



## Washington State Office of Civil Legal Aid

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August 30, 2019

Chief Justice Mary Fairhurst  
Temple of Justice  
415 12<sup>th</sup> Ave., SW  
Olympia, WA 98504

Re: Bar Structure Work Group

Dear Chief Justice Fairhurst:

As you know, I have been following the work of the Bar Structure Work Group (Structure Group) since its inception. With the Structure Group's appointment I was optimistic that consensus might be achieved to take proactive action to change the structure and orientation of the Washington State Bar Association (WSBA) necessary to preserve and protect WSBA's ability to perform core functions and, at the same time, avoid litigation that will inevitably and involuntarily drive such changes. In particular I had hoped that the Structure Group would offer recommendations that would decouple regulatory and near-regulatory functions inherent in the Supreme Court's constitutional responsibilities to regulate the practice of law and ensure equity and fairness within the justice system from the more trade-associational and trade-supportive functions currently carried by WSBA and underwritten in whole or in part through licensing fees.

I have reviewed the very thoughtful August 27, 2019 letter sent by the King County Bar Association on this subject. In the interest of brevity, I adopt the analysis and recommendations set forth in that letter in their entirety. Whether by changes in GR 12 or otherwise, I encourage the Court to take action that is grounded in the three principles outlined in the KCBA letter and reject the "do-nothing-for-now" recommendation offered by the Structure Group.

Thank you for the opportunity to contribute to the conversation.

Sincerely,

OFFICE OF CIVIL LEGAL AID

James A. Bamberger, Director