective)	⚠ Elective only	Up to 6 credits, but elective; no confirmed required experiential floor

Key finding: Only 2 of the 13 schools with documented experiential requirements (15%) unambiguously meet the ABA's 6-credit floor. The majority fall below this threshold, with one school (Drivon) requiring no experiential coursework at all. This represents one of the most consistent gaps between non-ABA and ABA standards across the dataset.

7.3 Clinics and Field Placements

ABA Standard 303(b)(1) requires ABA schools to offer substantial opportunities for live-client or field-placement work. The §6061.7(a) disclosures for CA CALS schools report school-sponsored clinical programs. Reported counts:

School	Reported Clinical Programs	Notes
Monterey College of Law	13	Most in cohort; includes required Small Claims Advisory Clinic
San Joaquin College of Law	2 in-house live-client clinics	NALC (immigration) + BREN (special ed); plus externship program
Cal Northern School of Law	1 (Self-Help Center, required)	Plus elective externship program
Lincoln Law School of San Jose	1 (USPTO Patent/Trademark Clinic)	Pro bono; not required
Purdue Global School of Law	1 (Criminal Law Clinic)	Elective; plus LEEP externship program
Nashville School of Law	2 (Wills + Juvenile Court Custody)	Externships also offered
Birmingham School of Law	1 (Mediation Clinic)	Under Prof. Baker at Jefferson County Mediation Project
Lincoln Law School of Sacramento	0	No school-sponsored clinic; elective internship program only
Humphreys University Drivon	0	Confirmed via §6061.7 §6c disclosure
NWCU School of Law	0	Online school; no in-house clinic; student-arranged internship only
St. Francis School of Law	0	Online school; externship/field placement courses only
JFK School of Law at National University	0 (per §6c)	Required public-interest internship but no school-run clinic

VIII. Tuition & Cost of Attendance

Total program costs (tuition plus fees to complete the JD) vary nearly tenfold across the dataset — from approximately $9,360 (Miles Law School, AL) to $93,550 (Monterey College of Law, CA). The following table presents total program cost data where available, organized from least to most expensive.

School	State	Total Program Cost	Notes
Miles Law School	AL	~$9,360	$260/semester hour × 36 hours required
Nashville School of Law	TN	~$46,640	$9,820/yr (Yr 1–2), $12,000 (Yr 3), $15,000 (Yr 4)
St. Francis School of Law	CA	~$56,400	$13,000/yr × 4 yrs + $4,400 fees
Purdue Global School of Law	CA	~$52,900–$56,440	$575/credit × 92 credits + fees (~$3,540 FT)
NWCU School of Law	CA	~$19,920–$22,000	$4,980/yr × 4 yrs + fees/materials; NO loans available
Massachusetts School of Law	MA	~$93,600–$117,000	$23,400/yr PT or $29,250/yr FT × ~4 or ~3 years
JFK School of Law (National)	CA	~$68,224+	$711/credit-hour × 82 units + fees
UWLA	CA	~$68,851	Total COA without parent (2025–26)
Cal Northern School of Law	CA	~$75,613	Total tuition + fees (§6061.7 §2b+c)
Lincoln Law School of Sacramento	CA	~$75,760	$73,960 tuition + $1,800 fees
Humphreys University Drivon	CA	~$73,800	$615/quarter unit × 120 units; no additional fees
Lincoln Law School of San Jose	CA	~$88,000	$22,000/yr × 4 yrs + $4,500 fees
San Joaquin College of Law	CA	~$90,450	$86,430 tuition + $4,020 fees
Monterey College of Law	CA	~$93,550	$85,750 tuition + $7,800 fees — HIGHEST in cohort
Birmingham School of Law	AL	~$36,000–$42,480	$9,000–$10,938/yr × 4 yrs (weeknight/Saturday)
University of La Verne	CA	$1,165/sem. hr	Total program cost not directly comparable; per-hour rate

Key Cost Observations:

- The non-California schools are dramatically cheaper — Miles Law ($9,360) and Nashville ($46,640) represent the cheapest options in the dataset, while Alabama's Birmingham

($36,000–$42,480) and Massachusetts Law ($93,600–$117,000 depending on track) bookend the non-CA range.

- Within California, the range from NWCU ($19,920) to Monterey ($93,550) spans nearly $74,000 — a fivefold difference within a single state's accreditation framework.
- There is no positive correlation between cost and bar outcomes in this dataset. Monterey, the most expensive CA school ($93,550), has an MPR of 61.2%. NWCU, the cheapest CA school ($19,920), has an MPR of 82.0% — though this figure is substantially driven by the denominator effect of extreme attrition.
- NWCU is unique in accepting no loan programs whatsoever — no federal, state, or private loans. Students pay $415/month on a subscription model. This makes it accessible by monthly cost but removes the financial-aid safety net available at Title IV-eligible programs like Purdue Global.
- Federal financial aid (Title IV) eligibility: Purdue Global is confirmed Title IV-eligible. NWCU and Monterey are not. For many prospective students, Title IV access may be determinative of whether a program is financially accessible.

IX. Transparency & Consumer Disclosures

9.1 California §6061.7 Disclosure Compliance

California Business & Professions Code §6061.7(a) requires all CALS schools to file annual consumer disclosures covering admissions data, enrollment, attrition, faculty composition, employment outcomes, bar passage, cost, and student financial aid. Compliance is generally strong among the documented California schools, though quality varies:

- Strong/Complete Disclosures: Lincoln Sacramento (fully populated, Jan 2026 disclosure with PLO assessment report); Monterey College of Law (full §6061.7 + MPR history published, institutional research function); Purdue Global (full §6061.7 + bar pass rates with state averages; candid 'cannot guarantee' language); NWCU (both 2025 and 2026 disclosures posted).
- Adequate but with Concerns: NWCU's 'Practicing Law in Other States' page is characterized in the matrix as 'arguably optimistic/borderline' — it emphasizes states where graduates 'have so far been admitted' in a manner that could overstate portability. Purdue Global markets a tuition comparison to ABA schools that, while accurate, is noted as promotional.
- Incomplete or Hard to Find: Humphreys Drivon publishes no dedicated academic-support page and no learning outcomes catalog. University of La Verne's §6061.7 disclosure is 'slightly difficult to find' with no dedicated disclosure section.
- Non-CA Schools: Birmingham, Miles, Nashville, and MSL Andover are not subject to §6061.7 and the matrix does not document ABA 509-equivalent disclosures for them. Nashville's disclosure is noted as absent. MSL Andover has a student consumer information webpage but no '509-equivalent paperwork' structure.

9.2 Published Learning Outcomes

ABA Standards 301(b) and 302 require published learning outcomes and curriculum mapping. The dataset shows a mixed picture:

Publishing learning outcomes (12 schools):

- Cal Northern (6 PLOs + curriculum map)
- Lincoln Sacramento (6 PLOs + published assessment report)
- Lincoln SJ (4 PLOs)
- Monterey (3-tier ILO→PLO→CLO framework with assessment matrix)
- Purdue Global (7 JD Learning Outcome Objectives)
- San Joaquin (5 measurable SLOs + independent assessment)
- St. Francis (5 PLOs in General Catalog)
- JFK/National (institutional ILOs; JD-specific PLOs unconfirmed)
- University of La Verne (learning outcomes listed on website)
- UWLA (learning outcomes published)
- GGU (ABA-era; discontinued program)
- MSL Andover (extensive learning outcomes on website)

No published learning outcomes found (4 schools):

- Humphreys University Drivon
- Northwestern California University School of Law
- Miles Law School
- Nashville School of Law

8 schools (Empire, three MCL branches, The Colleges of Law, Thomas Jefferson, Trinity, Birmingham) have no documented learning outcomes status — their research records are coded 'Not started' or 'Needs review' with incomplete data collection.

X. Academic Support Infrastructure

ABA Standard 309 requires academic support and bar-preparation programs. The dataset documents a wide range of support infrastructure intensity across the non-ABA schools.

Tier 1 — Robust, Structured, University-Scale

- JFK School of Law at National University: BarBri from enrollment; Director of Student and Bar Success; two mandatory Extended Bar Review courses (LAW-798 A/B) in required curriculum; University Academic Success Center (24/7 writing/coaching); Student Wellness + Behavioral Intervention Team; full library with Reference & Instruction Librarian.
- Purdue Global School of Law: Dedicated Academic Resource Center (1,000+ MCQs; model answers; skills videos); FLEX pre-admission skills program; required two-term Capstone (CL780/781) bar prep in curriculum; commercial bar-prep discount; Student Support team; 24/7 Westlaw/HeinOnline; professional librarians.
- Lincoln Law School of Sacramento: Dedicated Student Resource Center (SRC) with a Director of Student Services; proactive monitoring (midterm + final performance triggers); Small Groups (Zoom) for struggling students; Friday Review Program; Judge Mentorship for 4L students.

Tier 2 — Moderate, Dedicated Program

- Cal Northern School of Law: Mandatory tutoring program for students with course grades <70 or cGPA <2.00; required Kaplan PMBR bar review before graduation; required Intro to Law School & Legal Analysis (1L) orientation course.
- San Joaquin College of Law: Faculty open-door policy; regular study/review sessions; Director of Student Services academic advising; non-curve grading model; Career Services with résumé/mock interviews; Library Director doubles as R&W Program Director.
- Monterey College of Law: Required 1L Legal Skills course; embedded required bar-prep course (Legal Synthesis I & II) beginning with Class of 2028; academic probation safeguards; Institutional Research office for outcomes assessment.
- St. Francis School of Law: Director of Academic Excellence; Disability Services; embedded bar prep (LAW 4210/4220 General Bar Prep I & II) and LAW 2410 Competency Review.
- MSL Andover: Required twice-per-semester faculty advising meetings; Writing Lab; faculty availability.

Tier 3 — Minimal or Undocumented

- Northwestern California University School of Law: No structured academic-support program, no tutoring program, no bar-prep course found. Self-directed: faculty via online platforms; suggested study plans; LexisNexis/CALI access. Consistent with self-paced online model; 0 degreed librarians per §6061.7.
- Humphreys University Drivon: No academic-support or tutoring page located on the school's website as of the research date. Unlike peer CALS schools, Drivon publishes no dedicated academic-support or bar-prep program.

- Miles Law School: No academic support details documented (website described as 'very basic' with 'very little information').
- Nashville School of Law: Brief mention of advice, informal counseling, referrals, tutorials, and exam support — but no structured dedicated support program documented.

Pattern: The correlation between academic support intensity and bar outcomes is not linear across this dataset. JFK/National has the most comprehensive support infrastructure yet also has the lowest 5-year MPR among fully-documented CALS schools (60.0%) and extreme 1L→2L attrition. This suggests that robust support cannot compensate for an admissions pipeline that admits applicants who lack foundational preparation for law school-level work — a finding consistent with the ABA's Std 501 framework, which evaluates admissions practices and support together, not independently.

XI. JD Portability Beyond Home State

JD portability — the ability of a graduate to sit for bar examinations in multiple states — is one of the most significant practical distinctions between ABA-accredited and non-ABA JDs. An ABA degree provides broad national portability; a non-ABA degree generally does not.

All 24 schools in this dataset are classified as having 'Limited' portability. The operative rule for each school's home state is:

- California: CALS graduates may sit for the CA bar outright. Most other states do not accept CA-accredited (non-ABA) degrees for direct exam eligibility. Approximately 30 states admit some non-ABA path, but typically require prior licensure in another state plus several years of practice — not fresh-graduate exam eligibility.
- Alabama: Birmingham and Miles graduates may sit for the AL bar per Alabama Code §34-3-2.1. Other-state portability follows the same restrict framework as CA CALS.
- Massachusetts: MSL Andover graduates may sit for the MA bar directly. Other-state portability is narrow.
- Tennessee: Nashville graduates may sit for the TN bar. Other-state portability is restricted.
- Washington State Exception (9/1/2026): A new Washington rule taking effect September 1, 2026 creates a pathway for non-ABA graduates to sit for the Washington bar.

Purdue Global as Outlier — Multi-State Portability:

Purdue Global School of Law is the only school in the dataset with affirmative portability beyond its home state that does not require prior licensure. Purdue Global graduates are specifically approved to sit for: the California bar (CALS); the Connecticut bar (CT Bar approved PGLS graduates in 2024, valid through 2027 pending renewal); and the Indiana bar (by approved individual petition/waiver). After licensure in CA, CT, or IN, graduates may then apply in North Carolina and Wisconsin. The CT approval's 2027 renewal deadline is noted as a real caveat. This multi-state footprint required individual school-level effort and remains far narrower than an ABA degree, but it is a genuine differentiator within the dataset.

XII. Outliers, Anomalies & Red Flags

The following schools or data points represent statistical outliers, anomalies, or indicators that, based on the data in the matrix, warrant heightened attention.

🔴 CRITICAL: Miles Law School — Zero Bar Passage Across All Administrations

Miles Law School recorded 0% first-time bar pass rate in every administration reviewed: July 2024, February 2025, July 2025, and February 2026. Four consecutive zero-passage results represent an extreme anomaly with no parallel elsewhere in the dataset. No MPR data is available. The school's website is characterized as 'very basic' with 'very little information,' research status is 'Needs review,' and experiential/clinical/academic support data is entirely undocumented. Alabama's accreditation framework (statute-authorization vs. accreditation) is also unresolved in the matrix. Taken together, Miles Law presents the most acute unresolved data gap in the dataset.

🔴 CRITICAL: University of West Los Angeles — Persistent Low Bar Passage Despite High Retention

UWLA is an anomaly in an important inverse sense: it has the lowest attrition in the cohort (2.33%–4.12% annually) and growing enrollment (293→386 students) but a 5-year MPR of only 57.6% and first-time rates of 34.8% (Feb 2025), 7.7% (Jul 2025, n=39), and 12.1% (Feb 2026, n=33). The July 2025 rate of 7.7% on a sample of 39 is the lowest statistically meaningful first-time rate in the dataset. This combination — keeping students enrolled but not producing bar-passage outcomes — is the inverse of the attrition-denominator problem and raises independent consumer protection concerns.

🟡 SIGNIFICANT: NWCU's Denominator Effect and Portability Page

NWCU's 5-year MPR of 82.0% is the third-highest in the dataset but is achieved on a cohort that represents only approximately 30–40% of each entering class — the 60–68% who did not complete first year are excluded from the MPR denominator. The school's 'Practicing Law in Other States' page is characterized in the matrix as 'arguably optimistic/borderline' — presenting a list of 12+ states where graduates 'have so far been admitted' in a manner that may overstate general portability. These two features, taken together, represent a possible consumer information gap.

🟡 SIGNIFICANT: Lincoln Law School of San Jose — Enrollment Collapse and Accreditation Concerns

Lincoln SJ's total JD enrollment collapsed from 67 (2022) to 21 (2025), with only 4 first-year students in 2024 and a 5-year MPR of 53.1% — the lowest in the cohort. The program has 0 full-time faculty (23 part-time), 0 degreed librarians, average required-course class size of 7, and the matrix notes accreditation was 'reportedly lost and regained in 2025.' At

this scale and trajectory, the school's operational viability as a going concern is a reasonable analytical question.

🟡 SIGNIFICANT: Golden Gate University — ABA-to-CALS Transition Provides a Natural Control Case

GGU's 2023 transition from ABA accreditation to prospective CALS status is not a red flag in itself but provides a uniquely valuable analytical contrast. Its ABA-era infrastructure — full Std 509 disclosures, Standard 316 ultimate bar passage reporting, 4 attorney-counselors in Career Services, formal complaint-resolution procedures — illustrates what the ABA accreditation regime structurally produces. The prospective CALS program, if launched, will operate without any of these requirements. GGU is the dataset's most instructive example of the structural difference between the two regimes.

🟠 ANOMALY: MSL Andover's Proprietary MSLAT

MSL Andover requires all applicants to take the Massachusetts School of Law Aptitude Test (MSLAT) — a school-developed, proprietary test replacing the LSAT entirely. No external benchmark is applied to admission screening at MSL, meaning there is no standardized third-party measure of incoming academic preparation. MSL's first-time bar rates are consistent and low (41–52% range), with no administration-to-administration volatility comparable to smaller cohorts. This stability at a modest level may reflect the MSLAT's screening function, though no comparator data exists to evaluate whether MSLAT screening is more or less predictive than LSAT.

🟠 ANOMALY: SJCL's '90–100% Retained Graduation Rate' vs. 40–61% First-Year Retention

San Joaquin's published Student Achievement data shows a near-perfect graduation rate among first-year survivors (90–100%) alongside first-year retention rates of only 40–61%. This two-tiered outcome model — hard filter at entry, near-certain graduation after — is statistically distinct from every other school in the dataset and directly explains its 85.1% MPR. The school publishes this data proactively, which itself is an outlier in terms of transparency.

🟠 ANOMALY: Purdue Global's Growing Enrollment Alongside ~20% Annual Attrition

Purdue Global is simultaneously growing (798→1,180 total JD enrollment, 2022–2025) and reporting annual attrition of approximately 20% — precisely at the ABA red-flag threshold. The growth is partially attributable to large transfers-in (30→65/year). The school's hard academic gate (<1.00 CGPA after term 1 = automatic dismissal) and rising MPR (76.8%) suggest a program managing quality while scaling — but the coincidence of growth and ~20% attrition is worth monitoring.

XIII. Cross-Cutting Patterns & Trends

Pattern 1: Attrition-as-Filter Produces Higher Bar Rates — But Obscures Consumer Information

The most consistent pattern across the dataset is the mathematical relationship between pre-bar-exam attrition and reported bar passage rates. Schools that aggressively screen (SJCL: front-loaded academic exclusions; NWCU: organic 60% 1L→2L dropout; Lincoln Sacramento: cohort drop-off of ~50–66%) report higher MPRs because the reported denominator is self-selected. The ABA's Standard 316 '75% 2-year ultimate rate' is designed to address this by computing the rate across an entire entering cohort, not just bar-takers. No non-ABA school in this dataset calculates or reports a Standard 316-equivalent metric, making cross-school comparison structurally difficult.

Pattern 2: Admission Gate Correlates With Both Attrition and Bar Outcomes

Schools with genuine admission screening — bachelor's requirement and/or a required standardized test — tend to show better bar outcomes and more manageable attrition. Purdue Global (bachelor's required + proprietary test + telephone interview + FLEX program): 76.8% MPR, ~20% attrition, growing enrollment. San Joaquin (LSAT or GRE required): 85.1% MPR. Cal Northern (LSAT required): 78.4% MPR. In contrast, NWCU (no LSAT, no bachelor's required) and JFK/National (LSAT optional): 60–82% MPR with severe attrition. The correlation is imperfect but directionally consistent across the dataset.

Pattern 3: Online-Only Programs Show Higher Attrition Regardless of Support Level

The three fully-online California CALS schools (NWCU, JFK/National at NU, Purdue Global) all show elevated attrition compared to in-person programs. NWCU (38–53%/yr), JFK/National (~75–80% 1L→2L), and Purdue Global (~20%/yr) all exceed the ABA 20% threshold. St. Francis (online, CA) shows lower attrition (11–17 annual departures against ~103–133 enrollment) but has a 5-year MPR of only 66.7%. The pattern suggests that the online format compounds the access-accessibility challenges of open-admissions policies, though Purdue Global's selective admissions gate moderates this effect.

Pattern 4: Cost Does Not Predict Bar Quality

Across the dataset, there is no statistically meaningful positive correlation between total program cost and bar outcomes. Monterey ($93,550) has a 61.2% MPR. NWCU ($19,920) has an 82.0% MPR (with denominator caveats). Nashville ($46,640) passes the bar at 44–69% range. San Joaquin ($90,450) leads the cohort at 85.1%. Miles Law ($9,360) records 0% across four administrations. Cost appears to reflect geographic market, program format, and institutional overhead more than instructional quality as measured by bar outcomes.

Pattern 5: California CALS Schools Concentrate 80% of the Dataset but Exhibit Maximum Variance

The 20 California schools (including branches) represent 83% of the total dataset. Within this group, 5-year MPRs range from 53.1% to 85.1% — a 32-percentage-point spread within a single state's accreditation framework. Admission standards range from no-LSAT/no-bachelor's required (NWCU) to bachelor's required with a proprietary admission test and telephone interview (Purdue Global). Tuition ranges from $19,920 to $93,550. This extreme within-state variance demonstrates that state accreditation does not impose a uniform quality floor above the 40% MPR minimum, and that the CALS accreditation label encompasses a very wide range of educational profiles.

Pattern 6: Non-California Schools Are Cheaper but Data-Poorer

The four non-California schools (Birmingham, Miles, MSL Andover, Nashville) are uniformly cheaper than the California cohort, require a bachelor's degree (all four), and present substantially less documentation in the matrix (all coded 'Needs review'; Birmingham, Miles, and The Colleges of Law also coded 'Not started'). Bar passage data for the non-CA schools is extracted from state bar statistics rather than §6061.7 disclosures, and no MPR-equivalent metric exists for AL, MA, or TN. This data asymmetry means the non-CA schools can be described but not comparatively ranked with statistical confidence against the California cohort.

XIV. State-by-State Summary

14.1 California

California has the most developed non-ABA law school ecosystem in the country, governed by the Committee of Bar Examiners (CALS accreditation) and consumer disclosure obligations under B&P Code §6061.7. Key aggregate findings:

- 20 entries in the dataset; 17 independent schools plus 3 MCL branches; 1 closing, 1 in transition.
- 5-year MPR range (17 schools): 53.1%–85.1%; mean 70.5%; 8/17 (47%) meet ABA 75% threshold.
- No bachelor's degree required at 14/20 schools — the majority accommodate applicants with 60 semester units.
- 4 schools (Purdue Global, St. Francis, and all the ABA-benchmark schools including GGU) require a bachelor's.
- Admission test required at approximately 7 schools; 9 do not require a test at all.
- 6 schools report zero school-sponsored clinical programs.
- Only 2 schools unambiguously meet the ABA's 6-credit experiential floor.
- NWCU's enrollment (~889 total JD) and Purdue Global's enrollment (~1,180) dwarf all other schools in the dataset.
- Washington's September 2026 rule change (admitting non-ABA graduates to sit for the WA bar) is the policy trigger for this research and creates new portability for all California CALS graduates.

14.2 Alabama

Birmingham School of Law and Miles Law School are authorized by Alabama statute to graduate students who may then sit for the Alabama bar without ABA accreditation. Both require a bachelor's degree; neither requires an admission test. Both are 4-year part-time evening programs. Key distinctions:

- Birmingham: Annual tuition $9,000–$10,938 (weeknight/Saturday programs); first-time bar rates of 0%–52% across four administrations (high variance); one Mediation Clinic documented.
- Miles Law School: Total estimated program cost $9,360 (cheapest in dataset); 0% first-time bar passage across all four administrations reviewed; website described as 'very basic with very little information'; no experiential, clinical, or academic support data documented. Whether 'authorized' and 'accredited' are equivalent under Alabama law is unresolved in the matrix.
- Neither school has MPR data, 5-year cumulative statistics, or §6061.7-equivalent disclosures.

14.3 Massachusetts

Massachusetts School of Law at Andover is the sole non-ABA school documented in Massachusetts. It is state-authorized, requires a bachelor's degree, and uses a proprietary admissions test (MSLAT). The school offers both a 3-year full-time and a 4-year part-time program. Its first-time bar rates are stable but modest (41%–52% across four recent administrations). It publishes learning outcomes, provides faculty advising twice per semester, and has a Writing Lab — a basic but structured support infrastructure. Massachusetts allows MSL graduates to sit for the MA bar directly, with limited other-state portability.

14.4 Tennessee

Nashville School of Law is Tennessee's only non-ABA school in the dataset. It is state-accredited, requires a bachelor's degree and the LSAT, and offers a 4-year part-time evening program (M–Th, 4:45 PM) at a total cost of approximately $46,640. It documents a Wills Clinic and a Juvenile Court Custody Clinic, and mentions tutorials and exam support, but no structured academic support program is documented. Bar rates are volatile (0% in February 2026; 68.75% in July 2025; 44.44% in February 2025). No MPR equivalent or learning outcomes publication is noted.

XV. Conclusions & Key Takeaways

This analysis, grounded entirely in the data contained in the ABA vs. Non-ABA Comparison Matrix, produces the following conclusions:

1. The Non-ABA Landscape Is Highly Heterogeneous. The 24 schools in this dataset cannot be treated as a uniform category. They range from rigorous, selective programs with strong bar outcomes (San Joaquin: 85.1% MPR; LSAT/GRE required; live-client clinics; extensive outcomes data) to programs with no documented standards, zero bar passage, and minimal consumer information (Miles Law: 0% bar passage across four administrations; no academic support data; no learning outcomes published). Treating 'non-ABA' as a single quality tier is not supported by the data.

2. Bar Passage Rates Are Meaningful But Must Be Interpreted With Attrition Context. The MPR is the best available single-number quality indicator for California CALS schools, but it must be read alongside attrition and cohort data. A school's 80%+ MPR achieved on the 20–40% of entrants who survived to the bar is analytically different from an 80%+ MPR achieved on 90% of entrants. The ABA's Standard 316 2-year ultimate rate methodology was designed precisely to prevent this denominator manipulation; no non-ABA school in this dataset uses an equivalent metric.

3. Admission Standards Are the Upstream Driver of Both Attrition and Bar Outcomes. The strongest correlate of favorable outcomes (manageable attrition + higher MPR) is the presence of genuine admission screening — bachelor's requirement, standardized test, or both. Schools that combine open admissions (no bachelor's required, no test required) with large enrollments (NWCU, JFK/National) face structural attrition problems that academic support alone cannot resolve.

4. Experiential Requirements Are the Most Consistent Gap vs. ABA Standards. The ABA's 6-credit experiential floor is the standard most consistently missed across this dataset. Only 2 of the documented 13 schools with experiential data unambiguously meet this threshold. Six schools report zero school-sponsored clinical programs. This is not a marginal shortfall — it is a structural difference in how non-ABA programs prepare students for practice.

5. Consumer Information Quality Varies Widely and Matters. California's §6061.7 disclosure framework produces substantially more consumer information than is available for non-CA schools. Even within California, transparency ranges from comprehensive (San Joaquin's Student Achievement page with multi-year cohort data; Lincoln Sacramento's PLO assessment report) to minimal (Drivon's absence of any published learning outcomes or support program). Prospective students, policymakers, and researchers must account for the information asymmetry embedded in the dataset itself.

6. Washington's 2026 Rule Change Elevates the Stakes of This Research. The September 1, 2026 Washington rule change — allowing non-ABA graduates to sit for the WA bar — is the policy context animating this entire dataset. The schools documented here will, upon

that rule's effective date, produce graduates who are potentially eligible to practice law in Washington. The wide variation in bar outcomes, admission standards, experiential preparation, and consumer transparency documented in this matrix is therefore directly relevant to Washington's bar, bench, and public.

7. Several Schools Warrant Priority Follow-Up Review. Based solely on the data in the matrix, the following schools warrant follow-up verification before conclusions are finalized: (1) Miles Law School (0% bar passage, minimal data); (2) University of West Los Angeles (7.7% first-time rate, July 2025, n=39); (3) Lincoln Law School of San Jose (enrollment collapse, lowest MPR, accreditation history concerns); (4) Nashville School of Law (0% Feb 2026, no disclosure documentation); and (5) Golden Gate University (CALS program not confirmed as admitting as of research date).

Implementation/Conversion Plan for Current Sitting Committee Members[1]

Updated as of June 30, 2026

Leadership Team:

- Chair: Janta Steele
- Chair-Elect (Designate): Ariel Cook
- Immediate Past Chair: Alex Reaganson

Class A (with terms beginning October 1, 2026)[2]:

- At-Large: General Representative (Class A): TBD with current cycle
  - Have eight FY 27 Applicants Eligible for Position (if not selected for other roles).
- At-Large: Diversity, Equity and Inclusion Representative: TBD with current cycle
  - Have one FY 27 Applicant who would appear interested in position.
- District 2: TBD with current cycle
  - Have one FY 27 Applicant Eligible for Position
- District 5: TBD with current cycle
  - Have one FY 27 Applicant Eligible for Position: Hanna H. reapplied.
- District 7 (North): TBD with current cycle
  - Have one FY 27 Applicant Eligible for Position.
    - Though they are more interested in PBPS Rep.
- District 10: TBD with current cycle
  - No Applications as of 06/30/2026

Class B (with terms beginning October 1, 2027):

- At-Large: General Representative (Class B): Steven B.
- At-Large: PBPS Representative: Available for Interim Appt. amongst FY 27 Applicants.[3]

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[1] The following plan was developed accounting for the most practical spread of congressional districts in a manner that allows for similar-sized "classes" that are geographically-diverse throughout the State of Washington. Current committee members' assignments or designations were made based on a review of their current positions related congressional districts, current term schedules, and eligibility for interim appointments based on completed terms of committee service. The suggested interim appointments were purposefully limited to those that would only see a one-year extension of their term, unless no other option was available for a district. (i.e. CD 8). If multiple persons were eligible for a particular interim appointment, preference was given to 1) individuals who have not previously been a member of WNMC Leadership, and; 2) those with a newer service history on the WNMC.

[2] For the purpose of this plan, no interim appointments were suggested regarding Class A as to allow for consideration of eligible applicants who participated in the regular volunteer recruiting period for FY 27. Pending approval of this draft charter by the Board of Governors, the WNMC is prepared to open up a second recruiting period and provide recommendations for approval to the Board prior to the start of FY 27.

[3] Given the inaugural nature of the new topic-focused at-large positions, no persons were selected as potential interim appointments for these positions. Pending charter approval, the WNMC plans to consider eligible applicants who participated in the regular recruitment period and, if necessary, open up a second recruiting period and provide recommendations for approval to these positions prior to the start of FY 27.

    - Have one applicant with a stated interest in position.
- District 3: Available for Interim Appt.[4]
    - No Applications as of 06/30/2026
- District 4: Mackenzie L. (Interim, would be a one-year extension of current term)
    - Confirmed to Accept Interim Appt. if offered.
- District 7 (South): Available for Interim Appt. amongst FY 27 Applicants.
    - Have One FY 27 Applicant Eligible for Position

Class C (with terms beginning October 1, 2028)

- At-Large: General Representative (Class C): Chawisa L.
- At-Large: Solo & Small Practice Representative: Available for Interim Appt.
    - Have one FY 27 Applicant with Stated Interest in the Position.
- District 1: Fatima Al-Rikabi
- District 6: Thomas G. (Interim, would be a one-year extension of current term)
    - No response on extension offer.
- District 8: Available for Interim Appt.
    - Have four FY 27 Applicants Eligible for Interim Position.
        - One of which would prefer S&SP Rep.
- District 9: Makenzie S. (Interim, would be a one-year extension of current term)
    - No response on extension offer.

[4] The District 3 position was not assigned a potential interim appointment because no eligible committee member currently resides/works within this district nor has substantial ties to the district. Pending formal appointment of an interim representative: FY 27 Immediate Past Chair Alex Reaganson resides and works within CD 3 and so is able to ensure CD 3 has at least someone at the table for FY 27.

Other Current Committee Members Eligibility for Other Interim Appointments

- Congressional District Appointments: (Reasons Therefore):
    - ~~Ariel C.~~ **(Chair-Elect Designate)**
        - ~~District 3 (Minimal ties from previous regional role);~~
        - ~~District 7 (South) ("Home" zip code[5] is split between CD 7(S) & CD (9))~~
        - ~~District 9 ("Home" zip code is split between CD 7(S) & CD 9))~~
    - ~~Mason J.~~ **(Have One Regular FY 27 Applicant for Relevant Position)**
        - ~~District 7 (South) ("Home" Zip Code)~~
- For Interim At-Large Appointments (If not in a CD Role):
    - ~~Ariel C.~~ **(Chair-Elect Designate)**
    - ~~Hanna H.~~ **(Transferred Application for CD 5/Greater Spokane position)**
    - ~~Michelle H.~~ **(Declined Extension, "Retiring")**
    - Mason J.
    - ~~Mackenzie L.~~ **(Would Prefer and Accept Interim Appt. for CD 4, If Offered)**
    - Bethany N.
    - ~~Matt R.~~ **(Declined To Re-Apply, "Retiring")**
- Members not eligible due to two-term limit, for FY 27:
    - Stephan Y.

[5] The "Home" zip code was determined by a review of the addresses listed on the members' WSBA Directory profiles.

Region to Congressional District Committee Membership Comparison:

Current Regions (Cong. Dist.), Status of FY 27 Recruitment

Organized by Current Term End Date. (Term-Limited**)

- Oct. 2026
    - Southwest (CD: 3), No Applications
    - Northwest (CD: 2), Have One Qualifying Applicant
    - North Central (CD: 4, 5, 8), No Applications within Region System
    - Greater Olympia (CDs: 3, 10), No Applications
    - Greater Spokane (CD: 5), Hanna H. reapplied
    - King County (1) (CDs: 1, 2, 7, 8, 9), Have Qualifying 6 Applicants
    - At-Large (1), Has 8 Applicants (Not Counting Mackenzie L. & Hanna H.)
    - Southeast (CDs: 4, 5), Mackenzie L. reapplied.
- Oct. 2027
    - King County (2) (CDs: 1, 2, 7, 8, 9), Makenzie S.
    - At-Large (2), Steven B.
    - Peninsula (CD: 6), Thomas G.
    - South Central (CDs: 4, 8), No Applications within Regional System
    - Pierce (CDs: 6, 8, 10), Has Two Applicants
- Oct. 2028
    - Snohomish (CDs: 1, 2), Fatima Al-Rikabi
    - At-Large (3), Chawisa L.**

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July 20, 2026

Board of Governors
Washington State Bar Association
1325 Fourth Ave., Suite 600
Seattle, WA 98101-2539

Re: The Amendment to the Admissions Policies Regarding the Definition of Approved Law Schools

To the Members of the Board of Governors:

On behalf of Northwestern California University School of Law (NWCU), I write with gratitude for the Washington State Bar Association Board of Governors' approval of an amendment to expand the definition of "approved law schools" in its admissions policies beyond American Bar Association (ABA) accreditation, allowing graduates of law schools that other states recognize as meeting their education requirements to sit for the Washington State bar examination upon graduation.

Further, I write to provide context and facts regarding issues pertaining to attrition rates at law schools regulated by the State Bar of California. Due to a medical conflict on July 24, I am unable to attend your meeting to provide public comments in person. Instead, I submit my statements below for your consideration.

1. **Attrition rates in California regulated law schools are heavily influenced by student financial risk. Schools with the lowest tuition are likely to have the highest attrition rates.**

California-regulated law schools are known to be "opportunity schools," and they differ widely in type and mission. Some have rather traditional entrance requirements and teach in traditional in-person classroom settings. Others promote educational accessibility by deliberately having less stringent admission standards, and offer maximum flexibility through remote teaching platforms to accommodate individuals who live far from campus-based law schools or need to balance academics with full-time jobs, caregiver responsibilities, travel requirements, and more. The tuition is generally much lower than the tuition charged by ABA-approved schools.

In addition to making law school at California-regulated law schools affordable, lower tuition reduces the financial stakes of quitting. Because students face fewer financial penalties for discontinuing their study, the highly affordable programs experience significantly higher attrition rates.

For example, tuition for each year of the NWCU law study program is $4,980. It can be paid in monthly installments of $415. The tuition cost for the entire law study program is $19,920. This is less than the cost of a single semester at most ABA law schools. With the financial barriers to entry significantly decreased by the low tuition rate, students can easily exit the program without consequence, regardless of their abilities or level of effort.

The result for the school is an increased rate of attrition. However, those students who are strongly committed to their studies and stay in the program can do well in achieving their shared goals of becoming lawyers.

Graduates of the school who studied diligently and passed the bar exam have achieved success across a broad spectrum of legal professions. This includes as private practice lawyers and litigators, staff attorneys working for law firms, deputy public defenders, deputy district attorneys, deputy attorneys general, deputy county counsels, city attorneys, administrative court judges, and attorneys working for private corporations, non-profit organizations, and governmental agencies. One of the school's graduates recently passed the bar and was shortly afterwards hired as an Assistant United States Attorney for the Eastern District of California.

A few of the school's graduates are present members of the Washington State Bar, having qualified for admission under special eligibility rules. Those graduates include individuals who graduated both prior to and after the school received accredited status from the State Bar of California in 2020. The first graduate of the school to become a member of the Washington State Bar did so in 1994.

2. **Those who drop-out or fail-out of California regulated law schools are not ending up with monumental student debt.**

Tuition at California-regulated law schools ranges from around $5,000 per year to upwards of $30,000 per year, while at ABA-approved law schools it ranges from an average of around $45,000 per year to upwards of $88,000 per year. Moreover, at most if not all of the California regulated law schools, students can withdraw and receive either a full or partial refund of tuition dependent upon their length of enrollment.

As to those who go forward and complete an academic term or terms and then drop-out or fail-out of a California regulated law school, they spend much less for the education in law they did receive, as compared to what they would have spent for it at an ABA-approved law school. Whether their education in law is for one term or more than one term, it can be beneficial to them in many ways in their personal and business dealings, even though for some it may not ultimately result in degree completion and bar membership.

3. **Attrition results from both drop-outs and fail-outs. Law schools have little control over drop-out rates.**

Drop-outs are typically caused by transfers, changing goals, family obligations, financial changes, health considerations, and so on. Fail-outs, in contrast, are

caused by student inability to meet GPA requirements. While law schools have control over their grading and GPA requirements that affect fail-out rates, they have virtually no control over life matters that affect student drop-out rates.

Evaluating law schools based on figures driven in large part by non-academic factors unfairly conflates institutional performance with student life events. Indeed, non-traditional law schools tend to attract non-traditional students, who are often older and more likely to have work constraints, family responsibilities, financial difficulties, health issues, or other life disruptions than recent college graduates who predominate at ABA law schools. Insisting on ABA levels of attrition would directly undercut the policy of trying to diversify the pipeline to the legal profession.

4. **Distance-learning degree programs in particular are known to have high attrition rates, for reasons unrelated to—or even *inversely* correlated with—program quality.**

Students in distance degree programs are more likely to drop out and fail out than their campus-based peers. One of the reasons for this may be the perception held by many that distance-learning programs are easier to complete than face-to-face programs when, in fact, they are often more difficult. Another may be that students with the greatest levels of outside commitments might find the added convenience essential and so be more likely to choose online programs in the first place.

Assessing attrition of distance-learning and classroom-type law schools together would be fundamentally unfair, because it would attempt to equate a structured in-person residential learning environment with a flexible remote learning environment.

The law study program at NWCU utilizes a blend of synchronous and asynchronous online instruction. Currently throughout the week, students and faculty connect in real-time online classrooms for 24 face-to-screen JD classes across all four years. Those who cannot attend can watch recordings of the sessions. The weekly schedule features seven 1L classes, six 2L classes, six 3L classes, and five 4L classes.

Yet, some students need face-to-face peer accountability, social interaction, and other attributes of in-person learning to stay focused and motivated. Those students are likely to struggle in an online setting. (If so, they will likely find out in the first term, before they have made a significant investment of time, let alone money.) But students who are committed to a non-residential setting, and know how to juggle their personal life with their coursework, can do well in a distance-learning law study program and complete it.

Distance learning is not necessarily best for everyone. But for those who benefit from its flexibility and accessibility, they should have the option to sit for the bar exam.

5. **Decades of experience in countries elsewhere in the world have shown that distance education law degrees are a reputable and effective way to broaden access to legal education.**

California is not the only place where distance education is allowed for the education of students for entry to the law profession. Lawyers, both solicitors and barristers, have been educated in distance education programs in England and other English common law countries for many decades. Schools that offer distance-learning degree programs in those places are not regarded as predatory because of high rates of student attrition. Instead, it is accepted that high attrition is common in distance programs. The schools offering those distance education law degrees are not subject to attrition thresholds.

Distance education bar-qualifying LL.B. programs presently exist at accredited schools in England such as the University of London, which began offering distance law degrees in 1858; the University of Northumbria; the University of East London; Nottingham Law School at Nottingham-Trent University; the University of Wolverhampton; the University of Huddersfield; and Open University. They also exist at the University of South Africa in South Africa; and at Queensland University, the University of New England, Southern Cross University, Macquarie University, among others, in Australia.

A number of the lawyers educated in distance programs in those countries moved on from the practice of law to serve as judges and justices of courts. Sir Edward Stratten Williams of Australia, for example, graduated from the University of London's external (distance) degree program, practiced law for a time, and eventually was appointed as a judge to the Supreme Court of Queensland, the highest court in the Australian state of Queensland.

LL.B. distance-learning programs at those institutions have very high attrition and failure rates. The high attrition and failure rates are undoubtedly due to the self-directed nature of the studies and rigorous academic standards.

A five-year study of the University of London distance-learning programs for three degrees—the LL.B. law degree; the English degree; and the Economics, Management, Finance, and Social Sciences (EMFSS) degree—found that a significant portion of the distance-learning students in them did not complete any program modules, with approximately 40% to 50% not sitting for any exams. Of those who did sit for exams, 20% to 30% did not pass them. The combined completion (graduation) rate for the three degree programs was 15.7 percent.[1]

The 15.7 percent overall completion rate was compared in the study to completion rates of other distance-learning degree programs. The completion rates given in the report for those institutions were: UK Open University at 22 percent, Athabasca University at 5.3 percent, Open University of the Netherlands at 2.5 percent, Universite TELUQ (formerly known as Tele-university of Quebec) at 0.5 percent, Dr.

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[1] Cannell, P., Patel, D., & Tait, A. (2019). *Supporting progression and completion: Final report.* University of London, Centre for Online and Distance Education.

Ambedlar University of India at 14 percent, and University of South Africa at 6 percent.[2]

Of those institutions, UK Open University, Open University of the Netherlands, and the University of South Africa each have distance-learning LL.B. programs.

Similar to California distance-learning law degree programs, distance-learning law degree programs elsewhere in the world have high drop-out rates and high fail-rates, but are highly affordable. For example, the entire cost of tuition for the LL.B. degree in the distance-learning program of the University of London is currently around $18,000 in U.S. dollars.

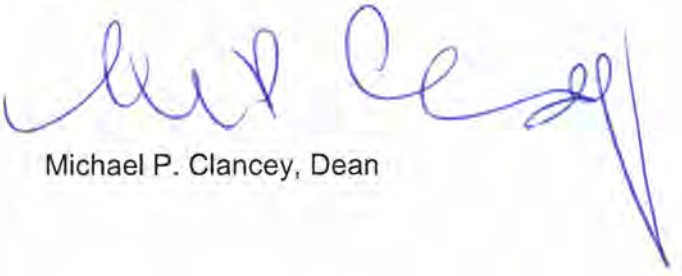
The low cost of distance-learning law degree programs makes them an incredible opportunity for those who are determined and goal-oriented.

Conclusion

California-regulated law schools expand access to legal education while offering flexible, quality based, and affordable alternatives to those who cannot attend ABA-approved law schools. While California law schools often have high attrition rates, they do not saddle students with insurmountable debt, and they provide vital opportunities to non-traditional students willing to embrace rigorous study requirements.

Thank you for considering the above-stated comments.

Respectfully Submitted,



Michael P. Clancey, Dean

[2] Inkelaar, T., & Simpson, O. (2015). *Challenging the "distance education deficit" through "motivational emails."* Open Learning: The Journal of Open, Distance and e-Learning, 30(2), 152-163.

PURDUE GLOBAL
Law School

July 13, 2026

Washington State Bar Association Board of Governors
Washington State Bar Association
1325 Fourth Avenue, Suite 600
Seattle, WA 98101-2539

Re: **ABA Law School Deans' Request for Reconsideration of Bar Exam Eligibility Vote**

Dear WSBA Board of Governors,

On behalf of Purdue Global Law School, the nation's first fully online law school ("PGLS"), I write to respond to the July 6, 2026, letter from current and/or former deans of the brick-and-mortar American Bar Association ("ABA")-approved law schools in Washington State (the "Deans' Letter"), wherein they asked the Board to reverse its May 1, 2026, vote amending its policies to allow graduates of state-approved law schools to sit for Washington's Bar Exam.

Respectfully, the Board should reject the ABA deans' request to relitigate a question already thoughtfully considered and resolved by the Board. The ABA deans' request is (1) procedurally improper, (2) driven by anticompetitive motives, (3) based on inaccurate information, and (4) raises exaggerated or irrelevant concerns.

1. <u>No Grounds for Reconsideration</u>

The Deans' Letter suggests the Board's vote was merely a "proposed policy change" and was somehow illegitimate because the Board did not consider the data contained in the report accompanying the Deans' Letter. In fact, the Board took a final vote on a scheduled agenda item as part of a regular publicly noticed meeting. And prior to the discussion and vote at the May 1 meeting itself, the Board conducted a separate risk analysis, fiscal analysis, and equity analysis.

As in the court system, the Board should not reconsider its decision merely because an interested party disagrees with the outcome. Rather, reconsideration should be based on narrow grounds such as excusable neglect or newly discovered evidence. *Cf.* Wash. S. Ct. Civ. R. 59(a),(b); Wash. R.App. P 12.4(b),(f).

Here, the ABA deans offer no reason why they failed to raise their concerns at or prior to the Board's May 1 meeting. Rather, the deans waited more than two months after the vote was taken to request that they be given the "opportunity to present to the Board and collaboratively discuss these weighty issues." They already had their opportunity, and failed to avail themselves of it. And the data they presented in their report is not "new." It was available prior to May 1, but the ABA deans simply hadn't put it before the Board. They should not now be rewarded for sitting on their hands. Indeed, there is a significant reliance interest at stake in *not* reversing course, as PGLS (and presumably other schools) has already been making preparations for the announced September 1, 2026 implementation date of the policy changes.

2. Anticompetitive Motivations

The 13th-hour opposition to the Board's vote comes not from a think tank, public interest organization, or other disinterested party, but from entrenched law schools that believe they have the most to lose by the vote. No one, not even a law school dean, likes new competition. The ABA deans are worried that lower-cost, more accessible non-ABA options will prove more attractive to some would-be law students than what their institutions offer. Although the Deans' Letter invokes public protection, it is a thinly veiled attempt at self-preservation.

This is nothing new from the ABA. As Harry First, professor emeritus of antitrust law at NYU School of Law, discussed last month at a webinar on recent trends in licensure, requiring attendance at an ABA-approved law school to pursue a law license was initially conceived during the Great Depression as a way to insulate existing attorneys from competition, particularly from immigrants.

In 1996, the ABA entered into an antitrust consent decree with the Department of Justice in a suit that alleged, among other things, that ABA schools had boycotted state-accredited law schools by restricting the ability of those schools' students and graduates to transfer to ABA schools. A decade later, the DOJ sought a civil contempt order against the ABA for violating the consent decree. (The ABA acknowledged the violations and paid a $185,000 fine.)

When the ABA itself proposed amending its Standards in 2024 to allow fully online law schools to pursue ABA approval, the only significant opposition came from ABA law school deans. One of them was open about his anticompetitive concerns, stating: "Without the obligation to provide students physical classroom space and other expensive educational facilities…a fully online program could run at much lower cost and offer degrees to much larger numbers of students than a traditional law school." To anyone other than a dean of a traditional law school, these sound like positives, not negatives. (The ABA has since taken no further action on the proposal.)

So desperate are the ABA deans to avoid competition that they even question a key premise animating the policy changes: the lawyer shortage in Washington State. The deans assert that "[t]he purported problem of 'too few lawyers in Washington' that this change is said to solve has yet to have any evidence presented to support it." In fact, the lawyer shortage in Washington State, particularly in rural areas, has been well documented for more than a decade, including by the WSBA itself.[1] And data from PGLS itself (which I will gladly share upon request) shows that online law students are more likely to hail from rural areas than their campus counterparts, and are more likely to practice in such areas after they graduate.

[1] *See, e.g.,* https://www.courts.wa.gov/disability-justice-task-force/public/OCLA-2015-Civil-Legal-Needs-Study-Update.pdf; https://wsba.org/docs/default-source/resources-services/rural-practice/rural-prac-outreach-calls_09-01-20.pdf?sfvrsn=730b0bf1_3;https://www.spokesman.com/stories/2024/jun/19/state-bar-looks-for-solutions-as-legal-deserts-wor/.

3. Inaccurate Information

The Deans' Letter also contains material inaccuracies. It characterizes the Board's vote as an unprecedented rush to judgment, claiming that "[t]here is no compelling reason to rush to decision" on what "would be a rule of *first impression* in any jurisdiction within the United States" (original emphasis).

In fact, the day *before* the Board's vote, the Supreme Court of Alabama issued an order modifying that state's bar admission rules, effective January 1, 2027, to allow graduates of state-approved law schools to sit for Alabama as their first bar exam—almost exactly what the Board voted to do. *See* https://judicial.alabama.gov/docs/rules/OrderOnRulesIIIAndIV.pdf.

For better or worse, Washington was not first. The Board's decision was neither unprecedented nor rushed. It was a sensible reform designed to help address a serious access to justice problem, and one that more and more states have either already undertaken or are considering doing.

4. Irrelevant and Exaggerated Concerns

The report accompanying the Deans' Letter argues that there is significant variability in the quality and features of non-ABA law schools. But the areas the ABA deans choose to focus on are either irrelevant or ignore important context.

For instance, the report cites a tenfold variability in the tuition charged at different non-ABA law schools, but ignores the eightfold difference in program tuition between the cheapest and most expensive ABA schools (Southern University Law Center at $34,104 and Columbia Law School at $256,104). Arguably, more important is the cost difference between the average ABA law school (approximately $140,000) and non-ABA law school (approximately $50,000).

The report also emphasizes variability in non-ABA schools' publication of learning outcomes. But it provides no evidence that publishing learning outcomes is correlated with the successful or ethical practice of law by a school's graduates. (For its part, PGLS graduates' disbarment rate is far lower than the California average.)

The ABA deans should be focusing on outputs, not inputs. This fundamental flaw infects the remainder of their analysis. For example, even if some non-ABA law schools have high attrition rates, that is not a reason to preclude the students who do successfully complete those programs from pursuing licensure in Washington State. (Indeed, it may be rational for people to "try" part-time law school for a term or two if the opportunity cost for doing so is so much lower.)

Moreover, the "barbarians at the gate" argument is simply overblown. The reality is that students from non-ABA law schools in places like Alabama, Tennessee, or Massachusetts are highly unlikely to move to Washington State even if given the opportunity to pursue licensure there. Indeed, even most Californians will not want to relocate to Washington. Rather, to the extent that the policy change will have an impact, it will largely be by making it easier for existing Washington residents who cannot move or commute to an ABA law school to remain where they are and attend a fully online law school.

Although the ABA will allow an ABA-approved, campus-based law school to seek a "variance" to go beyond the ABA's 50% cap on online learning, the ABA Standards do not currently permit a fully online law school to pursue approval in the first place. A number of ABA law schools have obtained variances to offer hybrid or fully online JD programs. But the average program tuition for those online offerings is virtually identical to their campus-based programs, at $151,776 versus $153,439. (PGLS's fully online program tuition is two-thirds less, at $52,900.)

For practical purposes, then, allowing non-ABA grads to sit for Washington's bar exam really means allowing more Washingtonians to pursue a law license by attending law school online. Notably, the ABA deans' report highlights that PGLS and one other online institution account for the lion's share of non-ABA enrollments. And on virtually every metric the report measures, PGLS *does* meet the ABA's standards (even if it is ineligible to apply for ABA approval). So the fact that some campus-based law schools in distant reaches of the country may have poor outcomes has little to do with how the amended policy will likely impact Washington State.

Conclusion

The Board should be commended, not criticized, for taking a logical step that has the potential to help ameliorate the state's access to justice crisis and diversify the pipeline to the profession. If, after a number of years of implementation, data shows that the ABA deans' sky-is-falling predictions have actually come to pass, the Board can always consider further policy changes. But the Board will never get that data until the policy change it already approved goes into effect.

If the Board would like any further information from me, I can be reached at martin.pritikin@purdueglobal.edu.

Respectfully submitted,

Martin Pritikin
Dean and Vice President
Purdue Global Law School

CALS CALIFORNIA ACCREDITED LAW SCHOOLS

July 21, 2026

Board of Governors
Washington State Bar Association
1325 Fourth Avenue., Suite 600
Seattle, WA 981010-2539

Re: CALS Public Comment to the Amendment to the Admissions Policies Regarding the Definition of Approved Law Schools

Dear Members of Board of Governors,

We, the undersigned deans of California-accredited law schools (CALS), hereby submit the following comments for the WSBA Board of Governors' consideration.

As an initial matter, we find it troubling that the ABA deans ask the Board to "revisit" a final vote that was already taken more than two months ago. They had ample opportunity to weigh in on the policy changes before it was made. We are also troubled that the ABA deans seek to stifle competition from lower-cost law schools[1] by re-imposing regulatory barriers to entry. We leave it to the antitrust experts to assess the legality of this.

Procedure and legalities aside, the Board made a carefully considered decision at its May 1 meeting. It should stand by that decision, which has a reasonable prospect of diversifying the legal profession and addressing the access to justice crisis in Washington. Below is some additional information relevant to what the ABA deans raised (or chose not to raise).

Diversification of the Profession and Access to Justice

Students at non-ABA law schools tend to be far more diverse. As noted in the July 14, 2026 Board report, "57% of students enrolled at CALS are people of color." This is

[1] Lest one doubt that the ABA deans are motivated more by self-interest than by concern for law students, the policy change they oppose would make state-approved law school students eligible to participate in Washington's APR 9 law clerk program. So at the same time that the ABA deans criticize non-ABA law schools for supposedly not providing students with sufficient experiential opportunities, they seek to prevent non-ABA schools from offering more experiential opportunities.

significantly higher than the figure among ABA schools—just 37%, according to the most recently available self-reported data.[2] Nationwide, 44% of the population consists of people of color.[3] Thus, people of color are underrepresented at ABA law schools but substantially overrepresented at CALS.

Non-ABA students also tend to be diverse in other ways. They are more likely to be the first in their family to go to college, more likely to be military-affiliated, and more likely to be older. Whereas the bulk of traditional law school students are 26 at most,[4] a typical non-ABA student is a decade or two older. For instance, at Purdue Global Law School (PGLS), the average entering age is 42; 38% are first-generation college students; and 15% are military-affiliated.

Importantly, online law students are also more likely to hail from—and ultimately practice in—rural areas than traditional law students, which is particularly important in addressing the access to justice crisis. Evidence from other states confirms this.

For example, whereas 3% of California residents live in rural areas, only 1.5% of the state's attorneys practice rurally. But among PGLS graduates, that figure rises to 4.5%. So, whereas California lawyers statewide are underrepresented in rural areas by half, PGLS' online graduates are overrepresented by half.

Nor is California alone. PGLS graduates have only been eligible to sit for the Indiana bar exam since July 2024. 22% of Indiana's population lives in "legal desert" counties, defined by the ABA as having fewer than one attorney per 1,000 residents. (The nationwide average is 1 in 250.) A mere 8% of Indiana's attorneys live in those counties. But among PGLS students, it is 18%.

Thus, broadening access to the bar exam to graduates of non-ABA law schools has the potential to put more lawyers in the very places where Washington needs them most. This makes sense: the best way to get more lawyers into rural areas is to make it easier for people already living there to stay in their communities while attending law school (and afford to do so). Non-ABA schools fill a need that the ABA schools simply aren't serving.

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[2] *See* https://www.abarequireddisclosures.org/requiredDisclosure, JD Enrollment and Ethnicity, Compilation - All Schools 2025 (visited July 17, 2026).

[3] *See* U.S. Census Bureau, Quick Facts, United States, Race and Hispanic Origin, https://www.census.gov/quickfacts/fact/table/US/PST045225#:~:text=Black%20alone%2C%20percent(a)%20%7C%20%EE%A1%80%EE%A0%BF%2013.5%25%20American,persons%2C%20percent%2C%202020%2D2024%20%7C%2014.1%25%20Housing%20%7C (visited July 17, 2026).

[4] *See* LSAC, The Composition of the First-Year Law School Class and Enrollment 2021-2025 Trends, https://www.lsac.org/sites/default/files/research/2026-Composition-Report.pdf#:~:text=All%20contents%20©%202026%20Law%20School%20Admission,students%20decide%20and%20plan%20for%20this%20journey (visited July 17, 2026)

Attrition

The ABA deans' report criticizes what it views as troubling levels of attrition at some non-ABA law schools. However, attrition cannot be measured in a vacuum. There should be a reasonable relationship between the chances of successfully completing law school and the risks of not doing so. If there is, then high attrition is not necessarily problematic.

At ABA law schools, where the average student puts their life on hold to attend full-time and pays $50,000 per year in tuition, plus another $20,000 to $30,000 in living expenses and fees, it is fair to expect that most of those admitted will complete their studies. But at non-ABA law schools, where tuition is usually far less, and where most students attend part-time either primarily or exclusively online and so do not need to quit their jobs or move to attend, the consequences of "trying" law school are far less. And most students who leave CALS schools do so within the first year, meaning the investment of time and money is limited.

Also, attrition statistics rarely distinguish between voluntary attrition (withdrawals) and involuntary attrition (academic dismissals). The distinction matters. Voluntary attrition does not signal that a school is predatory. Non-traditional students often face life stressors (work, family care, health problems) that make it difficult to stay in school. According to a 2024 State Bar of California report, voluntary attrition accounts for about 60% of CALS first-year attrition.[5]

Moreover, most CALS(14 of 15) are fully or partially online. Online programs invariably experience high voluntary attrition—again, largely due to the lower investment students make in attending. But the fact that some students make a rational decision to withdraw because it is too difficult to juggle their studies with their jobs, families, etc., does not mean that the institutions are inferior or admitting unqualified students. Indeed, sometimes the academically strongest students withdraw because their lives are oversubscribed.

We are not the only ones promoting this model. In his 2023 book "The Way Forward in Legal Education," University of Denver Sturm College of Law professor David I. C. Thomson advocated for what is essentially the CALS model: a lower-cost, accessible option that creates a broader pipeline for more non-traditional students. As stated in the book's official description:

> For too long administrations have used ineffective methods of diversifying their law schools, so it is time to be bold and adopt a plan likely to have

[5] *See* State Bar of California, *2024 California Accredited and Unaccredited Law School Performance Repor*t (Aug. 22, 2025), https://www.calbar.ca.gov/sites/default/files/portals/0/documents/reports/2025/2024-California-Accredited-and-Unaccredited-Law-School-Performance-Report.pdf, p.14 (visited July 20, 2026)

> greater impact…. [Law schools] should admit a much larger cohort to the 1L year, at much reduced cost, and put most of the content online in a hybrid format…, with only half passing into second year….

As even a full-time professor at an ABA-approved law school recognized, a low opportunity cost model of legal education can be beneficial even if it means relatively high levels of attrition.

Bar Pass Rates

The ABA deans suggest that non-ABA law schools are inferior because their graduates' bar pass rates, on average, are lower than at ABA schools. But this conflates correlation with causation. The higher average bar pass rates at ABA law schools may just as likely stem from the prestige of ABA approval, which helps schools attract students who are more likely to pass the bar exam in the first place, regardless of the quality of instruction.

Moreover, comparing bar-pass rates of traditional and non-traditional students is comparing apples and oranges. The typical ABA law school graduate studies full-time for the bar exam between graduating in mid-May and taking the exam in late July. But the typical non-ABA law graduate continues working full-time or raising children (or both) in the months leading up to the bar exam. As a study by AccessLex found, "[e]mployment during the bar preparation period is negatively associated with bar success."[6] Holding non-ABA law schools' bar pass rates against them effectively penalizes non-traditional law students for needing to work or raise families.

The lowest bar pass rates tend to be at campus-based non-ABA schools in Alabama, Massachusetts, and Tennessee. These schools' quality or performance is largely irrelevant to the Board's policy change. Washington residents are highly unlikely to move to those states for several years to attend law school and then move back to Washington to practice. Nor are people already living in those states likely to relocate to Washington just to practice law. Far more relevant is the bar exam performance among the CALS—particularly the online ones—which the ABA deans acknowledge tends to be at or near ABA-levels.

Portability

The concern raised by the ABA deans about the limitations on portability of a license for non-ABA graduates is similarly exaggerated.

First, in two-thirds of U.S. jurisdictions, there is an eventual path to licensure for graduates of non-ABA law schools who are licensed in another jurisdiction.

[6] *See* https://www.accesslex.org/approaching-the-bar (visited Jul. 19, 2026)

Second, a growing number of states are allowing non-ABA graduates to pursue licensure, either upon graduation (e.g., Indiana, Alabama) or immediately upon obtaining licensure elsewhere (North Carolina, Wisconsin). The Supreme Courts of Texas, Florida, and Ohio appear poised to do the same. And since virtually every jurisdiction, save Delaware and Louisiana, will adopt the NextGen Bar Exam by July 2028, transferring a bar exam score has never been easier.

Third, even in a jurisdiction where someone could never get licensed, their Washington State license may provide valuable opportunities. They can, for example, appear in immigration court in every state; appear in federal district court or bankruptcy court in nearly half of districts; and pursue a special in-house license in many states.

At the end of the day, however, the portability argument is a red herring. As long as prospective students clearly understand the potential licensure limitations of attending a non-ABA law school, they should be allowed to decide for themselves whether the pros outweigh the cons. The ABA Deans' invocation of portability is really an effort to restrict consumer choice.

ABA Standards Drive Up Cost Without Clear Corollary Benefit to Students

The ABA Standards for Approval of Law Schools require both a campus and a system of tenure. The rules governing CALS—while similar to the ABA Standards in many respects—require neither. A campus and a tenured faculty are by far a law school's biggest expenses. This is why CALS are able to offer a high-quality legal education for far less than ABA schools.

There is no evidence that either a campus or a tenured faculty is required for student success. For instance, fully online PGLS has been eligible for the bar exam in Indiana and Connecticut since the February 2025 administration. Since then, PGLS' overall pass rates (first-time and repeater) exceeded the statewide (i.e., ABA) pass rate in Indiana and tied the statewide rate in Connecticut. And while tenure undoubtedly benefits the faculty who earn it, a system that focuses as much on producing legal scholarship as on preparing students for practice is hardly the only model that can produce competent graduates.

If the WSBA is serious about reducing costs and expanding access, and the ABA Standards inhibit both, then it may be necessary to move beyond ABA approval to achieve the Board's policy goals. The measure the Board already passed accomplishes this.

Conclusion

The ABA deans seek to induce the Board to reverse course on a decision it already made, or at least kick the can down the road indefinitely, by highlighting the potential risks of proceeding. This is what opponents of reform do. Change always entails risk. But there is good reason to believe that the benefits of broadening access to affordable

legal education will make a meaningful difference in diversifying the state's legal profession and ameliorating the access to justice crisis. We urge the Board to reaffirm its well-reasoned decision.

Respectfully submitted,

California Accredited Law Schools

Dean Sandra L Brooks
Cal Northern School of Law

Dean Martin Pritikin
Purdue Global School of Law

Dean Matthew Reynolds
Humphreys University Drivon School of Law

Dean Lisa Hutton
JFK School of Law at National University

Dean Linda Keller
Thomas Jefferson School of Law

Dean Michael Clancey
Northwestern California University School of Law

Dean Eric Halvorson
Trinity Law School, Trinity International University

Dean Janice Pearson
San Joaquin College of Law

Dean Elizabeth Xyr
Monterey College of Law
San Luis Obispo College of Law
Kern County College of Law
Empire College of Law

Comparative Analysis – Non-ABA Law Schools vs. ABA Standards

Trends, Patterns, Outliers, and Statistical Findings

Prefatory Note on Methodology

This memo analyzes 19 operating, independently accredited non-ABA law schools across four states (15 in California, 2 in Alabama, 1 in Massachusetts, 1 in Tennessee) against the 2025–2026 ABA Standards as the analytical benchmark. Two excluded schools (Empire College School of Law standalone, Golden Gate University) are voluntarily closing or in teach-out and are omitted from trend analysis. Three Monterey College of Law branch campuses are reported under the parent institution. All statistical tests use non-parametric methods (Spearman rank correlation, Mann-Whitney U) appropriate for this sample size, completed with assistance by Claude Sonnet 4.6. Where ABA Standards set a specific numeric threshold, those thresholds serve as the comparison benchmark — not as regulatory requirements binding on these schools, which are governed by their respective state authorizing bodies.

A critical interpretive note runs throughout this memo: The ABA measures bar passage and attrition at the point of *graduation*. Non-ABA schools' state-mandated metrics use the same approach. This obscures the most important consumer-protection question: what is the realistic probability that a student who *enrolls* on Day One will ultimately pass the bar? That question — the enrollment-to-licensure completion rate — cannot be answered from disclosed data alone, but the attrition and 1L-to-2L cohort figures in this dataset allow a directional estimate. Those estimates are among the most consequential findings below.

Part I: Bar Passage — The Primary Outcome Measure

A. The Regulatory Gap: 40% vs. 75%

The most fundamental finding in this dataset is the gap between the standard California-accredited law schools (CALS) must meet and the standard ABA-accredited schools must meet.

Standard	Metric	Threshold	Consequence of Failure
ABA Standard 316	2-year ultimate bar passage rate	**≥ 75%**	Public non-compliance notice; 2-year cure period; risk of accreditation withdrawal
California CALS (Rule 4.160(D))	5-year cumulative Minimum Performance Rate (MPR)	**≥ 40%**	State Bar regulatory scrutiny

These are not equivalent metrics. The ABA's 2-year window captures passage by the first two attempts after graduation — a rigorous outcome standard. The CALS 5-year cumulative MPR is calculated over a longer window, uses a lower threshold, and permits graduates to attempt the bar up to ten times before the clock stops. A school could meet the 40% CALS standard and still fail the ABA 75% standard by a wide margin.

B. Where Schools Actually Land

Across the 15 California CALS schools with published MPR data:

- **Mean MPR: 69.3%** (SD = 10.7 percentage points)
- **Median MPR: 68.1%**
- **Range: 53.1% (Lincoln San Jose) to 85.1% (San Joaquin College of Law)**

Six of 15 schools (40%) meet the ABA 75% threshold on their 5-year MPR. The significance of that finding requires emphasis: the 5-year cumulative MPR is an *easier* metric than the ABA's 2-year ultimate rate. A school that barely clears 75% on the 5-year measure would likely fall below 75% on the stricter ABA measure. The practical implication is that **the majority of California CALS schools would not meet ABA Standard 316 if it applied to them.**

MPR Rankings — All 15 CA Schools:

School	5-Yr MPR	vs. ABA 75% Threshold
San Joaquin College of Law	**85.1%**	+10.1 pts
Northwestern California University (NWCU)	**82.0%**	+7.0 pts ⚠️ *See Note*
Lincoln Law School of Sacramento	**81.4%**	+6.4 pts
University of La Verne	**81.0%**	+6.0 pts
Cal Northern School of Law	**78.4%**	+3.4 pts
Purdue Global School of Law	**76.8%**	+1.8 pts
Humphreys University Drivon	73.1%	-1.9 pts
The Colleges of Law	68.1%	-6.9 pts
St. Francis School of Law	66.7%	-8.3 pts
Thomas Jefferson School of Law (TJSL)	61.4%	-13.6 pts
Monterey College of Law	61.2%	-13.8 pts
JFK School of Law at National University	60.0%	-15.0 pts
University of West Los Angeles (UWLA)	57.6%	-17.4 pts
Trinity Law School	53.8%	-21.2 pts
Lincoln Law School of San Jose	53.1%	-21.9 pts

NWCU's MPR is flagged at length in Part III. Its high MPR is statistically real but analytically misleading without the attrition context.

C. First-Time Pass Rates: The Consumer-Facing Metric

The ABA treats first-time pass rates as consumer information, not as a compliance standard (Standard 509(b)(8)). They are nonetheless the most direct signal of instructional quality visible to a prospective student. Across 14 schools with extractable July 2025 first-time data:

- **Mean: 34.7%** | **Median: 37.1%**
- **Zero schools cleared 75%** in July 2025
- **Two schools cleared 50%** (SJCL at 61.8%; NWCU at 50.0%)
- **Eight of 14 schools (57%) fell below 40%** — below even the CALS minimum bar
- **One school (Miles Law School, AL) posted 0%** across all four recent administrations

First-Time Pass Rate Trend — Three Recent Administrations:

School	Feb 2025	July 2025	Feb 2026	Avg
SJCL	—	61.8%	—	61.8%
NWCU	84.6%	50.0%	20.0%	51.5%
Purdue Global	69.0%	37.5%	33.3%	46.6%
MSLaw (MA)	42.1%	51.9%	45.5%	46.5%
Nashville (TN)	44.4%	68.8%	0.0%*	37.7%
Lincoln Sacramento	—	45.9%	—	45.9%
MCL	66.7%	46.7%	23.8%	45.7%
La Verne	75.0%	36.8%	17.6%	43.1%

School	Feb 2025	July 2025	Feb 2026	Avg
COL	58.8%	22.2%	43.6%	41.5%
Trinity	66.7%	28.6%	27.8%	41.0%
TJSL	45.8%	29.3%	28.6%	34.6%
Birmingham (AL)	33.3%	0.0%*	51.9%	28.4%
UWLA	34.8%	7.7%	12.1%	18.2%
Miles (AL)	0.0%	0.0%	0.0%	0.0%

Small n; extreme volatility

Pattern finding: July administrations consistently outperform February administrations across virtually all schools. This is a known national pattern — July takers are predominantly recent graduates sitting for the first time; February takers include a higher proportion of repeat-takers. **The February 2026 results are therefore the most diagnostically significant** and show sharp declines at several schools relative to July 2025: NWCU drops from 50% to 20%, La Verne from 36.8% to 17.6%, Monterey from 46.7% to 23.8%. These February figures represent repeat-takers who failed in July — and their low pass rates signal that bar preparation at these schools is not producing durable competency.

Part II: Attrition — The Hidden Consumer-Protection Crisis

A. The ABA Standard

ABA Standard 501 Interpretation 501-3 creates a **rebuttable presumption of non-compliance** with admissions standards when a school's cumulative non-transfer attrition rate for any entering class exceeds **20%**. The underlying obligation — under Standard 501(b) — is that a school "shall only admit applicants who appear capable of satisfactorily completing the program and being admitted to the bar." High attrition is treated as evidence that a school is not meeting that obligation.

Non-ABA schools are not subject to Standard 501. California's §6061.7 requires annual attrition disclosure (§4c) but imposes no minimum performance floor on attrition rates.

B. The Annual Attrition Picture

Five operating schools **persistently exceed the ABA's 20% annual attrition flag** across multiple years:

School	2022	2023	2024	2025	4-Year Avg	ABA Flag Years
NWCU	38%	53%	48%	52%	**47.8%**	4 of 4
Lincoln San Jose	34%	73%	44%	14%	**41.3%**	3 of 4
JFK/National	36%	53%	32%	25%	**36.5%**	4 of 4
Trinity	29%	28%	34%	34%	**31.3%**	4 of 4
Purdue Global	20%	23%	21%	20%	**21.0%**	2 of 4

Four schools are consistently within acceptable ranges under the ABA standard: La Verne (avg 9.3%), Monterey (avg 8.9%), Drivon (avg 8.5%), UWLA (avg 3.4%). TJSL (avg 15.3%), Colleges of Law (avg 15.6%), St. Francis (avg 12.2%), and Lincoln Sacramento (avg 14.9%) fall in a middle range — elevated but below the 20% flag on an annual basis.

C. The 1L-to-2L Cohort Collapse: The More Important Metric

Annual attrition rates understate the severity of the problem at several schools because they measure students leaving *across all class years* in a given 12-month window. The 1L-to-2L loss rate — how many students from one entering class actually appear as second-years the following year — is the closest available proxy to the ABA's cohort-level measure. It is the number an entering student should care most about.

School	2022→23	2023→24	2024→25	3-Yr Avg
JFK/National	82% loss	66% loss	77% loss	**75.0% avg**
NWCU	61% loss	59% loss	68% loss	**62.7% avg**

School	2022→23	2023→24	2024→25	3-Yr Avg
Lincoln San Jose	63% loss	—	—	63.0%
SJCL	~50-60% loss	~50-60%	—	~55% ⚠️ *See Note*
Lincoln Sacramento	48% loss	37% loss	54% loss	**46.3% avg**
Trinity	61% loss	13% loss*	33% loss	35.6% avg
St. Francis	13% loss	42% loss	26% loss	27.0% avg
TJSL	29% loss	23% loss	31% loss	28.0% avg
La Verne	25% loss	12% loss	35% loss	23.7% avg
Monterey	17% loss	34% loss	27% loss	26.0% avg
Colleges of Law	28% loss	18% loss	11% loss	**19.0% avg** ✅
UWLA	13% loss	net gain†	net gain†	—
Drivon	37% loss	6% loss	50% loss	30.9% (high n-volatility)

Trinity's 2023→24 figure is distorted by 45 transfers-in; not a reliable cohort measure for that year.
†UWLA transfers-in exceed prior 1L class size; metric not calculable.
SJCL's loss figure reflects a deliberate front-loaded academic exclusion gate; see Part III.

The headline finding: At JFK/National University, **three-quarters of entering students do not reach second year.** At NWCU, nearly two-thirds of entering students do not reach second year. At Lincoln Sacramento, approximately half of each entering class does not return as second-years, and the trend is worsening (2024→25: 54% loss).

D. The Correlation That Did Not Appear — and Why It Matters

A natural hypothesis is that schools with higher attrition would produce lower bar passage rates, and vice versa. **This hypothesis is not supported by the data** (Spearman r = −0.049, p = 0.87; not statistically significant). NWCU, with the second-highest MPR (82%) and the highest attrition (avg 47.8% annually, avg 62.7% 1L→2L loss), is the primary reason. This non-finding is itself the most important analytical result in the dataset, and it requires careful explanation.

The MPR metric is calculated on a denominator of graduates who sit for the bar — not on the entering class. NWCU enrolls approximately 540 first-year students per year and graduates approximately 30–50 fourth-year students (estimated from §4a enrollment data). Translating: roughly **5–9% of entering students graduate.** Among those graduates who sit for the bar, 82% pass — a genuinely high rate among that small, self-selected survivor group. But for the student who walks in the door on Day One, the relevant probability is not 82% — it is approximately **4–7 bar passers per 100 entering students**, once both the completion rate and the pass rate are applied.

No disclosure required of CALS schools — and no disclosure required of ABA schools — presents this enrollment-to-licensure figure directly. It must be calculated. And it reveals a consumer-protection gap that the MPR metric alone completely obscures.

Part III: Structural Compliance — How Non-ABA Programs Measure Against ABA Curricular Standards

These findings are *not* determinations of legal non-compliance. Non-ABA schools operate under state authority and are not required to meet ABA curricular standards. The purpose is to identify the structural gaps between what an ABA program guarantees and what these programs provide.

A. ABA Standard 502(a): Bachelor's Degree from USDE-Accredited Institution

ABA Standard 502(a) requires applicants to hold a bachelor's degree from an institution accredited by a Department of Education-recognized accreditor. This is the standard pre-legal education gate.

13 of 19 operating schools (68%) do not require a bachelor's degree from a USDE-accredited institution. The six schools that do require it — Purdue Global, Birmingham, Massachusetts School of Law, Nashville School of Law, and two others — include all four non-California schools in the cohort. California's CALS regulatory framework does not impose the bachelor's-degree requirement as an absolute prerequisite.

B. ABA Standard 503: Admission Test

ABA Standard 503 requires every first-year applicant to take a valid and reliable admission test (LSAT, GRE, or a school-specific test demonstrated to be valid and reliable). A limited exception covers up to 10% of an entering class in very narrow circumstances.

Across 19 operating schools:

- **Required (universally):** 9 schools (47%)
- **Conditional (required for some tracks, not all):** 4 schools (21%)
- **None/Not Required:** 6 schools (32%) — including Miles Law School (AL), which posts 0% bar passage across all administrations

Miles Law School — no admission test, no bachelor's degree requirement, and 0% first-time bar passage across four consecutive administrations — represents the most extreme expression of the open-access end of this spectrum.

Statistical note: A Mann-Whitney test comparing MPR between schools requiring admission tests and schools not requiring them produced no statistically significant difference ($U = 27$, $p = 0.955$). Schools requiring admission tests do not, on average, produce meaningfully higher bar passage rates in this dataset. The most likely explanations are (a) the sample is too small for reliable inference ($n = 7$ vs. 8), and (b) the pass-rate metric's denominator problem masks the true effect at the enrollment level.

C. ABA Standard 303(a)(3): Experiential Credits (≥ 6 Required)

ABA Standard 303(a)(3) requires students to complete at least 6 credit hours of qualifying experiential coursework — defined as simulation courses, law clinics, or field placements that integrate doctrine, theory, skills, and ethics, with multiple performance opportunities and faculty supervision.

This is the standard with **the widest and most uniform non-compliance** in the dataset:

- **Fully meets the ≥6 credit floor: 2 of 19 schools (11%)**
    - St. Francis School of Law (9 quarter units = ~6 semester units)
    - Lincoln Law School of San Jose (7 required units, all simulation-type)
- **Partially meets (6 units required but satisfiable by legal writing, not clinics/simulations): 3 schools (16%)**
    - NWCU, Trinity Law School, SJCL (4-year track only)
- **Does not meet (fewer than 6 units required): 10 schools (53%)**

- **Unclear/unverified: 4 schools (21%)**

An additional important distinction: ABA Standard 303(b)(1) separately requires that students have *substantial opportunities* for law clinics or field placements — not just simulation courses. Several schools in this cohort offer no school-sponsored clinical programs (§6c disclosures confirm: Cal Northern 0, Lincoln Sacramento 0, Drivon 0, NWCU 0, Lincoln San Jose 0). Students at these schools cannot fulfill an experiential requirement through live-client work because no live-client programs exist.

D. ABA Standard 301(b): Published Learning Outcomes

ABA Standard 301(b) requires schools to establish and publicly publish their program learning outcomes. This is a transparency standard, not a substantive curriculum mandate — but it is the minimum accountability framework for measuring whether graduates achieve what the school says it will teach them.

- **Full (PLOs published + assessment report): 9 of 19 schools (47%)**
- **Partial (PLOs published, no assessment report): 2 schools (11%)**
- **None (no published PLOs found): 0 CA schools, though some have very thin transparency**
- **Unverified/No data: 5 schools (26%)**
- **N/A (excluded): 3 branches**

This is the one structural variable where a statistically significant relationship with bar passage emerges. Schools with Full published PLOs have a mean MPR of **73.5%** compared to **55.6%** for schools with Partial or no published PLOs — a gap of 17.9 percentage points. A one-tailed Mann-Whitney test finds this difference statistically significant ($U = 23$, $p = 0.012$). The causal direction cannot be established from this dataset — schools that invest in systematic outcomes assessment may also invest more broadly in program quality — but the association is real and meaningful.

Part IV: Tuition — Cost Without Proportionate Returns

A. The Cost Landscape

Across 18 schools with usable total-program tuition data:

- **Mean: $71,649 | Median: $75,686 | SD: $28,600**
- **Range: $9,360 (Miles Law School) to $117,940 (Thomas Jefferson School of Law)**

Cost Tier	Schools	Tuition Range
Very High (>$100K)	TJSL, La Verne, Trinity	$100,775–$117,940
High ($75K–$100K)	Cal Northern, Lincoln Sac, Lincoln SJ, Monterey, SJCL, MSLaw	$75,613–$93,600
Mid ($50K–$75K)	Drivon, JFK/National, Purdue, St. Francis	$56,400–$73,800
Low (<$50K)	Nashville, Birmingham, NWCU	$20,975–$46,640
Extreme Low	Miles	$9,360 ⚠️

B. The Tuition-Outcomes Relationship

A Spearman rank correlation between total program tuition and 5-year MPR finds **no statistically significant relationship** ($r = -0.235$, $p = 0.42$). The Pearson correlation is similarly non-significant ($r = -0.351$, $p = 0.22$). In plain terms: **paying more does not predict passing the bar at these schools.**

The most vivid illustration is TJSL — the most expensive school in the cohort at $117,940 — with a 5-year MPR of 61.4% and July 2025 first-time pass rates of 29.3% across 41 takers. A student at TJSL pays the highest price in the cohort and receives bar passage outcomes in the bottom third of the cohort.

Conversely, NWCU offers the lowest-cost California program ($20,975) and posts the second-highest MPR among California schools — though, as established in Part II, that MPR figure is calculated on a very small survivor pool and does not reflect the enrollment-level outcome probability.

Miles Law School at $9,360 is a statistical outlier so extreme (z-score = −2.18 standard deviations below the cohort mean) that it warrants independent verification. The 36-credit-hour figure on which that estimate is based is inconsistent with a standard four-year JD curriculum, which typically requires 80–130 credits. If confirmed, $9,360 represents a program structure fundamentally different from all other schools in this cohort, not simply a less expensive version of the same product.

Part V: Key Outliers and Anomalies

Positive Outlier — San Joaquin College of Law (SJCL): 85.1% MPR

SJCL has the highest 5-year MPR in the cohort. However, the mechanism is essential context: SJCL operates a **front-loaded academic exclusion gate** requiring students to maintain a 65 GPA (equivalent to roughly a C) through first year, with approximately 30–60% of each entering class academically excluded before reaching second year. Of students who survive first year, approximately 90–100% go on to graduate. SJCL's bar passage performance reflects the outcomes of a rigorously pre-selected survivor group — a fundamentally different model than schools that retain most students through four years. This does not diminish SJCL's outcomes, but it means the 85.1% MPR is not directly comparable to schools using different selection and retention models.

Statistical Paradox — NWCU: 82% MPR, ~5% Enrollment-to-Graduation Rate

As detailed in Part II, NWCU's second-highest MPR in the cohort coexists with the cohort's highest annual attrition (avg 47.8%) and second-highest 1L-to-2L loss rate (avg 62.7%). The MPR is technically accurate as calculated — it measures graduates who sat for the bar — but it is the most analytically misleading figure in the dataset for a prospective student's purposes. NWCU's $20,975 cost may attract price-sensitive students who lack visibility into the completion probability. That combination — low cost, visible high MPR, invisible completion crisis — is the clearest consumer-protection anomaly in the dataset.

Retention Without Results — UWLA: 3.4% Annual Attrition, 18.2% Avg First-Time Pass Rate

UWLA presents the mirror-image of the NWCU problem: it retains students at the highest rate in the cohort (average annual attrition of only 3.4%) while producing the worst bar passage outcomes among schools with sufficient takers to be measured. July 2025: 7.7% first-time pass rate (n=39). February 2026: 12.1% (n=33). These are statistically robust figures — the sample sizes are large enough to rule out small-n volatility. UWLA requires an admission test and has a full published PLO framework, which makes its outcomes the most difficult to explain from structural factors alone. The data signals a fundamental instructional quality or bar-preparation problem.

Complete Failure — Miles Law School (AL): 0% Across Four Administrations

Miles Law School posted 0% first-time bar passage across July 2024, February 2025, July 2025, and February 2026. This is not statistical noise — four consecutive administrations of 0% represents a pattern. Miles requires no admission test, has an unverified $9,360 total

tuition figure, and has no published learning outcomes in the dataset. It is the most extreme outlier on every dimension measured.

High Cost, Low Return — TJSL: $117,940, 61.4% MPR

TJSL charges the highest total program cost in the cohort and delivers outcomes in the bottom third. Its July 2025 first-time rate of 29.3% is particularly notable because the n = 41 — large enough to be a reliable estimate, not a small-cohort artifact. TJSL also has no required experiential credits and no published student learning outcomes, placing it at the low end of structural compliance simultaneously.

Part VI: The ABA Disclosure Standard — A Structural Gap All Its Own

ABA Standard 509 requires accredited schools to publish a comprehensive, standardized consumer disclosure — including attrition data, bar passage rates, employment outcomes, conditional scholarship retention data, and accreditation status — in a Council-designated format, on a fixed deadline, audited by the ABA Managing Director's Office.

None of the 19 non-ABA schools in this cohort is subject to Standard 509. California's §6061.7 requirement is the closest analog for California schools, but it differs in material ways: it uses different categories (annual attrition counts rather than disaggregated academic/transfer/other attrition), does not require employment outcome standardization, and is not enforced through an independent accreditor audit. Alabama, Massachusetts, and Tennessee have no equivalent annual disclosure framework for non-ABA schools.

The practical result is that the comparative data compiled in this research required extensive manual extraction, cross-referencing, and cleaning across 19 separate schools. An ABA-accredited school's equivalent data exists in a standardized, publicly downloadable format. **The information asymmetry between ABA and non-ABA schools is itself a consumer-protection issue** — a prospective student choosing between an ABA and a non-ABA program has access to structurally incomparable information sets.

Summary of Findings

By the Numbers

Measure	Finding
Schools meeting ABA 75% bar passage (on 5-yr MPR)	**6 of 15 (40%)**
Schools failing ABA 75% bar passage	**9 of 15 (60%)**
Mean MPR across CA schools	**69.3%** (SD 10.7%)
Mean first-time pass rate (July 2025)	**34.7%** — zero schools at 75%
Schools exceeding ABA 20% attrition flag (annually)	**5 of 15 CA schools (33%)**
Schools with >50% average 1L→2L loss	**2 schools** (JFK/National 75%; NWCU 63%)
Schools meeting ABA ≥6 experiential credit floor	**2 of 19 (11%)**
Schools requiring bachelor's from USDE-accredited inst.	**6 of 19 (32%)**
Schools with Full published learning outcomes	**9 of 19 (47%)**
Schools requiring admission test universally	**9 of 19 (47%)**
Tuition–bar passage correlation	**r = −0.235, p = 0.42 (not significant)**
PLO Full vs. Non-Full bar passage gap	**+17.9 percentage points; p = 0.012 (significant)**
Attrition–MPR correlation	**r = −0.049, p = 0.87 (not significant)**

The Three Core Findings for Stakeholder Decision-Making

1. The bar passage standard gap is the headline. California CALS schools must meet a 40% threshold measured over 5 years. The ABA requires 75% in 2 years. Even applying the easier CALS metric to the ABA threshold, 9 of 15 schools would fail ABA Standard 316. The first-time pass rate data — which requires no benchmark translation — makes the picture starker: the cohort mean is 34.7% in July 2025, and zero schools cleared 75%.

2. The MPR metric is being read wrong. The 5-year cumulative MPR is not the probability that an entering student passes the bar. For schools with severe attrition, it is the probability that a student who *survived to graduation and sat for the bar* passes — a very different denominator. The enrollment-to-licensure probability at the highest-attrition schools is estimated in the single digits per 100 entering students. This is the most important number that no current disclosure framework directly requires anyone to compute or publish.

3. Higher cost does not predict better outcomes, and lower cost does not predict worse ones. Tuition and bar passage are statistically uncorrelated across this cohort. The most expensive school (TJSL, $117,940) performs in the bottom third on bar passage. The second-cheapest California school (NWCU, $20,975) has the second-highest MPR — though its completion rate, not its pass rate, is the consumer-relevant figure. A prospective student using tuition as a proxy for educational quality would be systematically misled.

Statistical Limitations and Analytical Caveats

1. **Sample size:** The cohort of 15 California schools with full MPR data is adequate for descriptive statistics but underpowers inferential tests. Statistically non-significant findings (attrition vs. MPR; tuition vs. MPR; admission test vs. MPR) should be interpreted as "insufficient evidence to conclude a relationship," not as "confirmed absence of relationship."
2. **Metric incomparability:** The MPR (5-year cumulative) and ABA ultimate rate (2-year) are not the same measure. MPR comparisons to the 75% ABA threshold are directional, not exact.
3. **Denominator problem:** All bar passage metrics — MPR and first-time rates alike — use graduates as the denominator, not entering students. Enrollment-to-licensure estimates derived in Part II are approximations based on §4a cohort flow data, not official school-reported figures.

4. **Small n and volatility:** Several schools produce fewer than 11 bar takers per administration (triggering State Bar suppression of exact figures). First-time pass rates at small schools (St. Francis, Cal Northern, Drivon) are statistically unreliable in any single administration and should be interpreted across multiple years.
5. **Non-CA schools:** Alabama, Massachusetts, and Tennessee schools do not report under §6061.7. Attrition data is unavailable; bar passage data relies on school-reported figures without the State Bar's independent verification infrastructure. Four-school sample for non-California states is too small for any meaningful state-by-state comparison.
6. **Causality:** The statistically significant association between Full published PLOs and higher MPR ($p = 0.012$) is associational, not causal. Both may reflect a common underlying factor (institutional investment in quality infrastructure) rather than a direct causal relationship.

This memo was prepared using data extracted from the Comparison_Matrix research workbook and ABA Benchmarks reference document. All §6061.7 figures are sourced from January 2026 Annual Disclosure reports. All bar passage figures are sourced from California State Bar CBX General Statistics Reports (February 2025, July 2025, February 2026) and school-reported data for non-California institutions. Statistical analysis performed July 9, 2026.

Washington State Lawyer Employment Projections
Comprehensive Statistical Analysis for Law School Supply-Demand Assessment

Sources:

- ESD Long-Term Alternative Occupational Projections, July 2025 (long-occup-proj-alt-2025.xlsx) — 2023–2033
- ESD All Occupational Projections, National/BLS Method, July 2025 (all-occup-proj-sep-2025.xlsx) — 2023–2033
- ABA-Accredited Law School Employment Data (WA_ABA_Employment_Data), 2023–2025
- WA State Bar Passage Data, 2023–2026 (WA Bar Passage Rates 2023–2025)
- Survey: Legal Practice in Washington's Rural Communities (WSBA, May 2020)

All figures verified directly from source spreadsheets | Prepared July 2026

Note: This analysis was put together with the assistance of UW Purple (using Claude Sonnet). The underlying data was validated prior to input.

Executive Summary

Washington State faces a **confirmed, structural, statewide shortage of lawyers** that is significantly more severe than preliminary analysis suggested. Using BLS-method occupational separation data — the correct methodology for measuring true new-entrant demand — Washington needs approximately **937 new lawyers per year** through 2028. ABA employment data shows that Washington-retained graduates from all ABA-accredited schools total only **350–437 per year**, covering just **37–47% of annual demand**. The annual shortfall is approximately **500–587 lawyers per year**. This deficit is compounded by severe geographic maldistribution: 60% of all Washington lawyers are concentrated in King County, leaving rural and eastern regions critically underserved. The data does not support the conclusion that interstate attorney migration is closing this gap — if anything, the data on declining attorney employment in Eastern Washington suggests the opposite.

Washington State Bar Association bar passage data (2023–2026) provides additional context on pipeline capacity. Total annual bar passers have ranged from **659 to 693 per year** across all candidate categories — still well below the 937/year BLS demand figure, and not all passers remain in Washington State.

Section 1: The Two Spreadsheets — What Each Does and Why Both Are Needed

long-occup-proj-alt-2025.xlsx — The Alternative Method File

This is the Washington state-specific file using ESD's proprietary alternative occupational method. It tracks all job openings, including **intra-occupation transfers** — lawyers who leave one firm and join another while remaining lawyers. The alternative method produces the large "total openings" figure of **4,808/year** for SOC 23-1011. This number is not appropriate for comparing against law school graduates. It represents total labor market churn, not new entrant demand.

all-occup-proj-sep-2025.xlsx — The BLS National Method File

This file applies **Bureau of Labor Statistics national separation rates** to Washington employment. It measures only two things:

1. **Growth openings** — genuinely new positions created as the economy expands demand for lawyers.
2. **Separation openings** — positions vacated by lawyers who permanently exit the profession (retirement, death, career change to a different SOC).

Intra-occupation transfers (changing firms while staying a lawyer) are explicitly excluded. This is precisely why the BLS method produces the correct denominator for comparing against law school graduation data. A new law graduate competes for openings created by growth and permanent exits — not for openings created when a partner changes firms.

The Right Rows

Both files contain SOC codes for the legal occupations group. For this analysis:

- **SOC 23-1011 (Lawyers)** is the primary occupation of interest — the specific row measuring licensed practicing attorneys.
- **SOC 23-1000 (Lawyers, Judges, and Related Workers)** is the broader group and provides useful context but should not be the primary comparison point against JD graduates, who are typically entering as lawyers, not judges or hearing officers.

Section 2: The Critical Numbers — BLS Method vs. Alternative Method

Metric	Alternative Method	BLS Method	Difference

Metric	Alternative Method	BLS Method	Difference
Annual total openings, SOC 23-1011, 2023–28	**4,808**	**937**	3,871
Annual total openings, SOC 23-1011, 2028–33	**4,933**	**865**	4,068
Annual growth openings, 2023–28	156	156	— (same)
Annual growth openings, 2028–33	108	108	— (same)

The growth openings figures are identical in both methods — they are simply the projected net increase in lawyer positions. The 3,871-opening difference between the two methods represents **intra-occupation transfers**: lawyers who change employers but remain lawyers. These positions do not need to be filled by law school graduates; they are filled by existing licensed attorneys already in the workforce.

The correct demand figure to use against law school graduation data is 937/year (2023–28), declining to 865/year (2028–33).

Section 3: Deriving the True Annual Separation Rate

This is the number that was previously modeled using a sensitivity range of 2–5%. The BLS file eliminates all uncertainty. The calculation is direct:

Separation Openings=Total BLS Openings−Growth OpeningsSeparation Openings=Total BL S Openings−Growth Openings

781=937−156781=937−156

Annual Separation Rate=78117,295=4.52%Annual Separation Rate=17,295781=**4.52%**

For the 2028–2033 period:

757=865−108⇒75718,073=4.19%757=865−108⇒18,073757=**4.19%**

What This Rate Means in Plain Language

Each year, approximately 4.52% of Washington's licensed practicing attorneys permanently leave the profession — through retirement, death, or a career change out of law entirely. For a base of 17,295 lawyers, this means roughly **781 attorney slots fall vacant every year** simply due to natural attrition, independent of any employment growth. Add the 156 growth positions and the total new-entrant demand is **937/year**.

Comparison to Sensitivity Analysis

The previous version of this analysis modeled exit rates of 2%, 3%, 4%, and 5% as a range of scenarios. The BLS data resolves this uncertainty: the actual rate (4.52%) falls between the 4% and 5% scenarios. This means the preliminary analysis using 4% was the closest approximation, and the true shortfall is slightly larger than that scenario estimated.

Section 4: Supply vs. Demand — The Definitive Comparison

ABA-Retained Graduate Supply (Washington State)

School	2025	2024	2023
Seattle University School of Law	152	162	140
University of Washington School of Law	122	122	111
Gonzaga University School of Law	103	92	70
Lewis & Clark Law School	13	22	13
University of Oregon School of Law	11	9	—
University of Idaho College of Law	8	17	10
Willamette College of Law	7	13	6
Total — All ABA Schools	**416**	**437**	**350**

These figures represent graduates from ABA-accredited schools who reported employment in Washington State. This is the correct supply metric because it is already filtered for Washington retention.

The Core Comparison

Year	WA-Retained Graduates	Annual BLS Demand	Annual Shortfall	Supply Coverage
2025	416	937	−521	44.4%
2024	437	937	−500	46.6%
2023	350	937	−587	37.4%

Washington State Bar Passage Rates, 2023–2026

Washington State bar passage data provides an independent measure of the professional pipeline entering practice. The table below reflects all candidates passing the Washington Bar Examination by exam session and candidate category.

Exam Month, Year	ABA-JD Students Pass	APR 6 Law Clerk Pass	U.S. Attorneys Pass	Non-ABA JD/ABA LLM Pass	U.S. Non-ABA JD/ABA LLM Pass	Common Law Attorneys Pass	Total Pass
Feb-26	96	3	8	27	1	4	**139**
Jul-25	514	4	14	21	0	5	**558**
Feb-25	93	11	16	11	0	4	**135**
Jul-24	506	4	13	11	0	4	**538**
Feb-24	103	6	19	14	0	1	**143**

Exam Month, Year	ABA-JD Students Pass	APR 6 Law Clerk Pass	U.S. Attorneys Pass	Non-ABA JD/ABA LLM Pass	U.S. Non-ABA JD/ABA LLM Pass	Common Law Attorneys Pass	Total Pass
Jul-23	478	6	13	21	0	3	**521**
Feb-23	106	5	12	10	2	3	**138**

Annual Totals:

Year	Total Bar Passers	Annual BLS Demand	Gap
2025	693	937	−244
2024	681	937	−256
2023	659	937	−278

Key observations from bar passage data:

- Even counting every candidate category — ABA graduates, APR 6 law clerks, U.S. attorneys admitted on motion, foreign-trained LLM holders, and common law attorneys — total annual passers (659–693) fall well short of the 937/year BLS demand.
- The July sitting accounts for approximately 79% of annual passers, creating a pronounced seasonal concentration in new attorney supply.
- Not all bar passers remain in Washington State. Some will be admitted for temporary or out-of-state matters; others may leave the state after passing. The 659–693 figure therefore represents a ceiling on Washington-based new entrants from bar passage alone.
- Bar passage data reinforces the ABA employment data conclusion: the state's professional pipeline is structurally insufficient to meet annual demand at current output levels.

Interpreting the Gap

Washington's law schools and their out-of-state counterparts are collectively supplying less than half of the annual demand for new lawyers in the state. The remaining 500–587 positions per year must be filled through one or more of the following:

1. **Licensed attorneys relocating to Washington from other states.** This is plausible for high-salary, high-demand markets like Seattle's tech and corporate law sectors. However, interstate migration of attorneys is unlikely to benefit rural, underserved, or lower-paying practice areas (public defenders, family law, rural general practice).
2. **Re-entrants to the workforce** — attorneys who had left the profession and returned. This is typically a small number.
3. **Positions going unfilled.** If neither of the above sources close the gap, the shortfall represents genuine unmet legal need — attorney vacancies that persist, or legal services that go unprovided.

The geographic data strongly suggests that for rural and eastern Washington, option 3 predominates.

Section 4A: Why Attorneys Practice in Rural Washington — WSBA Survey Evidence

Source: Survey: Legal Practice in Washington's Rural Communities, Washington State Bar Association, May 2020 (n = 48 respondents across rural Washington counties)

The 2020 WSBA rural practice survey asked attorneys currently practicing in rural Washington communities why they chose to practice there. Forty-seven of 48 respondents answered. Their responses — open-ended and direct — provide important context for understanding both the nature of rural legal practice and the barriers to expanding rural attorney supply.

Primary Motivations: What Brings Attorneys to Rural Practice

Analysis of the 47 open-ended responses to Q4 ("Why did you choose to practice in your community?") reveals six recurring themes:

1. Personal and Community Ties (most frequently cited)

The single most common motivation was having personal roots in the community — being born and raised there, having family in the area, or having grown up knowing the people. Respondents frequently described returning home after law school or after a period of urban practice:

"Born and raised in Clarkston; moved back here from Washington DC law firm to raise family and practice here."

"I was born and raised in the community in which I am now practicing law. I love living here and I have always intended to come back to work and raise my own family here."

"Because although I was away for many many years, elsewhere, I'm a native, I was ready to return, and there were no other lawyers left who actually lived here."

2. Preference for Rural Lifestyle and Quality of Life

Many respondents expressed a deliberate preference for rural living — not as a compromise, but as an affirmative choice. References to natural beauty, pace of life, lower cost of living, and community scale appeared frequently:

"I enjoy a rural lifestyle."

"Amazing little town (Port Townsend), high quality of life, and cost of living."

"I wanted to live where people prefer to vacation."

"It was a great place to raise a family though the legal opportunities may have been less. The cost of living is low as is the crime rate."

3. Family and Child-Rearing Considerations

The desire to raise children in a small-town environment was cited repeatedly as a motivating factor — often in combination with other reasons:

"Wanted to raise family in a small town. When I bought the firm it looked like a good population/attorney ratio."

"Its home, and its where I wanted to raise my family. The people are good decent people that care about doing the right thing."

4. Active Avoidance of Urban Practice

Several respondents described their choice in negative terms — not wanting to work in a large city, regardless of any particular pull toward their current community:

"Did not want to live or work in a large city."

"My dad grew up on a farm in Nebraska…I had no desire to work on the west side of the state, and didn't want to work in a large city."

5. Professional Opportunity — Favorable Market Conditions

A meaningful subset of respondents cited the favorable attorney-to-population ratio in rural areas as a factor. Some specifically referenced an absence of civil attorneys or identified the community as underserved:

"There were no civil attorneys in the county before I moved here. I wanted to raise my family in a rural setting and it seemed like there would be enough demand for services to support my practice. Since moving here, I can confirm that there is plenty of work for me."

"I like Columbia County and it's underserved."

"Unique opportunity to be involved with diverse legal, general practice, in small town."

Several respondents also described opportunistic entries — stepping in when a retiring attorney sought a successor, acquiring a deceased attorney's practice, or being asked to bid on a public defender contract:

"Fell in love with Lopez Island and the island attorney was ready to retire and sell his practice."

"I bought property after one of the local Judges asked me to bid on the Public Defender Contract in 2006."

6. Community Service and Desire to Help

Some respondents cited altruistic motivations — wanting to give back, to serve an underserved population, or to make a difference in a community where individual attorneys have more visible impact:

"I live in the area and I like helping local people."

"It's beautiful, small, and collegial, and anyone can make a difference."

"I enjoy rural living and giving back to the community where I grew up."

Key Finding: The Role of Pre-Existing Community Connection

A striking pattern in the data is that **72.9% of respondents (35 of 48) said they were from the community where they practice** (Q2). Rural attorneys are overwhelmingly people who already had ties to the area — through birth, family, or prior residence — before establishing their practice. This finding has direct implications for policy:

Strategies that rely on attracting urban-trained attorneys to relocate to rural areas with no prior connection are unlikely to succeed at scale. The evidence strongly suggests that the most effective pipeline for rural attorneys runs through people who already have roots in rural communities — either through rural upbringing, family ties, or prior residence.

This points to a need for **early-pipeline interventions**: identifying students from rural communities before or during law school, and providing them with financial and professional incentives to return home to practice.

Satisfaction and Retention

The data also indicates that rural attorneys who do practice in rural areas are highly satisfied. In response to Q6 ("Do you enjoy practicing in your community?"), **79.17% of respondents said they always enjoy practicing there or enjoy it so much they would not practice anywhere else** (weighted average: 3.98 out of 5). Zero respondents reported not enjoying their practice. This suggests that retention, once achieved, is strong — the problem is primarily one of initial recruitment and placement, not of attorneys leaving rural practice once established.

Barriers to Rural Practice (Q19)

Respondents identified several barriers that prevent new attorneys from establishing practices in their communities:

- **Small population and limited client base** — rural areas simply have fewer potential clients, and many residents have limited ability to pay for legal services
- **Low income potential** — rural attorneys generally earn less than urban counterparts, making student loan repayment difficult
- **Social and lifestyle barriers for younger attorneys** — limited dating pool, limited entertainment options, partners unable to find employment
- **Lack of legal infrastructure** — no established firms to join, no mentors, no peer network
- **Need to be a generalist** — rural practice requires competency across many areas of law, which is demanding and not well-supported by law school training
- **Community integration requirements** — success in rural practice depends heavily on becoming known and trusted in the community, a process that takes time and is difficult for attorneys without pre-existing ties

"Lack of money in client base, lack of resources generally to refer clients to. Lack of dynamic social life for young professionals."

"This area is very rural with limited housing, entertainment, and shopping opportunities. People have to REALLY like rural living to move here."

"One factor in why younger and inexperienced attorneys do not want to practice in my community is the desire to earn more money in larger communities."

Policy Implication

The rural survey data, combined with the supply-demand analysis, points to a specific and actionable policy conclusion: **the most effective intervention is loan forgiveness or debt relief tied to rural practice commitment, targeted at law students who already come from rural Washington communities.** This approach aligns with the demonstrated motivational pattern (community ties drive rural practice decisions), addresses the primary stated barrier (student loan debt), and avoids the difficulty of persuading urban-oriented graduates to relocate.

Section 5: Regional Breakdown — BLS Method, SOC 23-1011 Lawyers

Complete Regional BLS Data

Region	2023 Emp	2028 Emp	2033 Emp	Growth/yr	Sep/yr	Total BLS/yr	Sep Rate
Washington State	**17,295**	**18,073**	**18,613**	**156**	**781**	**937**	**4.52%**
Seattle-King County	10,396	10,736	11,039	68	442	510	4.25%
Tacoma-Pierce	1,239	1,333	1,365	19	64	83	5.17%
Snohomish	983	1,038	1,068	11	47	58	4.78%
Spokane	1,206	1,266	1,308	12	56	68	4.64%
Pacific Mountain	861	905	929	9	40	49	4.65%
Olympic	520	532	550	2	21	23	4.04%

Region	2023 Emp	2028 Emp	2033 Emp	Growth/yr	Sep/yr	Total BLS/yr	Sep Rate
Southwest (Vancouver)	624	661	689	7	30	37	4.81%
Northwest	426	451	468	5	21	26	4.93%
North Central	257	289	297	6	16	22	6.23%
South Central	308	325	335	3	15	18	4.87%
Benton-Franklin	246	253	261	1	10	11	4.07%
Eastern	**220**	**215**	**221**	**−1**	**7**	**6**	**3.18%**

Notable Regional Observations

Tacoma-Pierce has the highest separation rate (5.17%) of any major region, suggesting a relatively older attorney workforce with elevated retirement rates — combined with growth demand of 19/year, this region faces 83 new-entrant openings annually despite being adjacent to Seattle.

North Central has the highest separation rate statewide (6.23%), indicating an aging attorney population in a region (Wenatchee area) with only 257 total lawyers. This region will struggle severely to maintain its current level of legal services.

Eastern WDA is in net decline. With a growth rate of −0.459% and only 220 attorneys, the region is projected to *lose* net employment (215 by 2028) despite 7 annual separations. This means new graduates entering Eastern Washington are not even replacing those who retire — the effective demand signal is insufficient to attract and retain attorneys in that market, likely due to lower salaries and less institutional employer infrastructure.

Section 6: The Geographic Maldistribution Crisis

King County Concentration

- **60.1%** of all Washington lawyers (10,396 of 17,295) practice in King County.
- King County generates **510 BLS openings/year**, or **54.4% of all statewide demand**.
- The remaining **45.6% of statewide demand (427 openings/year)** is spread across eleven other regions serving approximately 7.8 million of Washington's roughly 8 million residents outside King County.

Eastern Washington: A Case Study in Legal Desert Formation

Aggregating the five regions that constitute eastern and central Washington:

Region	2023 Lawyers	BLS Demand/yr
Spokane	1,206	68
North Central	257	22
South Central	308	18
Benton-Franklin	246	11
Eastern	220	6
Eastern WA Total	**2,237**	**125**

Gonzaga University School of Law, based in Spokane, produced **103 WA-retained graduates in 2025** — theoretically enough to cover 82% of total eastern Washington demand *if all graduates remained in eastern Washington*. In practice, many Gonzaga graduates relocate to the Seattle metro, drawn by higher salaries and more varied practice opportunities. The actual number remaining in eastern Washington is unknown from this dataset, but the fact that Eastern WDA shows *declining* net employment despite active graduating school cohorts strongly implies significant outmigration of Gonzaga graduates toward Puget Sound.

The Maldistribution-Shortage Interaction

These are not two separate problems. Geographic maldistribution *amplifies* an underlying aggregate shortage:

- When supply is already below aggregate demand, it cannot simultaneously fill urban *and* rural needs.
- Market forces (salary differentials) systematically direct graduates toward urban markets.
- Rural areas effectively receive the residual supply after urban demand has been served.
- With aggregate supply covering only 44% of statewide demand, there is no residual left for rural markets.

Section 7: Policy Implications

For Law Schools

1. **Aggregate enrollment expansion is warranted by the data.** The shortage is not marginal — it is a 56% gap in supply. A meaningful increase in graduating class size at all three Washington law schools would address aggregate shortfall without creating a glut, given the scale of unmet demand.
2. **Rural pipeline programs are structurally necessary.** Market forces will not self-correct the geographic maldistribution without targeted intervention. Loan forgiveness for rural practice, rural externship programs, and partnerships with rural bar associations could improve placement rates in underserved regions. The WSBA rural survey data strongly suggests targeting students who already have rural ties will yield the highest return on investment.
3. **Gonzaga's upward trend (70 → 103 WA-retained graduates) is the most encouraging signal in this dataset.** Gonzaga's eastern Washington location positions it uniquely to address the eastern WA deficit if regional retention rates can be improved.

For Policymakers

1. **Legal access in rural Washington is deteriorating.** The combination of declining net lawyer employment in Eastern WDA and high separation rates in North Central suggests some rural communities will face functional legal deserts within the 10-year projection window.

2. **Interstate migration is not a reliable equalizer.** Attorneys relocating from other states disproportionately settle in Seattle, compressing the already-dominant King County concentration and providing no relief to rural markets.
3. **The 2028–2033 window is more severe.** Growth demand drops from 156 to 108/year, while separation demand remains near 757/year. Total BLS demand declines modestly (937 → 865), but if graduate production does not increase substantially, the shortfall compounds over time.

Section 8: Caveats and Limitations

1. BLS Separation Rates Are National, Applied Locally

The 4.52% separation rate derives from applying BLS national separation rates to Washington employment figures. Washington's actual attorney separation rate may differ modestly from the national average, particularly if Washington's attorney population skews younger or older than the national average. However, this methodology is the BLS standard, is applied consistently across all states, and is the best available estimate.

2. ABA Data Measures Employment, Not Bar Admission

The ABA employment figures capture graduates who reported *employment* in Washington within a defined window after graduation. Some graduates may have reported employment but not yet passed the bar, or may have subsequently left the state. This likely introduces a small upward bias in the supply figure.

3. Interstate Attorney Migration Is Unquantified

The analysis cannot determine precisely how many licensed attorneys relocate to Washington each year from other states. Washington State Bar Association admission data (particularly for attorneys admitted by UBE score transfer, reciprocity, or waiver) would be required to close this gap. If this number is large, the effective shortage is less severe than stated — but the geographic maldistribution problem persists regardless.

4. Demand Does Not Equal Access

A position being "open" in the BLS sense does not necessarily translate to an unfilled vacancy experienced by clients. Some unmet demand manifests as people simply going without legal services, which is invisible in employment data. The shortage is likely *understated* by demand-side projections for this reason.

5. The 2023 ABA Supply Dip

The 2023 figure (350) is noticeably lower than 2024–2025 (437, 416). This likely reflects COVID-era law school enrollment disruptions flowing through the graduation pipeline. It should not be treated as a structural floor; the 416–437 range of recent years is a more reliable baseline.

Section 9: Conclusions

Finding	Status
Washington faces an aggregate lawyer shortage	**Confirmed**
Annual shortage magnitude	**~500–587 lawyers/year**
True annual separation rate (attorney exits/retirements)	**4.52%**
Annual BLS demand for new-entrant lawyers	**937/year (2023–28)**
ABA-retained graduate supply	**350–437/year**
Annual bar passers (all categories)	**659–693/year**
Supply coverage of total demand	**37–47%**
Geographic maldistribution is severe	**Confirmed**
Eastern WA facing net decline in lawyer population	**Confirmed**
Interstate migration likely closes part of urban gap	**Probable, unquantified**
Interstate migration closes rural gap	**Not supported by data**

Finding	Status
Rural attorneys primarily driven by community ties	**Confirmed (WSBA survey)**
Market self-correction expected without intervention	**Not supported by data**

The data collectively supports a clear policy conclusion: **Washington State does not have enough law school graduates staying in Washington to meet employer and public demand for legal services.** The gap is not a rounding error — it is structural, sustained across three years of measurement, and likely to worsen as growth projections moderate in the 2028–2033 window while retirements continue. Geographic maldistribution compounds an already insufficient aggregate supply. Policy interventions addressing both total supply (enrollment expansion) and distribution (rural pipeline, financial incentives) are warranted by this evidence.

The WSBA rural community survey adds a critical behavioral dimension to the quantitative findings: the attorneys who practice in rural Washington overwhelmingly do so because of personal connection to those communities. Effective rural recruitment strategies must account for this reality — the pipeline most likely to succeed is one that begins well before law school, with students who already call rural Washington home.

Analysis prepared July 2026. Source data: Washington State Employment Security Department Occupational Projections (2025 release), ABA Law School Employment Data (2023–2025), WA State Bar Examination Passage Data (2023–2026), WSBA Survey: Legal Practice in Washington's Rural Communities (May 2020). All calculations performed directly from primary source spreadsheets.

Faculty Composition Analysis

Non-ABA Law Schools: Credentials, Experience, Structure, and Outliers

Prefatory Note on Data Scope and Limitations

This analysis draws on two datasets: a Faculty Summary sheet covering all 24 schools in the research cohort, and a Faculty Detail sheet containing individual profiles of 464 persons across 10 fully or substantially audited schools. **Fourteen of 24 schools have not yet been audited** — including Thomas Jefferson School of Law, Trinity Law School, The Colleges of Law, San Joaquin College of Law, St. Francis School of Law, University of La Verne, University of West Los Angeles, Monterey College of Law (and its three branches), Golden Gate University (teach-out), and Empire College (closing). The 10 audited schools represent approximately **370 individual teaching faculty** with substantive profile data.

This is not a complete census. Statistical findings derived from the audited schools are directionally reliable but cannot be extended with full confidence to the unaudited majority. That caveat is noted where relevant. The analytical power of this dataset will increase materially if and when the remaining 14 schools are audited.

ABA Benchmark Context. ABA Standards 401–405 govern faculty obligations at ABA-accredited schools: Standard 401 requires a sufficient number of full-time faculty; Standard 402 requires that full-time faculty be qualified by training and experience; Standard 403 governs clinical faculty qualifications; Standard 405 provides for academic freedom and security of position. These standards are not binding on the non-ABA schools in this cohort — they are used as analytical benchmarks, not regulatory requirements.

Part I: Overview of Audited Schools and Coverage

Ten schools have been substantially profiled. Their coverage rates — the percentage of reported faculty for whom individual profiles were located and completed — vary materially:

School	State	Teaching Faculty Profiled	Coverage Rate	Completeness
Cal Northern School of Law	CA	22	136.84%*	High

School	State	Teaching Faculty Profiled	Coverage Rate	Completeness
Lincoln Law School of Sacramento	CA	31	96.97%	High
Humphreys University Drivon School of Law	CA	11	63.16%	High
JFK School of Law at National University	CA	20	87.50%	High
Northwestern California University (NWCU)	CA	21	104.55%*	High
Purdue Global School of Law	CA	88	105.56%*	Low†
Birmingham School of Law	AL	70	N/A‡	High
Miles Law School	AL	14	N/A‡	High
Massachusetts School of Law at Andover	MA	38	N/A‡	High
Nashville School of Law	TN	52	N/A‡	High

*Coverage rates above 100% indicate that additional faculty were profiled beyond those reported in the school's §6061.7 disclosure — typically adjuncts listed on the school website but not in the official headcount, or administrative personnel with dual teaching roles.

†Purdue Global's "Low" completeness designation reflects that approximately 40 of its 95 profiled persons have only stub-level data (name and title) without credential detail — limiting the school's contribution to several analytical dimensions below.

‡Alabama, Massachusetts, and Tennessee schools do not file California §6061.7 reports; their enrollment and FT/PT faculty counts are not available in standardized format. Coverage rates are not calculable against a disclosed baseline.

Lincoln Law School of San Jose was attempted but only two persons (both deans) were publicly identified; it is treated as a partial audit with effectively zero teaching faculty data and is excluded from most cross-school comparisons.

Part II: JD Credential Rates — Who Has a Law Degree?

The foundational question for any law faculty is whether teaching personnel hold a JD. ABA Standard 402 requires full-time faculty to hold a JD or equivalent. Non-ABA schools have no equivalent mandate, though California's accreditation rules require faculty to be "qualified by education and training."

A. JD Attainment Across Audited Schools

Among the nine substantially audited schools (excluding Purdue Global's stub-only profiles):

- **Range:** 76.47% (Miles) to 100% (Drivon)
- **Cohort mean:** 90.3%
- **Cohort median:** 92.3%

All but Miles exceed 85%, suggesting that JD attainment is a near-universal faculty norm across audited schools. Miles at 76.47% is the low outlier — approximately one in four of its profiled faculty do not hold a JD. Given Miles's 0% bar passage rate across all four recent exam administrations, the below-average JD rate in the faculty adds a structural dimension to the outcome concern.

School	% Faculty with JD
Drivon	**100.0%**
Lincoln Sacramento	96.88%
NWCU	95.65%

School	% Faculty with JD
Nashville	92.45%
MSLaw	93.18%
Cal Northern	92.31%
Birmingham	90.54%
JFK/National	85.71%
Miles	**76.47%**

B. Where Faculty Earned Their JDs — ABA vs. Non-ABA

This is one of the most analytically significant dimensions in the dataset. The question is not merely whether faculty hold a JD, but from what type of institution. Faculty who trained at ABA-accredited schools bring exposure to ABA-standard legal education; faculty who trained at non-ABA schools — and particularly at the school where they now teach — bring a potentially narrower frame of reference.

Among faculty holding JDs, the percentage from ABA-accredited schools:

School	% JD from ABA School	% JD from Non-ABA School	% JD from Own School
Purdue Global	**97.73%**	2.27%	2.27%
Nashville	73.47%	26.53%	24.53%
JFK/National	77.78%	22.22%	22.22%
Drivon	58.33%	41.67%	41.67%
Lincoln	58.06%	41.94%	34.38%

School	% JD from ABA School	% JD from Non-ABA School	% JD from Own School
Sacramento			
Birmingham	47.76%	56.72%	**51.35%**
MSLaw	43.90%	53.66%	**50.00%**
Cal Northern	33.33%	**66.67%**	**66.67%**
NWCU	45.45%	54.55%	54.55%
Miles	**23.08%**	**76.92%**	35.29%

Three findings stand out:

Finding 1 — Purdue Global is a categorical outlier at the high end. Nearly 98% of its faculty JDs come from ABA-accredited schools. This reflects Purdue Global's deliberate national faculty recruitment strategy — it draws from law schools across the country rather than local practitioners. This is the highest ABA-JD rate in the cohort by a margin of more than 20 percentage points.

Finding 2 — Miles is a categorical outlier at the low end. Only 23% of its faculty JDs come from ABA schools, and 76.9% come from non-ABA institutions. This is the most insular faculty credential profile in the cohort. At a school posting 0% bar passage, the concentration of non-ABA-trained faculty is a material structural concern.

Finding 3 — Cal Northern, NWCU, Birmingham, and MSLaw all have faculty majorities who hold non-ABA JDs. At Cal Northern, every single non-ABA JD in the faculty comes from Cal Northern itself — meaning two-thirds of the teaching faculty are graduates of the school where they teach. This pattern — common to varying degrees across the cohort — is analyzed in depth below.

Part III: The Own-School Graduate Feedback Loop — The Cohort's Most Systemic Pattern

The most structurally consequential finding in this dataset is the concentration of own-school graduates on the teaching faculties of the schools they attended. This is not merely a credential question — it is an epistemological one. A faculty composed primarily of graduates of a single non-ABA institution will, by definition, reproduce the intellectual framework, methodological norms, and pedagogical culture of that institution. Where a school's bar outcomes are poor, a faculty that is predominantly the school's own graduates has limited external corrective influence.

Own-School Graduate Percentages — All Audited Schools:

School	% Faculty JD from Own School	Institutional Bar MPR
Cal Northern	**66.67%**	78.4%
NWCU	**54.55%**	82.0% (⚠️ attrition caveat)
Birmingham	**51.35%**	N/A (AL, no MPR)
MSLaw	**50.00%**	N/A (MA, no MPR)
Drivon	41.67%	73.1%
Lincoln Sacramento	34.38%	81.4%
Miles	35.29%	**0% bar passage**
Nashville	24.53%	N/A (TN, no MPR)
JFK/National	22.22%	60.0%
Purdue Global	2.27%	76.8%

Statistical observation: There is a directional (though not statistically conclusive at n=7 with bar data) inverse relationship between own-school graduate concentration and bar outcomes. The schools with the highest own-graduate faculty concentrations (Cal Northern at 66.67%, NWCU at 54.55%) happen to be among the better bar performers — but both have complicating factors (Cal Northern has a small, filtered cohort; NWCU's MPR

is dramatically overstated by severe attrition, as documented in the outcomes memo). At the other extreme, Miles has 35.29% own-school graduates and 0% bar passage — but also only 23% ABA-JD faculty, so the credential concern goes beyond self-referentiality.

The more important point is structural: **at four schools, more than half the teaching faculty are graduates of the same institution.** No ABA-accredited school operates on this model. ABA Standard 402's faculty qualification requirements implicitly assume external training benchmarks; the own-school-graduate pattern effectively bypasses that assumption.

The Cal Northern Case Study in Faculty Insularity

Cal Northern represents the most extreme version of this pattern in the audited dataset. Of 22 teaching faculty:

- **14 (63.6%)** hold JDs from Cal Northern itself
- **The dean** is a Cal Northern graduate (class of 1996)
- **The Director of Institutional Research** is a Cal Northern graduate
- **The CFO** is a Cal Northern graduate (and teaches Taxation and Business Associations)
- **The Director of Financial Aid** is a Cal Northern graduate (class of 2024 — meaning she graduated two years ago and is already teaching)

This last point is analytically notable: at least two Cal Northern faculty members began teaching within one to two years of graduating from the school. When a faculty member's entire legal education and the beginning of their teaching career occur within the same institution, the internal calibration of "what good legal instruction looks like" is self-referential by construction.

Cal Northern's 78.4% MPR partially offsets this concern — but the cohort is small and the first-year attrition rate (roughly 40–60% of entering students) means the graduating class reaching the bar is a heavily pre-filtered group, as documented in the outcomes memo.

Part IV: Active Practitioners vs. Academic Faculty — Two Distinct Models

A defining structural divide across the cohort is whether schools operate primarily through **active-practitioner adjunct faculty** (attorneys who teach as a secondary professional activity) or through a **more academic faculty model** (persons whose primary role is legal instruction, with limited or no current practice).

Neither model is inherently superior — ABA Standard 303 explicitly acknowledges the value of practitioner-adjuncts for experiential instruction — but the models carry different implications for bar exam preparation, doctrinal rigor, and instructional consistency.

Active Practitioner Rates — Audited Schools:

School	% Active Practitioners	% Judges/Commissioners	% Academic-Only	% Bar Admitted Active
Birmingham	**79.73%**	8.11%	~5%	**93.24%**
Miles	64.71%	0.00%	~18%	70.59%
NWCU	52.17%	**13.04%**	~17%	86.96%
MSLaw	50.00%	2.27%	~30%	63.64%
Nashville	47.17%	**18.87%**	~15%	**94.34%**
Lincoln Sacramento	21.88%	43.75%*	~20%	**100.00%**
Drivon	25.00%	25.00%	~25%	66.67%
JFK/National	19.05%	0.00%	~43%	**38.10%**
Cal Northern	**0.00%**	**57.69%**	~23%	84.62%
Purdue Global	15.79%	1.05%	~65%	40.00%†

*Lincoln Sacramento's high judge percentage reflects its Sacramento location and deliberate cultivation of sitting Superior Court judges as adjuncts — a distinctive and educationally valuable feature.

†Purdue Global's 40% bar-admitted rate reflects the large number of administrative staff and nationally dispersed adjuncts included in the profile set, many of whom are licensed in states other than California. The figure is not directly comparable to California-practice-focused schools.

The Birmingham and Nashville Practitioner Models

Birmingham and Nashville stand apart from California schools in one critical respect: their faculties are overwhelmingly composed of actively practicing attorneys and sitting judges. At Birmingham, 79.73% of profiled faculty are active practitioners, and 93.24% hold active bar licenses. Nashville's 94.34% active bar admission rate is the highest in the cohort.

This reflects a community-practitioner model common to non-ABA law schools in southern states, where part-time evening programs are taught entirely by working lawyers. The pedagogical implication is direct real-world relevance; the structural concern is instructional consistency and faculty accountability for student outcomes.

JFK/National — The Active-Bar-Admission Anomaly

JFK/National's 38.10% active bar admission rate is the lowest in the cohort by a substantial margin and warrants specific attention. Of 21 profiled persons:

- The **dean herself** (Lisa Hutton) does not hold an active California bar license — she graduated from JFK/National in 1999 but does not appear as an active licensee
- Two full-time faculty members (Kanios and Zimba) hold JDs from non-ABA, now-defunct or state-only institutions
- Multiple adjuncts appear to be inactive or retired from practice, or licensed in other states without CA admission

At a school whose mission is to prepare students to pass the California Bar Examination, a faculty in which fewer than 4 of every 10 profiled persons hold an active California bar license is a structural anomaly. It is not, by itself, disqualifying — adjuncts licensed in other states may teach doctrinal courses competently — but it represents a notable departure from the norm of the California practice community.

Part V: LLM Attainment — Advanced Credentials

The LLM (Master of Laws) is a post-JD advanced degree. For law faculty, it typically signals specialization, academic orientation, or international legal training. ABA schools generally

expect full-time faculty to hold JDs from top-ranked institutions and/or advanced degrees or scholarly records. Non-ABA schools have no equivalent expectation.

LLM rates among audited faculty:

School	% Faculty with LLM
Cal Northern	**53.85%**
NWCU	43.48%
Drivon	33.33%
Lincoln Sacramento	9.38%
Nashville	5.66%
Birmingham	5.41%
JFK/National	9.52%
MSLaw	2.27%
Miles	**0.00%**
Purdue Global	1.05%†

†Purdue Global's low LLM rate reflects its heavy reliance on adjunct practitioners rather than academically credentialed faculty.

Cal Northern at 53.85% is a marked outlier — more than half its profiled teaching faculty hold LLMs. This is unusually high for any law school, ABA or non-ABA, and is particularly striking for a school of Cal Northern's size (~19 FT/PT disclosed). Investigation of the detail data reveals that many of these LLMs are held by Cal Northern's own graduates who went on to earn the school's own MLS (Master of Legal Studies) degree — which Cal Northern itself confers. Several profiles show the same faculty member holding a Cal Northern JD and a Cal Northern MLS, both listed under "Other Advanced Degrees." If the MLS is being

counted in the LLM column, the 53.85% figure overstates credentialed LLM attainment in the traditional sense. This should be verified before citing this figure in any public-facing document.

Miles at 0% LLM is consistent with its broader credential profile — the lowest credential attainment across all measured dimensions.

Part VI: Dean Credentials and Leadership Profiles

All ten audited schools have deans with JDs. However, the source of that JD and the dean's professional standing vary materially:

School	Dean	JD Institution	JD ABA?	Own School?	LLM	Bar Active
Cal Northern	Brooks, Sandra L.	Cal Northern (1996)	No — Own	Yes	No	Yes
Lincoln Sacramento	Yeroshek, Filomena	UC Davis King Hall	Yes	No	No	Yes
Drivon	Reynolds, Matthew	UCLA School of Law	Yes	No	No	Yes
JFK/National	Hutton, Lisa S.	JFK School of Law (1999)	No — Own	Yes	No	**No**
Lincoln San Jose	Fuller, Mary A.	University of Notre Dame	Yes	No	No	Yes
NWCU	Clancey, Michael P.	State-accredited institution	No — State	No	No	Yes
Purdue Global	Pritikin, Martin	ABA school	Yes	No	No	Yes

School	Dean	JD Institution	JD ABA?	Own School?	LLM	Bar Active
Birmingham	Garrett, Scott	Birmingham School of Law (2012)	No — Own	Yes	No	Yes
Miles	Smitherman, Carole	Miles Law School (1979)	No — Own	Yes	No	Yes
MSLaw	Coyne, Michael L.	Suffolk University (ABA)	Yes	No	No	Yes
Nashville	Koch, Jr., William C.	Vanderbilt Law School (1972)	Yes	No	Yes (UVA LLM)	Yes

Pattern: Four of ten deans are graduates of the schools they now lead. At Cal Northern, Birmingham, Miles, and JFK/National, the chief academic and administrative officer received their legal education at the same institution they now head. This is the leadership-level expression of the own-school-graduate feedback loop described in Part III. At Birmingham and Miles — both Alabama non-ABA schools — the dean is also the school's own graduate, teaching courses at the same school.

The JFK/National dean's bar status is a significant outlier. Dean Lisa Hutton is the only dean in the audited cohort who does not appear to hold an active bar license. She graduated from JFK/National in 1999 but does not appear as an active California licensee. Leading a law school whose primary purpose is to prepare students to obtain bar admission while not holding an active bar license oneself is an anomaly worth explicit notation in any stakeholder communication.

The Nashville dean is the most credentialed in the cohort. Dean William Koch holds a JD from Vanderbilt Law School (1972) and an LLM from the University of Virginia School of Law — the only dean with both an ABA JD and a post-JD LLM from elite institutions. He previously served as a Justice on the Tennessee Supreme Court. Nashville's 94.34% active bar admission rate and 73.47% ABA-JD rate among its faculty are consistent with this leadership profile.

Part VII: Notable Individual Profiles and Anomalies

7A. Lincoln Sacramento — The New-to-Teaching Pattern

The Faculty Summary notes flag an observation by the researcher: "the majority of the faculty started teaching within 1 year of being admitted to the bar." The detail data partially supports this — several Lincoln Sacramento own-school graduates appear in the faculty list with graduation years followed immediately by teaching appointments. Examples:

- Meghan Kenley: JD from Lincoln 2019 → teaching at Lincoln 2020 (one year post-graduation)
- Jamie Mauhay Powers: JD from Lincoln 2019 → teaching at Lincoln 2021 (two years)

This pattern — recent own-school graduates immediately returning to teach — means some Lincoln faculty are teaching subjects they learned within the immediately preceding two to three years, without intervening practice experience. This is not unique to Lincoln (MSLAW shows the same pattern in several profiles), but it runs counter to the ABA's expectation under Standard 402 that faculty have sufficient training and experience to teach the subjects assigned.

7B. MSLAW — Teaching Before Graduating

The Faculty Detail contains a notable annotation for Gus Panagakis (MSLAW Assistant Professor): "Professor Panagakis taught at MSLAW as an adjunct professor before joining the faculty" — and his LinkedIn shows him beginning at MSLAW the same year he graduated. More significantly, the librarian Daniel Harayda is annotated: "his LinkedIn Profile indicates he started working at Massachusetts School of Law in 2003 as a Professor and Director of Library and Information Resource Center, while he was a law student and before he had his MLIS."

Teaching law students while simultaneously being a law student at the same institution is a structural anomaly with no ABA analog.

7C. Purdue Global — Scale and National Dispersion

Purdue Global's faculty profile is unlike any other school in the cohort. With 88 profiled teaching faculty, it is the largest faculty by a factor of more than 2x (the next largest audited school, Birmingham, has 70). Its faculty span at least 20 states of bar admission, teach entirely online, and are overwhelmingly ABA-JD holders. The school operates more like a national online law school than a community-practitioner model.

Two specific Purdue anomalies merit notation:

- **Two faculty** (Hatcher and Kass) hold JDs from **Valparaiso University School of Law**, which ceased admitting students in 2018 and has since closed. Their JDs are from an ABA-accredited school — but one that itself closed due to declining enrollment and bar passage concerns. This is a minor credential nuance, not a disqualifying fact.
- **One faculty member** (Kanios) holds a JD from **New College of California School of Law** — a non-ABA institution that operated in San Francisco until it closed in 2008. He is a full-time faculty member teaching at Purdue Global, one of only four full-timers whose credentials are fully profiled.

7D. Miles Law School — Systemic Credential Gaps

Miles has the weakest faculty credential profile on every measured dimension:

- Lowest JD attainment (76.47%)
- Lowest ABA-JD rate (23.08%)
- Lowest LLM rate (0%)
- Zero judges or commissioners on faculty
- Three of 14 profiled persons were "Not Found" — no credential data located

Five of Miles's adjunct faculty hold JDs from Birmingham School of Law (a non-ABA Alabama institution), rather than from Miles itself. This means Miles's faculty are trained at Alabama's two non-ABA schools — not at ABA institutions — creating a non-ABA-to-non-ABA credential chain with no external ABA benchmark at any point in the educational pipeline.

Against this backdrop, Miles's 0% bar passage rate across four consecutive administrations is less surprising as an institutional outcome. The faculty credential picture is consistent with, though not the sole cause of, the bar passage failure.

7E. Birmingham — The Self-Replicating Faculty in Context

Birmingham presents a more nuanced version of the own-school-graduate pattern than Miles. Its 51.35% own-school-graduate rate is high, but its active bar admission rate (93.24%) and active practitioner rate (79.73%) are the strongest in the cohort. Birmingham's own-school graduates are, for the most part, actively practicing attorneys — they teach from current experience, not from academic memory of their legal education.

The critical distinction is between:

- **Cal Northern/Miles model:** own-school graduates who are academic-only or semi-active, reinforcing the school's pedagogical culture through teaching
- **Birmingham model:** own-school graduates who are active practitioners, reinforcing the school's connection to the Alabama practice community through current experience

Both represent intellectual insularity at the credential level; the Birmingham version is partially mitigated by active practice.

Part VIII: Cross-School Statistical Summary

The table below consolidates the primary faculty metrics across audited schools, ranked by ABA-JD rate as the primary credential benchmark:

School	% JD	% ABA JD	% Own School	% Active Practitioner	% Bar Active	% LLM	Dean ABA JD
Purdue Global	46%†	**97.73%**	2.27%	15.79%	40%†	1.05%	Yes
Nashville	92.45%	73.47%	24.53%	47.17%	**94.34%**	5.66%	Yes
JFK/National	85.71%	77.78%	22.22%	19.05%	**38.10%**	9.52%	**No**
Drivon	**100%**	58.33%	41.67%	25.00%	66.67%	33.33%	Yes
Lincoln Sacramento	96.88%	58.06%	34.38%	21.88%	**100.00%**	9.38%	Yes
Birmingham	90.54%	47.76%	**51.35%**	**79.73%**	93.24%	5.41%	**No**
MSLaw	93.18%	43.90%	**50.00%**	50.00%	63.64%	2.27%	Yes
NWCU	95.65%	45.45%	**54.55%**	52.17%	86.96%	43.48%	No (State)

School	% JD	% ABA JD	% Own School	% Active Practitioner	% Bar Active	% LLM	Dean ABA JD
Cal Northern	92.31%	33.33%	**66.67%**	0.00%	84.62%	**53.85%‡**	**No**
Miles	**76.47%**	**23.08%**	35.29%	64.71%	70.59%	**0.00%**	**No**

†Purdue Global's JD and bar figures are depressed by the inclusion of numerous administrative staff without JDs; the teaching faculty subset would score materially higher. ‡Cal Northern's LLM figure may overcount MLS degrees from its own institution.

Part IX: What Cannot Yet Be Determined

The 14 unaudited schools include several that are analytically important to the overall research:

- **TJSL, Trinity, Colleges of Law, San Joaquin, St. Francis** — all California CALS schools with disclosed bar passage and attrition data but no faculty profiles
- **La Verne and UWLA** — ABA-accredited schools whose faculty credential profiles would provide the clearest comparison to ABA norms

Until these schools are profiled, the following questions remain open:

1. Whether the own-school-graduate feedback loop is more or less prevalent in the unaudited CA schools
2. Whether the TJSL faculty (at the most expensive school in the cohort) reflects meaningfully different credentials than the CALS schools
3. Whether La Verne and UWLA's ABA-accredited faculties provide a credential benchmark that clarifies the CALS-vs-ABA faculty gap

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Part X: Summary Findings for Stakeholder Communication

1. Own-school graduate concentration is the cohort's defining faculty characteristic. At five of ten audited schools, more than 40% of teaching faculty are graduates of the school where they teach. At Cal Northern the figure reaches 66.7%. No ABA-accredited school operates at this level of credential insularity. This pattern does not

automatically predict poor outcomes — Cal Northern's bar numbers are adequate — but it systematically limits external intellectual influence on pedagogical culture.

2. The credential gap between Purdue Global and the rest of the cohort is dramatic. Purdue's 97.73% ABA-JD faculty rate is more than 20 percentage points higher than the next school (JFK/National at 77.78%) and more than 70 points above Miles (23.08%). Purdue is operating an effectively ABA-standard faculty credential model within a non-ABA accreditation framework.

3. Miles Law School's faculty credential profile is consistent with its 0% bar passage outcomes. Lowest JD attainment, lowest ABA-JD rate, no LLM holders, no judges, and three "Not Found" profiles out of 14 — Miles presents a faculty profile unlike any other school in the cohort, and not in a positive direction.

4. JFK/National's dean does not hold an active bar license. The only dean in the audited cohort without active bar admission leads a school whose primary purpose is to prepare students to obtain exactly that license. This is an anomaly worth explicit attention.

5. Lincoln Sacramento and Nashville show the strongest faculty bar admission profiles. Lincoln Sacramento's 100% bar admission rate and Nashville's 94.34% represent the clearest examples of faculties composed of credentialed, actively licensed attorneys. Both schools also show the highest proportions of judges and sitting court officials on their teaching rosters.

6. The active practitioner divide reflects two distinct institutional philosophies. Birmingham (79.73% active practitioners) and Nashville (47.17%) operate a community-practitioner model; Purdue Global (15.79%) and JFK/National (19.05%) operate more academic or institutionally oriented models. Neither is inherently superior, but they produce different educational cultures and present different consumer experiences.

7. The dataset is incomplete and this memo should be read accordingly. Ten of 24 schools are audited. The 14 unaudited schools include some of the largest (TJSL, Trinity, Colleges of Law, La Verne) and the most analytically important (La Verne and UWLA as ABA comparators). A complete analysis will require completing those audits.

Executive Summary

The California First Year Law Students' Exam (FYLSX) is required for three groups of people: (1) students attending an unaccredited, registered law school, (2) students participating in the Law Office Study Program and, (3) students at a California-accredited law school who have less than two years of college coursework prior to enrolling in law school.

In practice, this means that most students attending a California-accredited law school do not take the FYLSX. For example, in 2023, only 80 students attending a California-accredited law school took the FYLSX. Two years later, 583 students graduating from a California-accredited law school took the California Bar Exam (196 sat for the February 2025 exam and 387 sat for the July 2025 exam). Assuming that the student taking the FYLSX in 2023 took the CBE in 2025, that means that only 13.7% of individuals graduating from a California-accredited law school who sat for the California Bar Exam that year also took the FYLSX after their first year of law school.

Additionally, bar passage for graduates of California-accredited law schools tends to be much lower than that of graduates from ABA-accredited schools. In July 2025, first time test takers passed the bar at the following rates based on type of law school attended: California ABA approved (84.4%), Out-of-State ABA approved (78.0%), California-accredited (35.1%).

WHO MUST TAKE THE FIRST YEAR LAW STUDENTS' EXAM (FYLSX) (AKA THE "BABY BAR")?

Not every law student in California is required to take the First Year Law Students' Exam (FYLSX). One issue as it concerns the WSBA proposal is that students at law schools that are California-accredited but not ABA-accredited are NOT automatically required to take it. Rather, only those students at a California-accredited law school who did **not** complete at least two years of college coursework before enrolling at law school must take it. Any student who completed more than two years of college coursework and is at a California-accredited law school DO NOT have to take the FYLSX. Purdue Global is the only CA-accredited law school with a bachelor's degree requirement.

Based on information from the California State Bar's page, here is a breakdown of exactly who must take the FYLSX:

[AI Summarization]

Not all law students are required to take it. The requirement applies to three specific groups:

1. **Students at State Bar-unaccredited registered law schools** — Anyone completing their first year of a Juris Doctor program at a law school that is registered with the State Bar but *not* accredited by it must take the exam.
2. **Law Office Study Program participants** — Students pursuing their legal education through the Law Office Study Program (i.e., studying under a practicing attorney or judge rather than attending a formal law school) must also take the exam after their first year.
3. **Students at ABA- or California-accredited law schools *without* sufficient undergraduate work** — Even if a student attends a fully accredited law school (ABA or California State Bar–accredited), they must take the FYLSX if they did **not** complete at least two years of college coursework (60 semester units or 90 quarter units) before enrolling in law school.

Who is EXEMPT

Students at ABA- or California-accredited law schools who **have** completed a minimum of 60 semester or 90 quarter units of undergraduate work are **generally exempt** from the exam. In other words, the typical law student at an accredited school with a standard college background does not need to take it.

This means that a small number of students take the FYLSX each year. Here are some numbers from the past few testing sessions (pulled from the California Bar's First-Year Law Students' Examination statistics):

	Number of takers (first time and repeat)	**Number of takers (first time and repeat) attending CA accredited law schools**
2025 (June + October sittings)	404	117
2024 (June + October sittings)	472	94
2023 (June + October sittings)	369	80

Additionally, the pass rate for the individuals who do have to take the FYLSX is quite low:

	First Time Takers (%)	Repeat Takers (%)	All Takers (%)
June 2025	33.3	12.3	22.6
October 2025	13.8	11.0	12.2
June 2024	29.8	37.8	32.5
October 2024	30.5	24.1	26.6
June 2023	17.0	5.5	13.7
October 2023	15.1	12.3	13.4

CALIFORNIA BAR PASSAGE RATES (FIRST-TIME TAKERS) – ABA-ACCREDITED VS. CA-ACCREDITED

	CA ABA Approved (%)	Out-of-State ABA Approved (%)	CA Accredited (%)
July 2025	84.4	78.0	35.1
February 2025	80.5	76.1	60.7
July 2024	81.3	74.7	36.3

	CA ABA Approved (%)	Out-of-State ABA Approved (%)	CA Accredited (%)
February 2024	55.1	49.0	35.3
July 2023	76.3	69.9	33.3
February 2023	49.4	46.6	30.7

CALIFORNIA ACCREDITATION REQUIREMENTS

In addition, the rules related to the California law school accreditation is not as rigorous as the ABA-accreditation when it comes to bar passage requirements.

[AI Summarization]

The Core Numbers

	California State Bar	ABA (Standard 316)
Minimum passage rate	40%	75%
Measurement window	Rolling 5-year period	2 years from graduation
Exam attempts included	Not specified — cumulative	All attempts within 2-year window

California requires a **40% Minimum Cumulative Bar Passage Rate (MPR)** over a rolling five-year reporting period. The ABA, under its revised Standard 316 (effective May 2019), requires at least **75% of graduates who sit for any bar exam to pass within two years of graduation** [1] [2].

Key Structural Differences

1. The threshold itself is dramatically different. California's 40% floor is less than *half* the ABA's 75% requirement [1] [2] . In practical terms, a California-accredited school can retain its accreditation even if most of its graduates never pass the bar. An ABA school would face probation and potential loss of accreditation long before reaching that point.

2. The time window is longer for California. California uses a rolling 5-year window to calculate its cumulative rate, which naturally smooths out year-to-year fluctuations and gives struggling schools more runway. The ABA's revised Standard 316 tightened its window *down* to 2 years specifically to allow the ABA to take faster corrective action against underperforming schools [1] .

3. Enforcement consequences differ. Under the ABA's Standard 316, a school that falls below 75% faces a formal finding of noncompliance, then a required remediation plan, then potential public probation (which the ABA posts publicly), and ultimately loss of accreditation [3] [4] . The recent probation of Cooley Law School is a real-world example of this process in action [4] . California's enforcement mechanism is less publicly documented and, given the much lower threshold, far less likely to be triggered in the first place.

4. The ABA tracks both first-time and ultimate rates; California focuses only on a cumulative figure. The ABA requires schools to publicly disclose both first-time pass rates and "ultimate" pass rates (within 2 years) under Standard 509, giving consumers detailed information [5] [3] . In 2024, the aggregate first-time rate for ABA schools was **82.79%**, and the two-year ultimate rate was **90.41%** [5] — numbers that dwarf California's 40% minimum.

Why the Gap Exists

The disparity reflects fundamentally different missions. ABA accreditation is a **national standard** designed to ensure degree portability across all 50 states and demonstrate that a school is adequately preparing students for the profession generally [6] . California's accreditation system, by contrast, is a **state-level consumer protection framework** designed primarily to regulate a sector of schools that serve nontraditional students and operate only within California [2] . The lower bar passage threshold arguably reflects that California-accredited schools enroll a broader range of students — but critics would argue it also means those schools can continue operating even when most graduates cannot pass the bar.

[1] https://thebarexaminer.ncbex.org/article/summer-2019/revised-bar-passage-standard-316-evolution-and-key-points/
[2] https://www.americanbar.org/news/abanews/aba-news-archives/2023/04/aba-report-bar-passage-data/
[3] https://legalclarity.org/bar-passage-rates-first-time-stats-aba-rules-and-gaps/
[4] https://www.jdjournal.com/2025/09/25/aba-imposes-probation-on-troubled-law-school-over-low-bar-passage-rates/
[5] https://www.americanbar.org/news/abanews/aba-news-archives/2025/03/section-legal-ed-releases-report-bar-admissions/
[6] https://www.americanbar.org/news/abanews/aba-news-archives/2025/12/council-of-legal-ed-law-school-data/

LAW SCHOOLS THAT HAVE LOST ABA ACCREDITATION

The table below provides detail regarding why ABA accreditation was lost for law schools that lost accreditation in the past 10 years. Broadly, the table shows a broad pattern of loss of accreditation driven by a few recurring problems: weak bar passage rates, admissions/noncompliance issues, financial distress, and declining enrollment. In most cases, schools were first placed on probation or cited for specific ABA standard violations, then moved through a teach-out process before accreditation was formally withdrawn.

School	Year Accreditation Was Lost	Reason Why Accreditation Was Lost (from Public Sources)
Arizona Summit (formerly Phoenix)	2020 (following teach-out)	Accreditation was pulled due to failure to comply with ABA standards for academics and admissions. The school also had terrible bar passage rates. The school was initially placed on probation in March 2017 failure to comply with ABA standards 301(a), 308(a), 309(b), 501(b), and Interpretations 501-1 and 501-2., with formal loss of accreditation occurring in 2020 following completion of a teach-out plan approved in October 2018.
Charlotte School of Law	2017 (due to loss of state licensure)	The school was placed on probation in October 2016 for failure to comply with ABA standards 301(a), 501(a), and 501(b). The school subsequently lost federal student aid and the UNC Board of Governors pulled its license. The school submitted a teach-out plan to the ABA that was rejected, forcing the school to close immediately.
Concordia University School of Law	2020	ABA approval was withdrawn amid Concordia Portland's financial problems and the collapse of a planned transfer to Concordia St. Paul.
Florida Coastal School of Law	2023 (following teach-out)	In October 2017 the ABA issued a letter indicating that the school was out of compliance with Standards 301(a), 309(b), 501(a), 501(b), and Interpretation 501-1. In March of 2018 the school was found to be in compliance with Standard 501(a), but the other issues still remained. In November 2019, the ABA issued a Notice of Finding Significant Noncompliance with Standard 202(a) and (d). In February 2020, the ABA found then found the school to be in compliance with financial standards 202(a) and (d). In 2021 the school lost federal student aid because the institution failed to meet financial responsibility standards. As a result, the school submitted a teach-out plan that was approved in August 2021. The school's accreditation was formally withdrawn in November 2023, following completion of the teach-out plan.

Golden Gate University School of Law	Anticipated 2027 (following teach-out)	In November 2021, the ABA issued a Notice of Finding of Significant Noncompliance with Standard 316 due to the school's lackluster bar passage rates. In February 2023 the ABA granted an extension to try and bring up their passage rates. Anticipating that they would ultimately be unable to meet the ABA bar passage requirements and potentially lose accreditation, the university's board of governors ultimately decided to end the JD program at the end of 2024 with a teach-out plan which allowed for accreditation to continue through July 2027. The school will continue to offer graduate programs and is applying for accreditation from the State Bar of California.
Indiana Tech Law School	2017	The school was given provisional ABA approval in March 2016, but in August 2017 the ABA decided not to grant full approval. The school closed following severe financial issues due to low enrollment.
University of La Verne College of Law*	2023 (following teach-out)	School's Board voted to give up its ABA accreditation in 2019 and instead pursue state accreditation. This decision stemmed from the school's low bar passage rates and expected inability to meet strict ABA passage requirements. The school submitted a teach-out plan in February 2020 which the ABA determined to be complete in August 2023.
Thomas Jefferson School of Law*	2019	School faced financial struggles (exacerbated by construction of a new, expensive building), bar passage issues, and questionable admissions practices. The school was placed on probation in November 2017 and accreditation was ultimately withdrawn in June 2019 with the ABA citing non-compliance with Standards 202(a) and (d), 301(a), 501(b) and Interpretations 501-1 and 501-2. It still exists as a California state approved law school.
Valparaiso University School of Law	2020 (following teach-out)	The school faced an enrollment crisis following poor bar passage rates and an official ABA censure in 2016 over its admissions practices (violations of Standards 501(a) and 501(b)), though that censure was lifted in November 2017. No students were admitted to the entering class of 2018. ABA approval stayed in place for a teach-out through August 31, 2020, and the school then closed after graduating its final class.
Whittier Law School	2020 (following teach-out)	In April 2017, the school's Board voted not to enroll new first-year students that coming fall due to financial issues.

*No longer ABA approved but remains open as a CA-accredited law school

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July 22, 2026

Via Electronic Submission

Board of Governors
Washington State Bar Association
1325 Fourth Ave., Suite 600
Seattle, WA 98101-2539
boardfeedback@wsba.org

Re: Proposed Rule Change to Definition of "Approved Law School"
Letter in Support of Expanded Definition

To the Honorable Board of Governors:

I thank the Board of Governors for implementing the expansion of the definition of "Approved Law Schools" as put forth at the May 1, 2026. This was a momentous decision and I understand one that was reached at comprehensive and respectful debate. I am a current student at Purdue Global Law School ("PGLS") and the law firm administrator of Clifton Law PLLC based in Kirkland, WA. I am an adamant supporter of the Board of Governors' proposed rule change expanding the definition of "Approved Law Schools" ("Proposed Rule Change"), as I believe based on the arguments and the data presented that it will help achieve WSBA and the State of Washington's goal of increasing access to legal education and justice.

The term "non ABA-accredited schools" is misleading. PGLS and various other competent schools are "state-accredited schools" and should be given the respect of their accredited status for which they have passed their jurisdiction's standards. In response to comments from the Deans of Washington's three only law schools (which are all ABA-accredited), and the letters in support of the Proposed Rule Change from various other schools, I feel it is important for me to offer my thoughts and experience on the matter, as I am a product of these state-accredited institutions at issue. The Proposed Rule Change has the capacity to determine the trajectory of the operations of state-accredited schools and the eligibility of thousands of future nontraditional law students. Please accept this letter as my comments in support of the Proposed Rule Change, my respectful response to the opposition posed by the Deans of the ABA-accredited law schools, and my plea to allow you to let me exist among my colleagues.

A. The Decision of the Board of Governors to Expand the Definition of "Approved Law School" Should Not Be Disturbed Absent a Compelling Interest.

The Washington Supreme Court has delegated the function of determining specific qualifications and rules for the admission to the practice of law to the WSBA Board of Governors as an entity operating under the authority and direction of the Washington Supreme Court, but still

reserving the ultimate authority on implementation. APR 1(a). The specific functions of WSBA's Board of Governors with respect to this duty are stated in APR 2(a)(4)(A):

> "…developing the form and content, receiving, reviewing, investigating, and approving or denying applications for admission and licensing examinations, participating in programs administered by the Bar, being admitted or licensed to practice law, or changing membership status with the Bar, and any other certificate or document referred to in these Admission and Practice Rules and…Perform any other functions and take any other actions provided for in these rules, or as may be delegated by the Supreme Court, or as may be necessary and proper to carry out its duties."

As trust has been given to the WSBA Board of Governors, "considerable weight" is given to the Board's recommendation in certain cases, such as in disciplinary proceedings and rule changes. See *Matter of Disciplinary Proceeding Against Kelley*, 3 Wn.3d 541, 550, 553 P.3d 1101, 1108 (2024). Though the Washington Supreme Court is not bound by the recommendations of the Board, for several reasons the Supreme Court does not "depart from recommendations shaped by this experience and perspective" of the Board of Governors. See *Matter of Cottingham*, 191 Wn.2d 450, 468, 423 P.3d 818, 826–27 (2018), as corrected (Aug. 17, 2018), as amended (Oct. 10, 2018).

The operative presumption here is that the Board of Governors has carefully deliberated on the Proposed Rule Changes, considered adequate alternatives, incorporated both timely notice and comment, and still recommended near-unanimous adoption of the Proposed Rule Change. It is only proper that deference is given to the Board of Governors' experience and perspective regarding the Proposed Rule Change, which absent a clear and compelling interest should not be disturbed. Here, no clear and compelling interest as to why the Proposed Rule Change should be rescinded has been demonstrated by parties challenging the rule.

B. The Concerns Raised by the Deans of the ABA Law Schools of Washington Confuse the Issues Before the Board, and are Not Conducive to the Discussion Regarding the Proposed Rule Change.

The Deans of Seattle University, University of Washington, and Gonzaga University Schools of Law ("Deans") submitted their opposition letter on July 6, 2026 recommending that the Board of Governors postpone the implementation of the rule and "reconsider this matter fully beginning at its July 24th meeting", citing 50 years of the current licensing structure as precedent, and citing an apparent lack of evidence considered in reaching the Proposed Rule Change. This letter is disingenuous, attempts to call into question the expertise and discretion afforded to the Board of Governors, and simply put, is untimely and does not warrant dispositive weight. Furthermore, the Proposed Rule Change has already been implemented, and the proper mechanism would be for the Deans to ask to rescind the already-implemented rule change instead of tabling the matter. The Deans' letter does not stand scrutiny and should not be determinative with respect to the Proposed Rule Change for the foregoing reasons.

1. A collaborative opportunity existed during the notice period, to which the Deans did not participate in.

The Proposed Rule Change was first circulated on April 7, 2026 and allowed for a comment period of 24 days. The effective date of the Proposed Rule Change is slated to be September 1, 2026. The initial comment period was the ideal opportunity for the Deans to submit their support or opposition in order for the Board of Governors to timely review their materials and add them to the deliberations regarding this subject. Simply put, the Deans did not participate in this early timeframe and submitted no materials on the subject. To the extent that the Deans submitted minimal materials in opposition to the Proposed Rule Change, it is unreasonable to complain about their level of participation when the time period for submitting all relevant evidence existed. Including new arguments and evidence now works to confuse the issues and waste time.

2. The relevant data of state-accredited law schools has already been made available for review and deliberation.

On the Proposed Rule Change listed for consideration on May 1, 2026, five attachments to the proposal were submitted: (1) Proposed Amendments to the WSBA Admissions Policies – Markup, (2) Memo re Approved List of Law Schools for Bar Examination Purposes, BOG Materials, June 1978, (3) List of known law schools recognized by other states to qualify for the bar exam, (4) Court Opens Door to New Law School Accreditors for Bar Admission, The Florida Bar News, Jan. 16, 2026 and (5) Texas Supreme Court Order re Misc. Docket No. 26-9002, January 6, 2026. Comments and discussion were welcomed at the May 1, 2026 Board of Governors meeting, but no Deans or ABA Law School representatives appeared to give comments regarding this Proposed Rule Change. It is inferable at that the time of the Proposed Rule Change, there was no substantial opposition presented. While it is within the ultimate discretion of the Board of Governors to consider new materials submitted past the appropriate deadline, due to the untimely nature of the opposition submitted, a simple letter from the Deans of Washington's only law schools (which are all ABA-accredited) cannot serve as dispositive evidence for changing the Board's recommendation.

3. The Proposed Rule Change, in nature and intent, is not a rule change of first impression because Washington already licenses nontraditional graduates of state-accredited schools.

As mentioned in the Proposed Rule Change's initial materials at the May 1, 2026 meeting, the State of Washington already allows attorneys from alternative pathways not involving ABA-accredited schools to apply for licensure and/or sit for the bar exam. An example of this is admission via motion under APR 3(c), which allows a lawyer licensed in other "states or territories of the United States or the District of Columbia" to apply for licensure via motion if they can file a certificate from their jurisdiction exemplifying their admission to practice and good standing, and "present satisfactory proof of active legal experience for at least one of the three years immediately preceding the filing of the application." Similarly, the courtesy is extended to spouses of active duty service members. APR 3(c)(2). This relies on the assumption, however, that the lawyer attended the requisite law school in their jurisdiction, passed the bar exam, and then practiced without problems

for one full year before applying for admission by motion. The Proposed Rule Change resolves those ambiguities in construction and interpretation of Washington's licensing rules.

The problem is that while nontraditional students have access to state-accredited schools not in Washington, their status as "law student" is not recognized under the current Washington definition of "Approved Law School", resulting in the categorical denial of resources and services available to traditional students at ABA-accredited institutions. Students at ABA-accredited institutions within the State of Washington have access to far more resources, opportunities, pathways to licensure, and pathways to limited licensure compared to nontraditional students from foreign state-accredited jurisdictions. Consider the example of the APR 9 licensed legal intern program: a student who is duly enrolled and in good academic standing at an "Approved Law School" could quality for a limited license to practice law under the direction of a supervising lawyer, but the semantics of this rule effectively constrain this coveted limited license to traditional students at the law schools of Seattle University, University of Washington, and Gonzaga. The APR 9 program provides practical experience and the opportunity to develop in-person legal advocacy skills by allowing the limited practice of law and advising clients, but it is expressly not available to nontraditional students.

4. <u>The publication of the Proposed Rule Change satisfied public notice, and reference of the new bar exam's ability to affect quality applicants doesn't speak directly to the rule change.</u>

The Deans raise the issue of the new bar exam's ability to affect quality applicants which in turn would somehow affect the ability to "protect the public from unqualified lawyers". The Deans do not establish correlation or causation with this argument. To the extent that the bar exam is the ultimate determiner of what makes a future lawyer competent, it is worth reminding that WSBA has a multi-stage vetting process consisting of requiring a passing score on the Multistate Professional Responsibility Examination, a comprehensive Character and Fitness Background check from the National Conference of Bar Examiners, subsequent review of an applicant's submission in a holistic manner, along with issuing final recommendations to the Washington Supreme Court, who has the ultimate plenary authority on accepting or rejecting new applicants. There are additional safeguards already present which serve to protect the public from sub-standard lawyers in practice, such as ongoing monitoring and continuing legal education. It is not reasonable to "hinge all bets" on the new bar exam when there already is a multi-part process designed to adequately vet candidates for licensure in all aspects.

5. <u>The Deans' letter disregards the regulating function of the Washington State Supreme Court as the final authority on who is qualified to practice law within Washington State.</u>

The Deans argue that Washington's current rules "are built on the foundation of a national accreditation system which includes real monitoring and safeguards for consumer protection of legal clients as well as prospective law students." This argument is overbroad and misconstrued. The ABA promulgates legal educational standards for institutions which it deems worthy of accreditation, but the final authority on who is fit to practice law rests with each individual state

jurisdiction's respective state bar association or highest court. The Washington Supreme Court is the final authority on who is fit to practice law, and they are the authority who issues the order admitting the specified applicant to the practice of law. WSBA serves as the regulatory and disciplinary body under the State Bar Act RCW 2.48 where membership in the State Bar Association is a mandatory prerequisite to the practice of law, along with certain exclusions as the Board of Governors may prescribe.

It is well within the purview of WSBA to promulgate rules under APR 2 which form the procedure for vetting candidates for admission to the practice of law (APR 2(a)(4)), along with approving law schools for the purpose of admission to practice law (APR 2(a)(5)), and it is the ultimate authority of the Washington Supreme Court to establish the qualifications for admission to practice law, and to admit and license persons to practice law in this state. APR 1(a). Subverting the authority under the guise of educational accreditation downplays the important role that both WSBA and the Washington Supreme Court already play in regulating admissions to the practice of law, and as such, the collective thoughts of the Deans cannot substitute for the statutory authority already established reserved to WSBA and the Washington Supreme Court. Respectfully, this attempt is a further conflation of issues not relevant to the approval of the Proposed Rule Change.

6. <u>The Deans' letter is antithetical to their proclaimed efforts to reducing unfair and unnecessary barriers to access, only solidifying a notion of disparity on who society deems worthy to study and practice law.</u>

To the extent which the Deans' letter attempts to put an administrative pause on opening up additional pathways for nontraditional students to study law in Washington, it goes against the policy of promoting diversity, equity, and inclusion within the profession. While it is agreed that study from an ABA-accredited institution historically has been the "gold standard" for legal education, it comes at a severe cost not available to the nontraditional student: time spent away from home and families, exorbitant amounts of debt (to which graduate students must now face the additional stress of lack of federal funding due to the elimination of Graduate Direct PLUS loans, $50,000 annual and $200,000 aggregate caps on federal loans for professional students, and reduction in Federal Pell Grant eligibility), and other unique life difficulties not shared with traditional students.

The Law School Admissions Council in their 2025 composition report[1] identified that the majority of law school students in 2024 identified as White, Female, Heterosexual/Straight, had Parents with Bachelor's Degrees, were Continuing-Generation College Graduates, were First-Generation Law Students, did not receive a Pell Grant nor LSAC Fee Waiver, and ranged from 23 to 26 in age. This is the current profile of the "traditional" law student which ABA institutions are actively marketing towards. Nontraditional students on the other hand do not fit into these major demographic categories, and typically come from different educational, professional, and age backgrounds of life. State-accredited schools tailor their curriculum to be more cognizant of their nontraditional student diverse demographic: parents holding a full-time job and juggling family responsibilities while attending online school, disabled veterans hoping to use GI bill funds towards their school expenses, students with accessibility and mobility issues who can only attend remotely,

[1] *LSAC's Knowledge report: the composition of the First-Year Law School Class and Enrollment Trends*. Law School Admissions Council. https://www.lsac.org/sites/default/files/research/2025-Composition-Report.pdf

and other nontraditional students who are not the main target market for ABA-accredited schools. Nontraditional students attend state-accredited institutions because their programs fit better into their lives, and state-accredited institutions can offer the flexibility in pricing and curriculum that ABA-accredited schools simply cannot offer under their standards. However, denying nontraditional students the right to be called "law students" in line with all other students in legal academia circumvents the purpose of promoting diversity, equity, and including within the legal community. This sentiment continues to evolve into the unsupported notion that those that did not attend an ABA-accredited school are not worthy to practice law. This pervasive sentiment must end if the State is to truly demonstrate active progress towards diversity, equity, and inclusion in the legal profession, and it all starts with allowing nontraditional students into the discourse.

C. As Properly Determined by the Board of Governors, the Proposed Rule Change Resolves an Inconsistency in Licensing, and Promotes Access to Legal Education for Nontraditional Students.

As succinctly stated in the Board of Governors' response letter dated July 14, 2026, the Board's decision resolves an inconsistency in the recognition of law students and graduates from other jurisdictions and is a logical extension of the current trends of licensure in Washington. The exclusivity of the APR Rule 9 Supervised Practice program was cited, and allowing nontraditional students access to this program does not deviate from the fundamental determination of who may ultimately practice law in the State of Washington. It merely allows for more opportunities and pathways to those who are not able to ascend to the definition of a "traditional" student at an ABA-accredited institution. Seeing as pathways already exist, the Proposed Rule Change works in concert with ideals of diversity, equity, inclusion, and accessibility to help ease the lawyer shortage by allowing nontraditional students to fill those gaps which students from ABA-accredited institutions are not doing.

D. The Benefits of Nontraditional Students from State-Accredited Law Schools are Already Being Realized in the State of Washington.

The argument that allowing nontraditional students from state-accredited law schools will lead to lack in quality of services and chaos to the legal profession is unfounded. As previously mentioned by the Board of Governors, Washington already allows alternative pathways to licensure such as motion for admission after a year's worth of study, the APR 6 law clerk program, and the APR 9 supervised practice pathway. What the Proposed Rule Change attempts to resolve is an inconsistency where a state-accredited law student successfully obtains their license to practice in another jurisdiction, but does not allow them to sit for the bar exam in Washington. Various law students who have obtained their education from state-accredited institutions and licensed to practice in other jurisdictions have obtained admission to practice in the State of Washington and are leading thriving careers.

Clifton Law PLLC is an example of a law firm that effectively could not have existed without the administrative and substantive support provided by the undersigned. Managing Attorney Adriena X. Clifton hired me because of my paralegal credentials, legal career spanning more than a decade, my practical knowledge of Washington Courts, my experience teaching Continuing Legal

Education classes for attorneys, but ultimately the skills I demonstrated which I attribute to my education at Purdue Global Law School. However, in the Washington legal community, I am not respected for my state-accredited education or achievements, and I'm simply regarded as "the help", which exemplifies the disparate and discriminatory treatment by the profession at-large of nontraditional students.

What started out on an apartment countertop has grown in a year to a firm which employs multiple competent legal professionals and has had a historical gross revenue of $500,000.00. My business administration background combined with the high quality of substantive education from PGLS has allowed me to be useful at the firm in more ways than any attorney can dream of. Ms. Clifton attributes the success of the firm to both her and my efforts, but she also attributes the success to the trend of allowing nontraditional students access to opportunities within the State of Washington. Our firm has been able to offer pro-bono services to the general public, serve clients from multiple financial backgrounds, and demonstrate high-quality work product, which I can personally attribute to my studies at PGLS.

Kevin Plachy, Director of Advancement at the WSBA, is a PGLS graduate who has demonstrated support for this rule change. Not only does he have an impressive academic and professional background, his continued presence at WSBA highlights that PGLS graduates, and graduates from state-accredited institutions who are given an opportunity to excel in the legal community of Washington can rise to amazing positions. Marie Trombley is a licensed practitioner in Washington who focuses on criminal appeals, and is also a PGLS graduate. She was able to take the bar exam in California more than a decade ago, and at the time the State of Washington had reciprocity with the State of California and allowed the transfer of the bar exam score into the Washington jurisdiction. That privilege is no longer available for current students at PGLS.

Brenna Berquam is a licensed attorney whom I personally know in the State of Washington who opened up her own solo practice after graduating from PGLS. At the time she graduated, there were no alternative pathways to effectively transition her California licensure into Washington licensure. The only pathway available to her was to obtain an LLM degree at an ABA-accredited institution, then sit to take the WA Bar Exam, then only upon those additional hurdles did she qualify for the admission to the practice of law. If the Proposed Rule Change is rescinded, nontraditional students would still be subject to the scrutiny of ABA-accredited institutions by being forced to pursue an LLM if they do not meet the practice requirements of admission via motion, which in itself is still a high time and financial cost.

There are countless other success stories applicable to the State of Washington, but neither the Deans nor any regulatory body are tracking these success stories because the idea of the nontraditional student is foreign and uninteresting to the ABA-accredited crowd. However, we all must recognize that nontraditional students can (and have) played an important role in the development of the legal profession and provision of legal services to underserved communities. Continuing to regard us as different is a gross miscarriage of justice and diversity that must be remedied.

E. This Proposed Rule Change is Needed to Advance the Ideals of Access to Legal Education, Justice and Opportunity for Nontraditional Students.

Under current ABA Accreditation Standards 701 and 702, an accredited law school must have "suitable class and seminar rooms in sufficient number to permit reasonable scheduling of all classes, skills offerings, and seminars… and facilities and equipment that meet all applicable health and safety codes."[2] These standards impose a physical location requirement for prospective students and require them to appear in-person at Seattle or Spokane law school locations in order to study under an ABA-accredited program. The "traditional law student" usually can afford the financial and temporal taxations of obtaining housing, reliable transportation, materials, and the time constraints imposed by mandating in-person appearances at law school facilities compared to fully-online programs. The nontraditional student by comparison, usually cannot afford these costs.

While the ABA does not accredit fully-online programs where 100% of the curriculum is taught online and does not require in-person attendance, history has shown that the requirement of in-person learning is not necessary in legal education. As various law schools have demonstrated during the COVID pandemic, the forced shut-down of campuses promulgated a temporary rule change to the ABA accreditation standards 306 which allowed 199 law schools to offer their programs fully-remote and remove the in-person requirement, including Seattle University School of Law, University of Washington School of Law, and Gonzaga University School of Law.[3] The temporary rule change was then modified to allow up to 50% of credits to be obtained in a fully-virtual environment. The ongoing debate regarding continuing to allow distance education was covered by many scholars in the years that followed.[4]

Under the current accreditation standards for ABA-schools, Washington schools are not marketing or actively trying to solicit nontraditional students. While variances may be granted on an occasional basis, only Seattle University has a Flex-JD program which allows the majority of classes to be taken online in virtual classrooms, but mandates five weekends each academic year for a full day of class on Saturdays and half day on Sundays.[5] This operates under the presumption that (a) students are able to travel to campus reliably at those times with adequate means and mobility, (b) has enough bandwidth or flexibility from professional or personal obligations to attend these sessions, and (c) will be supported enough by family, friends, and faculty in pursuing this option. While this is a venerable attempt to increase access to justice, it leaves out key populations of

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[2] Standards 701 and 702, Standards and Rules of Procedure for Approval of Law Schools 2025-2026. American Bar Association Section of Legal Education and Admissions to the Bar. https://www.americanbar.org/content/dam/aba/administrative/legal_education_and_admissions_to_the_bar/standards/2025-2026/2025-2026-standards-chapter-7.pdf

[3] "Granted 199 Law School Requests for Variance from Standard 306 (Distance Education)". American Bar Association Section of Legal Education & Admissions to the Bar. July 2020. https://www.americanbar.org/content/dam/aba/administrative/legal_education_and_admissions_to_the_bar/306-variance-approval-list.pdf

[4] See Lael Weinberger, *Keep Distance Education for Law Schools: Online Education, the Pandemic, and Access to Justice,* 53 Loy. U. Chi. L. J. 211 (). Available at: https://lawecommons.luc.edu/luclj/vol53/iss1/7

[5] "Frequently Asked Questions". Seattle University School of Law. Accessed 21 July 2026. https://law.seattleu.edu/academics/degree-programs/jd/flex-jd/faqs/

prospective students such as those not within travelling distance for the nontraditional student, or single parents who cannot find adequate daycare for their children in order to attend class, or the former disabled veteran who is physically unable to commute nor afford the high costs of ABA law school, and other nontraditional students who simply cannot afford the temporal and distance costs of physical attendance.

The Board of Governors' Proposed Rule Change of allowing state-accredited schools, which include those that are fully-online, help increase access to legal education to nontraditional students and members of the public that can't make the travel distance. While the ABA will still have its place in legal education as the authority on educational standards and professional responsibility, the State of Washington has clearly expressed their mandate: to devise pathways for nontraditional students to achieve their goal of legal education. state-accredited schools, such as PGLS, are actively marketing to nontraditional students like me and seeing the need to provide access to online rigorous legal education to prepare the nontraditional students and practitioners of the future.

I thank you for the opportunity to present my comments on the matter. Nontraditional students will benefit from the Proposed Rule Change, and the Board of Governors were correct in implementing the rule change. I strongly urge the Board to reconsider any attempts to rescind the implemented rule change, and to consider it in the lens of the thousands of nontraditional students who are waiting to join the profession, to be recognized for their achievements, but most importantly, to be allowed to exist in the same community as their peers.

Yours Truly,

Carlos Cepeda-Ojo, MBA, ACP, RP
Firm Administrator (Non-Lawyer) to
Clifton Law PLLC
(Adriena X. Clifton, Managing Attorney)

CGC

July 24, 2026

Washington State Bar Association
Board of Governors Meeting
Tulalip, WA
Submitted electronically
Re: Proposed Amendment to the Admissions Policies Re Definition of Approved Law School

To the Washington State Bar Association Board of Governors:

Veterans Education Success is a nonprofit organization that works on a bipartisan basis to advance higher education success for veterans, service members, and military families. We have helped more than 5000 students in the last decade, many of whom had negative experiences at low-quality schools that did not deliver on their promises and left veterans in debt. As a result, it is our organizational priority to pursue policies that ensure quality education and good outcomes for veterans, service members, and their families.

We have previously shared concerns involving non-ABA-accredited law schools with Indiana and California, and we would like to share those concerns with you as you consider a change to your definition of an approved law school.[1] We hope you will vote against the proposed amendment.

The proposed amendment would allow law school graduates to sit for the Washington bar exam if their law school is approved or accredited by a state or territory of the United States and if graduates of their school are eligible to sit for the bar exam in a state or territory. We are concerned that the proposed amendment would add the Washington stamp of approval to subpar schools, while undercutting the important role that ABA accreditation has played in ensuring quality education for students as well as quality in the legal profession. The proposed amendment's reliance on the Department of Education's institutional accreditation process and other states' approval processes and its lack of threshold metrics barring subpar schools do not ensure quality for students or prospective clients. Given the long history of aggressive and deceptive recruiting by for-profit companies that run chains of online, low-quality, improperly accredited, subpar colleges and law schools, we have a special fear that the amendment could perversely enable predatory schools to recruit students by promising that they will be eligible to

[1] Our letter to the Indiana Supreme Court regarding proposed rule for unaccredited law schools, Veterans Education Success (Dec. 15, 2023), https://vetsedsuccess.org/our-letter-to-the-indiana-supreme-court-regarding-proposed-rule-for-unaccredited-law-schools/; Our Testimony to the California Senate Judiciary Committee on Assembly Joint Resolution No. 12, Veterans Education Success (Jul. 2021), https://vetsedsuccess.org/our-testimony-to-the-california-senate-judiciary-committee-on-assembly-joint-resolution-no-12/; Letter from The Nation's Leading Military and Veteran-Serving Organizations to California Legislators on Assembly Joint Resolution No. 12, Veterans Education Success (Jul. 2, 2021), https://vetsedsuccess.org/letter-from-the-nations-leading-military-and-veteran-serving-organizations-to-california-legislators-on-assembly-joint-resolution-no-12/.

take the bar exam in Washington, even if the school cannot deliver an education that will prepare the student to pass.

Accreditation is an important safeguard of institutional quality

The accreditation process is key to ensuring that law schools deliver on the promises they make to students about providing a quality legal education and preparing students for success in their legal careers. In order to earn ABA accreditation, law schools must demonstrate that they comply with a number of important factors that ensure a quality legal education. Among the many requirements, ABA-accredited law schools must:

- meet certain benchmarks with regard to the size, qualifications, and responsibilities of faculty;
- demonstrate a curriculum and learning outcomes that meet standards and provide experiential learning opportunities;
- publish policies related to topics such as admissions, student support, handling student complaints, discrimination, and disability accommodation; and
- provide disclosures to students about important topics, including admissions and enrollment data, class sizes, employment outcomes, and bar passage data.

The ABA's standards ensure that law students receive a thorough legal education and are prepared to work as licensed lawyers. The proposed amendment would not replace ABA accreditation with any other defined, rigorous review process. If law schools could bypass ABA accreditation but still leave their students eligible to take the Washington state bar exam, the important quality-assurance role of ABA accreditation would be undermined, and Washington would demonstrably lower the bar for entry to the legal profession.

Increasing access to the legal profession is important, but there must be a mechanism in place to ensure that the quality of legal representation in the state will not dip and that student outcomes will be positive. Because of this quality concern, Congress ensured, in a nearly unanimous vote, that only law schools that are approved by the ABA are eligible to receive GI Bill educational benefits.[2] Congress particularly considered the case of California's law schools that lack ABA approval and determined these should not be eligible for the GI Bill. If Washington follows the same path, such law schools will also not be eligible for the GI Bill.

A letter to the Board of Governors states that one protection for students is institutional accreditation, saying "a majority (83%) of the evaluated state-approved law schools are already bound by rigorous U.S. Department of Education institutional accreditation."[3] However, it is extremely important to understand the difference between institutional accreditation and

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[2] 38 U.S.C. § 3676(c)(15)(B) and 38 U.S.C. § 3676(c)(16)(B), https://www.law.cornell.edu/uscode/text/38/3676.

[3] Letter from Jordan Couch and Renata de Carvalho Garcia to Board of Governors, Washington State Bar Association (Jul. 14, 2026), *accessed via* Board of Governors Meeting Materials, https://www.wsba.org/about-wsba/who-we-are/board-of-governors (p. 484).

programmatic accreditation at the Department of Education. Institutional accreditation of an overall university has nothing to do with its law school's qualifications. Institutional accreditation regards the overall university and is primarily focused on the undergraduate programs of education. Department of Education officials and accreditors who provide institutional accreditation do not claim to have any knowledge of legal education or what would constitute an adequate law school, and they do not claim that their institutional accreditation says anything about the adequacy of the law school (nor the medical school, for that matter, which would be specially accredited by the country's medical school accreditor). The Department of Education's institutional accreditation does not in any way compare to the technical, specialized review of a programmatic accreditor, especially given that there are already concerns that institutional accreditation isn't particularly rigorous at all.[4]

Additionally, the *Report on Washington's Expansion of Law School Approval Beyond ABA Accreditation*[5] states that many of the programs "already operate under robust, dual layers of regulatory oversight," because the states also accredit the programs. Specifically, it refers to California's "strict five-year minimum cumulative bar passage baseline of 40%." But a 40% bar passage rate is significantly lower than the ABA's baseline of 75% passage within two years, and proponents provide no justification as to why oversight is considered "robust" if more than half of an approved school's test-takers can be without bar passage five years after graduation. A school that is so subpar that the ABA does not recognize it as a law school, or a school that does not seek ABA accreditation but has such a low bar passage rate, raises serious doubts that the school is teaching legal fundamentals well enough to prepare graduates to practice as lawyers.

There is a long history of predatory, aggressive, and deceptive recruiting of low-income students by subpar, for-profit education companies.[6] We are concerned that the proposed amendment would provide an open invitation to predatory, low-quality law schools to recruit unwitting students who would invest money in a subpar legal degree but not be adequately prepared to pass the state bar exam or gain adequate legal skills.

We have heard from thousands of students whose schools made false promises to entice them to pour money into their programs and could not deliver on those promises, leaving the students

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[4] Title IV Accreditation: Regulatory Capture and Competition, Veterans Education Success (Apr. 2026), https://vetsedsuccess.org/title-iv-accreditation-regulatory-capture-and-competition/.

[5] Report on Washington's Expansion of Law School Approval Beyond ABA Accreditation, Washington State Bar Association (Jul. 14, 2026), *accessed via* Board of Governors Meeting Materials, https://www.wsba.org/about-wsba/who-we-are/board-of-governors (p. 487).

[6] *For Profit Higher Education: The Failure to Safeguard the Federal Investment and Ensure Student Success*, Majority Committee Staff Report and Accompanying Minority Committee Staff Views, United States Senate Health, Education, Labor and Pensions Committee (Jul. 30, 2012), https://www.help.senate.gov/imo/media/for_profit_report/PartI.pdf; Schools Receiving the Most Post-9/11 GI Bill Tuition and Fee Payments Since 2009, Veterans Education Success (Mar. 2018), https://vetsedsuccess.org/schools-receiving-the-most-post-9-11-gi-bill-tuition-and-fee-payments-since-2009/.

worse off than when they started. Several students have shared that they had extremely negative experiences attending non-ABA-accredited law schools:

- One student testified at a Senate Committee hearing that the for-profit law school Concord School of Law, run by Kaplan Education Company, promised him a high-paying legal career. But after six years and hundreds of thousands of dollars, he learned for the first time from an adjunct professors' off-hand remark that he would not be eligible to take the bar exam in nearly every state with that degree.
- Another student shared that the educational standards at Concord Law School were incredibly low and that grades were manipulated. He said, "I feel sorry for the students that will go through this program and still not be equipped to pass the bar because they will not receive the education they rightfully deserved. The tactics, lies, manipulation, and stealing of federal funding from students is appalling. Who is going to stand up for all of these students? I have talked to dozens of students who were never told that they had to take the California bar or would only be eligible to practice in California."
- A third student told us how she was strung along for five years, retaking (and passing) Constitutional Law three times but still not receiving her degree from Pacific Coast University School of Law. The school was California-accredited when she enrolled, although it eventually lost that accreditation.

Students should not take on the considerable financial burden of earning a law degree without a reasonable assurance that the education they pay for will adequately prepare and qualify them to not only sit for, but also pass, the bar exam and to have the skills and knowledge necessary to serve in the legal profession. ABA accreditation is currently the only such assurance available to law students. Since there is already a pathway to licensure for these lawyers via admission by motion, there is no need to make it much easier for schools that may be subpar or predatory to take advantage of Washington students.

Student outcomes at some unaccredited schools raise quality concerns

One aspect of the proposed amendment is that students who graduate from a non-ABA-accredited law school would be allowed to take the Washington state bar exam if they are eligible to take the bar exam in another state. But this provision provides little protection for students and consumers of legal services because many low-performing, non-ABA-accredited law schools easily meet the condition in the proposed amendment. Specifically, California allows students to take its bar exam even if their law school is not accredited by the ABA but is merely California-accredited or even unaccredited, and the bar passage rates are significantly lower in these two groups.

A recent report[7] published by the State Bar of California documents a large disparity in bar passage rates between test-takers from ABA-accredited law schools and test-takers from other law schools. Only 19.7% of test-takers from California-accredited (but not ABA-accredited) law

[7] General Statistics Report, July 2025 California Bar Exam, The State Bar of California, https://www.calbar.ca.gov/sites/default/files/2026-01/July-2025-CBX-Statistics.pdf.

schools passed the July 2025 California bar exam, and only 10.2% of test-takers from unaccredited law schools passed the same exam. By contrast, 77.3% of test-takers from ABA-accredited schools in California passed the July 2025 exam.

If the proposed amendment is adopted, unaccredited law schools with poor student outcomes run by predatory for-profit education companies would be able to point to the Washington rule and recruit students with the promise that they can sit for the Washington State bar exam, regardless of the likelihood that those students will pass. Because the proposed amendment would not require minimum licensure exam pass rates for non-ABA-accredited schools, it would create a perverse incentive for the lowest quality and most predatory operations to victimize low-income, unknowing students by claiming an illusory legitimacy in Washington.

Recommendations

We strongly urge the Board of Governors to consider the potential effect on low-income, unwitting students who attend law schools that would not prepare them to pass the bar or adequately serve as lawyers. They may end up with a large amount of debt but no increase to their earning potential or path to employment in their desired profession. We urge you to reject the proposed amendment.

In the event that you nevertheless wish to pass the proposed amendment, we strongly urge you to add safeguards to protect prospective students, such as requiring a minimum bar passage rate equal to the ABA-required rate. Requiring a minimum bar passage rate for schools would at least prevent the worst performing schools from recruiting prospective students with promises of a path to a legal career in Washington. Indeed, we urge you to consider requiring the non-ABA-accredited law schools to meet all other requirements of ABA accreditation in order for its graduates to sit for the bar exam in Washington. The *Report on Washington's Expansion of Law School Approval Beyond ABA Accreditation* states that non-ABA-accredited schools are not necessarily "unable to qualify for ABA accreditation" or "inherently inferior" to schools that do.[8] Therefore, they should be able to meet similar, rigorous standards that help ensure students will see a return on their investment.

Thank you for providing an opportunity for public comment. We hope that our comments and recommendations will assist the Board of Governors in its process.

Sincerely,

Allison Muth
Director of Veterans Services and Civic Engagement
Veterans Education Success

[8] Report on Washington's Expansion of Law School Approval Beyond ABA Accreditation, Washington State Bar Association (Jul. 14, 2026), *accessed via* Board of Governors Meeting Materials, https://www.wsba.org/about-wsba/who-we-are/board-of-governors (pp. 491-492).