

2026 January Board of Commissioners Meeting

Schedule	Friday, January 23, 2026 9:30 AM — 1:00 PM EST
Venue	State Bar of Michigan
Organizer	Amy Owens

Agenda

1. Call to Order

2. Consent Agenda

2.1. Minutes

2.1.1. November 21, 2025, Board Meeting*

 11.21.25 BOC Minutes.pdf

2.1.2. November 5, 2025, Executive Committee Meeting*

 November 5, 2025 EC Minutes.pdf

2.1.3. December 10, 2025, Executive Committee Meeting*

 December 10, 2025 EC Minutes.pdf

2.2. President's Activities*

 President Hamamehs Activities January 23 meeting.pdf

2.3. Executive Director's Activities*

Presented by Peter Cunningham

 Executive Director's Activities January 23 meeting.pdf

2.4. Finance and Audit Committee

Presented by David C. Anderson

2.4.1. FY2025 Financial Reports through November 2025*

-  Nov 25 Cash and Investment Summary.pdf
 -  November 2025 Cash and Investment Balance Detail.pdf
 -  SBM Financial Summary November 30, 2025.pdf
 -  SBM Financial Report November 30, 2025.pdf
 -  SBM Member Report November 30, 2025.pdf
-

2.4.2. MSUFCU Credit Card Facility - Limit Increase*

2.5. Professional Standards

Presented by Suzanne C. Larsen

2.5.1. Client Protection Fund Claims*

-  Client Protection Fund Claims.pdf
-

2.5.2. Unauthorized Practice of Law Claims*

2.6. Strategic Planning and Engagement

Presented by Thomas H. Howlett

2.6.1. Military & Veterans Law Section Proposed Bylaw Revisions*

-  Military & Veterans Law Section Memo.pdf
-

3. FY2025 Audit Update / Report - Andrews Hooper Pavlik*

Presented by David C. Anderson




-  SBAR BRD REP_FINAL-Secured.pdf
-

4. Closed Discussion: Consider Attorney / Client Privileged Communication

5. President's and Executive Director's Report

Presented by Lisa J. Hamameh and Peter Cunningham

5.1. Board Vacancy*

-  Walton Correspondence.pdf
 -  Rules Concerning the State Bar of Michigan Rule 5. Board of Commissioners.pdf
 -  Moheeb H Murray Bio.pdf
-

5.2. Michigan Supreme Court Commissions Update

5.3. Staff Update

5.4. SBM Program Presentation - Lawyer Services

6. Representative Assembly Report

Presented by Nicole A. Evans











7. Young Lawyers Section Report

Presented by Jacob G. Eccleston

8. Public Policy

Presented by Erika L. Bryant

8.1. Court Rules*

-  A.1. ADM File No. 2025-03.pdf
 -  A.2. ADM File No. 2022-31.pdf
 -  A.3. ADM File No. 2022-34.pdf
 -  A.4. ADM File No. 2023-09.pdf
 -  A.5. ADM File No. 2024-10.pdf
 -  A.6. ADM File No. 2024-02.pdf
 -  A.7. ADM File No. 2024-30 2024-39.pdf
 -  A.8. ADM File No. 2025-37.pdf
 -  A.9. ADM File No. 2022-49.pdf
 -  A.10. ADM File No. 2024-19.pdf
-

8.2. LSAM Letter*

 B.1. Non-Fee-Generating Cases.pdf

9. Strategic Planning and Engagement

Presented by Thomas H. Howlett

9.1. Preferred Partner Programs

9.1.1. FileVine*

 Filevine Memo.pdf

9.1.2. Incogni*

 Incogni Memo.pdf

9.2. Great Lakes Legal Conference (GLLC) Update*

 GLLC Workgroup Memo.pdf

9.3. Website Update

10. Audit and Finance

Presented by David C. Anderson

10.1. Finance Report

10.2. Cannabis Law Section*

 Cannabis Law Section Financial Plan ver3.pdf

11. Professional Standards

Presented by Suzanne C. Larsen

12. For the Good of the Public and the Profession

12.1. Comments or Questions from Commissioners

12.2. Public Comment

Any member of the public who wishes to address the commissioners during public comment must sign up before 9:30 a.m. on the date of the meeting using the “Public Comment Sign Up” sheet available at the front desk of the State Bar Building.

13. Adjournment

1. Call to Order

2. Consent Agenda

2.1. Minutes

2.1.1. November 21, 2025, Board
Meeting*

STATE BAR OF MICHIGAN BOARD OF COMMISSIONERS MEETING MINUTES

President Hamameh called the meeting to order at 9:36 a.m. on Friday, November 21, 2025, in the Boardroom at the Michael Franck building in Lansing, Michigan.

Commissioners present:

David C. Anderson, Treasurer
Hon. Karl A. Barr
Darnell Barton
Erika L. Bryant, President-Elect
Aaron V. Burrell
Alena Clark
Hon. Ponce Clay
Patrick J. Crowley
Sherrie L. Detzler
Robert A. Easterly
Jacob G. Eccleston
Nicole A. Evans
Lisa J. Hamameh, President
Thomas H. Howlett, Vice-President

Elizabeth A. Kitchen-Troop
Suzanne C. Larsen, Secretary
Joshua A. Lerner
James L. Liggins, Jr.
James W. Low
Ashley E. Lowe
Silvia A. Mansoor
Gerard V. Mantese
Gerrow D. “Gerry” Mason
Nicholas M. Ohanesian
Hon. David A. Perkins
Douglas B. Shapiro
Danielle Walton

Commissioners absent:

Hon. B. Chris Christenson
Claudnyse D. Holloman
Elizabeth L. Luckenbach

Thomas P. Murray, III
Hon. Kristen D. Simmons

Consent Agenda

The Board received the minutes from the September 19, 2025, Board meetings.
The Board received the minutes from the October 15, 2025, Executive Committee meeting.
The Board received the recent activities of the president.
The Board received the recent activities of the executive director.
The Board received Michigan Indian Legal Services (MILS) Board of Trustees Appointment.
The Board received Model Criminal Jury Instructions.
The Board received the FY 2025 financial reports through September 2025.
The Board received Client Protection Fund Claims.
The Board received Unauthorized Practice of Law Claims.
The Board received Character and Fitness Nominations.

President Hamameh asked if any items needed to be removed from the consent agenda. There were none.

A motion was offered to approve the consent agenda. The motion was seconded and approved.

President and Executive Director’s Report: Lisa Hamameh, President

President’s Report

President Hamameh summarized her presidency thus far. Ms. Hamameh encouraged Board members to be better educators and ambassadors of the State Bar.

President Hamameh read a letter that Peter Cunningham sent to Chief Justice Cavanagh on behalf of the Executive Committee with comments on the Phase I and Phase II JTC Equity Reports, which were prepared by the National Center for State Courts.

President-Elect Bryant shared her experience from this year's Great Rivers Bar Leaders Conference, which was held last month in Destin, Florida. Mr. Cunningham and President Hamameh were also in attendance. This group of bar leaders represents both mandatory and voluntary bars, who gather to discuss and exchange ideas, programs, and challenges of the legal profession. Each state bar presents a relevant topic to their bar, and the SBM led a discussion on how bars can increase board members' engagement.

Supreme Court Commissions Update

Justice For All (JFA) Commission

President Hamameh reported that the JFA has not met since the last BOC meeting in September. Vice-President Howlett reviewed the work of the JFA for those new to the Board. The next JFA meeting is in December, so an update will be provided at the January meeting.

DEI Commission

President-Elect Bryant summarized the purpose of the DEI Commission. Ms. Bryant indicated that she serves on the judicial pathways sub-committee. The DEI Commission has not met since the last BOC meeting in September but will meet again in the first week of December.

Commission on Well-Being in the Law (WBIL)

Molly Ranns, Director of Lawyers and Judges Assistance, reported that the Commission on Well-Being in the Law met last week at the Hall of Justice. She summarized the three sub-committees and the work that they are doing.

Ms. Ranns gave an update on the Well-Being in the Law survey, which was conducted this past summer. There were approximately 40,000 attorneys who participated in this survey nationwide, which is the largest known survey of well-being for attorneys to have ever been conducted. The data from the survey is expected to be analyzed and available within the first quarter of 2026.

Kari Thrush, Assistant Executive Director, provided an update on the implementation of the Convene software, which staff hopes to have completed no later than the April 2026 Board meeting.

Member List Policy

Ms. Thrush shared that the Member List Policy was reviewed by the Executive Committee with minor edits and suggestions made to clarify inconsistencies between the Member List Policy and the Member Privacy Policy.

A motion was made to accept the changes to the language of this policy as provided to the Commissioners in the meeting materials. The motion was seconded and approved unanimously.

Cannabis Law Update

Darin Day, Director of Outreach, summarized the financial deficit that the Cannabis Law Section has encountered as a result of their recent fall conference. The section currently has an estimated negative balance of approximately \$13,000. The full financial picture will not be known until January, and another update will be provided at the January Board meeting.

Staff Update

President Hamameh introduced Tanisha Davis as the new Clerk of the Representative Assembly. Clerk Davis was elected to the position after the September meeting.

Robin Eagleson, Director of Lawyer Services, introduced the new Practice Management Counsel, Ms. Savannah Polimeni. Ms. Polimeni most recently practiced at Garan Lucow Miller where she was a civil litigation attorney.

Ms. Thrush announced three new hires: Mr. Brian Burgess has been hired as the Director of Research and Analytics. He comes to SBM from Colorado State University where he was a Research Fellow. Ms. Felicia Thomas was recently hired as Assistant Executive Director (Counsel). Ms. Thomas previously worked at The Management Center in Washington, D.C. She will be replacing Ms. Kathy Gardner. Lastly, Ms. Amy Owens was recently hired as Senior Executive Assistant. Ms. Owens has over 20 years of experience supporting senior-level administrative support. She was hired to replace Ms. Marge Bossenbery who will retire at the end of the year. All three of these new hires will be formally introduced at the January meeting.

SBM Program Presentation - Ethics

Alecia Chandler, Director of Professional Responsibility, reviewed the work of the Ethics team and the SBM staff members who make up this team. Ms. Chandler described the numerous programs that the Ethics department handles, such as the Ethics helpline, webinars, seminars, Bar Journal articles, and presentations.

Discussion: Challenges & Opportunities for the Profession and Justice System

Continuing Legal Education in Michigan

President Hamameh read a resolution that the State Bar received from the Michigan Judges Association urging the Michigan Supreme Court and the State Bar of Michigan to adopt a mandatory continuing legal education requirement for Michigan attorneys. A lengthy discussion on the topic followed.

Representative Assembly (RA) Report: Nicole A. Evans, Chairperson

Chair Evans shared that the next meeting is scheduled for Saturday, April 25, 2026, in Lansing. The leadership team of the Representative Assembly has been busy making committee chair appointments, as well as committee member appointments; they have also been discussing RA roles and ways to encourage collaboration on committees. The RA leadership team held a retreat in October, where they discussed visions and goals for the year.

Chair Evans informed the Board that at last count there were 39 vacancies in numerous districts across the state. In the past six weeks, 11 of those vacancies have been filled. There will be multiple districts which will have contested elections in the upcoming election cycle.

The special issues committee of the RA is working on a proposal regarding MIDC attorneys being removed for violations of professional conduct and working to remove them from active cases. On October 22, 2025, the MSC issued administrative order, 2024-07, which is a proposed amendment to Rule 6, addressing the nomination and election of members of the Representative Assembly, including their terms and vacancies. The comment period is open through February 6, 2026.

Young Lawyers Section (YLS) Report: Jacob Eccleston, Chairperson

Commissioner Eccleston provided the report for the Young Lawyers Section. Mr. Eccleston shared that the section had their annual retreat shortly after the September Board meeting. Other recent events include National Trial Advocacy Competition, which was held on October 24-26 in Detroit. There were 15 teams who participated in this event this year. The section held a Trunk or Treat in Southfield, where they handed out candy and provided legal advice to attendees. Upcoming events include a holiday outreach party in Detroit on December 13. There is also an Urban Alliance High School event where students work with providers to get high school students in and learn about the law before they make the commitment of law school. The YLS Summit is scheduled for March 27, 2026, at the Henry Ford Museum. NTAC is scheduled for November 6-8, 2026.

COMMISSIONER COMMITTEES

Public Policy: Erika L. Bryant, Chairperson

President-Elect Bryant provided the report for the Public Policy committee.

Court Rules

1. ADM File No. 2020-08: Proposed Amendments of MCR 1.109, 2.104, 2.107, 2.119, 3.203, and 5.105

The proposed amendments of MCR 1.109, 2.104, 2.107, 2.119, 3.203, and 5.105 would, subject to an opting-out procedure, clarify the use of electronic service when MiFILE is not available in the court or for the particular case type.

A motion was offered and seconded to support ADM File No. 2020-08 with two amendments: (1) while parties represented by counsel should be required to *opt out* of electronic service, parties proceeding pro se should be required to *opt in* to electronic service; and (2) subrule (C)(5)(c) should be amended to strike “24 hours” and insert “72 hours.” The motion was approved.

2. ADM File No. 2023-23: Proposed Amendments of MCR 3.942 and 3.972

The proposed amendments of MCR 3.942 and 3.972 would, in delinquency and child protective proceeding bench trials, require the court to make findings of fact and conclusions of law and allow for the equivalent of a directed verdict.

A motion was offered and seconded to support ADM File 2023-23. The motion was approved.

3. ADM File No. 2023-39: Proposed Amendment of MCR 7.215

The proposed amendment of MCR 7.215 would eliminate the requirement that parties provide copies of unpublished opinions cited in briefs filed in the Court of Appeals.

A motion was offered and seconded to support ADM File 2023-39 with an amendment that MCR 7.21(C)(1) should read: “A party who cites an unpublished opinion must provide the docket number and date of decision as part of the citation.” The motion was approved.

Legislation

1. HB 4840 (Lightner) Courts: business court; types of cases heard by the business court; revise. Amends sec. 8031 of 1961 PA 236 (MCL 600.8031).

A motion was offered and seconded that this legislation is *Keller*-permissible. The motion was approved.

A motion to support HB 4840 was offered and seconded. The motion was approved.

2. **SB 330** (McMorrow) Courts: juries; exemption from jury service; expand. Amends sec. 1307a of 1961 PA 236 (MCL 600.1307a).

A motion was offered and seconded that this legislation is *Keller*-permissible. The motion was approved.

A motion was offered and seconded to support SB 330 as introduced and to communicate to the bill sponsor that the State Bar would also support legislation to expand the proposed jury service exemption beyond hospice patients to encompass other individuals in a period of bereavement. The motion was approved.

Strategic Planning and Engagement Committee (SPEC): Thomas H. Howlett, Chairperson
Vice-President Howlett summarized the purpose of the Committee. He also described the three sub-committees and their functions as they pertain to the jurisdiction of the full Committee.

Mr. Howlett spoke about the success of this year's presidential inauguration and awards luncheon held in September at the Detroit Marriott in Troy, which had 323 attendees, and received a net promoter score of 51.

Partnership Programs

Ms. Eagleson shared the negotiated revisions to the iStorage preferred partner program that have occurred since the last Board meeting. Recent contract modifications include encrypted hardware data storage.

A motion was offered and seconded to support the proposal as presented in the Board materials. The motion was approved unanimously.

Ms. Eagleson shared that the State Bar has 25 current partner programs, which have produced over \$200,000 in non-dues revenue in the past year.

The Great Lakes Legal Conference (GLLC) workgroup has been discussing options for the future of conference. Historically, there have been three components to the GLLC: continuing legal education primarily for northern Michigan and U.P. attorneys, a Board of Commissioners meeting, and the Bar Leadership Forum (BLF). Discussions have included ending the continuing education component; hosting an annual board retreat; and hosting a separate event with programming specific for section leaders, and local and affinity bar leaders. The workgroup is working with staff and expects to bring recommendations to SPEC and the Board in January.

Ms. Raymer and Mr. Howlett provided a historical summary of the new website overhaul. The next step in the project is to issue a request for proposals in early December with proposals due early in 2026.

Finance and Audit: David C. Anderson, Chairperson **Financial Report**

Treasurer Anderson shared that the State Bar of Michigan is within the audit period.

There are currently 47,222 total members, which includes 938 new attorneys. SBM is currently \$1.65 million better than budget. The Committee expects significant payouts for the Client Protection Fund in FY 2026.

Professional Standards: Suzanne C. Larsen, Chairperson

Secretary Larsen indicated that their first meeting of the Bar year was earlier this week. All potential action items were approved on the consent agenda.

FOR THE GOOD OF THE PUBLIC AND THE PROFESSION

Comments or questions from Commissioners

Vice-President Howlett acknowledged Commissioner Ponce Clay, who was recently appointed to the 36th District Court bench by Governor Whitmer.

Commissioner Mantese shared that he has been visiting high schools in Michigan, giving presentations about the legal field and the Rule of Law. He encouraged fellow Commissioners to contact him if they are interested and he will provide them with detailed information about what is included in his presentations. Commissioner Eccleston expressed interest in meeting and discussing this opportunity with Commissioner Mantese. It was also suggested that this be shared with the Straker Bar and other affinity Bars across the state.

Comments or questions from the public

None.

Adjournment

The meeting was adjourned at 1:06 p.m.

2.1.2. November 5, 2025, Executive
Committee Meeting*

**State Bar of Michigan
Executive Committee Virtual Meeting
Thursday, November 5, 2025
4:00 p.m.**

President Hamameh called the meeting to order at 4:02 p.m.

Members Present: President Lisa J. Hamameh, President Elect Erika L. Bryant, Vice-President Thomas H. Howlett, Treasurer David C. Anderson, Secretary Suzanne C. Larsen, Representative Assembly Chair Nicole A. Evans, Representative Assembly Vice Chair Alena M. Clark, and Commissioners, Sherrie L. Detzler, Robert A. Easterly, and James L. Liggins Jr.

State Bar Staff Present: Peter Cunningham, Executive Director; Drew Baker, General Counsel; Margaret Bossenbery, Executive Coordinator; Kari Thrush, Assistant Executive Director, and Nathan Triplett, Director of Governmental Relations

Minutes:

A motion was offered and supported to approve the October 15, 2025 EC meeting minutes. The motion was approved.

President and Executive Director's Report

Great Rivers Bar Leaders Conference

Ms. Hamameh gave the committee a report on the agenda and discussion topics from the Great Rivers Bar Leaders Conference that she, Ms. Bryant and Mr. Cunningham attended in October.

Amicus Brief

The request for the State Bar to submit an amicus brief in a case before the Michigan Court of Appeals was withdrawn because the case was settled.

Member List Policy

The committee reviewed the proposed amendments made since the October meeting. A motion was offered and supported to send the Member List Policy to the Board at its November 21 meeting for their consideration. The motion was approved.

MILS Board of Trustee Appointment

A motion was offered and supported to recommend to the Board of Commissioners the appointment of Mr. Thomas St. Dennis to the Michigan Indian Legal Services Board of Trustees. The motion was approved.

Access to Board and Committee Meeting Policy

In response to questions from committee members during the October meeting, Mr. Cunningham provided the committee with the current policy. He told the members that changes to the policy can be made, but there is no urgency. After some discussion, Ms. Hamameh suggested that this topic be tabled indefinitely and track what happens at future meetings and revisit if needed.

Resolution from Michigan Judges Association

Mr. Cunningham reminded the committee of the letter that Judge John Hallacy sent to the Supreme Court, many judges, and the SBM officers advocating for mandatory continuing legal education in October. In response to the letter, the Michigan Judges Association approved a resolution calling on the State Bar of Michigan and the Michigan Supreme Court to implement mandatory continuing legal education (MCLE) for attorneys. The resolution was sent to the SBM executive director and the Chief Justice.

The committee was reminded that in previous conversations with the chief justice, the officers had expressed to her that 1) any decisions on MCLE should be data-driven; and 2) that the State Bar should be part of any discussions about MCLE if the Court decides to study the issue. Mr. Cunningham also let the committee know that a memo on the history of MCLE in Michigan should be completed before the November Board meeting. The committee decided that no action was necessary on the resolution from the Michigan Judges Association, but the Board should be informed of the resolution and the previous conversations on MCLE with the Chief Justice.

Michigan Judicial Tenure Commission Equity report

Ms. Hamameh asked Ms. Bryant to lead the discussion for this topic. Ms. Bryant summarized the Michigan Judicial Tenure Commission Equity Reports (Phase I and Phase II) that were undertaken in response to concerns initially raised by the Association of Black Judges of Michigan that the Judicial Tenure Commission (JTC) grievance process results in disproportionately severe sanctions for Black judges. The Court asked for comments when Phase II was released earlier this year.

Ms. Bryant presented a letter for the executive committee to consider. The letter acknowledged the efforts the Court has undertaken to address the concerns raised about the JTC, and recommends that the JTC and SCAO engage experts who specialize in implicit bias in organizational processes, procedures, and culture to work collaboratively with the JTC in evaluating the grievance process, isolating potential causes of racial differences in JTC public outcomes, and making recommendations to minimize the impact of bias and ameliorate racial disparities.

A motion was offered and supported to send the letter as drafted to the Chief Justice of the Michigan Supreme Court and copy to Mr. Lynn Helland at JTC and Mr. Tom Boyd at SCAO. The motion was approved.

Membership Renewal

Mr. Cunningham reported that 50% of the SBM membership have renewed their licenses, which is slightly more than had renewed at this time last year. Attorneys have until November 30 to renew before late fees are applied.

Representative Assembly (RA) Report

Ms. Evans reported that the RA had a leaderships meeting and 5 of the 7 chairs attended. She stated that at the beginning of the year there were 38 vacancies and now there are 11, that the April 25 meeting will be a hybrid meeting, and that there has been one agenda item being considered is a discussion MIDC ability to remove attorneys removed but not removed from active cases.

Ms. Evans would like to hold an in-person officer's retreat and will discuss budgetary issues with Mr. Cunningham.

November 21, 2025 Board of Commissioners Agenda

A motion was offered and seconded to approve the agenda for the November 21 board meeting with amendments. The motion was approved.

Adjournment

The meeting was adjourned at 5:20 p.m.

2.1.3. December 10, 2025, Executive
Committee Meeting*

**State Bar of Michigan
Executive Committee Virtual Meeting
Wednesday, December 10, 2025
4:00 p.m.**

President Hamameh called the meeting to order at 4:01 p.m.

Members Present: President Lisa J. Hamameh, President Elect Erika L. Bryant, Vice-President Thomas H. Howlett, Treasurer David C. Anderson, Secretary Suzanne C. Larsen, Representative Assembly Chair Nicole A. Evans, Representative Assembly Vice Chair Alena M. Clark, and Commissioners, Sherrie L. Detzler, Robert A. Easterly, and James L. Liggins Jr.

State Bar Staff Present: Peter Cunningham, Executive Director; Drew Baker, General Counsel; Margaret Bossenbery, Executive Coordinator; Amy Owens, Senior Executive Assistant; Marjory Raymer, Director of Communications; Felicia Thomas, Assistant Executive Director; Kari Thrush, Assistant Executive Director, and Nathan Triplett, Director of Governmental Relations

Minutes:

A motion was offered and supported to approve the November 5, 2025, EC meeting minutes. The motion was approved.

President and Executive Director's Report

Ms. Hamameh gave the committee an update on the events she has been attending, mentioning that it may be useful to have nametags to wear to the events that identifies the representative as a State Bar attendee.

Staff Updates

Mr. Cunningham introduced new employees Felicia Thomas, Assistant Executive Director and Amy Owens, Senior Executive Assistant.

Before getting into the additional topics on the agenda, Mr. Cunningham also provided a membership renewal update indicating we are on track with where we were last year at this time.

Website RFP

Mr. Cunningham stated that the release of the RFP on December 1 was successful and thanked Marjory Raymer for all her hard work. The RFP was sent to 33 potential vendors, shared on our website and posted to a national RFP website. Proposals are due January 9. After speaking with consultants, it was suggested that the RFP should include a budget of \$200,000-\$500,000 otherwise the costs may escalate. The proposals will be reviewed by the Website Subcommittee of the Strategic Planning and Engagement Committee (SPEC), and SPEC will make a recommendation for approval by the full Board. In addition to approving a bid, the Board will need to approve a budget amendment.

Supreme Court Commission Updates

Justice for All Commission (JFA)

Mr. Cunningham gave an update on the JFA Commission which met on December 8, including progress on the licensed paralegal pilot program. The new licensees will be referred to as "legal practitioners," consistent with national recommendations to promote uniformity across jurisdictions. The court-appointed steering committee is preparing final recommendations for submission to the

Court in January, with anticipated approval early next year. The anticipated timeline includes opening applications as early as March or April, with the first examinations scheduled for September. State Bar staff have begun coordinating with SCAO on implementation planning, including development of a character and fitness portal that will be ready to launch when applications for the new licenses open in late spring. Discussions are also underway regarding implementation costs, which are expected to be borne by the JFA.

Commission on Fairness and Public Trust –

Mr. Cunningham reported that the court issued an order renaming the DEI Commission to “The Commission on Fairness and Public Trust.”.

Cannabis Law Section

Mr. Cunningham indicated none of the numbers reported at the November board meeting have changed. Since the board meeting, Mr. Cunningham reported that he met with Dave Watson, Director of Institute of Continuing Legal Education (ICLE), and made three requests: 1) That the due date for the ICLE bill to the section be pushed back from December 17 to the end of January to give the board time to meet and discuss options for the section, 2) That the section will need to cancel their multi-year contract with ICLE, 3) Request for ICLE to reduce their \$18,000 flat fee for their services. We are waiting to hear back on reducing the fee; however, Mr. Watson did not see an issue with the first two requests. Mr. Cunningham and SBM staff also had a meeting with the leaders of the Cannabis Law Section to discuss the situation. He let the section leaders know that although it is likely that the Board will provide a short-term loan to section, the section will need to have a long-term plan for returning to fiscal solvency. The leaders were told they will be charged interest, and the Board will likely put other conditions on the section until they reach fiscal solvency.

Representative Assembly (RA) Report

Ms. Evans reported that the RA is still working to fill remaining vacancies and is also working on logistics of RA leadership retreat. Ms. Evans also provided a reminder that the Michigan Supreme Court issued ADM File No. 2024-07 which are the changes to the State Bar Rules that Representative Assembly requested to simplify and improve the RA election and nomination process.

Public Policy

Mr. Triplett went through the proposed amendment of MCR 8.115 which would prohibit the civil arrest of a person while attending a court proceeding or having legal business in the courthouse. After discussion, a motion was offered and seconded to support the amendment of MCR 8.115 as written. The motion was approved.

Adjournment

The meeting was adjourned at 4:57 p.m.

2.2. President's Activities*

President Lisa J. Hamameh
President's Activities
November 22 through January 23, 2026

Date	Event	Location
December 4 to December 7	Mission Pointe	Mackinac Island
December 9	Macomb County Bar Association YLS Holiday Party	Shelby Twp
December 10	Eastern District of Michigan Bar Association Holiday Party	Detroit
December 10	Executive Committee Virtual Meeting	
December 11	Rochester Bar Association (Speaker) Luncheon Rochester Mills Beer Company, 400 Water Street, Rochester	Rochester
December 11	Incorporated Irish American Attorneys Holiday Party	Eastern Market
December 11	Ven Johnson Holiday Party	Detroit
December 12	WLAM Macomb Region and Foundation Holiday Luncheon	Sterling Heights
January 7	Executive Committee Virtual Meeting	
January 8	Lapeer County Bar Association	Lapeer
January 8	Ingham County Bar Association Meet the Judges Event	Lansing
January 9	We The People Competition Finals	Lansing
January 16	Board Officers Dinner	Birmingham
January 22	New Board Member Orientation	Lansing
January 23	Board of Commissioners meeting	Lansing

2.3. Executive Director's Activities*

Presented by Peter Cunningham

**Executive Director Peter Cunningham Activities
November 22 through January 23, 2026**

Date	Event
November 24	Meeting with David Watson, Executive Director, Institute for Continuing Legal Education (ICLE)
November 24	Diversity, Equity, and Inclusion (DEI) Commission Workgroup D Meeting
November 25	Meeting with Cannabis Law Section Leadership
December 1	Meeting with Chief Justice Cavanagh
December 4	SBM/SCAO Legal Practitioner Licensing Pilot
December 4	Meeting with Jennifer Bentley, Executive Director of MSBF on JFA Triage and Referral Workgroup
December 5	Commission on Fairness and Public Trust Meeting
December 8	Justice for All (JFA) Commission Meeting
December 9	SBM Finance and Audit Committee Meeting
December 10	SBM Executive Committee Meeting
December 11	Great Lakes Legal Conference (GLLC) Workgroup Meeting
December 11	Justice for All (JFA) Executive Team Meeting
December 12	Judicial Section Council Meeting
December 16	Justice for All (JFA) Resource Committee Meeting
December 16	Commission on Well-Being-in the Law Executive Team Meeting
December 17	Call with Bidders on Website RFP
December 18	Meeting with Chief Justice Cavanagh
December 18	SPEC Michigan Bar Journal Subcommittee
January 7	SBM Executive Committee Meeting
January 8	Great Lakes Legal Conference (GLLC) Workgroup Meeting
January 8	SPAR and Future Strategic Planning Subcommittee
January 9	State Bar of Michigan LRS Survey Data Meeting
January 12	Capitol Club Lunch
January 15	SPEC Michigan Bar Journal Subcommittee

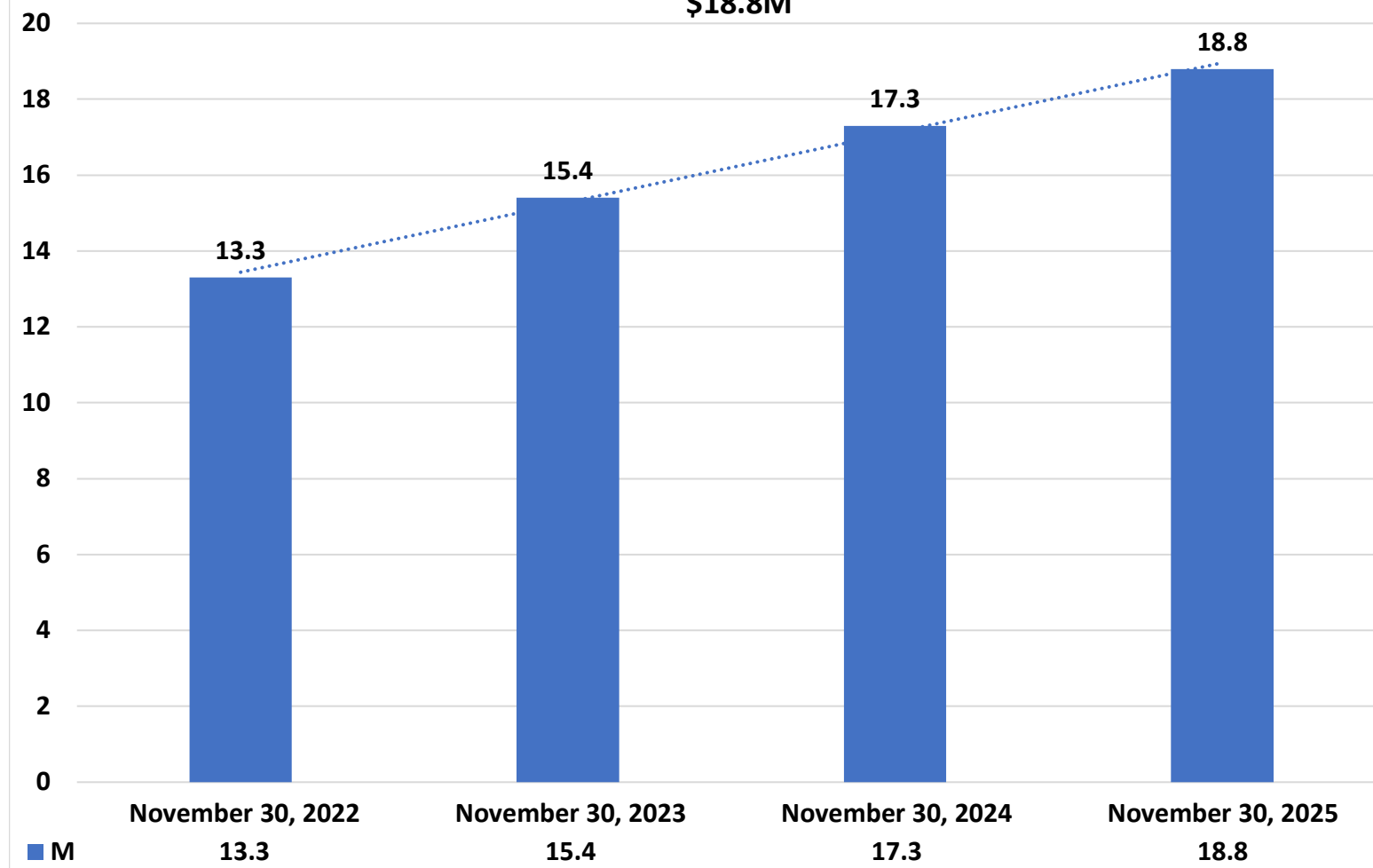
January 15	State Planning Body Meeting
January 16	SPEC Website Subcommittee Meeting
January 16	SBM Officer's Dinner
January 20	Justice for All (JFA) Resource Committee Meeting
January 20	SBM Finance and Audit Committee Meeting
January 20	Strategic Planning and Engagement Committee Meeting
January 20	Professional Standards Committee Meeting
January 21	2025-2026 Public Policy Committee
January 22	Meeting with Chief Justice Cavanagh
January 22	New Board Member Orientation
January 23	Board of Commissioners Meeting
January 23	Commission on Fairness and Public Trust Executive Team Meeting

2.4. Finance and Audit Committee

Presented by David C. Anderson

2.4.1. FY2025 Financial Reports through November 2025*

State Bar of Michigan Cash & Investments
Excluding Sections, ADS, Client Protection Fund and Retiree Health Care Trust
For the Two Months Ending November 30, 2025
\$18.8M



As of November 30, 2025, the cash and investment balance in the State Bar Admin Fund net of *due to Sections, ADS, Client Protection Fund, and Retiree Health Care Trust* was \$18,785,449 an increase of \$5,116,419 from the beginning of the year primarily due to collection of license fees and other revenues.

Summary of Cash and Investment Balances by Financial Institution

November 30, 2025

Bank Rating	Assets	Financial Institution	Amount	Interest Rate
		SBM Chase Checking	\$ 188,131.07	
		SBM Chase Credit Card	\$ 1,211,202.74	
		SBM Chase E Checking	\$ 412,307.50	
		SBM Chase Payroll	\$ (1,035.81)	
		ADS Chase Checking	\$ 3,194.52	
		ADS Chase Petty Cash	\$ 2,781.85	
		CPF Chase Checking	\$32,058.72	
4	\$3.8 trillion	** Chase Total	\$ 1,848,640.59	
		SBM Horizon Bank Money Market	\$ 9.00	
		SBM Horizon ICS	\$ 547,900.67	3.45%
5	\$6.7 billion	Horizon Bank Total w/CD	\$ 547,909.67	
		SBM Fifth Third Commercial Now	\$211,865.94	
5	\$212 billion	Fifth Third Total	\$ 211,865.94	
		MSUFCU Savings & MM	\$ 1,269.85	0.50%
		MSUFCU Checking	\$ 18,131.33	
		MSUFCU Total	\$ 19,401.18	
4	\$8.2 billion	MSUFCU Total w/CDs	\$ 1,725,725.94	
		CASE Cr Un	\$ 5.00	
5	\$0.4 billion	CASE Cr Un Total w/CD	\$ 59,267.04	
		Grand River Bank	\$ -	
4	\$0.5 billion	Grand River Bank Total w/CD	\$ 761,313.68	
		MI Schools & Govt Cr Un	\$ 5.00	
5	\$4.2 billion	MI Schools & Govt Cr Un w/CD	\$ 974,622.25	
		FNBA	\$ -	
4	\$6.6 billion	FNBA Total w/CDs	\$ 1,482,624.02	
		SBM Flagstar Savings	\$ 2,214.29	2.70%
3	\$91.6 billion	Flagstar Total w/CD	\$ 962,214.29	
		SBM Flagstar ICS Checking	\$ 40,882.37	2.30%
		ADS Flagstar ICS Checking Account	\$ 21,212.70	2.30%
		CPF Flagstar ICS Checking	\$ 1,559.04	2.30%
		Flagstar Bank FDIC Insured with CDARs	\$ 1,492,702.66	

Fund Summary	
Client Protection Fund	\$ 3,760,456
State Bar Admin Fund (including Sections)	\$ 22,994,145
Attorney Discipline System	\$ 7,385,286
SBM - Retiree Health Care Trust	\$ 5,102,006
ADB - Retiree Health Care Trust	\$ 1,752,634
AGC - Retiree Health Care Trust	\$ 5,274,100
Total	\$ 46,268,628

State Bar Admin Fund Summary	
Cash and Investments	\$ 22,994,145
Less:	
Due (to)/from Sections	\$ (3,772,203)
Due (to)/from ADS	\$ (395,923)
Due (to)/from CPF	\$ (40,570)
Due to Sections and CPF	\$ (4,208,696)
Net Administrative Fund	\$ 18,785,449
SBM Average Weighted Yield:	3.55%
ADS Average Weighted Yield:	3.73%
CPF Average Weighted Yield:	3.85%

Notes:

- All amounts are based on reconciled book balance and interest rates as of
- Actual unreconciled Chase balance per statements was \$249,819(**).
- Funds held in bank accounts are FDIC insured up to \$250,000 per bank.
- ICS and CDARS are invested in multiple banks up to the FDIC limit for each bank and are FDIC insured.
- Bank star rating from Bauer Financial.
- Average weighted yields exclude retiree health care trusts.
- Funds held in SBM Entities Trust with Schwab are invested in Tbills and government money market funds (15%), bond mutual funds (25%), and equity mutual funds (60%). Not FDIC insured.

Asset size & ratings from Bauer Financial were updated on 12/26/25 (based on 9/30/25 data)

SBM US Treasuries & Gov Money Market		Amount	Interest Rates	Maturity
912797RX7	\$	249,593.28	3.68%	12/16/2025
912797RZ2	\$	490,463.72	3.77%	12/30/2025
9128286A3	\$	548,796.88	4.18%	1/31/2026
91282CBH3	\$	766,407.73	4.20%	1/31/2026
912797SR9	\$	249,985.62	3.71%	2/17/2026
912797SR9	\$	249,985.62	3.65%	2/17/2026
91282CKB6	\$	590,001.99	4.63%	2/28/2026
91282CGR6	\$	356,867.75	3.61%	3/15/2026
9128286L9	\$	499,456.27	3.62%	3/31/2026
912797SD0	\$	246,873.22	3.67%	4/2/2026
912797SL2	\$	200,328.80	3.66%	4/9/2026
912797QD2	\$	304,721.72	3.63%	4/16/2026
912797SN8	\$	305,273.79	3.63%	4/30/2026
91282CHB0	\$	367,744.13	4.17%	5/15/2026
91282CKS9	\$	276,443.75	4.93%	5/31/2026
912797QX8	\$	318,818.07	3.55%	6/11/2026
91282CCJ8	\$	294,101.54	3.63%	6/30/2026
91282CCJ8	\$	138,690.02	3.62%	6/30/2026
91282CHM6	\$	246,168.73	3.59%	7/15/2026
91282CLB5	\$	502,031.25	4.30%	7/31/2026
91282CHU8	\$	598,691.31	3.82%	8/15/2026
91282CLH2	\$	342,078.55	3.62%	8/31/2026
91282CLH2	\$	247,056.73	3.61%	8/31/2026
91282CHY0	\$	247,806.56	3.59%	9/15/2026
91282CLP4	\$	424,395.70	3.89%	9/30/2026
912797SA6	\$	218,356.08	3.50%	10/1/2026
91282CLS8	\$	572,280.00	4.10%	10/31/2026
91282CKA8	\$	470,906.72	3.51%	2/15/2027
91282CMV0	\$	301,089.84	3.88%	3/31/2027
91282CMY4	\$	296,716.88	3.58%	4/30/2027
91282CNE7	\$	251,152.35	3.89%	5/31/2027
91282CNL1	\$	315,959.77	3.75%	6/30/2027
91282CNV9	\$	250,400.39	3.63%	8/31/2027
US Gov MM Fund - SXX		\$ 1,377,409.41	3.84%	
SBM US Treasuries & Gov Money Market Total		\$ 13,117,054.17		

CPF US Treasuries & Gov Money Market		Amount	Interest Rates	Maturity
912797SR9	\$	199,393.29	3.65%	11/28/2025
912797PV3	\$	160,199.94	3.67%	2/17/2026
912797QN0	\$	245,838.62	4.06%	3/19/2026
912797QX8	\$	147,146.80	4.07%	5/14/2026
91282CLB5	\$	351,421.88	4.30%	6/11/2026
912797RG4	\$	282,963.16	3.78%	7/31/2026
91282CMV0	\$	209,759.26	3.88%	8/6/2026
91282CNE7	\$	803,687.50	3.95%	3/31/2027
91282CNL1	\$	250,761.72	3.95%	5/31/2027
US Gov MM Fund - GXX		\$ 501,677.66	3.68%	
CPF US Treasuries & Gov Money Market Total		\$ 3,152,849.83		

ADS US Treasuries & Gov Money Market	Amount	Interest Rates	Maturity
91282CGA3 \$	161,997.62	3.44%	12/15/25
912797SE8 \$	230,123.12	3.73%	01/06/26
912797SG3 \$	184,022.55	3.74%	01/20/26
912797SH1 \$	198,794.03	3.70%	01/27/26
91282CGL9 \$	247,091.66	3.72%	02/15/26
912797SR9 \$	370,018.40	3.68%	02/17/26
912797SS7 \$	198,259.09	3.70%	02/24/26
912797RU3 \$	364,702.35	3.69%	02/26/26
912797PV3 \$	296,666.55	3.66%	03/19/26
912797SD0 \$	222,185.90	3.67%	04/02/26
912797QD2 \$	318,527.88	3.59%	04/16/26
912797QN0 \$	309,756.65	4.03%	05/14/26
91282CKS9 \$	401,094.75	3.57%	05/31/26
91282CNE7 \$	251,152.35	3.88%	05/31/26
91282CLB5 \$	331,340.63	3.98%	07/31/26
912797RG4 \$	487,867.52	3.78%	08/06/26
91282CLH2 \$	99,022.74	3.60%	08/31/26
91282CLH2 \$	198,045.48	3.61%	08/31/26
91282CLP4 \$	199,715.62	3.89%	09/30/26
91282CLS8 \$	200,800.00	4.10%	10/31/26
91282CMH1 \$	328,877.70	3.74%	01/31/27
91282CNL1 \$	200,609.38	3.75%	06/30/27
91282CNV9 \$	250,400.39	3.63%	08/31/27
UG Gov MM Fund - SXX \$	974,047.28	3.84%	
ADS US Treasuries & Gov Money Market Total \$	7,025,119.64		

US Treasuries & Gov Money Market Total \$ 23,295,023.64 -
(not FDIC insured)

CDARS			
Financial Institution	Amount	Interest Rates	Maturity
SBM Flagstar CDARS \$	732,109.97	4.10%	02/05/26
SBM Flagstar CDARS \$	467,949.75	3.54%	09/25/26
SBM Flagstar CDARS \$	300,000.00	3.54%	10/08/26
CPF Flagstar CDARS \$	60,000.00	3.52%	05/07/26
CPF Flagstar CDARS \$	103,988.83	3.54%	09/25/26
CPF Flagstar CDARS \$	100,000.00	3.54%	10/08/26
CPF Flagstar CDARS \$	110,000.00	3.44%	11/19/26
ADS Flagstar CDARS \$	207,977.66	3.54%	09/25/26
ADS Flagstar CDARS \$	125,000.00	3.73%	04/09/26
CDARS Total \$	2,207,026.21		

CDs				
Financial Institution	Amount	Interest Rates	Maturity	
CPF-Flagstar	\$ 200,000.00	4.20%	02/17/26	
SBM-Flagstar	\$ 250,000.00	4.20%	02/17/26	
SBM-Flagstar	\$ 425,000.00	4.20%	02/18/26	
SBM-Flagstar	\$ 85,000.00	3.73%	04/28/26	
SBM-Grand River	\$ 250,000.00	4.05%	04/30/26	
SBM-FNBA	\$ 261,312.02	4.20%	05/29/26	
SBM-FNBA	\$ 261,312.00	4.20%	05/31/26	
SBM-FNBA	\$ 250,000.00	4.05%	05/31/26	
SBM-CD MSU Federal Credit Union	\$ 271,190.82	4.00%	06/02/26	
SBM-CD MSU Federal Credit Union	\$ 282,542.51	4.00%	06/02/26	
SBM-CD MSU Federal Credit Union	\$ 282,542.51	4.00%	06/02/26	
SBM-CD MSU Federal Credit Union	\$ 282,542.51	4.00%	06/02/26	
SBM-FNBA	\$ 250,000.00	4.29%	10/29/26	
SBM-FNBA	\$ 250,000.00	3.95%	10/29/26	
SBM-FNBA	\$ 210,000.00	4.29%	10/31/26	
SBM-Grand River	\$ 261,313.68	3.83%	03/22/27	
SBM-Grand River	\$ 250,000.00	3.83%	03/22/27	
MI Schools & Govt Cr Un	\$ 200,000.00	4.05%	04/14/27	
MI Schools & Govt Cr Un	\$ 516,243.79	4.05%	04/16/27	
MI Schools & Govt Cr Un	\$ 258,373.46	4.05%	04/24/27	
SBM-CASE Credit Union	\$ 59,262.04	3.50%	07/08/27	
SBM-CD MSU Federal Credit Union	\$ 587,506.41	3.70%	08/12/27	
CDs Total	\$ 5,069,141.75			
Total Cash & Investments	\$ 33,361,909.72			
Total Amount of Cash and Investments not FDIC-insured (includes Tbills and Gov MM held at JPM)	\$ 29,550,164.41	88.6%		
SBM Entities Retiree Healthcare Trust (Schwab)				
SBM - Ret Healthcare Trust	\$ 5,102,006.22			
ADB - Ret Healthcare Trust	\$ 1,752,634.33			
AGC - Ret Healthcare Trust	\$ 5,274,099.90			
SBM Entities Retiree Healthcare Trust Total	\$ 12,128,740.45			
Total Investments	\$ 45,490,650.17			

State Bar of Michigan Financial Results Summary

For the Two Months Ended November 30, 2025
Fiscal Year 2026

Administrative Fund - Summary of Results as of November 30, 2025

Operating Revenue	\$2,369,045
Operating Expense	<u>(2,329,855)</u>
Operating Income (Loss)	39,189
Non-Operating Income (Loss)	<u>205,890</u>
Change in Net Position	\$245,079
Net Position, October 1, 2025	<u>\$18,394,134</u>
Net Position, November 30, 2025	<u>\$18,639,213</u>

As of November 30, 2025, Net Position *excluding* net assets restricted for retiree healthcare was \$13,984,872, an increase of \$152,914 since the beginning of the year and favorable to budget by \$400,117.

YTD Operating Revenue variance – \$68,017, favorable to budget (2.3%):

- License fee and related revenue was lower than budget by \$2,345 (0.1%) due to lower late, delinquent, and reinstatement fees.
- Other operating revenue was higher than budget by \$70,362 (12.1%) notably due to higher Bar Journal, E-Journal, C&F and IAP, offset by lower LJAP and Digital revenues.

YTD Operating Expense variance - \$334,460, favorable to budget (12.6%):

Labor Operating Expenses - \$112,841, favorable (6.6%)

- Salaries expenses were lower than budget by \$92,196 or (7.2%) due to vacancies.
- Employee Benefits & Payroll Taxes were lower than budget by \$20,644 (4.8%) due to vacancies and timing.

Non-Labor Operating Expenses - \$221,619, favorable (23.4%)

- Division 1 - \$26,785, favorable (21.7%) – Lower than budget with the largest variances in IAP, Outreach, and UPL, some due to timing.

- Division 2 - \$132,680, favorable (29.9%) – Lower than budget with the largest variances in IT, Facilities and Bar Journal, some due to timing.
- Division 3 - \$62,153, favorable (16.3%) – Lower than budget with the largest variances in Finance and Administration, Executive Office, HR, and General Counsel.

YTD Non-Operating Revenue Budget Variance - \$89,806, favorable to budget (77.3%):

- Interest income is favorable to budget by \$2,360 (2%)
- Retiree Health Care Trust had a net investment gain of \$92,166 (this amount is not budgeted)

Cash and Investment Balance

As of November 30, 2025, the cash and investment balance in the State Bar Admin Fund net of *due to Sections, ADS, Client Protection Fund, and Retiree Health Care Trust* was \$18,785,449, an increase of \$5,116,419 from the beginning of the year primarily due to collection of license fees and other revenues.

SBM Entities Retiree Health Care Trust

As of November 30, 2025, the SBM retiree health care trust investments were \$5,102,006, an increase of \$92,166 since the beginning of the year. The change is due to investment gain of \$95,150 and investment advisor and recordkeeping fees of \$2,984.

Capital Budget

Year-to-date capital expenditures totaled \$38,280, or 13% of the FY 2026 capital expenditures budget of \$306,128.

Client Protection Fund

The Net Position of the Client Protection Fund as of November 30, 2025, totaled \$3,190,842, a decrease of \$106,489 from the beginning of the year. Claims expenses totaled \$202,913.

SBM Membership

As of November 30, 2025, the active, inactive, and emeritus membership in good standing totaled 47,391, an increase of 169 attorneys since the beginning of the year. The number of active fee-paying attorneys decreased by 414. Since the beginning of this fiscal year, 251 new attorneys joined SBM, compared to 340 during the same period of FY 2025.

**STATE BAR OF MICHIGAN
ADMINISTRATIVE FUND**

Unaudited and For Internal Use Only

**FINANCIAL REPORTS
November 30, 2025**

FY 2026

Note: License fee revenue is recognized
and budgeted as earned each month
throughout the year.

**State Bar of Michigan
Statement of Net Position
November 30, 2025**

Financial Row	Current Period (As of Nov 2025)	Prior Month (As of Oct 2025)	Variance	Variance %	Beginning of FY (As of FY 2025)
ASSETS AND DEFERRED OUTFLOWS OF RESOURCES					
Assets					
Cash	\$ 2,632,889	\$ 1,585,738	\$ 1,047,151	66.0%	\$ 1,536,471
Investments	\$ 20,361,256	\$ 17,081,198	\$ 3,280,058	19.2%	\$ 15,095,629
Due from (to) CPF	\$ (40,570)	\$ (24,893)	\$ (15,678)	63.0%	\$ 14,118
Due from (to) Sections	\$ (3,772,203)	\$ (3,278,809)	\$ (493,394)	15.0%	\$ (2,933,667)
Due from (to) ADS	\$ (395,923)	\$ (212,229)	\$ (183,693)	86.6%	\$ (43,520)
Net Administrative Fund Cash and Investment Balance	\$ 18,785,449	\$ 15,151,005	\$ 3,634,444	24.0%	\$ 13,669,030
Accounts Receivable	\$ 242,111	\$ 191,864	\$ 50,248	26.2%	\$ 221,664
Prepaid Expenses	\$ 255,231	\$ 284,324	\$ (29,093)	(10.2%)	\$ 370,218
Capital Assets, Net	\$ 3,070,955	\$ 3,090,768	\$ (19,813)	(0.6%)	\$ 3,110,581
SBM Retiree Health Care Trust	\$ 5,102,006	\$ 5,088,598	\$ 13,409	0.3%	\$ 5,009,841
Total Assets	\$ 27,455,753	\$ 23,806,558	\$ 3,649,195	15.3%	\$ 22,381,333
Deferred Outflows of Resources					
Deferred Outflows of Resources Related to Pensions	\$ 14,807	\$ 14,807	\$ -	0.0%	\$ 14,807
Deferred Outflows of Resources Related to OPEB	\$ 878,755	\$ 878,755	\$ -	0.0%	\$ 878,755
Total Deferred Outflows of Resources	\$ 893,563	\$ 893,563	\$ -	0.0%	\$ 893,563
TOTAL ASSETS AND DEFERRED OUTFLOWS OF RESOURCES	\$ 28,349,316	\$ 24,700,121	\$ 3,649,195	14.8%	\$ 23,274,895
LIABILITIES, DERERRED INFLOWS OF RESOURCES AND NET POSITION					
Liabilities					
Accounts Payable	\$ 135,908	\$ 96,860	\$ 39,048	40.3%	\$ 520,342
Accrued Expenses	\$ 789,473	\$ 781,865	\$ 7,608	1.0%	\$ 848,383
Deferred Revenue	\$ 7,232,115	\$ 3,867,515	\$ 3,364,600	87.0%	\$ 1,959,429
GASB 96 Subscription Liability	\$ 123,037	\$ 123,037	\$ -	0.0%	\$ 123,037
Net Pension Liability	\$ 82,698	\$ 82,698	\$ -	0.0%	\$ 82,698
Net OPEB Liability	\$ 126,297	\$ 126,297	\$ -	0.0%	\$ 126,297
Total Liabilities	\$ 8,489,527	\$ 5,078,272	\$ 3,411,255	67.2%	\$ 3,660,186
Deferred Inflows of Resources					
Deferred Inflows of Resources Related to Pensions	\$ 20,452	\$ 20,452	\$ -	0.0%	\$ 20,452
Deferred Inflows of Resources Related to OPEB	\$ 1,200,123	\$ 1,200,123	\$ -	0.0%	\$ 1,200,123
Total Deferred Inflows of Resources	\$ 1,220,575	\$ 1,220,575	\$ -	0.0%	\$ 1,220,575
Total Liabilities and Deferred Inflows	\$ 9,710,102	\$ 6,298,847	\$ 3,411,255	54.2%	\$ 4,880,761
Net Assets					
Invested in Capital Assets, Net of Related Debt	\$ 2,947,919	\$ 2,967,731	\$ (19,813)	(0.7%)	\$ 2,987,544
Restricted for Retiree Health Care Trust	\$ 4,654,342	\$ 4,640,933	\$ 13,409	0.3%	\$ 4,562,176
Unrestricted	\$ 11,036,953	\$ 10,792,610	\$ 244,343	2.3%	\$ 10,844,415
Total Net Position	\$ 18,639,213	\$ 18,401,274	\$ 237,939	1.3%	\$ 18,394,134
TOTAL LIABILITIES, DERERRED INFLOWS OF RESOURCES AND NET POSITION	\$ 28,349,316	\$ 24,700,121	\$ 3,649,195	14.8%	\$ 23,274,895
Net Position Excluding Impacts of Retiree Health Care Trust	\$ 13,984,872	\$ 13,760,341	\$ 224,530	1.6%	\$ 13,831,958

State Bar of Michigan
Summary - Statement of Revenue, Expense and Net Assets
November 30, 2025

Financial Row	Actual YTD (Oct 2025 - Nov 2025)		Budget YTD (Oct 2025 - Nov 2025)		Variance	Percentage	Prior YTD Actual (Oct 2024 - Nov 2024)	
Operating Revenue								
License Fees, Dues and Related	\$	1,719,064	\$	1,721,409	\$ (2,345)	(0.1%)	\$	1,736,955
All Other Op Revenue	\$	649,981	\$	579,619	\$ 70,362	12.1%	\$	622,026
Total Operating Revenue	\$	2,369,045	\$	2,301,028	\$ 68,017	3.0%	\$	2,358,981
Operating Expenses								
Labor Operating Expenses								
Salaries	\$	1,191,152	\$	1,283,348	\$ (92,196)	(7.2%)	\$	1,210,413
Benefits and Payroll Taxes	\$	412,783	\$	433,427	\$ (20,644)	(4.8%)	\$	420,493
Total Labor Operating Expenses	\$	1,603,934	\$	1,716,775	\$ (112,841)	(6.6%)	\$	1,630,905
Non Labor Operating Expenses								
Division 1 Non Labor Operating Expenses	\$	96,624	\$	123,409	\$ (26,785)	(21.7%)	\$	38,558
Division 2 Non Labor Operating Expenses	\$	311,012	\$	443,692	\$ (132,680)	(29.9%)	\$	258,538
Division 3 Non Labor Operating Expenses	\$	318,286	\$	380,439	\$ (62,153)	(16.3%)	\$	328,150
Total Non Labor Operating Expenses	\$	725,921	\$	947,540	\$ (221,619)	(23.4%)	\$	625,246
Total Operating Expenses	\$	2,329,855	\$	2,664,315	\$ (334,460)	(12.6%)	\$	2,256,151
Operating Income (Loss)	\$	39,189	\$	(363,287)	\$ 402,476	(110.8%)	\$	102,830
Non Operating Revenue (Expenses)								
Investment Income	\$	113,724	\$	116,084	\$ (2,360)	(2.0%)	\$	102,963
Investment Income - Ret HC Trust	\$	92,166	\$	-	\$ 92,166	0.0%	\$	55,065
Total Non Operating Revenue (Expenses)	\$	205,890	\$	116,084	\$ 89,806	77.4%	\$	158,027
Increase (Decrease) in Net Position	\$	245,079	\$	(247,203)	\$ 492,282	(199.1%)	\$	260,857
Net Position Beginning of Year	\$	18,394,134	\$	18,394,134	\$ -	0.0%	\$	16,076,928
Net Position End of Period	\$	18,639,213	\$	18,146,931	\$ 492,282	2.7%	\$	16,337,785
Change in Net Position Excluding Ret HC Trust Investment Income (Loss)	\$	152,914	\$	(247,203)	\$ 400,117	(161.9%)	\$	205,793

State Bar of Michigan
Statement of Revenues, Expenses and Net Assets
November 30, 2025

Financial Row	Actual (Oct 2025 - Nov 2025)	Budget YTD (Oct 2025 - Nov 2025)	Budget Variance	Budget Variance %	Last YTD Actuals (Oct 2024 - Nov 2024)	Actuals Variance	Actuals Variance %
Operating Revenues							
License Fees and Related	\$ 1,719,064	\$ 1,721,409	\$ (2,345)	(0.1%)	\$ 1,736,955	\$ (17,891)	(1.0%)
Other Operating Revenues							
Division 1							
Character & Fitness	\$ 46,975	\$ 37,852	\$ 9,123	24.1%	\$ 39,075	\$ 7,900	20.2%
Ethics	\$ 1,650	\$ 584	\$ 1,066	182.5%	\$ 1,625	\$ 25	1.5%
IAP	\$ 168,960	\$ 161,000	\$ 7,960	4.9%	\$ 174,060	\$ (5,100)	(2.9%)
Lawyer Referral Services	\$ 26,840	\$ 25,866	\$ 974	3.8%	\$ 23,264	\$ 3,577	15.4%
UPL	\$ -	\$ -	\$ -	0.0%	\$ 203	\$ (203)	(100.0%)
Total - Division 1	\$ 244,425	\$ 225,302	\$ 19,123	8.5%	\$ 238,227	\$ 6,199	2.6%
Division 2							
Bar Journal	\$ 121,863	\$ 92,716	\$ 29,147	31.4%	\$ 97,249	\$ 24,615	25.3%
Digital	\$ 7,147	\$ 10,334	\$ (3,187)	(30.8%)	\$ 9,012	\$ (1,865)	(20.7%)
E Journal	\$ 32,475	\$ 17,000	\$ 15,475	91.0%	\$ 20,725	\$ 11,750	56.7%
Lawyer Services	\$ 15,176	\$ 12,754	\$ 2,422	19.0%	\$ 36,668	\$ (21,492)	(58.6%)
Lawyers & Judges Assistance Program	\$ 7,720	\$ 12,250	\$ (4,530)	(37.0%)	\$ 8,810	\$ (1,090)	(12.4%)
Practice Management Resource Center	\$ -	\$ 250	\$ (250)	(100.0%)	\$ -	\$ -	0.0%
Print and Design	\$ 3,120	\$ 1,230	\$ 1,890	153.6%	\$ 1,957	\$ 1,163	59.4%
Total - Division 2	\$ 187,502	\$ 146,534	\$ 40,968	28.0%	\$ 174,421	\$ 13,080	7.5%
Division 3							
Administration	\$ 218,054	\$ 207,783	\$ 10,271	4.9%	\$ 209,379	\$ 8,675	4.1%
Total - Division 3	\$ 218,054	\$ 207,783	\$ 10,271	4.9%	\$ 209,379	\$ 8,675	4.1%
Total Other Operating Revenues	\$ 649,981	\$ 579,619	\$ 70,362	12.1%	\$ 622,026	\$ 27,954	4.5%
Total Operating Revenues	\$ 2,369,045	\$ 2,301,028	\$ 68,017	3.0%	\$ 2,358,981	\$ 10,063	0.4%

Financial Row	Actual (Oct 2025 - Nov 2025)		Budget YTD (Oct 2025 - Nov 2025)		Budget Variance	Budget Variance %	Last YTD Actuals (Oct 2024 - Nov 2024)		Actuals Variance	Actuals Variance %		
Operating Expenses												
Division 1												
Character & Fitness	\$	2,361	\$	2,655	\$	(294)	(11.1%)	\$	2,477	\$	(116)	(4.7%)
Client Protection Fund	\$	1,520	\$	3,846	\$	(2,326)	(60.5%)	\$	1,232	\$	288	23.4%
Diversity	\$	5,715	\$	5,260	\$	455	8.6%	\$	7,526	\$	(1,811)	(24.1%)
Ethics	\$	1,096	\$	2,160	\$	(1,064)	(49.3%)	\$	1,634	\$	(539)	(33.0%)
IAP	\$	3,106	\$	13,785	\$	(10,679)	(77.5%)	\$	1,713	\$	1,393	81.4%
Justice Initiatives	\$	524	\$	612	\$	(88)	(14.4%)	\$	510	\$	14	2.7%
Lawyer Referral Services	\$	5,278	\$	6,948	\$	(1,670)	(24.0%)	\$	6,608	\$	(1,330)	(20.1%)
Outreach	\$	75,944	\$	83,778	\$	(7,834)	(9.4%)	\$	15,687	\$	60,257	384.1%
UPL	\$	1,079	\$	4,365	\$	(3,286)	(75.3%)	\$	1,170	\$	(91)	(7.8%)
Total - Division 1	\$	96,624	\$	123,409	\$	(26,785)	(21.7%)	\$	38,558	\$	58,066	150.6%
Division 2												
50 Year Event	\$	2,504	\$	2,500	\$	4	0.1%	\$	-	\$	2,504	0.0%
Bar Journal	\$	50,661	\$	71,800	\$	(21,139)	(29.4%)	\$	56,934	\$	(6,272)	(11.0%)
Digital	\$	78,712	\$	89,070	\$	(10,358)	(11.6%)	\$	18,189	\$	60,523	332.7%
E Journal	\$	3,406	\$	3,965	\$	(559)	(14.1%)	\$	2,974	\$	432	14.5%
Facilities	\$	40,351	\$	70,970	\$	(30,619)	(43.1%)	\$	49,945	\$	(9,594)	(19.2%)
General Communications	\$	7,711	\$	12,320	\$	(4,609)	(37.4%)	\$	10,418	\$	(2,708)	(26.0%)
IT	\$	92,804	\$	149,881	\$	(57,077)	(38.1%)	\$	92,795	\$	10	0.0%
Inaugural and Awards Lunch	\$	18,900	\$	22,000	\$	(3,100)	(14.1%)	\$	-	\$	18,900	0.0%
Lawyer Services	\$	4,623	\$	5,984	\$	(1,361)	(22.7%)	\$	5,418	\$	(795)	(14.7%)
Lawyers & Judges Assistance Program	\$	5,016	\$	5,384	\$	(368)	(6.8%)	\$	15,315	\$	(10,299)	(67.2%)
Practice Management Resource Center	\$	910	\$	2,634	\$	(1,724)	(65.5%)	\$	200	\$	710	354.4%
Print and Design	\$	4,993	\$	5,366	\$	(373)	(6.9%)	\$	6,255	\$	(1,262)	(20.2%)
Research	\$	421	\$	1,818	\$	(1,397)	(76.9%)	\$	95	\$	326	342.7%
Total - Division 2	\$	311,012	\$	443,692	\$	(132,680)	(29.9%)	\$	258,538	\$	52,474	20.3%
Division 3												
Administration	\$	21,958	\$	42,921	\$	(20,963)	(48.8%)	\$	38,810	\$	(16,852)	(43.4%)
Board of Commissioners	\$	7,078	\$	8,734	\$	(1,656)	(19.0%)	\$	4,170	\$	2,908	69.8%
Executive Office	\$	3,169	\$	10,750	\$	(7,581)	(70.5%)	\$	7,728	\$	(4,559)	(59.0%)
General Counsel	\$	3,148	\$	10,676	\$	(7,528)	(70.5%)	\$	1,138	\$	2,010	176.5%
Governmental Relations	\$	10,716	\$	11,741	\$	(1,025)	(8.7%)	\$	10,986	\$	(270)	(2.5%)
Representative Assembly	\$	7,643	\$	7,500	\$	143	1.9%	\$	188	\$	7,455	3,968.6%
Human Resources												
Payroll Taxes	\$	86,819	\$	98,406	\$	(11,587)	(11.8%)	\$	88,849	\$	(2,029)	(2.3%)
Benefits	\$	325,963	\$	335,021	\$	(9,058)	(2.7%)	\$	331,644	\$	(5,681)	(1.7%)
Human Resources - Other	\$	6,705	\$	15,832	\$	(9,127)	(57.7%)	\$	7,048	\$	(343)	(4.9%)
Total Human Resources	\$	419,487	\$	449,259	\$	(29,772)	(6.6%)	\$	427,540	\$	(8,053)	(1.9%)
Finance												
Finance	\$	179,963	\$	197,943	\$	(17,980)	(9.1%)	\$	181,561	\$	(1,598)	(0.9%)
Depreciation	\$	77,905	\$	74,342	\$	3,563	4.8%	\$	76,522	\$	1,383	1.8%
Total Finance	\$	257,868	\$	272,285	\$	(14,417)	(5.3%)	\$	258,083	\$	(215)	(0.1%)
Total - Division 3	\$	731,068	\$	813,866	\$	(82,798)	(10.2%)	\$	748,643	\$	(17,575)	(2.3%)

Financial Row	Actual (Oct 2025 - Nov 2025)	Budget YTD (Oct 2025 - Nov 2025)	Budget Variance	Budget Variance %	Last YTD Actuals (Oct 2024 - Nov 2024)	Actuals Variance	Actuals Variance %
Salaries	\$ 1,191,152	\$ 1,283,348	\$ (92,196)	(7.2%)	\$ 1,210,413	\$ (19,261)	(1.6%)
Total Operating Expenses	\$ 2,329,855	\$ 2,664,315	\$ (334,460)	(12.6%)	\$ 2,256,151	\$ 73,704	3.3%
Net Operating Income (Loss)	\$ 39,189	\$ (363,287)	\$ 402,476	(110.8%)	\$ 102,830	\$ (63,641)	(61.9%)
Non Operating Revenue (Expense)							
Investment Income	\$ 113,724	\$ 116,084	\$ (2,360)	(2.0%)	\$ 102,963	\$ 10,762	10.5%
Investment Income - Retiree HC Trust (Net)	\$ 92,166	\$ -	\$ 92,166	0.0%	\$ 55,065	\$ 37,101	67.4%
Total Non Operating Revenue (Expense)	\$ 205,890	\$ 116,084	\$ 89,806	77.4%	\$ 158,027	\$ 47,863	30.3%
Increase (Decrease) in Net Assets	\$ 245,079	\$ (247,203)	\$ 492,282	(199.1%)	\$ 260,857	\$ (15,778)	(6.0%)

**State Bar of Michigan
Administrative Fund
FY 2026 Capital Expenditures vs Budget
For the Two Months Ending November 30, 2025**

FACILITIES, FURNITURE & OFFICE EQUIPMENT	FY 2026 Actual	FY 2026 Budget	Comments	Actual to Budget Variance
Breaker units and electrical panel upgrade in the building	\$ -	\$ 76,448		\$ (76,448)
TOTAL FACILITIES, FURNITURE & OFFICE EQUIPMENT	\$ -	\$ 76,448		\$ (76,448)
INFORMATION TECHNOLOGY				
Application and Software Development:				
Receivership /Interim Administrator Program Data Portal	\$ -	\$ 31,600		\$ (31,600)
Bar Cards	6,380	-		\$ 6,380
Michigan Bar Journal Upgrade	3,190	-		\$ 3,190
Syn Portal for Windows	6,380	-		\$ 6,380
E-commerce Store	3,190	10,000		(6,810)
E-commerce Events	12,760	32,460		(19,700)
E-commerce License Fee Updates	6,380	40,600		(34,220)
e-Services Application to Court e-Filing (mi-File)	-	20,000		(20,000)
Firm Administration and Billing	-	11,000		(11,000)
Website Functionality Enhancements	-	12,680		(12,680)
Character & Fitness Module	-	34,800		(34,800)
Volunteer Application Updates	-	19,140		(19,140)
Consumer Portal (LRS)	-	17,400		(17,400)
TOTAL INFORMATION TECHNOLOGY	\$ 38,280	\$ 229,680		\$ (191,400)
TOTAL CAPITAL EXPENDITURES BUDGET	\$ 38,280	\$ 306,128		\$ (267,848)

**STATE BAR OF MICHIGAN
CLIENT PROTECTION FUND**

Unaudited and For Internal Use Only

**FINANCIAL REPORTS
November 30, 2025**

FY 2026

Note: License fee revenue is recognized
and budgeted as earned each month
throughout the year.

Client Protection Fund
Comparative Statement of Net Assets
November 30, 2025

Financial Row	As of Nov 2025		As of Oct 2025		Variance	Variance %	As of FY 2025
Assets							
Cash-Checking	\$	32,059	\$	15,196	\$	111.0%	\$ 5,537
Savings	\$	1,559	\$	60,987	\$	(97.4%)	\$ 90,972
Investments	\$	3,726,839	\$	3,459,855	\$	7.7%	\$ 3,305,563
Account Receivable	\$	37,064	\$	30,656	\$	20.9%	\$ 24,757
Due (To) From SBM	\$	40,570	\$	24,893	\$	63.0%	\$ (14,118)
Total Assets	\$	3,838,090	\$	3,591,587	\$	6.9%	\$ 3,412,711
Liabilities and Fund Balance							
Liabilities							
Claims Payable	\$	202,913	\$	-	\$	0.0%	\$ -
Deferred Revenue	\$	444,336	\$	240,926	\$	84.4%	\$ 115,381
Total Liabilities	\$	647,249	\$	240,926	\$	168.7%	\$ 115,381
Fund Balance Beginning of Year	\$	3,297,330	\$	3,297,330	\$	0.0%	\$ 3,125,627
Net Income (Expense) Year to Date	\$	(106,489)	\$	53,331	\$	(299.7%)	\$ 171,703
Total Fund Balance	\$	3,190,842	\$	3,350,661	\$	(4.8%)	\$ 3,297,330
Total Liabilities and Fund Balance	\$	3,838,090	\$	3,591,587	\$	6.9%	\$ 3,412,711

**Client Protection Fund
CPF Income Statement
November 30, 2025**

Financial Row	CY (Oct 2025 - Nov 2025)		PY (Oct 2024 - Nov 2024)		Variance
Income					
License Fees and Related	\$	104,290	\$	51,648	\$ 52,642
Other Operating Revenues					
42000 - Other Operating Revenue					
42960 - Claims Recovery (Net of Fees)	\$	654	\$	1,589	\$ (935)
42970 - Contributions Received	\$	10,502	\$	736	\$ 9,766
40055 - Pro Hac Vice Fees	\$	3,105	\$	2,865	\$ 240
Total - Other Operating Revenues	\$	14,261	\$	5,190	\$ 9,071
Total Income	\$	118,551	\$	56,838	\$ 61,713
Expenses					
65285 - Bank Service Fees	\$	70	\$	70	\$ -
69060 - SBM Administrative/Service Fees	\$	45,166	\$	43,800	\$ 1,366
71005 - Claims Payments	\$	202,913	\$	17,000	\$ 185,913
Total Expenses	\$	248,149	\$	60,870	\$ 187,279
Investment Income					
49010 - Interest & Dividends	\$	2,930	\$	1,176	\$ 1,753
49015 - Gain or Loss on Investment JPM Brokerage	\$	20,179	\$	16,654	\$ 3,525
Total Investment Income	\$	23,109	\$	17,831	\$ 5,278
Increase or Decrease in Net Positon	\$	(106,489)	\$	13,799	\$ (120,288)
Net Position, Beginning of Year	\$	3,297,330	\$	3,125,627	\$ 171,703
Net Position, End of Period	\$	3,190,842	\$	3,139,426	\$ 51,415

Monthly SBM Attorney and Affiliate Report - November 30, 2025

FY 2026

	September 30 2018	September 30 2019	September 30 2020	September 30 2021	September 30 2022	September 30 2023	September 30 2024	September 30 2025	November 30 2025	FY Increase (Decrease)
Attorneys and Affiliates In Good Standing										
Active	42,342	42,506	42,401	42,393	42,395	41,985	41,427	41,430	41,358	(72)
Less than 50 yrs serv	40,973	41,036	40,559	40,504	40,680	40,115	39,399	39,222	38,808	(414)
50 yrs or greater	1,369	1,470	1,842	1,889	1,715	1,870	2,028	2,208	2,550	342
Voluntary Inactive	1,169	1,139	1,192	1,097	1,072	1,106	1,262	1,195	1,206	11
Less than 50 yrs serv	1,142	1,105	1,149	1,055	1,030	1,059	1,217	1,151	1,147	(4)
50 yrs or greater	27	34	43	42	42	47	45	44	59	15
Emeritus	2,204	2,447	2,727	3,033	3,306	3,733	4,245	4,597	4,827	230
Total Attorneys in Good Standing	45,715	46,092	46,320	46,523	46,773	46,824	46,934	47,222	47,391	169
Fee-paying Attorneys (Active & Inactive less than 50 yrs of Serv)	42,115	42,141	41,708	41,559	41,710	41,174	40,616	40,373	39,955	(418)
Affiliates										
Legal Administrators	10	10	8	5	2	2	4	4	4	-
Legal Assistants	401	393	317	219	214	194	195	210	220	10
Total Affiliates in Good Standing	411	403	325	224	216	196	199	214	224	10
Total Attorneys and Former Attorneys in the Database										
State Bar of Michigan Attorney and Affiliate Type										
	September 30 2018	September 30 2019	September 30 2020	September 30 2021	September 30 2022	September 30 2023	September 30 2024	September 30 2025	November 30 2025	FY Increase (Decrease)
Attorneys in Good Standing:							(558)			
ATA (Active)	42,342	42,506	42,401	42,393	42,395	41,985	41,427	41,430	41,358	(72)
ATVI (Voluntary Inactive)	1,169	1,139	1,192	1,097	1,072	1,106	1,262	1,195	1,206	11
ATE (Emeritus)	2,204	2,447	2,727	3,033	3,306	3,733	4,245	4,597	4,827	230
Total Attorneys in Good Standing	45,715	46,092	46,320	46,523	46,773	46,824	46,934	47,222	47,391	169
Attorneys Not in Good Standing:										
ATN (Suspended for Non-Payment of Dues)	6,072	6,246	6,416	6,472	6,588	6,824	7,065	7,159	7,151	(8)
ATDS (Discipline Suspension - Active)	439	440	445	449	454	456	466	478	477	(1)
ATDI (Discipline Suspension - Inactive)	19	24	25	25	25	25	27	29	29	-
ATDC (Discipline Suspension - Non-Payment of Court Costs)	15	16	16	14	14	15	15	15	16	1
ATNS (Discipline Suspension - Non-Payment of Other Costs)	95	98	100	102	106	104	111	110	109	(1)
ATS (Attorney Suspension - Other)*	1	1	2	-	-	-	-	-	-	-
ATR (Revoked)	583	596	613	623	634	645	647	660	660	-
ATU (Status Unknown - Last known status was inactive)**	2,070	2,070	2,070	2,070	2,047	2,047	2,047	2,047	2,047	-
Total Attorneys Not in Good Standing	9,294	9,491	9,687	9,755	9,868	10,116	10,378	10,498	10,489	(9)
Other:										
ATSC (Former special certificate)	155	157	158	164	167	170	173	175	176	1
ATW (Resigned)	1,689	1,798	1,907	2,036	2,143	2,282	2,428	2,574	2,630	56
ATX (Deceased)	9,287	9,524	9,793	10,260	10,664	10,958	11,212	11,594	11,628	34
Total Other	11,131	11,479	11,858	12,460	12,974	13,410	13,813	14,343	14,434	91
Total Attorneys in Database	66,140	67,062	67,865	68,738	69,615	70,350	71,125	72,063	72,314	251

* ATS is a new status added effective August 2012 - suspended by a court, administrative agency, or similar authority

** ATU is a new status added in 2010 to account for approximately 2,600 attorneys who were found not to be accounted for in the IMIS database
The last known status was inactive and many are likely deceased. We are researching these attorneys to determine a final disposition.

N/R - not reported

Notes: Through November 30, 2025 a total of 251 new attorneys joined SBM, compared to 340 new attorneys who joined SBM through November 30, 2024.

2.4.2. MSUFCU Credit Card Facility - Limit Increase*

2.5. Professional Standards

Presented by Suzanne C. Larsen

2.5.1. Client Protection Fund Claims*

TO: Board of Commissioners
FROM: Professional Standards Committee
DATE: January 23, 2026, BOC Meeting
RE: Client Protection Fund Claims for Consent Agenda

Rule 15 of the Client Protection Fund Rules provides that “claims, proceedings and reports involving claims for reimbursement are confidential until the Board authorizes reimbursement to the claimant.” To protect CPF claim information as required in the Rule, and to avoid negative publicity about a lawyer subject to a claim, which has been denied and appealed, the CPF Report to the Board of Commissioners is designated “confidential.”

**CONSENT AGENDA
CLIENT PROTECTION FUND**

Claims recommended for payment:

a. Consent Agenda

Claim No	Amt Recommended
CPF 3895	\$500.00
CPF 4137	\$12,800.00
CPF 4234	\$6,000.00
CPF 4240	\$10,000.00
CPF 4287	\$2,490.70
TOTAL	\$31,790.70

Pro-rated Single Respondent Claims that
Exceed the Maximum Aggregate

Claim No	Amt Recommended
CPF 4032	\$17,803.00
CPF 4034	\$31,566.38
CPF 4090	\$21,575.31
CPF 4095	\$43,022.98
CPF 4119	\$10,182.05
CPF 4129	\$12,000.47
CPF 4133	\$22,678.11
CPF 4149	\$136,601.16
CPF 4158	\$3,268.20
CPF 4262	\$69,170.83
CPF 4265	\$6,620.80
CPF 4305	\$510.71
TOTAL	\$375,000.00

b. Supporting documentation is provided separately.

The Professional Standards Committee recommends payment of these claims by the State Bar of Michigan Client Protection Fund:

CPF 3895

Total Loss: \$500.00

In December of 2015, Claimant retained Respondent to file a Chapter 13 bankruptcy petition and paid \$500 for the representation. Respondent filed the petitions but failed to file any additional required pleadings resulting in dismissal. Respondent then filed a second petition but again failed to file the necessary pleadings resulting in dismissal. Thereafter, Respondent filed in the State Court to stay a foreclosure proceeding, but took no further action, abandoning the representation.

The Attorney Discipline Board entered an Order of Suspension and Restitution with Conditions on April 30, 2025, pursuant to a stipulation, ordering Restitution to Claimant of \$500. Reimbursement of this claim is recommended pursuant to CPF Rules 7(A)(1) and 10(D)(1).

CPF 4137

Total Loss: \$12,800.00

Claimants retained Respondent to represent them in an Adversarial Bankruptcy proceeding. Respondent commingled Claimants' funds by depositing the retainer into their operating account that had a negative balance instead of into an IOLTA account. Respondent then used those funds, along with several disbursements from the Bankruptcy Court, to pay personal and credit card expenses. Respondent continued to transfer additional funds from the IOLTA into the operating account and continued making large credit card payments.

About two years after Respondent was retained by Claimants, Respondent's co-counsel informed Claimants that Respondent could no longer represent them. Claimants requested a detailed accounting and refund of any unused portion of the retainer, but Respondent has failed to provide any documentation, failed to provide a refund and failed to communicate any further with the Claimants.

The ADB in revoking Respondent's license to practice law found in this matter that Respondent failed to promptly render a full accounting of client funds or property, in violation of MRPC 1.15(b)(3); failed to hold property of a client or third person funds in connection with a representation separate from the lawyer's property, in violation of MRPC 1.15(d) and failed to deposit a legal fee paid in advance into a client trust account and withdrew unearned fees, in violation of MRPC 1.15(g).

However, the ADB did not order any restitution to any of Respondent's clients, and instead only ordered Respondent pay costs associated with the disciplinary proceedings. CPF Rule 10(D)(1) states that an order disciplining Respondent for the same dishonest conduct alleged in a claim is conclusive evidence that the lawyer committed the dishonest conduct.

Though the ADB Order does not mandate Respondent to pay the clients back, the findings did determine that Respondent misappropriated Claimants' funds. Pursuant to CPF Rule 8(A), the Committees utilized their discretion to recommend the authorization of payment of a claim that would otherwise be excluded under these Rules. As Respondent did not complete the legal services before being disbarred and failed to return the unearned fee, this constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rule 7(A)(1).

CPF 4234

Total Loss: \$6,000.00

In July of 2021, Claimant retained Respondent for representation in a post-divorce custody and support matter and paid \$3,000 for the representation. Respondent agreed to file a motion regarding child support but did not do so. Between July of 2021 and March of 2022, Claimant was unable to reach Respondent.

Respondent advised Claimant that pleadings were filed, which were not, and requested an additional \$3,000 that Claimant paid. Thereafter mediation was held, and Respondent was to draft a proposed order, which was not done. Respondent again became uncommunicative. As of April 2023, Respondent still had not filed the necessary pleadings.

The ADB in suspending Respondent's license to practice law found, among other things, that Respondent failed to act with reasonable diligence, failed to keep the client informed, and engaged in dishonest conduct and ordered restitution to Claimant in the amount of \$6,000.

This is reimbursable loss pursuant to CPF Rule 10(D)(1) which states that an order disciplining Respondent for the same dishonest conduct alleged in a claim is conclusive evidence that the lawyer committed the dishonest conduct. Additionally, Respondent did not complete the legal services before being suspended from the practice of law. Respondent's failure to return the unearned fee constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rule 7(A)(1).

CPF 4240

Total Loss: \$10,000.00

Claimant retained Respondent for representation in a divorce matter and paid the \$7,500 retainer. Later, pursuant to a Stipulation, Respondent received \$10,000 from the sale of the marital home to be held in safekeeping but then abandoned the matter.

The Court held Respondent in contempt for failure to remit the proceeds of the sale to Claimant. Pursuant to that Order, Respondent embezzled the funds to be held in safekeeping, which is a reimbursable loss under CPF Rule 7(A)(2). Therefore, there is a reimbursable loss of \$10,000 pursuant to the Court Order and CPF Rule 10(D)(1).

CPF 4287

Total Loss: \$2,490.70

Claimant's now ex-spouse retained Respondent for representation in a divorce proceeding. Respondent was ordered to safeguard funds from the sale of the marital home to be distributed upon entry of the Judgment of Divorce. After receiving the funds, Respondent abandoned the matter, failing to remit Claimant's \$2,490.70.

Respondent failed to safeguard funds and fees paid and unearned in an appropriate trust account to be refunded to Claimant, which is conclusive evidence of dishonest conduct per CPF Rule 7(A)(1). Respondent embezzled the funds to be held in safekeeping, which is also a reimbursable loss under CPF Rule 7(A)(2).

Pro-rated Single Respondent Claims that Exceed the Maximum Aggregate:

CPF 4032

Total Loss: \$69,725.73

Claimant's sibling retained Respondent to establish an Estate plan after being diagnosed with terminal cancer. Respondent established a Trust for the benefit of Claimant's sibling's children, who are minors. After the Testator/Claimant's sibling passed, Respondent persuaded the Trustee to transfer the assets to Respondent's IOLTA to avoid interest during the Covid Lockdown. Respondent received \$69,725.73 to be held on behalf of the Trust. Respondent embezzled the Trust assets, which constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rules 7(A)(1) and 7(A)(2).

CPF 4034

Total Loss: \$123,630.10

Claimant and family members retained Respondent for representation in a land contract forfeiture matter. After protracted litigation, an Escrow agreement was created and \$165,000 in sale proceeds were deposited into Respondent's IOLTA. Respondent provided an Escrow Reconciliation indicating receipt of \$165,000, subtracting expenses and attorney fees. Respondent embezzled Escrow funds held on behalf of a client, which constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rules 7(A)(1) and 7(A)(2).

CPF 4090

Total Loss: \$84,500.00

Claimant retained Respondent for representation in a divorce matter for a fee of \$4,500. Additionally, Respondent required Claimant to remit \$80,000 into an Escrow account pending resolution of the divorce. Within days, the parties agreed to reconcile and a Stipulation to Dismiss the divorce was granted. Respondent provided no legal services to Claimant, instead using the retention to obtain \$80,000 in Escrow funds, which were embezzled. Therefore, Respondent's failure to return the \$4,500 in unearned fees and embezzlement of the funds held in Escrow constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rules 7(A)(1) and 7(A)(2).

CPF 4095

Total Loss: \$168,500.00

Respondent received \$100,000 for the benefit of Claimant from a third party to be held in Escrow. To repay the third party, Claimant provided Respondent with \$68,500. Respondent then embezzled all of the funds. Respondent's embezzlement of funds constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rules 7(A)(1) and 7(A)(2).

Respondent was eventually convicted of felony embezzlement and ordered to pay criminal restitution to Claimant in the amount of \$68,500. This did not include the \$100,000 loss suffered by the third party. Moreover, the Attorney Discipline Board ordered Restitution to Claimant in the amount of \$68,500 and the third party in the amount of \$100,000. CPF Rule 10(D)(1) states that an order disciplining Respondent for the same dishonest conduct alleged in a claim is conclusive evidence that the lawyer committed the dishonest conduct.

CPF 4119

Total Loss: \$39,878.14

Claimant retained Respondent to represent a family member in a divorce matter. Respondent received \$48,083.77 in proceeds to be held in safekeeping for the client. Respondent remitted \$8,205.63 but embezzled the remaining \$39,878.14. Thus, this is a reimbursable loss under CPF Rules 7(A)(1) and 7(A)(2).

CPF 4129

Total Loss: \$47,000.00

Claimant retained Respondent for representation in a land division action. Respondent received \$47,000 in proceeds from the division to be remitted to Claimant. Respondent embezzled the funds, which constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rules 7(A)(1) and 7(A)(2).

CPF 4133

Total Loss: \$88,819.09

Claimant's predecessor retained Respondent for representation as Personal Representative for an Estate. While assisting with administration, Respondent received \$88,818.09 to be held for the Estate.

As Respondent failed to communicate with the Court and was suspended from the practice of law, Claimant was appointed as Successor Personal Representative. The Court Order required Respondent to remit the Estate funds in the amount of \$88,819.09. However, Respondent embezzled the funds. Therefore, this claim is reimbursable under CPF Rules 7(A)(1) and 7(A)(2).

CPF 4149

Total Loss: \$535,000.00

Claimant retained Respondent for representation related to a Trust matter. Pursuant to the representation, Respondent received \$535,000 to be held in safekeeping pending the outcome of the litigation. Respondent embezzled the funds. Respondent's embezzlement of the funds constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rules 7(A)(1) and 7(A)(2).

CPF 4158

Total Loss: \$12,800.00

Claimant retained Respondent for representation in a contract matter for a fee and received an additional \$12,800 to be held in Escrow as a show of good faith. Respondent embezzled the \$12,800. Respondent's embezzlement of the funds constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rules 7(A)(1) and 7(A)(2).

CPF 4262

Total Loss: \$270,908.36

Respondent, as an attorney for the Trustee, obtained \$295,908.36 to be held in safekeeping. Respondent remitted \$25,000 to Claimant to avoid being held in contempt of Court and incarcerated. Respondent admitted to no longer being in possession of \$270,908.36 that was to be held in safekeeping. The Court entered a judgment in favor of Claimant due to Respondent's misappropriation. Additionally, Respondent has been criminally convicted of the same misconduct. CPF Rule 10(D)(1) states that an order disciplining Respondent for the same dishonest conduct alleged in a claim is conclusive evidence that the lawyer committed the dishonest conduct.

Respondent's embezzlement of the funds constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rules 7(A)(1) and 7(A)(2).

CPF 4265

Total Loss: \$25,930.25

The Personal Representative of an Estate retained Respondent to assist in administering the Estate. A parcel of real property was sold. Respondent paid some of the Estate liabilities but failed to remit the remaining proceeds to MDHHS to satisfy a Medicaid lien, instead embezzling the funds. Respondent's embezzlement of the funds constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rules 7(A)(1) and 7(A)(2).

CPF 4305

Total Loss: \$2,000.00

Claimant retained Respondent for representation in two license reinstatement matters for a total fee of \$4,000. Respondent completed the legal services for the first reinstatement but was suspended from the practice of law before completing the second representation. Thus, only earning \$2,000 of the \$4,000 paid.

Respondent's failure to refund the unearned fee constitutes dishonest conduct and is a reimbursable loss as provided by CPF Rule 7(A)(1).

2.5.2. Unauthorized Practice of Law Claims*

2.6. Strategic Planning and Engagement

Presented by Thomas H. Howlett

2.6.1. Military & Veterans Law Section Proposed Bylaw Revisions*



MEMORANDUM

To: SBM Board of Commissioners (BOC)
SBM Strategic Planning & Engagement Committee (SPEC)

From: Darin Day
SBM Director of Outreach

Date: January 12, 2026

Re: Proposed Bylaws Amendments: **Military & Veterans Law Section**

Rule 12, Section 2 of the Supreme Court Rules Concerning the State Bar of Michigan requires each SBM section to maintain bylaws “not inconsistent with these Rules or the bylaws of the State Bar of Michigan” and further that “[s]ection bylaws or amendments thereof shall become effective when approved by the Board of Commissioners.”

Upon review of documents submitted by the Military & Veterans Law Section (MVLS), staff confirms that MVLS has followed all steps necessary to propose changes to its bylaws in accordance with the amendment procedures found in the current MVLS bylaws. The remaining steps are for SPEC to review and recommend approval to the BOC, and for the BOC to approve the section’s proposed amendments. Please see excerpts below taken from the current MVLS bylaws, redlined to highlight the section’s proposed changes.

No proposed amendment from MVLS is inconsistent with Supreme Court Rules or SBM bylaws. Thus, staff recommends APPROVAL.

ARTICLE III ANNUAL MEETINGS

Section 1. ~~The organizational Annual Meeting of the Section shall be held anytime after January 1, 2014 at a time and place to be determined by the Acting Chairperson hereafter appointed.~~ on the second Tuesday of September. Officers and Council members' office terms shall be from October 1 to September 30 of each year.

Section 2. ~~The Board of Commissioners of the State Bar of Michigan hereby appoints LTS John Wojcik as Acting Chairperson of the proposed Section, to serve in this capacity until the Bylaws of the Section are approved and the Council and Officers of the Section are duly elected as hereinafter provided.~~

Section 2. All active members of the State Bar of Michigan who have applied for membership in the Section and have paid dues or have otherwise qualified under Article II ~~by November 19, 2013 shall receive written notice of the time and place of the organizational meeting and shall be eligible to vote at the meeting. An e-mail will qualify as written notice for this purpose.~~ by September 1st by mail or by electronic means shall receive notice of the time and place of the Annual Meeting and shall be eligible to vote at the meeting. Participation in the meeting may be in person or by zoom or other electronic means.

Section 3. Voting at the Annual Meeting may not be done by proxy.

Section 5. ~~At the organizational meeting, the members shall elect seven (7) members to serve as the first Council, and shall elect the 4 officers of the Section. A majority of those present and voting at the organizational meeting shall be sufficient to elect to elect the first Council. In order to preserve continuity, the terms of three (3) members of the Council elected at the organizational meeting shall be for three (3) year and the terms of the other four (4) members of the Council elected shall be for four (4) years. Subsequent elections will be for 3 year terms.~~

Section 6. ~~Once the first council has been elected, they will elect four (4) officers. Those initial officers will serve two (2) year terms. Subsequent officers will serve three (3) year terms. If a council person is elected to an officer position at the organizational meeting, he or she may appoint a replacement to sit on the council.~~

~~**Section 7.** The Acting Chairperson may appoint an acting Secretary and Acting Treasurer to assist in preparation for the initial meeting and to perform other functions for the Military and Veterans' Law Section.~~

ARTICLE IV ELECTION OF COUNCIL

Section 1. The members shall select eleven (11) members, consisting of:

- (a) The officers, ~~ex officio~~, elected pursuant to Article V and
- (b) Seven (7) members elected to three (3) year terms by the membership of the Section.

ARTICLE V ELECTIONS OF OFFICERS

Section 1. The Officers of the Section shall serve three (3) year terms, and shall consist of the following, elected by the members at the annual meeting:

- (a) Chairperson
- (b) Chairperson-elect
- (c) Secretary
- (d) Treasurer

Section 2. If any office becomes vacant during the period between annual meetings, the Council may select a replacement who *will* succeed to the full duties and responsibilities of the office.

Section 3. Subject to the approval of the members at the annual meeting, The Chairperson-elect shall succeed to the office of Chair.

~~Section 4. Elections of the Officers shall be by voice vote of the council, unless voting by written ballot is requested and approved by a majority vote of the members present at the annual meeting or the outcome of the election by voice vote is indeterminable in which case voting by written ballot shall be required. The members of the Section present at annual meeting of the Section constitutes a quorum for the transaction of business, and the actions of the majority of the quorum constitutes action of the section.~~

ARTICLE IX MEETINGS

Section 1. The Council shall meet ~~not less than quarterly~~ at least once per quarter. Majority of those present and voting shall be sufficient to take action on any matter before the Council. Members may attend in person, by video or computer, zoom, telephone or any electronic means. Everyone must be able to adequately hear and participate.

~~Section 2. The annual meeting of the Section shall take place during and in the same venue as the annual meeting of the State Bar of Michigan. The members of the Section present at any annual meeting or special meeting of the Section constitutes a quorum for the transaction of business, and the action of the majority of the quorum constitutes action of the Section.~~

Section 2. Special meetings of the Council or Section may be called at any time by the Chairperson.

ARTICLE X MISCELLANEOUS

Section 1. The fiscal year of the Section shall be ~~the same as that of the State Bar of Michigan~~ from October 1 to September 30 of each year.

Section 2. All bills incurred by the Section, before being forwarded to the Treasurer or to the Executive Secretary of the State Bar of Michigan for payment, shall be approved by ~~the President or by the Treasurer, or, if the Council shall direct, both the Chairperson and the Treasurer.~~

3. FY2025 Audit Update / Report - Andrews Hooper Pavlik*

Presented by David C. Anderson

Board of Commissioners

State Bar of Michigan

January 23, 2026

Board of Commissioners

State Bar of Michigan

January 23, 2026

- Introduction
 - AHP Representatives
 - Greg Soule, Partner
- Financial Highlights
- Board of Commissioners Letter
 - Services Provided and in Process
 - Results of our Audit of the Financial Statements
 - Required Communications with the Board of Commissioners
 - Attachment – Management’s Representation Letter
- Other Questions or Comments

January 23, 2026

Board of Commissioners
State Bar of Michigan

We are pleased to submit this report, which summarizes the results of our audit, and other matters that we believe would be of interest to you.

Services Provided and in Process

In accordance with our engagement letter, AHP provided the following services:

Audit Services:

- Annual Financial Statement Audit—Completed

Nonaudit Services:

- Assistance with Preparation of the Financial Statements and Related Notes—Completed

We have reviewed the services provided and confirm that we are independent of State Bar of Michigan (State Bar).

Results of our Audit of the Financial Statements

The audit was conducted in accordance with auditing standards generally accepted in the United States of America and included such tests of the accounting records and such other auditing procedures as we considered necessary for the purpose of expressing an opinion on the financial statements.

The following summarizes various matters of interest noted during our audit:

Significant Risks

As noted in our scope letter dated October 14, 2025, we identified certain areas as having significant risks related to the potential of a material misstatement. We audited each of those significant risks with audit procedures designed to mitigate those risks. Based on our procedures performed, we noted no matters that need to be communicated to you.

Cybersecurity and Information Technology Controls

Cyberattacks are on the rise across the globe, and the cost of these attacks is ever increasing. Because of these attacks, entities stand to lose their reputation, the ability to operate efficiently, and proprietary information or assets. Entities may also be subject to financial and legal liabilities. Managing this issue is especially challenging because even an entity with a highly mature cybersecurity risk management program still has a residual risk that a material cybersecurity breach could occur and not be detected in a timely manner. We believe management should continue to monitor and evaluate this risk, which is a critical best practice. Additionally, periodic assessments of the system in order to verify that the control environment is functioning as designed are key parts of measuring associated business risk. We encourage those charged with governance to work with management on this very important topic. If we can be of assistance in the process, we would be happy to do so.

Adopted Audit and Accounting Standards

GASB Statement No. 101, *Compensated Absences*, requires that liabilities for compensated absences be recognized for (1) leave that has not been used and (2) leave that has been used but not yet paid in cash or settled through noncash means. A liability should be recognized for leave that has not been used if (a) the leave is attributable to services already rendered, (b) the leave accumulates, and (c) the leave is more likely than not to be used for time off or otherwise paid in cash or settled through noncash means.

- Leave is attributable to services already rendered when an employee has performed the services required to earn the leave.
- Leave that accumulates is carried forward from the reporting period in which it is earned to a future reporting period during which it may be used for time off or otherwise paid or settled.
- In estimating the leave that is more likely than not to be used or otherwise paid or settled, a government should consider relevant factors such as employment policies related to compensated absences and historical information about the use or payment of compensated absences.

The GASB was effective for fiscal years beginning after December 15, 2023. As a result of the adoption of this guidance, the State Bar has restated beginning Administrative Fund net position by \$(19,190).

GASB Statement No. 102, *Certain Risk Disclosures*, affects governmental entities when circumstances make a government vulnerable to a heightened possibility of loss or harm. GASB 102 requires governments to disclose essential information about risk related to vulnerabilities due to certain concentrations or constraints. Concentrations and constraints may limit a government's ability to acquire resources or control spending.

A concentration is a lack of diversity related to an aspect of a significant inflow or outflow of resources and a constraint is a limitation imposed on a government by an external party or by formal action of the government's highest level of decision-making authority.

Disclosures should include a description of the known concentration or constraint; events associated with the concentration or constraint that could cause substantial impact if the event has occurred; and actions taken by the government to mitigate the risk.

This standard was effective for fiscal years beginning after June 15, 2024. The adoption of this guidance by the State Bar did not have a material impact on the financial statements.

Future Audit and Accounting Standards

GASB Statement No. 103, *Financial Reporting Model Improvements*, establishes new accounting and financial reporting requirements or modifies existing requirements related to the following: management's discussion and analysis; unusual or infrequent items; presentation of the proprietary fund statement of revenues, expenses, and changes in fund net position; information about major component units in basic financial statements; budgetary comparison information; and financial trends information in the statistical section.

This standard is effective for fiscal years beginning after June 15, 2025.

Required Communications with Those Charged with Governance

This section discusses our responsibilities under AICPA Professional Standards AU-C Section 260, *The Auditor's Communication with Those Charged with Governance*. The following excerpts from that standard describe the specific matters required to be communicated to you and our responses thereto:

Our Responsibility under U.S. Generally Accepted Auditing Standards

The auditor's standard report emphasizes that an audit conducted in accordance with auditing standards generally accepted in the United States of America is designed to provide reasonable, but not absolute, assurance that the financial statements are free of material misstatement and in conformity with accounting principles generally accepted in the United States of America (U.S. GAAP). Our report dated December 9, 2025 follows this format. Because of the concept of reasonable assurance, and because we did not perform a detailed examination of all transactions, there is a risk that material errors, irregularities, or illegal acts, including fraud and defalcations, may exist and not be detected by us.

Our responsibility, as described by our professional standards, is to express an opinion about whether the financial statements prepared by management with your oversight are fairly presented, in all material respects, in conformity with U.S. GAAP. Our audit does not relieve you or management of your responsibilities.

As part of the audit, we considered the internal control of the State Bar. Such considerations were solely for the purpose of determining our audit procedures and not to provide any assurance concerning internal control.

Planned Scope and Timing of the Audit

We performed the audit according to the planned scope and timing previously communicated to you in our scope letter dated October 14, 2025. No matters came to our attention during our audit that resulted in a change to our timing or scope of our procedures.

Qualitative Aspects of Accounting Practices

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by the State Bar are described in Note 1 to the financial statements. No new accounting policies were adopted, except the adoption of the new accounting standard, and the application of existing policies was not changed during the year. We noted no transactions entered into by the State Bar during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the financial statements in the proper period.

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimates affecting the financial statements were:

- The State Bar's proportionate share of pension benefits and the net pension liability as disclosed in Note 8 to the financial statements.
- The State Bar's proportionate share of postemployment benefits and the net OPEB liability as disclosed in Note 9 to the financial statements.

For each of the estimates listed above, we evaluated the key factors and assumptions used to develop the estimate in determining that it is reasonable in relation to the financial statements taken as a whole.

The disclosures in the financial statements are neutral, consistent, and clear. Certain financial statement disclosures are particularly sensitive because of their significance to financial statement users.

The most sensitive disclosures affecting the financial statements were:

- The State Bar's proportionate share of pension benefits and the net pension liability as disclosed in Note 8 to the financial statements.
- The State Bar's proportionate share of postemployment benefits and the net OPEB liability as disclosed in Note 9 to the financial statements.
- Disclosures in Notes 1 and 2 regarding deposits and investments held by the State Bar of Michigan on behalf of the Attorney Discipline System.

Difficulties Encountered in Performing the Audit

We encountered no significant difficulties in dealing with management in performing and completing our audit.

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all misstatements identified during the audit, other than those that are trivial, and communicate them to the appropriate level of management. There were no corrected misstatements during our audit. We noted an uncorrected misstatement which management has determined is not material to the financial statements resulting in an understatement of Sections expenses and Administrative Fund accounts payable of approximately \$19,000.

Disagreements with Management

For purposes of this letter, a disagreement with management is a disagreement on financial accounting, reporting, or auditing matters, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditor's report. We are pleased to report that no such disagreements arose during the course of the audit.

Management Representations

We have requested certain representations from management that are included in the management's representation letter dated December 9, 2025. A copy is attached for your reference.

Management's Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the financial statements or a determination of the type of opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all relevant facts. To our knowledge, there were no such consultations with other accountants.

Major Issues Discussed with Management Prior to Retention

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

Other Matters

We applied certain limited procedures to management's discussion and analysis and the pension and OPEB schedules, which are required supplementary information (RSI) that supplements the basic financial statements.

Our procedures consisted of inquiries of management regarding the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We did not audit the RSI and do not express an opinion or provide any assurance on the RSI.

We were engaged to report on the other supplementary information identified in the audited financial statements which accompany the financial statements but are not RSI, and the crosswalk reconciliation schedules, which do not accompany the financial statements but are not RSI. With respect to this supplementary information, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with accounting principles generally accepted in the United States of America, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

We were not engaged to report on the introductory section of the annual report, which accompanies the financial statements but are not RSI. Such information has not been subjected to the auditing procedures applied in the audit of the basic financial statements, and accordingly, we do not express an opinion or provide any assurance on it.

Communication of Fees for Nonaudit Services

As previously described in this letter, we performed certain nonaudit services at the request of management and documented in an engagement letter. Fees for these services did not exceed those noted in our engagement letter.

Management Letter

We considered the State Bar's internal control during the course of the audit, and we remained alert for areas where procedures and controls could be improved. We noted no matters involving the internal control over financial reporting and its operation that we would consider to be material weaknesses.

* * *

This report is intended solely for the information and use of the Board of Commissioners and management of the State Bar of Michigan and is not intended to be, and should not be, used by anyone other than these specified parties.

We will be pleased to respond to any comments or questions you may have concerning this letter, our management letter, or any other aspects of our services to the State Bar.

It has been a pleasure to serve the State Bar of Michigan during 2025. We would like to express our appreciation for the cooperation and courtesy extended to us by management and employees of the State Bar and look forward to continuing our association in the future.

Sincerely,

Andrews Hooper Pavlik PLC

Management Representation Letter

December 9, 2025

Andrews Hooper Pavlik PLC
4295 Okemos Rd, Suite 200
Okemos, Michigan 48864

This representation letter is provided in connection with your audit of the financial statements of the State Bar of Michigan (State Bar), which comprise the respective financial position of the business-type activities and each major fund as of September 30, 2025, and the respective changes in financial position and, where applicable, cash flows for the year then ended, and the disclosures (collectively, the "financial statements"), for the purpose of expressing opinions as to whether the financial statements are presented fairly, in all material respects, in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP).

Certain representations in this letter are described as being limited to matters that are material. Items are considered to be material, regardless of size, if they involve an omission or misstatement of accounting information that, in light of surrounding circumstances, makes it probable that the judgment of a reasonable person relying on the information would be changed or influenced by the omission or misstatement. An omission or misstatement that is monetarily small in amount could be considered material as a result of qualitative factors.

We confirm, to the best of our knowledge and belief, as of December 9, 2025 the following representations made to you during your audit.

FINANCIAL STATEMENTS

1. We have fulfilled our responsibilities, as set out in the terms of the audit engagement letter dated July 2, 2025, including our responsibility for the preparation and fair presentation of the financial statements in accordance with U.S. GAAP and for preparation of the supplementary information in accordance with the applicable criteria.
2. The financial statements referred to above are fairly presented in conformity with U.S. GAAP and include all properly classified funds and other financial information of the primary government and all component units required by generally accepted accounting principles to be included in the financial reporting entity.
3. We acknowledge our responsibility for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.
4. We acknowledge our responsibility for the design, implementation, and maintenance of internal control to prevent and detect fraud.



5. The methods, significant assumptions, and data used in making accounting estimates and their related disclosures are appropriate to achieve recognition, measurement, or disclosure that is reasonable in accordance with U.S. GAAP.
6. Related party relationships and transactions, including revenues, expenditures/expenses, loans, transfers, leasing arrangements, guarantees, and amounts receivable from or payable to related parties have been appropriately accounted for and disclosed in accordance with U.S. GAAP.
7. Adjustments or disclosures have been made for all events, including instances of noncompliance, subsequent to the date of the financial statements that would require adjustment to or disclosure in the financial statements.
8. The effects of uncorrected misstatements are immaterial, both individually and in the aggregate, to the financial statements as a whole for each opinion unit. There was an uncorrected misstatement resulting in an understatement of Sections expenses and Administrative Fund accounts payable of approximately \$19,000.
9. The effects of all known actual or possible litigation, claims, and assessments have been accounted for and disclosed in accordance with U.S. GAAP.
10. Guarantees, whether written or oral, under which the State Bar is contingently liable, if any, have been properly recorded or disclosed.
11. We believe that the actuarial assumptions and methods used to measure OPEB and pension liabilities and costs for financial accounting purposes are appropriate in the circumstances.

INFORMATION PROVIDED

12. We have provided you with:
 - a. Access to all information, of which we are aware, that is relevant to the preparation and fair presentation of the financial statements, such as records (including information obtained from outside of the general and subsidiary ledgers), documentation, and other matters.
 - b. Additional information that you have requested from us for the purpose of the audit.
 - c. Unrestricted access to persons within the entity from whom you determined it necessary to obtain audit evidence.
 - d. Minutes of the meetings of the Board of Commissioners, the Finance Committee, the Executive Committee, and the Audit Committee or summaries of actions of recent meetings for which minutes have not yet been prepared.
13. All material transactions have been recorded in the accounting records and are reflected in the financial statements.
14. We have disclosed to you the results of our assessment of the risk that the financial statements may be materially misstated as a result of fraud.

15. We have no knowledge of any fraud or suspected fraud that affects the entity and involves:
 - a. Management,
 - b. Employees who have significant roles in internal control, or
 - c. Others where the fraud could have a material effect on the financial statements.
16. We have no knowledge of any allegations of fraud or suspected fraud affecting the entity's financial statements communicated by employees, former employees, regulators, or others.
17. We have no knowledge of instances of noncompliance or suspected noncompliance with provisions of laws, regulations, contracts, or grant agreements, or waste or abuse, whose effects should be considered when preparing financial statements.
18. We have disclosed to you all known actual or possible litigation, claims, and assessments whose effects should be considered when preparing the financial statements.
19. We have disclosed to you the names of the entity's related parties and all the related party relationships and transactions, including any side agreements.

GOVERNMENT — SPECIFIC

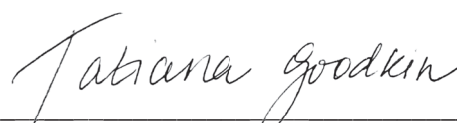
20. There have been no communications from regulatory agencies concerning noncompliance with, or deficiencies in, financial reporting practices.
21. We have identified to you any previous audits, attestation engagements, and other studies related to the objectives of the audit and whether related recommendations have been implemented.
22. We have identified to you any investigations or legal proceedings that have been initiated with respect to the period under audit.
23. The State Bar has no plans or intentions that may materially affect the carrying value or classification of assets, deferred outflows of resources, liabilities, deferred inflows of resources, and net position.
24. We are responsible for compliance with the laws, regulations, and provisions of contracts and grant agreements applicable to us, including tax or debt limits and debt contracts, and legal and contractual provisions for reporting specific activities in separate funds.
25. We have appropriately identified, recorded, and disclosed all leases in accordance with GASB Statement (GASBS) No. 87.
26. We have appropriately identified, recorded, and disclosed subscription-based information technology arrangements in accordance with GASBS No. 96.
27. We have identified and disclosed to you all instances of identified and suspected fraud and noncompliance with provisions of laws, regulations, contracts, and grant agreements that we believe have a material effect on the financial statements.
28. We have appropriately measured, recorded, and disclosed compensated absences and other salary-related payments in accordance with GASBS No. 101.

29. There are no violations or possible violations of budget ordinances, laws, and regulations (including those pertaining to adopting, approving, and amending budgets), provisions of contracts and grant agreements, tax or debt limits, and any related debt covenants whose effects should be considered for disclosure in the financial statements, or as a basis for recording a loss contingency, or for reporting on noncompliance.
30. As part of your audit, you assisted with preparation of the financial statements and related notes. We acknowledge our responsibility as it relates to those nonaudit services, including that we assume all management responsibilities; oversee the services by designating an individual, preferably within senior management, who possesses suitable skill, knowledge, or experience; evaluate the adequacy and results of the services performed; and accept responsibility for the results of the services. We have reviewed, approved, and accepted responsibility for those financial statements and disclosures.
31. The State Bar has satisfactory title to all owned assets, and there are no liens or encumbrances on such assets nor has any asset been pledged as collateral.
32. The State Bar has complied with all aspects of contractual agreements that would have a material effect on the financial statements in the event of noncompliance.
33. The financial statements include all component units, appropriately present majority equity interests in legally separate organizations and joint ventures with an equity interest, and properly disclose all other joint ventures and other related organizations.
34. The financial statements properly classify all funds and activities in accordance with GASB Statement No. 34, as amended.
35. The financial statements include all fiduciary activities required by GASBs No. 84, as amended.
36. All funds that meet the quantitative criteria in GASBs No. 34 and 37 for presentation as major are identified and presented as such and all other funds that are presented as major are particularly important to financial statement users.
37. Components of net position (net investment in capital assets; restricted; and unrestricted) and equity amounts are properly classified and, if applicable, approved.
38. Provisions for uncollectible receivables have been properly identified and recorded.
39. Expenses have been appropriately classified in or allocated to functions and programs in the statement of activities, and allocations have been made on a reasonable basis.
40. Revenues are appropriately classified in the statement of activities within program revenues, general revenues, contributions to term or permanent endowments, or contributions to permanent fund principal.
41. Interfund, internal, and intra-entity activity and balances have been appropriately classified and reported.
42. Deposits and investment securities and derivative instruments are properly classified as to risk and are properly disclosed.

43. Capital assets, including infrastructure and intangible assets, are properly capitalized, reported, and, if applicable, depreciated or amortized.
44. We acknowledge our responsibility for the required supplementary information (RSI). The RSI is measured and presented within prescribed guidelines and the methods of measurement and presentation have not changed from those used in the prior period. We have disclosed to you any significant assumptions and interpretations underlying the measurement and presentation of the RSI.
45. With respect to the Other Supplementary Information and crosswalk reconciliation schedules:
- a. We acknowledge our responsibility for presenting the Other Supplementary Information and crosswalk reconciliation schedules in accordance with U.S. GAAP, and we believe the information, including its form and content, is fairly presented in accordance with U.S. GAAP. The methods of measurement and presentation of the information have not changed from those used in the prior period, and we have disclosed to you any significant assumptions or interpretations underlying the measurement and presentation of the supplementary information.
 - b. If the Other Supplementary Information and crosswalk reconciliation schedules are not presented with the audited financial statements, we will make the audited financial statements readily available to the intended users of the supplementary information no later than the date we issue the supplementary information and the auditor's report thereon.
46. With respect to the introductory section (other information):
- a. We acknowledge that we have informed you of all documents that may comprise other information we expect to issue. The financial statements and other information you obtained prior to the auditor's report date are consistent with one another, and the other information does not contain any material misstatements.
 - b. With regard to the other information that will be included in the annual report that has not been obtained by you prior to the auditor's report date, we intend to prepare and issue the other information, as well as communicate the expected timing of issuance, and provide you with the final version of the document(s) when available and prior to the issuance of the annual report.



Peter Cunningham, Executive Director



Tatiana Goodkin, Chief Financial Officer

4. Closed Discussion: Challenges & Opportunities for the Profession and Justice System

5. President's and Executive Director's Report

Presented by Lisa J. Hamameh and Peter
Cunningham

5.1. Board Vacancy*

From: Walton, Danielle <waltond@oakgov.com>
Sent: Monday, December 22, 2025 11:18 AM
To: Lisa J. Hamameh <hamameh@rsjalaw.com>
Subject: Moving offices

Lisa,

In mid-January I am changing jobs to head up the appellate division in Genesee County. I looked at the ByLaws but didn't see anything about what happens when I move out of the district. I would be happy to serve out the year but I wanted to let you know to see about next steps. Wishing you a very Merry Christmas!



OFFICE OF THE PROSECUTING ATTORNEY

County of Oakland | Karen D. McDonald

Danielle Walton

Assistant Prosecuting Attorney, Appellate Division

West Wing - Bldg. 14 E.

1200 N. Telegraph Rd., Pontiac, MI 48341

(248) 858-0685

waltond@oakgov.com

Excerpt from the Rules Concerning the State Bar of Michigan

Rule 5. Board of Commissioners

Section 5. Vacancy. The board shall fill a vacancy among the elected commissioners and the Supreme Court shall fill a vacancy among the appointed commissioners, to serve the remainder of an unexpired term. If an elected commissioner moves his or her principal office out of his or her election district, the board shall declare that a vacancy exists. If an elected or appointed commissioner does not attend two consecutive meetings of the board without being excused by the president because of a personal or professional emergency, the president shall declare that a vacancy exists.

Moheeb H. Murray

Bio from bsp Law website – <https://bsplaw.com>

Moheeb H. Murray represents clients in complex commercial disputes, tort defense cases, insurance coverage matters, and construction litigation. He leads BSP's insurance coverage and construction litigation practice groups. In commercial litigation matters, his extensive experience includes complex breach of contract and breach of warranty claims, shareholder actions, and cases involving misappropriation of trade secrets and covenants not to compete. In his insurance coverage practice, Moheeb represents leading insurers in life, health, disability, ERISA, long-term care, annuity, P&C, commercial general liability, and auto-insurance no-fault matters.

He advises and represents clients from pre-litigation strategy through final verdict and on appeal. Moheeb has helped clients obtain favorable awards and outcomes at trial and in arbitrations involving claims of breach of contract, breach of warranty, construction, and design-professional malpractice. He is also a trained civil litigation mediator.

Beyond his legal practice, Moheeb also serves on the board of directors of Zaman International, which provides food, clothing, services and vocational support to marginalized women in Southeast Michigan and was also a long-time board member of The Institute for Social Policy and Understanding.

Honors & Awards

Benchmark Litigation, *Litigation Star* (2026)

Chambers USA Guide, *Insurance (Michigan) Band 1* (2024)

Michigan Lawyers Weekly, *Go-To Lawyers Power List* (2023)

DBusiness Top Lawyers (2024 – present)

Michigan Lawyers Weekly, *Go-To Lawyers for Business Law* (2023)

Oakland County Bar Association Committee of the Year Award (2023)

Best Lawyers® Lawyer of the Year, *Insurance Law* (Troy, MI: 2023)

DRI Lifetime Community Service Award (2019)

Inclusion in *The Best Lawyers in America*®: Insurance Law (2018 – present)

Oakland County Bar Association Distinguished Service Award (2017)

Oakland County Executive's Elite 40 Under 40 (2015)

Michigan Super Lawyers, *Rising Star* (2011-2015)

Michigan Super Lawyers, Top 100 (2023 – present)

Michigan Super Lawyers (2018 – present)

Michigan Lawyers Weekly, *Leader in the Law* (2014)

American Arab Professional of the Year Award in the Legal Category (2013)

Martindale Hubbel® AV Peer Review Rating

Professional Activities

American Arab Chamber of Commerce, *Professionals Committee*

American Bar Association, *Tort Trial and Insurance Practice and Litigation Sections, and Forum on Construction Law*

Defense Research Institute, *Life, Health and Disability Membership Subcommittee Co-Chair, Commercial Litigation and Construction Law Committees, and Former Editor of Life, Health, and Disability Newsletter*

Eastern District of Michigan Bar Association, *Complex Commercial Litigation Committee, and Sustaining Member*

Leadership Oakland Class LOXXVI, *Member*

Leading Lawyers, *Member, 2017-present*

Michigan Muslim Bar Association, *Former Vice President*

Michigan State Bar Foundation, *Fellow*

National Arab American Bar Association Michigan Chapter, *Member*

National Association of Minority & Women Owned Law Firms, *Insurance PAC Member and Chair (2009-2022)*

Oakland County Bar Association, *Board of Directors*

Oakland County Bar Association, *Membership Committee Former Co-Chair, Business Court and Counsel Committee, Former Co-Chair*

Oakland County Bar Foundation, *Fellow*

Ross School of Business Club of Southeast Michigan, *Life Member*

State Bar of Michigan, *Insurance Law and Litigation Sections, Former Member of the Professionalism & Civility Committee*

The Trial Network 2026 Executive Committee, *Officer at Large*

The Trial Network 2023 Program Review Committee, *Member*

5.2. Michigan Supreme Court Commissions Update

5.3. Staff Update

5.4. SBM Program Presentation - Lawyer Services

6. Representative Assembly Report

Presented by Nicole A. Evans

7. Young Lawyers Section Report

Presented by Jacob G. Eccleston

8. Public Policy

Presented by Erika L. Bryant

8.1. Court Rules*

Order

Michigan Supreme Court
Lansing, Michigan

November 26, 2025

Megan K. Cavanagh,
Chief Justice

ADM File No. 2025-03

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

Proposed Amendment of
Rule 1.111 of the Michigan
Court Rules

On order of the Court, this is to advise that the Court is considering an amendment of Rule 1.111 of the Michigan Court Rules. Before determining whether the proposal should be adopted, changed before adoption, or rejected, this notice is given to afford interested persons the opportunity to comment on the form or the merits of the proposal or to suggest alternatives. The Court welcomes the views of all. This matter will also be considered at a public hearing. The notices and agendas for each public hearing are posted on the [Public Administrative Hearings](#) page.

Publication of this proposal does not mean that the Court will issue an order on the subject, nor does it imply probable adoption of the proposal in its present form.

[Additions to the text are indicated in underlining and
deleted text is shown by strikeover.]

Rule 1.111 Foreign Language Interpreters

(A)-(E) [Unchanged.]

(F) Appointment of Foreign Language Interpreters

(1)-(3) [Unchanged.]

(4) Interpretation costs are at no charge to the individual receiving the services, and reimbursement to the court is prohibited. The court may set reasonable compensation for interpreters who are appointed by the court. Court-appointed interpreter costs are to be paid out of funds provided by law or by the court.

(5) ~~Except as otherwise provided in this subrule, if a party is financially able to pay for interpretation costs, the court may order the party to reimburse the court for all or a portion of interpretation costs. Reimbursement is prohibited in criminal cases.~~

(6)-(7) [Renumbered (5)-(6) but otherwise unchanged.]

(G)-(H) [Unchanged.]

Staff Comment (ADM File No. 2025-03): The proposed amendment of MCR 1.111 would expand free foreign language interpretation services to civil cases as suggested by several commenters on the Court’s initial proposal in this ADM file, which was adopted by the Court with some revisions. The initial proposal only contemplated free interpretation services in criminal cases. The Court is now interested in receiving additional comments regarding its proposal to expand free interpretation services to civil cases. Please note that subrule (F)(5), which would be struck under this proposal, reflects the version of subrule (F)(5) adopted by the Court in its initial proposal that becomes effective on January 1, 2026.

The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.

A copy of this order will be given to the Secretary of the State Bar and to the State Court Administrator so that they can make the notifications specified in MCR 1.201. Comments on the proposal may be submitted by March 1, 2026 by clicking on the “Comment on this Proposal” link under this proposal on the [Court’s Proposed & Adopted Orders on Administrative Matters](#) page. You may also submit a comment in writing at P.O. Box 30052, Lansing, MI 48909 or via email at ADMcomment@courts.mi.gov. When submitting a comment, please refer to ADM File No. 2025-03. Your comments and the comments of others will be posted under the chapter affected by this proposal.

ZAHRA, J., would have declined to publish the proposal for comment.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

November 26, 2025

Elizabeth Kingston-Miller
Clerk

Public Policy Position
ADM File No. 2025-03: Proposed Amendment of MCR 1.111

Support

Explanation

The Committee voted unanimously to support ADM File No. 2025-03.

Position Vote:

Voted for position: 16

Voted against position: 0

Abstained from vote: 0

Did not vote (absence): 5

Contact Persons:

Garrett Burton gburton@sado.org

Public Policy Position
ADM File No. 2025-03: Proposed Amendment of MCR 1.111

Support

Explanation

The Committee voted to support ADM File No. 2025-03.

Position Vote:

Voted For position: 23

Voted against position: 1

Abstained from vote: 0

Did not vote (absence): 7

Contact Person:

Marla Linderman Richelew mrichelew@gmail.com

Public Policy Position
ADM File No. 2025-03: Proposed Amendment of MCR 1.111

Support

Explanation

The Committee voted to support ADM File No. 2025-03.

Position Vote:

Voted For position: 16

Voted against position: 0

Abstained from vote: 0

Did not vote (absence): 4

Contact Person:

Ashley E. Lowe alow@lakeshorelegalaid.org

Comments Submitted to the Court on ADM File No. 2025-03

Name: Amanda Feltner

Date: 11/26/2025

Comment:

Please enact this. All people deserve the human dignity of understanding what is happening in court proceedings.

Name: Mary Hugler

Date: 11/27/2025

Comment:

In order to comprehend, what is going on people need someone to articulate in their own language

Name: Tyler Abbott

Date: 11/28/2025

Comment:

This amendment should pass. If civil proceedings are required by the state, and if every person in the United States has a right to legal representation, whether via a lawyer or themselves, the ability to communicate coherently and accurately is extremely important. One cannot achieve accurate representation of themselves in a civil setting without being able to communicate their side of things. In order to protect a persons right to fair representation, access to free interpretation services should absolutely be available to allow for the best and most honest outcomes in the rule of law. The burden of the cost of such services should not fall on the person in need of them if it is required to give them fair representation.

Name: Phyllis Peterson

Date: 11/28/2025

Comment:

Make foreign language interpretation available in civil cases.

Name: Colleen McInerney

Date: 11/28/2025

Comment:

This seems like a very good policy. I I were n civil court I would certainly like to understand everything that is going on. I imagine this would also benefit the opposing parties so that their cases can proceed.

Name: susan Julian

Date: 12/01/2025

Comment:

This reasonable rule assures that all can get equal access to court proceedings without bias to understanding English.

Name: Axel Mar

Date: 12/01/2025

Comment:

Yes, allow free foreign interpretation

Name: Dianne Slager

Date: 12/04/2025

Comment:

I support improving access in this manner

Name: anne soltysiak

Date: 12/04/2025

Comment:

Absolutely provide free foreign language interpretation services in civil cases. This should be obvious and non-controversial. People should understand what goes on in court proceedings.

Name: Kennedy

Date: 12/04/2025

Comment:

Please approve this, it is important for all

Name: Sandra Xenakis

Date: 12/04/2025

Comment:

There are many residents in MI whose first language is not English. It makes sense to have free interpretative services available for these people conducting civil business in court.

Name: Sarah Hopper

Date: 12/12/2025

Comment:

I support this amendment. To truly have a fair chance in court, a person must be able to understand what is happening. Michigan should support all of its residents, regardless of first language.

Name: Holli Porter

Date: 12/15/2025

Comment:

I am in full support of this amendment. It is unfair to subject people to legal proceedings without ensuring that they understand their rights and obligations. I fully support providing interpreters to anyone who wants them.

Name: Shea PoteBarbara Pote

Date: 12/22/2025

Comment:

Court proceedings are complicated enough - interpreters should be provided to those who have trouble with English

Name: Carol Schroeder

Date: 12/22/2025

Comment:

We are a land of immigrants and we need to remember that people seeking asylum are entitled to due process which may mean an interpreter given to them.

Name: Eunice Benavidez
Date: 12/22/2025
Comment:
In favor of the proposed amendment.

Name: Suzanne
Date: 12/22/2025
Comment:
This service should absolutely be adopted. Everyone has the right to understand what's happening to them.

Name: Stacey Carson
Date: 12/22/2025
Comment:
This should be passed. No one should be in a situation that they can't understand what is happening to them and what their rights are. That's unjust.

Name: Toni
Date: 12/22/2025
Comment:
Yes. All people should be able to understand court proceedings

Name: AnneMarie Slater
Date: 12/23/2025
Comment:
Considering immigration issues are addressed in civil court, free and high quality language and interpretation services should be available to anyone who needs them. Failing to do so would be a sinister manipulation of the system to further oppress our immigrant neighbors.

Name: Meg leblanc
Date: 12/28/2025
Comment:
Yes please!

January 13, 2026

Clerk, Michigan Supreme Court
925 W. Ottawa St.
Lansing, MI 48915
Submitted electronically

Re: Comment on ADM File No. 2025-03 regarding Michigan Court Rule 1.111

Dear Supreme Court Clerk,

The Michigan Legal Help Program (MLH) submits these comments on the proposed amendments to Michigan Court Rule 1.111 regarding interpreters. *This comment is largely the same as our July 31, 2025 comment regarding the criminal interpreter rule. We are resubmitting this comment to commend the court for adopting the rule to eliminate interpreting fees in criminal cases, and to reiterate our support for eliminating fees in civil cases.*

The now-adopted amendment that eliminates fees for interpreters in criminal cases recognizes that requiring criminal defendants to pay interpreter costs creates a significant barrier to participation in the justice system. This principle also applies in civil proceedings, where Limited English Proficient (LEP) individuals face life-altering consequences including loss of housing, child custody, protection from domestic violence, and other critical rights. Just as in criminal cases, imposing interpreter fees in civil matters may discourage LEP individuals from requesting necessary language assistance, potentially undermining the fairness and efficacy of judicial proceedings.

MLH supports self-represented litigants throughout Michigan, providing critical legal information, tools, and referrals to individuals navigating the court system without attorneys. Nationally, courts estimate that 75% or more of cases in state court have at least one self-represented party.¹ LEP individuals among this population are disproportionately likely to have lower incomes, making them particularly vulnerable to interpreter fees.² When self-represented LEP litigants cannot predict or afford interpreter costs, they may be forced to choose between risking unknown financial liability and attempting to navigate proceedings without language assistance. This creates an unacceptable barrier that undermines both individual rights and the integrity of the judicial process itself.

Interpreters serve the integrity of the entire judicial process. Michigan Court Rule 1.111(C) recognizes this in allowing courts to prohibit the waiver of interpreter services when such services are “required for the protection of the person’s rights and the integrity of the case or court proceeding.” Courts should therefore not place the financial burden on the LEP litigant to bear the cost of ensuring that the judicial process is carried out in a fair and accurate manner.

Michigan remains in the company of a dwindling number of states that still allow interpreter costs to be passed on to the litigant in civil cases. Thirty-five states currently have (or have passed) laws, policies,

¹ Self-Represented Litigation Network, *SRLN Brief: How Many SRLs?* (2019)

² Zong and Batalova, *The Limited English Proficient Population in the United States in 2013*, (2015) (“In 2013, about 25 percent of LEP individuals lived in households with an annual income below the official federal poverty line—nearly twice as high as the share of English-proficient persons (14 percent).”).

or guidelines that provide for free interpreter services in civil proceedings, recognizing that meaningful access to justice cannot depend on one's ability to pay for language assistance.³ Michigan should join these jurisdictions in ensuring equal access in civil cases, consistent with both principles of fairness and the federal civil rights protections established by Title VI of the Civil Rights Act of 1964.

Respectfully submitted,

Nora Ryan
Director, Michigan Legal Help

Kim Cramer
Senior Staff Attorney, Michigan Legal Help

Research support from Elsa Armstrong
Summer Law Clerk, Michigan Legal Help

³ See (bold emphasis added to highlight the states involved) **Alaska**, Alas R Ct 6(b); **Arizona**, see Az Sup Ct AO 2011-96, see also Ariz Judicial Branch, *Self-Service Center: Language Access*; **California**, Cal Evid Code 756; **Colorado**, Colo Sup Ct Chief Justice Directive 06-03 (Amended 2023), II.A.; **Connecticut**, Conn Judicial Branch Policy Statement Regarding Limited English Proficiency; see also, State of Conn Judicial Branch, *Language Access Plan* (2023), p 9; **Delaware**, see Del Judiciary, *Language Access Plan* (2021), p 9; **Georgia**, R for Legal Interpreting in the State of Ga, R 5-9; **Hawaii**, Hawaii Judiciary Policy #12, see also Hawaii State Judiciary, *Language Access Plan for Persons with Limited English Proficiency* (2022), p10, created pursuant to Hawaii Revised Statutes (HRS), Chapter 321C; **Idaho**, Idaho Ct Admin R 52(h); **Illinois**, IL Sup Ct, *Language Access Policy* (2016), p 7; **Kansas**, Kan Stat 75-4352; **Kentucky**, Ky Ct of Justice Admin P IX, sec 7; **Louisiana**, La Sup Ct R pt G Sec 14(B)(3); **Maine**, Me Judicial Branch, *Language Access Plan* (2022), p 18; **Maryland**, Md R 1-333(b)(2); **Massachusetts**, Mass Trial Ct, *Language Access Plan* (2014), p 4; **Minnesota**, Minn Stat 480.182; **Mississippi**, Miss Code Ann 9-21-81(2); **Missouri**, Mo Rev St 476.806 (effective August 28, 2025); **Montana**, Mont Judicial Branch Admin Policy 890, 9.1 (2010); **Nebraska**, Neb Rev Stat 25-2406; **New Hampshire**, NH Judicial Branch, *Language Access Plan* (2023), p 14; **New Jersey**, NJ Judiciary, *Language Access Plan* (2023), p 11; **New Mexico**, NM Judiciary, *Language Access Plan* (2017), p 10; **New York**, NY Trial Ct R 217.1; **North Carolina**, NC Judicial Branch, *Standards for Language Access Services*, p 25; **Oklahoma** MOU Between US and Okla Admin Office of Ct (2023); **Oregon**, Or Rev Stat 45.275(2); **Pennsylvania**, The Unified Judicial System of Pa, *Language Access Plan*, p 5; **Rhode Island**, RI Sup Ct R Civ P 1(H)(2); **South Dakota**, SD Unified Judicial System, *Language Access Plan* (2023), p 6; **Tennessee**, Tenn Sup Ct R 42 Sec 7; **Vermont**, VT Judiciary, *Language Access Plan* (2017), p 3; **Virginia**, See Sup Ct of Va, *Va Language Access Plan Manual*, p 61; **Washington**, Wa Cts, *Deskbook on Language Access in Wa Cts* (2017), p 14; **West Virginia**, WV Judiciary, *Access to Justice*.



Order

Michigan Supreme Court
Lansing, Michigan

October 22, 2025

Megan K. Cavanagh,
Chief Justice

ADM File No. 2022-31

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

Proposed Amendment of
Rule 2.106 of the Michigan
Court Rules

On order of the Court, this is to advise that the Court is considering an amendment of Rule 2.106 of the Michigan Court Rules. Before determining whether the proposal should be adopted, changed before adoption, or rejected, this notice is given to afford interested persons the opportunity to comment on the form or the merits of the proposal or to suggest alternatives. The Court welcomes the views of all. This matter will also be considered at a public hearing. The notices and agendas for each public hearing are posted on the [Public Administrative Hearings](#) page.

Publication of this proposal does not mean that the Court will issue an order on the subject, nor does it imply probable adoption of the proposal in its present form.

[Additions to the text are indicated in underlining and
deleted text is shown by strikeover.]

Rule 2.106 Notice by Posting or Publication

(A)-(E) [Unchanged.]

(F) Newspaper Defined.

- (1) The term “newspaper” as used in this rule means a print publication~~is limited to a newspaper~~ published in the English language for the dissemination of local news of a general character~~general news and information~~ or for the dissemination of legal news, to which all of the following apply:
 - (a) There is~~The newspaper must have~~ a bona fide list of paying subscribers to the publication or the publication has~~or have been~~ published at least once a week in the same community without interruption for at least 2 years;
 - (b) The publication has~~and have been published and of general circulation~~ at not less than weekly intervals~~established, published, and circulated~~ at least once a week without interruption for at least 1 year in the county where publication is to occur. A newspaper shall not lose

eligibility for interruption of continuous publication due to any of the following:

- (i) An act of God.
- (ii) Labor disputes.
- (iii) The COVID-19 pandemic, for the period beginning March 10, 2020 through the end of the COVID-19 pandemic.
- (iv) Military service of the publisher for a period not to exceed 2 years and provided the publication is resumed within 6 months following the termination of such military service.
- (c) The publication annually averages at least 25% news and editorial content per issue.
- (d) The publication must offer a print and website version. During the full publication period, any notice must appear in the publication's print and website versions and be placed on the website established and maintained by a state association of newspapers that represents a majority of newspapers in this state as a central repository for notices.

(2) [Unchanged.]

(G) [Unchanged.]

Staff Comment (ADM File No. 2022-31): The proposed amendment of MCR 2.106 would update the definition of “newspaper” for notice by publication. See MCL 691.1051.

The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.

A copy of this order will be given to the Secretary of the State Bar and to the State Court Administrator so that they can make the notifications specified in MCR 1.201. Comments on the proposal may be submitted by February 1, 2026 by clicking on the “Comment on this Proposal” link under this proposal on the [Court’s Proposed & Adopted Orders on Administrative Matters](#) page. You may also submit a comment in writing at P.O. Box 30052, Lansing, MI 48909 or via email at ADMcomment@courts.mi.gov. When

filing a comment, please refer to ADM File No. 2022-31. Your comments and the comments of others will be posted under the chapter affected by this proposal.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

October 22, 2025

Elizabeth Kingston-Miller
Clerk

Public Policy Position
ADM File No. 2022-31: Proposed Amendment of MCR 2.106

Support

Explanation

The Committee voted unanimously to support ADM File No. 2022-31.

Position Vote:

Voted For position: 16

Voted against position: 0

Abstained from vote: 0

Did not vote (absence): 5

Contact Persons:

Garrett Burton gburton@sado.org

Public Policy Position
ADM File No. 2022-31: Proposed Amendment of MCR 2.106

Support

Explanation

The Committee voted to support ADM File No. 2022-31.

Position Vote:

Voted For position: 25

Voted against position: 0

Abstained from vote: 1

Did not vote (absence): 5

Contact Person:

Marla Linderman Richelew mrichelew@gmail.com

Public Policy Position
ADM File No. 2022-31: Proposed Amendment of MCR 2.106

Support

Position Vote:

Voted for position: 18

Voted against position: 0

Abstained from vote: 0

Did not vote: 0

Contact Person: David Barberi

Email: drbarberi@barberilawfirm.com

Public Policy Position
ADM File No. 2022-31: Proposed Amendment of MCR 2.106

Support

Position Vote:

Voted for position: 19

Voted against position: 0

Abstained from vote: 0

Did not vote: 4

Contact Person: Melisa M.W. Mysliwec

Email: Melisa.Mysliwec@btlaw.com

Name: Richard A Golden

Date: 10/27/2025

ADM File Number: 2022-31

Comment:

Michigan should allow publication on-line as is now permitted in Virginia (Va.Code 8.01-324). The following is a snip-and-past from that statute:

. Whenever any ordinance, resolution, notice, or advertisement is required by law to be published in a newspaper, such ordinance, resolution, notice, or advertisement may be published in an online-only news publication in lieu of publication in a newspaper. Such online-only news publication shall:

1. Employ local news staff;
2. Have been in business for at least two years with a Virginia State Corporation Commission entity registration;
3. Have its own dedicated and registered domain name;
4. Be published exclusively online;
5. Publish regularly updated general news coverage of the area in which the notice is required to be published;
6. Have published at least once per week for at least 50 out of the preceding 52 weeks;
7. Have a clear and easily found link to the public notice section on its website homepage;
8. Allow, if such online-only news publication requires that users pay for other content on the website, any user to access public notices free of any charge;
9. Allow for search engine accessibility and optimization and the ability to be indexed by search engines; and
10. Post the complete notice on a searchable statewide repository website, established and maintained as a joint venture of the majority of newspapers in the Commonwealth as a repository for such notices. Such notices shall remain on such repository website for at least three years.

Received

NOV 05 2025

SHELDON G. LARKY
2100 RHINE ROAD
WEST BLOOMFIELD MI 48323-3065
(248) 642-4660
FAX (248) 939-8008

State Court Administrative Office

Wednesday, October 29, 2025

State Court Administrator
Michigan Supreme Court
P.O. Box 30052
Lansing, Michigan 48909

re: *ADM File No. 2022-31*


Dear Administrator:

The proposed amendments to MCR 2.106 should be adopted.

Expanding publication possibilities is good. In addition, having a central repository where public notices can be viewed is a great idea. A central repository will make it easy for people to view information which may affect them, their families, their livelihoods, and their businesses.

Thank you for allowing me to communicate my thoughts.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Sheldon G. Larky', written in a cursive style.

Sheldon G. Larky

SGL:s

From: phil@philmoilanen.com
To: ADMcomment
Cc: "Moilanen Philip"
Subject: ADM 2022-31
Date: Thursday, November 20, 2025 3:26:20 PM

Dear Justices of the Supreme Court,

My comment on the proposed amendment is an objection to a portion of 2.106(F)(1)(d).

As proposed, the subsection reads:

*(d) The publication must offer a print and website version. During the full publication period, any notice must appear in the publication's print and website versions **and be placed on the website established and maintained by a state association of newspapers that represents a majority of newspapers in this state as a central repository for notices.***

The last clause requiring the newspaper to have access to a state association of newspapers website is only legitimate if such access is free and membership in the state association is not mandatory in order to place the notice on the website. Otherwise the rule will impose a burden on legitimate newspapers that may disagree with having to associate with others for whatever reason, violating the right of free speech and free association.

If the goal is to maintain a neutral central registry of all published notices, that should be accomplished by other means, such as the Court or departments of the state government creating and maintaining one.

Sincerely,

Philip Moilanen

P17874

404 S. Jackson St.

Jackson, MI 49201

CONFIDENTIAL DOCUMENT

This message contains information that is confidential and exempt from disclosure. It is intended to be read and for use only by the person to whom it is addressed. If you have received this message in error, please (1) do not forward or use this information in any way and (2) contact me immediately. Thank you. Philip M. Moilanen, 404 S. Jackson Street, Jackson, MI 49201. 517-788-8500; 517-745-1064 cell; email: phil@philmoilanen.com; www.philmoilanen.com

Order

Michigan Supreme Court
Lansing, Michigan

October 1, 2025

Megan K. Cavanagh,
Chief Justice

ADM File No. 2022-34

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

Proposed Amendment of
Rule 3.992 of the Michigan
Court Rules

On order of the Court, this is to advise that the Court is considering an amendment of Rule 3.992 of the Michigan Court Rules. Before determining whether the proposal should be adopted, changed before adoption, or rejected, this notice is given to afford interested persons the opportunity to comment on the form or the merits of the proposal or to suggest alternatives. The Court welcomes the views of all. This matter will also be considered at a public hearing. The notices and agendas for each public hearing are posted on the [Public Administrative Hearings](#) page.

Publication of this proposal does not mean that the Court will issue an order on the subject, nor does it imply probable adoption of the proposal in its present form.

[Additions to the text are indicated in underlining and
deleted text is shown by strikeover.]

Rule 3.992 Rehearings; New Trial

- (A) ~~Time and Grounds~~. Except for the case of a juvenile tried as an adult in the family division of the circuit court for a criminal offense, and except for a case in which parental rights are terminated, a party may seek a rehearing or new trial by filing a written motion stating the basis for the relief sought within 21 days after the date of the order resulting from the hearing or trial. In a case that involves termination of parental rights, a motion for new trial, rehearing, reconsideration, or other postjudgment relief shall be filed within 14 days after the date of the order terminating parental rights. The court may entertain an untimely motion for good cause shown.
- (B) Grounds. Except for a motion that seeks relief from an order entered pursuant to MCR 3.991(A)(3), ~~a~~A motion will not be considered unless it presents a matter not previously presented to the court, or presented, but not previously considered by the court, which, if true, would cause the court to reconsider the case. A motion that seeks relief from an order entered pursuant to MCR 3.991(A)(3) must be considered.

(B)-(F) [Relettered (C)-(G) but otherwise unchanged.]

Staff Comment (ADM File No. 2022-34): The proposed amendment of MCR 3.992 would require courts to consider a motion for postjudgment relief when the underlying order was entered following a referee’s recommendation and before the time for filing for judicial review under MCR 3.991 has elapsed. See MCR 3.991(A)(3).

The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.

A copy of this order will be given to the Secretary of the State Bar and to the State Court Administrator so that they can make the notifications specified in MCR 1.201. Comments on the proposal may be submitted by February 1, 2026 by clicking on the “Comment on this Proposal” link under this proposal on the [Court’s Proposed & Adopted Orders on Administrative Matters](#) page. You may also submit a comment in writing at P.O. Box 30052, Lansing, MI 48909 or via email at ADMcomment@courts.mi.gov. When submitting a comment, please refer to ADM File No. 2022-34. Your comments and the comments of others will be posted under the chapter affected by this proposal.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

October 1, 2025

Elizabeth Kingston-Miller
Clerk

Public Policy Position
ADM File No. 2022-34: Proposed Amendment of MCR 3.992

Support with Amendment

Explanation

The Committee shared the concerns raised by the Children's Law Section that the language proposed in ADM File No. 2022-34 was somewhat confusing and voted unanimously to support the amended language proposed by that Section:

Except as otherwise stated in this subrule, a motion will not be considered unless it presents a matter not previously presented to the court, or presented, but not previously considered by the court, which, if true, would cause the court to reconsider the case. A motion that seeks relief from an order entered pursuant to MCR 3.991(A)(3) must be considered regardless of whether the matters it presents were previously presented to or considered by the court.

Position Vote:

Voted For position: 17

Voted against position: 0

Abstained from vote: 0

Did not vote (absence): 4

Contact Persons:

Garrett Burton

gburton@sado.org

Public Policy Position
ADM File No. 2022-34: Proposed Amendment of MCR 3.992

Support with Amendment

Explanation

The Committee voted unanimously to support ADM File No. 2022-34 with the amended language proposed by the Children's Law Section and additional clarifying language indicated below:

Except as otherwise stated in this subrule, a motion will not be considered unless it presents a matter not previously presented to the court, or presented, but not previously considered by the court, which, if true, would cause the court to reconsider the case. A motion that seeks relief from an order entered early by the judge pursuant to MCR 3.991(A)(3) must be considered regardless of whether the matters it presents were previously presented to or considered by the court.

Position Vote:

Voted For position: 26

Voted against position: 0

Abstained from vote: 0

Did not vote (absence): 5

Contact Person:

Marla Linderman Richelew mrichelew@gmail.com

Public Policy Position
ADM File No. 2022-34: Proposed Amendment of MCR 3.992

Support with Amendment

Explanation:

The Committee voted unanimously to support the amended language proposed by the Children's Law Section and supported by the Access to Justice Policy Committee:

Except as otherwise stated in this subrule, a motion will not be considered unless it presents a matter not previously presented to the court, or presented, but not previously considered by the court, which, if true, would cause the court to reconsider the case. A motion that seeks relief from an order entered pursuant to MCR 3.991(A)(3) must be considered regardless of whether the matters it presents were previously presented to or considered by the court.

Position Vote:

Voted For position: 18

Voted against position: 0

Abstained from vote: 0

Did not vote (absent): 3

Contact Persons:

Alexandria L. Casperson

CaspersonA@michigan.gov

John A. Shea

jashea@earthlink.net

Public Policy Position
ADM File No. 2022-34: Proposed Amendment of MCR 3.992

Support with Recommended Amendments

Explanation

The Children's Law Section Council supports ADM File No 2022-34 with recommended amendments. The Council had previously suggested that the Court amend MCR 3.992 due to its overly restrictive language regarding motions for rehearing. The Council supports the Court's amendments to MCR 3.992 but found that language to be somewhat confusing. The Council suggests that the new MCR 3.992(B) be amended for clarity to read as follows:

"Except as otherwise stated in this subrule, a motion will not be considered unless it presents a matter not previously presented to the court, or presented, but not previously considered by the court, which, if true, would cause the court to reconsider the case. A motion that seeks relief from an order entered pursuant to MCR 3.991(A)(3) must be considered regardless of whether the matters it presents were previously presented to or considered by the court."

Position Vote:

Voted for position: 11

Voted against position: 0

Abstained from vote: 2

Did not vote: 6

Contact Person: Joshua Pease

Email: jpease@sado.org

Public Policy Position
ADM File No. 2022-34: Proposed Amendment of MCR 3.992

Support

Position Vote:

Voted for position: 18

Voted against position: 0

Abstained from vote: 0

Did not vote: 0

Contact Person: David Barberi

Email: drbarberi@barberilawfirm.com

Order

Michigan Supreme Court
Lansing, Michigan

October 22, 2025

Megan K. Cavanagh,
Chief Justice

ADM File No. 2023-09

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

Proposed Amendment of
Rule 6.106 of the Michigan
Court Rules

On order of the Court, this is to advise that the Court is considering an amendment of Rule 6.106 of the Michigan Court Rules. Before determining whether the proposal should be adopted, changed before adoption, or rejected, this notice is given to afford interested persons the opportunity to comment on the form or the merits of the proposal or to suggest alternatives. The Court welcomes the views of all. This matter will also be considered at a public hearing. The notices and agendas for each public hearing are posted on the [Public Administrative Hearings](#) page.

Publication of this proposal does not mean that the Court will issue an order on the subject, nor does it imply probable adoption of the proposal in its present form.

[Additions to the text are indicated in underlining and
deleted text is shown by strikeover.]

Rule 6.106 Pretrial Release

(A)-(H) [Unchanged.]

(I) Termination of Release Order.

- (1) Except as otherwise provided in this subrule, if the conditions of the release order are met and the defendant is discharged from all obligations in the case, the court must vacate the release order, discharge anyone who has posted bail or bond, and, return the cash (or its equivalent) posted in the full amount of the bail, or, if there has been a deposit of 10 percent of the full bail amount for a crime governed by MCL 780.66, return 90 percent of the deposited money and retain 10 percent. If the accused deposited 10 percent of the full bail amount for a crime governed by MCL 780.66, is discharged from all obligations in the case, and has not been convicted of the charged crime, the court must return to the defendant the entire deposited amount.

(2)-(3) [Unchanged.]

Staff Comment (ADM File No. 2023-09): The proposed amendment of MCR 6.106 would align the rule with MCL 780.66(6), which addresses the return of deposited percent bonds.

The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.

A copy of this order will be given to the Secretary of the State Bar and to the State Court Administrator so that they can make the notifications specified in MCR 1.201. Comments on the proposal may be submitted by February 1, 2026 by clicking on the “Comment on this Proposal” link under this proposal on the [Court’s Proposed & Adopted Orders on Administrative Matters](#) page. You may also submit a comment in writing at P.O. Box 30052, Lansing, MI 48909 or via email at ADMcomment@courts.mi.gov. When submitting a comment, please refer to ADM File No. 2023-09. Your comments and the comments of others will be posted under the chapter affected by this proposal.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

October 22, 2025

Elizabeth Kingston-Miller
Clerk

Public Policy Position
ADM File No. 2023-09: Proposed Amendment of MCR 6.106

Support with Amendment

Explanation

The Committee voted unanimously to support ADM File No. 2023-09 with a further amendment to clarify the last sentence of MCR 6.106(I)(1) as follows:

However, if the accused is discharged from all obligations in the case and has not been convicted of the charged crime, the court must return to the accused the entire deposited amount.

“Defendant” is changed to “accused” for consistency with MCL 780.66 and because an individual could receive an interim bond under MCL 780.581 before being charged as a “defendant.”

Position Vote:

Voted For position: 17

Voted against position: 0

Abstained from vote: 0

Did not vote (absence): 4

Contact Persons:

Garrett Burton gburton@sado.org

Public Policy Position
ADM File No. 2023-09: Proposed Amendment of MCR 6.106

Support with Amendment

Explanation:

The Committee voted unanimously to support ADM File No. 2023-09 with a further amendment to clarify the last sentence of MCR 6.106(I)(1) as follows:

However, if the accused is discharged from all obligations in the case and has not been *convicted in the charged case whether public or under seal, has not received assignment under HYTA, is not under a delayed sentence and has not been assigned to specialty court, the court must return to the accused the entire* deposited amount.

Position Vote:

Voted For position: 18

Voted against position: 0

Abstained from vote: 0

Did not vote (absent): 3

Contact Persons:

Alexandria L. Casperson

CaspersonA@michigan.gov

John A. Shea

jashea@earthlink.net

Public Policy Position
ADM File No. 2023-09: Proposed Amendment of MCR 6.106

Support

Position Vote:

Voted for position: 18

Voted against position: 0

Abstained from vote: 0

Did not vote: 0

Contact Person: David Barberi

Email: drbarberi@barberilawfirm.com

From: Matthew Sawicki
To: ADMcomment
Subject: ADM File No. 2023-09
Date: Wednesday, December 17, 2025 4:05:09 PM
Attachments: [image001.png](#)

You don't often get email from msawicki@redfordtwp.gov. [Learn why this is important](#)

EXTERNAL EMAIL

In regards to the proposed amendment of Rule 6.106 of the Michigan Court Rules regarding Pretrial Release, I am offering this comment opposed to the changes for a number of reasons. First, eliminating the court's ability to retain 10% of a 10% bond will cause courts to not issue these type of bonds and instead require defendants to post bond in full. For example, if a district court judge orders bond set in the amount of \$5000 or 10%, meaning the defendant only is required to post \$500.00, then the court will simply start ordering \$5000.00 bonds with no 10%, resulting in more individuals being retained in custody. The second reason I am opposed to this amendment is due to the accounting issues this change will cause. Currently, when a clerk accepts a 10% bond the amount withheld is kept by the court and transferred to the funding unit at the end of each month. Many times a case is not resolved within thirty days, so if the withheld portion of a 10% bond is to be returned to a defendant, the court will be required to create a "void" in the case management system and order a check from the court's general account to issue to the poster. Since withheld funds may have already been remitted to the funding unit, these checks created for the defendant may cause accounting issues. Finally, I oppose this amendment because the steps the clerk must take when a defendant posts bond are costly to the court from clerical time to costs associated with maintaining a trust account for bonds. The 10% provision has always been a way for the court to recover some of the associated costs. The argument can be made that despite a dismissal or a not guilty finding for a defendant, there was still probable cause to charge the defendant, so the 10% provision was valid despite the outcome. For these reasons I oppose the proposed amendment to Court Rule 6.106.

As a point of clarification, I would also like to point out that some Police Departments/Jails charge an administrative fee for a defendant to post an interim bond, where a local court and a local police department have interim bond orders in place. It should be clear that these administrative fees are not required to be returned as they are not ordered by the court and they are not a court requirement.

Thank you for your consideration.

Sincerely,



Matthew Sawicki
Court Administrator
17th District Court
15111 Beech Daly
Redford, MI 48239
(313) 387-2794
www.redfordtwp.gov/263/17th-District-Court

Order

Michigan Supreme Court
Lansing, Michigan

October 22, 2025

Megan K. Cavanagh,
Chief Justice

ADM File No. 2024-10

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

Proposed Amendment of
Rule 6.429 of the Michigan
Court Rules

On order of the Court, this is to advise that the Court is considering an amendment of Rule 6.429 of the Michigan Court Rules. Before determining whether the proposal should be adopted, changed before adoption, or rejected, this notice is given to afford interested persons the opportunity to comment on the form or the merits of the proposal or to suggest alternatives. The Court welcomes the views of all. This matter will also be considered at a public hearing. The notices and agendas for each public hearing are posted on the [Public Administrative Hearings](#) page.

Publication of this proposal does not mean that the Court will issue an order on the subject, nor does it imply probable adoption of the proposal in its present form.

[Additions to the text are indicated in underlining and
deleted text is shown by strikeover.]

Rule 6.429 Correction and Appeal of Sentence

(A) Authority to Modify Sentence. The court may correct an invalid sentence, on its own initiative ~~after giving the parties an opportunity to be heard~~, or on motion by either party. Any correction of an invalid sentence on the court's own initiative must occur after giving the parties an opportunity to be heard and within 6 months of the entry of the judgment of conviction and sentence. Any objection to the corrected sentence must be presented to the court at the time that the court provides an opportunity to be heard. ~~But~~ The court may not modify a valid sentence after it has been imposed except as provided by law. ~~Any correction of an invalid sentence on the court's own initiative must occur within 6 months of the entry of the judgment of conviction and sentence.~~

(B)-(C) [Unchanged.]

Staff Comment (ADM File No. 2024-10): The proposed amendment of MCR 6.429 would reorganize and update the rule to clarify that a court must afford parties an opportunity to object to its sua sponte correction of a Judgment of Sentence and that the parties must raise any objections when that opportunity is provided.

The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.

A copy of this order will be given to the Secretary of the State Bar and to the State Court Administrator so that they can make the notifications specified in MCR 1.201. Comments on the proposal may be submitted by February 1, 2026 by clicking on the “Comment on this Proposal” link under this proposal on the [Court’s Proposed & Adopted Orders on Administrative Matters](#) page. You may also submit a comment in writing at P.O. Box 30052, Lansing, MI 48909 or via email at ADMcomment@courts.mi.gov. When submitting a comment, please refer to ADM File No. 2024-10. Your comments and the comments of others will be posted under the chapter affected by this proposal.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

October 22, 2025

Elizabeth Kingston-Miller
Clerk

Public Policy Position
ADM File No. 2024-10: Proposed Amendment of MCR 6.429

Support with Amendment

Explanation

The Committee voted unanimously to support ADM File No. 2024-10 with further amendments to MCR 6.429(A) to read:

~~Any~~ **An** objection to the corrected sentence ~~must~~ **may, but need not,** be presented to the court at the time that the court provides an opportunity to be heard.

The Committee believes that the amendment should provide counsel with an opportunity for objections at the opportunity to be heard provided in the proposed amendment to MCR 6.429, but was concerned that the language published for comment could be read to foreclose or limit the opportunity to raise such objections elsewhere (e.g., on appeal).

Position Vote:

Voted For position: 15

Voted against position: 0

Abstained from vote: 1

Did not vote (absence): 5

Contact Persons:

Garrett Burton gburton@sado.org

Public Policy Position
ADM File No. 2024-10: Proposed Amendment of MCR 6.429

Support with Amendment

Explanation:

The Committee voted unanimously to support ADM File No. 2024-10 with further amendments to MCR 6.429(A) to read:

Any correction of an invalid sentence on the court's own initiative must occur after a hearing giving the parties an opportunity to be heard and within 6 months of the entry of the judgment of conviction and sentence. ~~Any objection to the corrected sentence must be presented to the court at the time that the court provides an opportunity to be heard.~~

Position Vote:

Voted For position: 19

Voted against position: 0

Abstained from vote: 0

Did not vote (absent): 2

Contact Persons:

Alexandria L. Casperson

CaspersonA@michigan.gov

John A. Shea

jashea@earthlink.net

Public Policy Position
ADM File No. 2024-10: Proposed Amendment of MCR 6.429

Support

Position Vote:

Voted for position: 17

Voted against position: 0

Abstained from vote: 1

Did not vote: 0

Contact Person: David Barberi

Email: drbarberi@barberilawfirm.com

Order

Michigan Supreme Court
Lansing, Michigan

October 22, 2025

Megan K. Cavanagh,
Chief Justice

ADM File No. 2024-02

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

Proposed Amendment of
Rule 7.215 of the Michigan
Court Rules

On order of the Court, this is to advise that the Court is considering an amendment of Rule 7.215 of the Michigan Court Rules. Before determining whether the proposal should be adopted, changed before adoption, or rejected, this notice is given to afford interested persons the opportunity to comment on the form or the merits of the proposal or to suggest alternatives. The Court welcomes the views of all. This matter will also be considered at a public hearing. The notices and agendas for each public hearing are posted on the [Public Administrative Hearings](#) page.

Publication of this proposal does not mean that the Court will issue an order on the subject, nor does it imply probable adoption of the proposal in its present form.

[Additions to the text are indicated in underlining and
deleted text is shown by strikeover.]

Rule 7.215 Opinions, Orders, Judgments, and Final Process for Court of Appeals

(A)-(G) [Unchanged.]

(H) Certain Dispositive Orders and Opinions ~~in Criminal Cases;~~

(1) [Numbered but otherwise unchanged.]

(2) Remand With Retained Jurisdiction. If the Court of Appeals remands a case to the trial court and retains jurisdiction, the Court of Appeals will review the decisions made by the trial court during the remand proceedings and consider any remaining issues in the appeal in the same Court of Appeals case. The parties and the trial court must not initiate a new appeal from an order entered on remand within the scope of this appeal.

Unless the Court of Appeals states a different time, the appellant must:

(a) initiate the proceedings in the trial court within 21 days of the Court's opinion.

- (b) file with the Court of Appeals all orders entered on remand within seven days of entry by the trial court.
- (c) ensure the transcripts of all proceedings on remand are filed in the trial court and the Court of Appeals within 21 days after completion of the proceedings.

In a criminal or termination of parental rights case, the appellant may file a supplemental brief addressing issues resulting from the remand proceedings within 21 days after the trial court's decision or after the filing of the transcript of the remand proceedings in the trial court, whichever is later. If the appellant does not file a supplemental brief, the appellee may file a supplemental brief within 21 days after appellant's time for filing has run. A responsive brief may be filed within 14 days of service of the supplemental brief.

In all other cases, the parties may move for leave to file supplemental briefs after the proceedings on remand have concluded.

The parties may request oral argument in their supplemental briefs. The Court of Appeals retains discretion to grant or deny requests for oral argument.

(I)-(J) [Unchanged.]

Staff Comment (ADM File No. 2024-02): The proposed amendment of MCR 7.215 would clarify that in cases where the Court of Appeals remands a case to the trial court, the Court of Appeals will review the decisions made on remand, and in criminal and termination of parental rights cases, the parties are afforded the right to supplemental briefing.

The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.

A copy of this order will be given to the Secretary of the State Bar and to the State Court Administrator so that they can make the notifications specified in MCR 1.201. Comments on the proposal may be submitted by February 1, 2026 by clicking on the "Comment on this Proposal" link under this proposal on the [Court's Proposed & Adopted Orders on Administrative Matters](#) page. You may also submit a comment in writing at P.O. Box 30052, Lansing, MI 48909 or via email at ADMcomment@courts.mi.gov. When

submitting a comment, please refer to ADM File No. 2024-02. Your comments and the comments of others will be posted under the chapter affected by this proposal.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

October 22, 2025

Elizabeth Kingston-Miller
Clerk

Public Policy Position
ADM File No. 2024-02: Proposed Amendment of MCR 7.215

Support with Amendment

Explanation

The Committee voted unanimously to support ADM File No. 2024-02 with further amendments to: (1) change the filing requirement of the trial court's decision from within seven-days of *entry* to within seven-days of *receipt*; (2) change the transcript filing requirement to place the burden on the court reporter instead of the appellant; and (3) add juvenile delinquency cases, alongside criminal and termination of parental rights cases in the proposed third paragraph of MCR 7.215(H).

Position Vote:

Voted For position: 16

Voted against position: 0

Abstained from vote: 0

Did not vote (absence): 5

Contact Persons:

Garrett Burton gburton@sado.org

Public Policy Position
ADM File No. 2024-02: Proposed Amendment of MCR 7.215

Support with Amendment

Explanation

The Committee voted unanimously to support ADM File No. 2024-02 with further amendments proposed by the Criminal Jurisprudence & Practice Committee to:

- (1) Amend MCR 7.215(H)(2)(b) to read: “file with the Court of Appeals all orders entered on remand within seven days of ~~entry by the trial court~~ **receipt by the party.**”
- (2) Amend MCR 7.215(H)(2)(c) to read: “ensure the transcripts of all proceedings on remand are filed in the trial court and the Court of Appeals within ~~21~~ **seven** days **of the receipt of the transcript by the party** ~~after completion of the proceedings.~~”

The Committee also voted to recommend that all appellants be permitted to file supplemental briefs, as provided for in the third paragraph of ADM File No. 2024-02, as opposed to limiting such briefs to criminal or termination of parental rights cases (as published for comment), or juvenile delinquency cases (as recommended by the ATJ Policy Committee).

Position Vote:

Voted For position: 25

Voted against position: 0

Abstained from vote: 1

Did not vote (absence): 5

Contact Person:

Marla Linderman Richelew mrichelew@gmail.com

Public Policy Position
ADM File No. 2024-02: Proposed Amendment of MCR 7.215

Support with Amendment

Explanation:

The Committee voted unanimously to support ADM File No. 2024-02 with further amendments to:

- (1) Amend MCR 7.215(H)(2)(b) to read: “file with the Court of Appeals all orders entered on remand within seven days of ~~entry by the trial court~~ **receipt by the party.**”
- (2) Amend MCR 7.215(H)(2)(c) to read: “ensure the transcripts of all proceedings on remand are filed in the trial court and the Court of Appeals within ~~21~~ **seven** days **of the receipt of the transcript by the party** ~~after completion of the proceedings.~~”
- (3) add juvenile delinquency cases, alongside criminal and termination of parental rights cases in the proposed third paragraph of MCR 7.215(H).

The Committee further recommends the reorganization of the language of the new rule for clarification in a manner consistent with the formatting of the other Court Rules (e.g., number all paragraphs/subparagraphs for clear reference/citation).

Position Vote:

Voted For position: 19

Voted against position: 0

Abstained from vote: 0

Did not vote (absent): 2

Contact Persons:

Alexandria L. Casperson

CaspersonA@michigan.gov

John A. Shea

jashea@earthlink.net

Public Policy Position
ADM File No. 2024-02: Proposed Amendment of MCR 7.215

Support with Recommended Amendments

Explanation

The APS recommends supporting the proposed amendment, with revisions. First, the proposed requirement that the appellant must ensure that the transcripts are filed within 21 days of the proceedings is impractical because when the transcripts get filed is a matter entirely in the hands of the court reporter. We recommend revising the language to require the appellant to order the transcripts within 21 days, and then require the court reporter to file the transcripts within 21 days of that order. Second, we recommend revising the proposed rule to entitle parties in all cases to file supplemental appellate briefs.

- (2) Remand With Retained Jurisdiction. If the Court of Appeals remands a case to the trial court and retains jurisdiction, the Court of Appeals will review the decisions made by the trial court during the remand proceedings and consider any remaining issues in the appeal in the same Court of Appeals case. The parties and the trial court must not initiate a new appeal from an order entered on remand within the scope of this appeal.

Unless the Court of Appeals states a different time, the appellant must:

- (a) initiate the proceedings in the trial court within 21 days of the Court's opinion.
- (b) file with the Court of Appeals all orders entered on remand within seven days of entry by the trial court.
- (c) ensure the transcripts of all proceedings on remand are ordered within 21 days after completion of the proceedings.

Within 21 days after the transcripts are ordered by the appellant, the court reporter or recorder must file the transcripts in the trial court and the Court of Appeals.

The appellant may file a supplemental brief addressing issues resulting from the remand proceedings within 21 days after the trial court's decision or after the filing of the transcript of the remand proceedings in the trial court, whichever is later. If the appellant does not file a supplemental brief, the appellee may file a supplemental brief within 21 days after appellant's time for filing has run. A responsive brief may be filed within 14 days of service of the supplemental brief.

Position Vote:

Voted for position: 15

Voted against position: 0

Abstained from vote: 0

Did not vote: 3

Contact Person: Fawzeih Daher

Email: fdaher@bodmanlaw.com

Public Policy Position
ADM File No. 2024-02: Proposed Amendment of MCR 7.215

Support with Recommended Amendments

Explanation

The Children's Law Section supports ADM File No 2024-02 with a recommended amendment that, under (H)(2), juvenile delinquencies be included with criminal and termination of parental rights cases as allowing a supplemental brief without seeking leave. While juvenile delinquency appeals are not as common as criminal and termination of parental rights appeals, they are also a class in which there is a right to the appointment of appellate counsel and themselves quasi-criminal proceedings. Because they fall in the same general class of cases a criminal and child welfare cases, they should be afforded the same rights and opportunities in appellate proceedings, including allowing a supplemental brief following remand.

Position Vote:

Voted for position: 10

Voted against position: 0

Abstained from vote: 1

Did not vote: 8

Contact Person: Josh Pease

Email: jpeace@sado.org

Public Policy Position
ADM File No. 2024-02: Proposed Amendment of MCR 7.215

Support

Position Vote:

Voted for position: 18

Voted against position: 0

Abstained from vote: 0

Did not vote: 0

Contact Person: David Barberi

Email: drbarberi@barberilawfirm.com

Name: Brenda Rusch

Date: 11/27/2025

ADM File Number: 2024-02

Comment:

The procedure in cases where the Court of Appeals remands a case to the trial court and retains jurisdiction should be clarified.

SPEAKER LAW FIRM, PLLC

DETERMINED. COMPASSIONATE. STRATEGIC.

YOUR APPELLATE ADVOCATES



819 N. Washington Ave. Lansing, MI 48906

P: 517-482-8933

www.speakerlaw.com

January 5, 2026

VIA Email roths@courts.mi.gov

Michigan Supreme Court
c/o Sarah Roth
Supreme Court Administrative Counsel
P.O. Box 30052
Lansing, MI 48909

Re: Comments on ADM 2024-02; Proposed Amendments to MRPC 7.215

Dear Justices of the Michigan Supreme Court:

I am writing on behalf of Speaker Law Firm to share our experience and comments to the proposed amendment to the retained jurisdiction court rule, MCR 7.215.

Our firm devotes a majority of its practice to appeals in the arena of family law and child welfare cases. The Court of Appeals retains jurisdiction in our cases approximately three times per year. Thus, over the years, we have accumulated many experiences with the retain jurisdiction procedure.

Overall, the proposed court rule comports with the practice in the Court of Appeals in retaining jurisdiction by imposing deadlines on initiating remand proceedings, providing deadlines to submit trial court orders after they have been entered, ensuring production of transcripts within a specified deadline after the completion of the proceedings, and allowing appellate review of the remand proceedings in the context of the existing appeal.

We have a financial concern with the court rule requiring the appellant to ensure production of the transcripts within 21 days of the completion of the proceedings. The court reporters are not beholden to appealing parties, and it is not always possible to obtain a transcript

within 21 days, as that is a significantly shorter period of time than the statutory period of 42 days for custody cases and 91 days for non-custody cases. Moreover, even when it is possible for the court reporter to produce a transcript within 21 days, the reporter will almost certainly charge an expedited rate. It is unfair, and often impossible, for the appealing party who has already taken on the burden of appealing an erroneous trial court order to pay for expedited transcripts. In fact, the new statutory transcript rate is already causing a financial burden for many families. When the Court of Appeals believes that the trial court's actions in the case are so egregious to merit the rare "retain jurisdiction" procedure, the county should bear the cost of the transcripts from the remand proceedings.

One logistical concern that is not addressed by this court rule is the efforts made by the Court of Appeals to follow up with the trial court when it is well beyond the time provided in the Court of Appeals' order (and now the proposed court rule amendment). Typically, the Court of Appeals' orders retaining jurisdiction provide a deadline for the trial court to complete the remand proceedings, usually within 56 days of the motion initiating the remand proceedings. Our firm has experienced many trial judges in this context taking many months, and even beyond a year to complete the remand proceedings and issue an opinion. In the past, the Court of Appeals used to contact the trial courts after the deadline to check in on them (thus, gently nudging them to move along). But in more recent years, the Court of Appeals has left that burden on appellate counsel. We have experienced many judges who are non-responsive to our requests for information. Yet, the Court of Appeals repeatedly contacts our firm to find out what is happening in the trial court and requires us to provide a status letter. Being appellate counsel and not from the local county makes it more difficult to obtain information. The trial courts seemed to be more responsive when the Court of Appeals inquired of the trial court for a status, rather than appellate counsel. In one case, we were required to provide 7 status letters over the course of 7 months that it took to obtain a trial court opinion on remand where the Court of Appeals had retained jurisdiction.

We do not believe oral argument would ever be necessary after remand proceedings, however, we understand that there might be a rare case where the Court of Appeals believes it is needed. In the appeals our firm handles, we believe oral argument will further delay the Court of Appeals' decision and would prefer that oral argument only occur on the rare occasion that the Court of Appeals requests it (rather than having the parties request oral argument in their supplement briefs).

Finally, we agree with the court allowing parties in a termination of parental rights case to file a supplement brief without the need of filing a motion for leave. We would suggest that the court rule also specify that the Court of Appeals can request supplement briefs (thus, without the appellant having to file a motion) in other cases, such as cases involving children, such as custody, domicile, adoption, and minor guardianship appeals.

Thank you for your time and consideration.

Respectfully submitted,

A handwritten signature in blue ink, reading "Liisa R. Speaker". The signature is fluid and cursive, with the first name "Liisa" and last name "Speaker" clearly legible.

Liisa R. Speaker P65728
Jordan Ahlers-Smith P84538
Lisa J. Schmidt P73654
Elizabeth L. Parker P51288
Speaker Law Firm, PLLC
Lansing, MI 48906
517-482-8933

Order

Michigan Supreme Court
Lansing, Michigan

October 22, 2025

Megan K. Cavanagh,
Chief Justice

ADM File No. 2024-30

ADM File No. 2024-39

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

Proposed Amendment of
Rule 7.306 of the Michigan
Court Rules

On order of the Court, this is to advise that the Court is considering an amendment of Rule 7.306 of the Michigan Court Rules. Before determining whether the proposal should be adopted, changed before adoption, or rejected, this notice is given to afford interested persons the opportunity to comment on the form or the merits of the proposal or to suggest alternatives. The Court welcomes the views of all. This matter will also be considered at a public hearing. The notices and agendas for each public hearing are posted on the [Public Administrative Hearings](#) page.

Publication of this proposal does not mean that the Court will issue an order on the subject, nor does it imply probable adoption of the proposal in its present form.

[Additions to the text are indicated in underlining and
deleted text is shown by strikeover.]

Rule 7.306 Original Proceedings

(A)-(B) [Unchanged.]

(C) The following actions must be initiated only in the Supreme Court as an original proceeding and in accordance with this rule:

(1)-(2) [Unchanged.]

(3) An action under MCL 168.479 that challenges a determination by the Board of State Canvassers under MCL 168.882 or MCL 168.883a regarding a recount or proposed recount of ballots cast for President or Vice President of the United States following the most recent general election.

For any filing deadlines expressed in terms of hours, MCR 1.109(G)(5)(b) does not apply.

(D) What to File. Service provided under this subrule must be verified by the clerk. To

initiate an original proceeding, a plaintiff must file with the clerk all of the following:

(1)-(2) [Unchanged.]

(3) Proof that the complaint and brief were served on the defendant, and

(a)-(b) [Unchanged.]

(c) for purposes of a complaint filed under MCL 168.46, it must also include a date and time stamped copy of the board of state canvasser's certification of the completed recount, and service of a copy of the complaint and brief shall be made on the defendant(s) and all of the following persons if not named as a defendant:

(i)-(iv) [Unchanged.]

A complaint filed under MCL 168.46 must be filed with the Court within 24 hours after the board of state canvassers's~~governor's~~ certification of the completed recount or by~~but no later than~~ 8:00 a.m. on the day before the electors of President and Vice President are required to convene pursuant to MCL 168.47, whichever is earlier.

(d) for purposes of a complaint filed under MCL 168.845a, it must also include a date and time stamped copy of the certification or determination of the presidential election results, and service of a copy of the complaint and brief shall be made on the defendant(s) and all of the following persons if not named as a defendant:

(i)-(iv) [Unchanged.]

A complaint filed under MCL 168.845a must be filed with the Court within 48 hours after the certification or determination of the results of a presidential election and must name the board of state canvassers as a defendant.

(e) for purposes of a complaint filed under MCL 168.479 to challenge a determination under MCL 168.882 or MCL 168.883a, service of a copy of the complaint and brief shall be made on any of the following persons if not named as a defendant:

(i) all presidential and vice presidential candidates who appeared on the ballot,

- (ii) the governor,
- (iii) the attorney general,
- (iv) the secretary of state, and
- (v) any chairperson of a board of county canvassers that may be subject to or participated in the recount.

A complaint filed under MCL 168.479 to challenge a determination under MCL 168.882 or MCL 168.883a must be filed within 24 hours after the Board of State Canvassers issues its determination.

(4) [Unchanged.]

Copies of relevant documents, record evidence, or supporting affidavits may be attached as exhibits to the complaint.

(E) Answer.

(1)-(3) [Unchanged.]

(4) A defendant in an action filed under MCL 168.479 to challenge a determination under MCL 168.882 or MCL 168.883a must file the following with the clerk within 24 hours of the complaint being filed, unless the Court directs otherwise:

- (a) 1 signed copy of an answer in conformity with MCR 2.111(C);
- (b) 1 signed copy of a supporting brief in conformity with MCR 7.212(B) and (D); and
- (c) Proof that a copy of the answer and supporting brief was served on the plaintiff.

(4) [Renumbered (5) but otherwise unchanged.]

(F) [Unchanged.]

(G) Reply Brief. 1 signed copy of a reply brief may be filed as provided in MCR 7.305(E). In an action filed under Const 1963, art 4, § 6(19), a reply brief may be filed within 3 days after service of the answer and supporting brief, unless the Court directs otherwise. In an action filed under MCL 168.845a, a reply brief may be filed

within 24 hours~~1 day~~ after service of the answer and supporting brief, unless the Court directs otherwise. A plaintiff may not file a reply brief in an action for judicial review under MCL 168.46 or in an action under MCL 168.479 that challenges the Board of State Canvassers' determination(s) under MCL 168.882 or MCL 168.883a.

(H)-(L) [Unchanged.]

Staff Comment (ADM File Nos. 2024-30 and 2024-39): The proposed amendment of MCR 7.306 would clarify some previously-adopted amendments and would allow new original actions relating to recounts or proposed recounts of the ballots cast in a presidential election to be filed in this Court as a means of reducing any judicial-related barriers that may interfere with the outcome of such a recount or proposed recount.

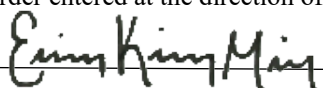
The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.

A copy of this order will be given to the Secretary of the State Bar and to the State Court Administrator so that they can make the notifications specified in MCR 1.201. Comments on the proposal may be submitted by February 1, 2026 by clicking on the “Comment on this Proposal” link under this proposal on the [Court’s Proposed & Adopted Orders on Administrative Matters](#) page. You may also submit a comment in writing at P.O. Box 30052, Lansing, MI 48909 or via email at ADMcomment@courts.mi.gov. When submitting a comment, please refer to ADM File No. 2024-30/2024-39. Your comments and the comments of others will be posted under the chapter affected by this proposal.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

October 22, 2025


Clerk

Public Policy Position
ADM File No. 2024-30/2024-39: Proposed Amendment of MCR 7.306

Support

Explanation

The Committee voted to support ADM File No. 2024-30/2024-39.

Position Vote:

Voted For position: 23

Voted against position: 2

Abstained from vote: 1

Did not vote (absence): 5

Contact Person:

Marla Linderman Richelew mrichelew@gmail.com

Order

Michigan Supreme Court
Lansing, Michigan

December 18, 2025

Megan K. Cavanagh,
Chief Justice

ADM File No. 2025-37

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

Proposed Amendment of
Rule 7.312 of the Michigan
Court Rules

On order of the Court, this is to advise that the Court is considering an amendment of Rule 7.312 of the Michigan Court Rules. Before determining whether the proposal should be adopted, changed before adoption, or rejected, this notice is given to afford interested persons the opportunity to comment on the form or the merits of the proposal or to suggest alternatives. The Court welcomes the views of all. This matter will also be considered at a public hearing. The notices and agendas for each public hearing are posted on the [Public Administrative Hearings](#) page.

Publication of this proposal does not mean that the Court will issue an order on the subject, nor does it imply probable adoption of the proposal in its present form.

[Additions to the text are indicated in underlining and
deleted text is shown by strikeover.]

Rule 7.312 Briefs, Responses to Adverse Amicus Briefs, and Appendixes in Calendar Cases and Cases Argued on the Application

(A)-(D) [Unchanged.]

(E) Time for Filing. Unless the Court directs a different time for filing,

(1) the appellant's brief and appendixes, if any, are due

- (a) within 56 days of the order granting the application for leave to appeal, or within 56 days of an order appointing counsel for representation in this Court or of a ruling that the defendant is not entitled to appointed counsel, or
- (b) within 42 days of the order directing the clerk to schedule oral argument on the application, or within 42 days of an order appointing counsel for representation in this Court or of a ruling that the defendant is not entitled to appointed counsel;

(2)-(4) [Unchanged.]

(F)-(K) [Unchanged.]

Staff Comment (ADM File No. 2025-37): The proposed amendment of MCR 7.312 would establish rule-based briefing deadlines in leave granted and MOAA cases where it appears necessary to appoint counsel for the indigent defendant.

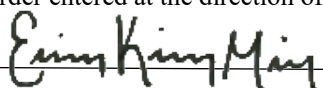
The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.

A copy of this order will be given to the Secretary of the State Bar and to the State Court Administrator so that they can make the notifications specified in MCR 1.201. Comments on the proposal may be submitted by April 1, 2026 by clicking on the “Comment on this Proposal” link under this proposal on the [Court’s Proposed & Adopted Orders on Administrative Matters](#) page. You may also submit a comment in writing at P.O. Box 30052, Lansing, MI 48909 or via email at ADMcomment@courts.mi.gov. When submitting a comment, please refer to ADM File No. 2025-37. Your comments and the comments of others will be posted under the chapter affected by this proposal.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

December 18, 2025


Clerk

Public Policy Position
ADM File No. 2025-37: Proposed Amendment of MCR 7.312

Support

Explanation

The Committee voted unanimously to support ADM File No. 2025-37.

Position Vote:

Voted For position: 16

Voted against position: 0

Abstained from vote: 0

Did not vote (absence): 5

Contact Persons:

Garrett Burton gburton@sado.org

Public Policy Position
ADM File No. 2025-37: Proposed Amendment of MCR 7.312

Support

Explanation

The Committee voted to support ADM File No. 2025-37.

Position Vote:

Voted For position: 25

Voted against position: 0

Abstained from vote: 1

Did not vote (absence): 5

Contact Person:

Marla Linderman Richelew mrichelew@gmail.com

Public Policy Position
ADM File No. 2025-37: Proposed Amendment of MCR 7.312

Support

Explanation:

The Committee voted unanimously to support ADM File No. 2025-37.

Position Vote:

Voted For position: 17

Voted against position: 0

Abstained from vote: 0

Did not vote (absent): 4

Contact Persons:

Alexandria L. Casperson

CaspersonA@michigan.gov

John A. Shea

jashca@earthlink.net

Name: Barbara Pote

Date: 12/22/2025

ADM File Number: 2025-37

Comment:

A basic tenant of American justice system is the right to representation

Order

Michigan Supreme Court
Lansing, Michigan

December 18, 2025

Megan K. Cavanagh,
Chief Justice

ADM File No. 2022-49

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

Proposed Amendments of Rule
8.120 of the Michigan Court
Rules and Rule 5 of the Rules
for the Board of Law Examiners

On order of the Court, this is to advise that the Court is considering amendments of Rule 8.120 of the Michigan Court Rules and Rule 5 of the Rules for the Board of Law Examiners. Before determining whether the proposal should be adopted, changed before adoption, or rejected, this notice is given to afford interested persons the opportunity to comment on the form or the merits of the proposal or to suggest alternatives. The Court welcomes the views of all. This matter will also be considered at a public hearing. The notices and agendas for each public hearing are posted on the [Public Administrative Hearings](#) page.

Publication of this proposal does not mean that the Court will issue an order on the subject, nor does it imply probable adoption of the proposal in its present form.

[Additions to the text are indicated in underlining and
deleted text is shown by strikeover.]

Rule 8.120 Law Students, ~~and Recent Law Graduates, and Individuals Already Barred;~~
Participation in Legal ~~Services~~Aid Clinics, and Programs, Defender Offices, and Legal
Training Programs

- (A) Legal Aid Clinics; Defender Offices. Effective legal service for each person in Michigan, regardless of that person's ability to pay, is important to the directly affected person, to our court system, and to the whole citizenry. Law students and recent law graduates, under supervision by a member of the state bar, may staff the following:
- (a) public and nonprofit defender offices, ~~and~~
 - (b) legal aid clinics that are organized under a city or county bar association or an accredited law school or for the primary purpose of providing free legal services to indigent persons, and;
 - (c) organized legal services programs funded by the Michigan State Bar Foundation or Legal Services Corporation that provide legal assistance to

indigent persons in civil matters.

(B) [Unchanged.]

(C) Eligible Individuals~~Students~~.

(1) A student in a law school approved by the American Bar Association who has received a passing grade in law school courses and has completed the first year is eligible to participate in a clinic or program listed in subrules (A) and (B) if the student meets the academic and moral standards established by the dean of that school.

(2) ~~A~~For the purpose of this rule, a “recent law graduate” is a person who has graduated from an ABA-accredited law school within the last 15 months~~year~~.

(D) The student or recent law graduate must certify in writing that they have~~he or she has read and are~~ familiar with the Michigan Rules of Professional Conduct and the Michigan Court Rules, and shall take an oath which is reasonably equivalent to the Michigan Lawyer’s Oath in requiring at a minimum the promise to: (a) support the Constitution of the United States; (b) support the Constitution of the State of Michigan; (c) maintain the respect due to courts of justice and judicial officers; (d) never seek to mislead a judge or jury by any artifice or false statement of fact or law; (e) maintain the confidence and preserve inviolate the secrets of the client; (f) abstain from all offensive personality; (g) advance no fact prejudicial to the honor or reputation of a party or witness, unless required by the justice of the cause; and (h) in all other respects conduct himself or herself personally and professionally in conformity with the high standards of conduct imposed upon members of the state bar of Michigan.

(~~E~~) Scope; Procedure; Duration; Revocation.

(1) A law student or recent law graduate~~member of the legal aid clinic~~, in representing an indigent person, is authorized to advise the person and to negotiate and appear on the person’s behalf in all Michigan courts~~except the Supreme Court~~. Except as otherwise provided in this rule, the indigent person that will be assisted by the student or graduate must consent in writing to the representation. In a situation in which a law student provides short-term, limited-scope legal advice by telephone in the context of a clinical program intended to assist indigent persons offered as part of a law school curriculum, the clinic patron shall be informed that:

(a) the advice provided may be rendered by a law student;⁵ and

(b) [Unchanged.]

- (2) Representation by a law student or recent law graduate must be conducted under the supervision of a state bar member. Supervision by a state bar member includes the duty to examine and sign all pleadings filed. It does not require the state bar member to be present:

(a) while a law student or recent law graduate is advising an indigent person or negotiating on the person's behalf; or

(b) during a courtroom appearance of a law student or recent law graduate, except

(i)-(ii) [Unchanged.]

The supervising attorney shall assume all personal professional responsibility for the student's or recent law graduate's work, and should consider purchasing professional liability insurance to cover the practice of such student or graduate.

- (3) A law student or recent law graduate may not appear in a case in a Michigan court without the approval of the judge or a majority of the panel of judges to which the case is assigned. If the judge or a majority of the panel grants approval, the judge or a majority of the panel may suspend the proceedings at any stage if the judge or a majority of the panel determines that the representation by the law student or graduate:

(a) is professionally inadequate; and

(b) [Unchanged.]

In the Court of Appeals or Supreme Court, a request for a law student or recent law graduate to appear at oral argument must be submitted by motion to the Court of Appeals panel that will hear the case or to the Supreme Court Clerk. The Court of Appeals panel or Supreme Court may deny the request or establish restrictions or other parameters for the representation on a case-by-case basis.

- (4) A law student or recent law graduate serving in a prosecutor's, county corporation counsel's, city attorney's, Attorney Grievance Commission's, or Attorney General's program may be authorized to perform comparable functions and duties assigned by the prosecuting attorney, county attorney,

city attorney, Attorney Grievance Commission attorney, or Attorney General, except that:

- (a) the law student or recent law graduate is subject to the conditions and restrictions of this rule; and
- (b) the law student or recent law graduate may not be appointed as an assistant prosecutor, assistant corporation counsel, assistant city attorney, assistant Attorney Grievance Commission attorney, or assistant Attorney General.

Board of Law Examiners Rule 5. Admission Without Examination.

(A) [Unchanged.]

(B) An applicant for admission without examination must

(1)-(4) [Unchanged.]

(5) have, after being licensed and for 3 of the 5 years preceding the application,

- (a) actively practiced law as a principal business or occupation in a jurisdiction where admitted (the practice of law ~~under a special certificate pursuant to Rule 5[F]~~ or as a special legal consultant pursuant to Rule 5[G] does not qualify as the practice of law required by this rule);

(b)-(c) [Unchanged.]

The Board may, for good cause, increase the 5-year period. Active duty in the United States armed forces not satisfying Rule 5(B)(5)(c) may be excluded when computing the 5-year period.

(6) [Unchanged.]

(C)-(E) [Unchanged.]

(F) An attorney

(1) [Unchanged.]

- (2) practicing law in an institutional setting, e.g., counsel to a corporation or instructor in a law school; or,
- (3) employed by a public or nonprofit defender office, legal aid clinic organized under a city or county bar association, legal aid clinic with a primary purpose of providing free legal services to indigent persons, legal services program funded by the Michigan State Bar Foundation or the Legal Services Corporation,

may apply to the Board for a special certificate of qualification to practice law. The applicant must satisfy Rule 5(B)(1)-(3), and comply with Rule 5(C). The Board may then issue the special certificate, which will entitle the attorney to continue current employment if the attorney becomes an active member of the State Bar. The special certificate permits attorneys teaching or supervising law students in a clinical program to represent the clients of that clinical program. If the attorney leaves the current employment, the special certificate automatically expires; if the attorney's new employment is also institutional, the attorney may reapply for another special certificate.

(G) [Unchanged.]

Staff Comment (ADM File No. 2022-49): The proposed amendment of MCR 8.120 would allow law students and recent law graduates to: (1) staff certain legal programs that provide assistance to indigent persons in civil matters under the supervision by a member of the state bar, and (2) appear on behalf of indigent persons in all Michigan courts. The proposal would also expand the definition of a “recent law graduate” from one year to 15 months. The proposed amendment of BLE Rule 5 would expand the qualifications for a special certificate of qualification to practice law.

The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.

A copy of this order will be given to the Secretary of the State Bar and to the State Court Administrator so that they can make the notifications specified in MCR 1.201. Comments on the proposal may be submitted by April 1, 2026 by clicking on the “Comment on this Proposal” link under this proposal on the [Court's Proposed & Adopted Orders on Administrative Matters](#) page. You may also submit a comment in writing at P.O. Box 30052, Lansing, MI 48909 or via email at ADMcomment@courts.mi.gov. When

submitting a comment, please refer to ADM File No. 2022-49. Your comments and the comments of others will be posted under the chapter affected by this proposal.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

December 18, 2025

Elizabeth Kingston-Miller
Clerk

Public Policy Position**ADM File No. 2022-49: Proposed Amendment of MCR 8.120 and BLE Rule 5****Support with Amendment****Explanation**

The Committee voted to support ADM File No. 2022-49 with a recommendation that “Individuals Already Barred” be deleted from the title of MCR 8.120. The Committee believes that “Law Students and Recent Law Graduates” alone more accurately describes the content of the rule and that the proposed language is unnecessary and confusing.

Position Vote:

Voted For position: 15

Voted against position: 0

Abstained from vote: 1

Did not vote (absence): 5

Contact Persons:

Garrett Burton

gburton@sado.org

Public Policy Position
ADM File No. 2022-49: Proposed Amendment of MCR 8.120 & BLE Rule 5

Support

Explanation

The Committee voted to support ADM File No. 2022-49.

Position Vote:

Voted For position: 26

Voted against position: 0

Abstained from vote: 0

Did not vote (absence): 5

Contact Person:

Marla Linderman Richelew mrichelew@gmail.com

Public Policy Position**ADM File No. 2022-49: Proposed Amendment of MCR 8.120 & BLE Rule 5****Support with Amendment****Explanation:**

The Committee voted unanimously to support the position of the Access to Justice Policy Committee, which is: to support ADM File No. 2022-49 with a recommendation that “Individuals Already Barred” be deleted from the title of MCR 8.120.

Position Vote:

Voted For position: 17

Voted against position: 0

Abstained from vote: 0

Did not vote (absent): 4

Contact Persons:

Alexandria L. Casperson

CaspersonA@michigan.gov

John A. Shea

jashea@earthlink.net

Public Policy Position
ADM File No. 2022-49: Proposed Amendment of MCR 8.120 and BLE Rule 5

Support with Amendment

Explanation

The Committee voted to support ADM File No. 2022-49 with a recommendation that the definition of “recent law graduate” be amended from a person who graduated from an ABA-accredited law school within the last 15 months to within the last 18 months. The Committee believes that an 18-month timeframe will better address the challenges that legal aid organizations and others are facing onboarding recent graduates as they work through the process of studying for and passing the bar exam and being admitted to practice.

Position Vote:

Voted For position: 16

Voted against position: 0

Abstained from vote: 0

Did not vote (absence): 4

Contact Person:

Ashley E. Lowe alow@lakeshorelegalaid.org

Public Policy Position**ADM File No. 2022-49: Proposed Amendment of MCR 8.120 and BLE Rule 5****Support****Explanation**

The State Bar of Michigan Negligence Law Section respectfully submits this comment in support of the proposed amendments to MCR 8.120 and Board of Law Examiners Rule 5. The Section appreciates the Court's continued efforts to expand access to legal services for indigent persons and to strengthen the capacity of legal aid, defender, and clinical programs throughout Michigan.

The Section supports the proposed expansion of MCR 8.120 to include additional organized legal services programs providing civil legal assistance to indigent clients, as well as the extension of the definition of "recent law graduate" from one year to fifteen months. These changes reflect the practical realities of bar-exam timing and help ensure continuity of services in under-resourced settings.

The Section respectfully recommends, however, that the Court clarify that MCR 8.120 does not apply to attorneys who have passed the Michigan bar examination and have been admitted and sworn in as members of the State Bar of Michigan, regardless of how recently they graduated.

This clarification is particularly important in light of the proposed change to the rule's title, which would expressly reference "Individuals Already Barred." That language increases the potential for confusion by suggesting that attorneys who are already licensed and sworn in may nevertheless fall within the scope of MCR 8.120's supervision and court-permission requirements based solely on recency of graduation. Read broadly, the revised title and text risk sweeping already licensed attorneys into a regulatory framework intended for students and unadmitted graduates.

Applying MCR 8.120 to sworn-in attorneys would unnecessarily limit their ability to practice and could slow or complicate the delivery of legal services to indigent clients – undermining the rule's access-to-justice objectives. Once an individual has been admitted to the State Bar of Michigan and sworn in, that attorney should be treated like any other licensed Michigan lawyer, without additional procedural hurdles based on graduation date.

The Section agrees that enhanced supervision and safeguards are appropriate for law students and for recent graduates who have not yet been admitted to the bar. Clarifying that MCR 8.120 applies only to law students and unadmitted graduates – and not to attorneys who are already barred – would preserve those protections while avoiding unintended restrictions on licensed attorneys.

For these reasons, the Negligence Law Section supports adoption of the proposed amendments and respectfully recommends this clarification.

Position Vote:

Voted for position: 11

Voted against position: 0

Abstained from vote: 0

Did not vote: 3

Contact Person: Madelyne Lawry

Email: Neglaw@sharedresources.us

Name: Jane

Date: 12/22/2025

ADM File Number: 2022-49

Comment:

I am in support of this Proposed Amendment, as I believe that increasing the ability for law students and recent graduates to appear on behalf of indigent persons will help mitigate some of the strain on the court system as a whole.

Name: Sylvia

Date: 12/22/2025

ADM File Number: 2022-49

Comment:

100% YES. The most vulnerable in our society need protection and sometimes those still in school possess the most passion for serving and for the law TO help.

Name: James N. McNally

Date: 12/30/2025

ADM File Number: 2022-49

Comment:

The heading of the rule mentions people who are "barred." Is that a term of art for people who have taken the bar exam, or is it the common word indicating that a person has been prohibited from doing something? Maybe it's appropriate to strike a word that is used in the title and never again in the body of the rule - or at least define it.

Order

Michigan Supreme Court
Lansing, Michigan

December 18, 2025

Megan K. Cavanagh,
Chief Justice

ADM File No. 2024-19

Brian K. Zahra
Richard H. Bernstein
Elizabeth M. Welch
Kyra H. Bolden
Kimberly A. Thomas
Noah P. Hood,
Justices

Proposed Amendments of
Rules 9.108 and 9.110 of
the Michigan Court Rules

On order of the Court, this is to advise that the Court is considering amendments of Rules 9.108 and 9.110 of the Michigan Court Rules. Before determining whether the proposal should be adopted, changed before adoption, or rejected, this notice is given to afford interested persons the opportunity to comment on the form or the merits of the proposal or to suggest alternatives. The Court welcomes the views of all. This matter will also be considered at a public hearing. The notices and agendas for each public hearing are posted on the [Public Administrative Hearings](#) page.

Publication of this proposal does not mean that the Court will issue an order on the subject, nor does it imply probable adoption of the proposal in its present form.

[Additions to the text are indicated in underlining and
deleted text is shown by strikeover.]

Rule 9.108 Attorney Grievance Commission

- (A) [Unchanged.]
- (B) Composition. The commission consists of 3 laypersons and 6 attorneys appointed by the Supreme Court. The members serve 3-year terms. Unless initially appointed to fill a mid-term vacancy, a member may serve up to 2 full terms. A member appointed to fill a mid-term vacancy shall serve the remainder of that term and may be reappointed to may not serve up to more than 2 full terms.
- (C) Chairperson and Vice-Chairperson. The Supreme Court shall designate from among the members of the commission a chairperson and a vice-chairperson who shall serve 1-year terms in those offices. The commencement and termination dates for the 1-year terms shall coincide appropriately with the 3-year membership terms of those officers and the other commission members. The Supreme Court may reappoint these officers for additional terms and may remove these officers prior to the expiration of a term. An officer appointed to fill a mid-term vacancy shall serve the remainder of that term and may be reappointed ~~to serve up to 2 more full terms.~~
- (D)-(E) [Unchanged.]

Rule 9.110 Attorney Discipline Board

- (A) [Unchanged.]
- (B) Composition. The board consists of 6 attorneys and 3 laypersons appointed by the Supreme Court. The members serve 3-year terms. Unless initially appointed to fill a mid-term vacancy, a member may serve up to 2 full terms. A member appointed to fill a mid-term vacancy shall serve the remainder of that term and may be reappointed to may not serve up to more than 2 full terms.
- (C) Chairperson and Vice-Chairperson. The Supreme Court shall designate from among the members of the board a chairperson and a vice-chairperson who shall serve 1-year terms in those offices. The commencement and termination dates of the 1-year terms shall coincide appropriately with the 3-year board terms of those officers and the other board members. The Supreme Court may reappoint these officers for additional terms and may remove an officer prior to the expiration of a term. An officer appointed to fill a midterm vacancy shall serve the remainder of that term and may be reappointed to serve two full terms.
- (D)-(E) [Unchanged.]

Staff Comment (ADM File No. 2024-19): The proposed amendments of MCR 9.108 and 9.110 would address mid-term member vacancies and would eliminate the 2-full term officer limit for the Attorney Grievance Commission and the Attorney Discipline Board.

The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.

A copy of this order will be given to the Secretary of the State Bar and to the State Court Administrator so that they can make the notifications specified in MCR 1.201. Comments on the proposal may be submitted by April 1, 2026 by clicking on the “Comment on this Proposal” link under this proposal on the [Court’s Proposed & Adopted Orders on Administrative Matters](#) page. You may also submit a comment in writing at P.O. Box 30052, Lansing, MI 48909 or via email at ADMcomment@courts.mi.gov. When submitting a comment, please refer to ADM File No. 2024-19. Your comments and the comments of others will be posted under the chapter affected by this proposal.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

December 18, 2025

Elizabeth Kingston-Miller
Clerk

Name: Kathleen Evers

Date: 12/22/2025

ADM File Number: 2024-19

Comment:

We need to continue term limits instead of people "rotting" in these positions for 30-45 years. their desire to fully fulfill these positions just "rot" away with them.

8.2. LSAM Letter*

To: Members of the Public Policy Committee
Board of Commissioners

From: Nathan A. Triplett, Director of Governmental Relations

Date: January 15, 2026

Re: Legal Services of Michigan List of Non-Fee-Generating Cases

Background

The Legal Services Association of Michigan (“LSAM”) is a support organization for legal services programs in Michigan, including all six Legal Services Corporation (“LSC”) funded legal aid programs. Federal regulations (45 CFR 1609) prohibit LSC grantees from accepting cases that private attorneys regularly accept for a fee. To ensure that LSAM members are only accepting non-fee-generating cases, they can either (1) develop an understanding with the State Bar of Michigan (“SBM”) that certain categories of cases are non-fee-generating, or (2) provide documentation in each file that a referral was attempted but unsuccessful. (45 CFR 1609.3). LSAM has historically opted for the first of these options and, to that end, now seeks to renew its understanding with SBM on an updated list of non-fee-generating cases. This understanding was last updated in 2019.

Keller Considerations

According to LSAM, the understanding regarding non-fee-generating case types helps LSAM “avoid file-by-file documentation and fruitless referrals to private attorneys in hundreds of cases each year.” By SBM and LSAM renewing the existing understanding, members of LSAM will be able to run more efficiently and thus increase the availability of legal services to society, a *Keller*-permissible subject area.

Note that the SBM Board of Commissioners considered the *Keller*-permissibility of the non-fee-generating understanding in 2019 and determined that it was reasonably related to the availability of legal services to society and thus a permissible activity.

Keller Quick Guide

THE TWO PERMISSIBLE SUBJECT-AREAS UNDER KELLER:

<i>As interpreted by AO 2004-1</i>	Regulation of Legal Profession	Improvement in Quality of Legal Services
	Regulation and discipline of attorneys	Improvement in functioning of the courts
	Ethics	✓ Availability of legal services to society
	Lawyer competency	
	Integrity of the Legal Profession	
	Regulation of attorney trust accounts	

Staff Recommendation

The non-fee-generating case understanding between SBM and LSAM is reasonably related to the availability of legal services to society and therefore *Keller*-permissible. It may be considered on its merits.

LEGAL SERVICES ASSOCIATION OF MICHIGAN

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November 6, 2024

Dear Peter,

We are writing on behalf of the Legal Services Association of Michigan (LSAM). As you know, several LSAM organizations are funded in part by the Legal Services Corporation (LSC). One of the LSC regulations, 45 CFR 1609, prohibits LSC grantees from accepting cases that private attorneys regularly accept for a fee. As you know, all LSC grantees have systems in place to assure that any cases that can be directly referred to private lawyers are referred.

Beginning in 1998, LSC adopted a regulation relating to possible fee generating cases. Under the LSC system, programs are required to either: (1) develop an understanding with the Bar that certain categories of cases are non-fee generating; or (2) provide documentation in each file that a referral to a private attorney was attempted but was unsuccessful. The LSC policy is problematic under Michigan law, since Michigan provides for a nominal attorney fee (usually \$40) in almost every case, see MCL 600.2441. Thus, virtually every case in which an attorney appears for a Plaintiff of Defendant in any Michigan court could be a "potentially fee generating case."

In 1998, LSAM developed an understanding with the State Bar that the following categories of cases were "non-fee-generating." We've updated these understandings from time to time- most recently in 2019. The previous approval is attached here for convenience. We are writing again to renew these understandings as reviewed and agreed upon at LSAM's November 2024 meeting.

1. In general, civil cases where the only fee is a statutory attorney fee or statutory damage under \$2,000;
2. Eviction, housing discrimination, and foreclosure prevention cases, including summary proceedings actions, lock-out actions, actions relating to security deposits, land contract forfeitures, and Circuit Court suits to prevent foreclosure. These suits may be handled even if damage claims or counterclaims may be filed on behalf of the legal aid client. Real property and personal property cases also include Probate Court and quiet title actions where the primary goal of the litigation is to preserve a home, cash assets up to the program asset limit, or personal property (such as a mobile home or vehicle) for a low-income client;

3. Domestic violence cases and other family law cases (e.g. Personal Protection Order cases, child support enforcement or defense of custody cases, Indian Child Welfare Act cases) for low-income individuals. These cases may be handled even if a money or property claim may be made;

4. Cases seeking benefits through needs-based public benefits programs;

5. Consumer cases where the primary objective of the case is to prevent attachment or garnishment of an individual's income or bank account or cases that challenge a policy or practice affecting low-income consumers;

6. Defense of tort or general civil litigation claims on behalf of low-income persons, even when that defense might include a money counterclaim or a claim under a fee shifting statute;

7. Wage claim cases where the amount of wages claimed by each individual client is under the value of each program's asset limit.

Sincerely,



Pamela Hoekwater
Chair



Shannon Lucas
Chair

9. Strategic Planning and Engagement

Presented by Thomas H. Howlett

9.1. Preferred Partner Programs

9.1.1. FileVine*



To: Board of Commissioners

From: Robin Eagleson

Date: January 23, 2026

Re: Potential Partner Program: Filevine

Discussions were initiated between the State Bar of Michigan and Filevine for Filevine to be considered as a potential partnership program. The following provides a summary of the potential partnership:

- Discount to State Bar of Michigan Members: 15% discount to members of the State Bar of Michigan off their first year of Filevine for new customers.
- Royalty to SBM: 10% referral fee on the first year of ARR as well as on any upsell opportunities that result from the referrals.

Filevine is a case and matter management software that also includes document management, time, billing, and payments, and lead management. The case management software provides efficiency with workflows, reduction of redundant tasks, and drafting of documents. The software provides document management as well for lawyers to quickly find and update documents, connect matters, and is configurable. The software also provides for time and billing for legal practice management and allows firms to lead management by tracking and nurturing leads, optimizing lead generation, gather feedback, and share and summarize intake forms with AI assistance. Further information regarding Filevine may be found [here](#).

Currently, the State Bar of Michigan five (5) full¹ practice management software partnerships including 8amMyCase, Rocket Matter, Practice Panther, Clio, and CARET Legal. Each case management software program offers 10-15% discount to SBM members. In reviewing other bar associations, the average number of case management software programs that are advertised range from five (5) to eight (8) different programs. It should also be noted that SBM's Client Protection Fund division is currently using the Filevine software for its work.

Recommendation: The Strategic Planning and Engagement Committee voted unanimously to recommend for approval Filevine as a preferred partner program of the State Bar of Michigan at its November 18, 2025 meeting. It is recommended that the Board of Commissioners approve Filevine as a preferred partner program pending General Counsel's review and finalization of the contract.

¹ Full practice management software partnerships provide users with multiple uses including casework, billing, scheduling, communication, and/or financial abilities.

9.1.2. Incogni*



To: Board of Commissioners

From: Robin Eagleson

Date: January 23, 2026

Re: Potential Partner Program: Incogni

Discussions were initiated between the State Bar of Michigan and Incogni for Incogni to be considered as a potential partnership program. The following provides a summary of the potential partnership:

- Discount to State Bar of Michigan Members: 55% discount for all annual plans to members of the State Bar of Michigan.
- Royalty to SBM: 40% royalty on all approved sales (due to cancellation policy, all sales are approved after 30 days).

Incogni is a personal data removal service that automatically removes a person's information from data broker websites and other public sources. It works regularly sending automated requests to these sites on behalf of the user to take down personal data, such as name, address, and phone number. Incogni automates the process, which would otherwise be time-consuming to do manually. Incogni scans public websites, people search engines, and private databases to determine where information is stored and then sends takedown and opt-out requests to data brokers on the user's behalf citing privacy laws such as GDPR and CCPA. The services provides constant rescans and sends fresh requests to prevent data from reappearing. Some plans also include removals from specific sites not covered by the standard service. Incogni currently provides this protection to the Michigan judiciary through its subsidiary, Ironwall. Further information regarding Incogni may be found [here](#).

Currently, the State Bar of Michigan does not have a personal data removal service in its current stream of preferred partner programs. General Counsel is currently in the process of reviewing the proposed contract. Due to threats and assaults against attorneys, this type of service is imperative to provide an added protection for Michigan lawyers.

Recommendation: The Strategic Planning and Engagement Committee voted unanimously to recommend for approval Incogni as a preferred partner program of the State Bar of Michigan at its November 18, 2025 meeting. It is recommended that the Board of Commissioners approve Incogni as a preferred partner program pending General Counsel's review and finalization of the contract.

9.2. Great Lakes Legal Conference (GLLC) Update*



To: Board of Commissioners

From: Suzanne Larsen and Ashley Lowe

Date: January 23, 2026

Re: GLLC Workgroup Recommendation – BOC Retreat

The Great Lakes Legal Conference (GLLC) Workgroup has met seven times since being formed in February 2025. During this time, the workgroup has reviewed various pieces of data, discussed and debated options, run focus groups and surveys, and reviewed results.

The GLLC Workgroup unanimously agreed that the CLE portion of the conference be eliminated due to the lack of CLE requirements in Michigan and due to the numerous opportunities afforded to Michigan attorneys to receive continued education through various means. The GLLC Workgroup focused on the BOC meeting and the Bar Leadership Forum (BLF).

Based on the work over the last ten months, the GLLC Workgroup recommends the following:

- Cancel the Great Lakes Legal Conference beginning in 2027. Notice must be given to the Grand Hotel before the June 2026 event begins to not incur any cancellation charges.
- State Bar Staff to organize a Board of Commissioners Retreat for the Fall of 2026.
 - Based on the survey results by the Board of Commissioners, it is recommended that the Retreat consists of the following logistics:
 - Location: to be determined by SBM Staff based on best value and minimal conflicts.
 - Length: 1 ½ Day Retreat
 - Days: Friday through Saturday
 - Alternative: Thursday through Friday (based on availability)
 - Calendar: SBM Staff to provide a survey to all BOC members for potential retreat dates and set a date that aligns with the majority of BOC availability.

Following the completion of focus groups and a staff review of the surveys completed by Bar Leaders, the GLLC Workgroup reviewed the results and feedback in December 2025. Survey results and focus group feedback focused on the following needs:

- One Day (in-person) Statewide Leadership Summit
- Quarterly Virtual Workshops
- Toolkits and Resource Guides (role-specific, practical, on-demand)

However, due to holiday schedules, staff required additional time to present model and implementation ideas. Therefore, a meeting will be scheduled in late February or early March to review ideas and compile recommendations for the Board of Commissioners.

9.3. Website Update

10. Audit and Finance

Presented by David C. Anderson

10.1. Finance Report

10.2. Cannabis Law Section*



CANNABIS LAW SECTION

Financial Turnaround Plan and Strategic Roadmap (2026–2029)

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EXECUTIVE SUMMARY

The Cannabis Law Section of the State Bar of Michigan submits this Comprehensive Fiscal Responsibility Plan and Strategic Roadmap (2026–2029) in response to guidance from State Bar leadership and the State Bar of Michigan Finance Committee. This Plan documents the Section’s identification of the structural causes of its prior financial deficits, the corrective actions already implemented, and the governance framework adopted to ensure long-term solvency, sustainability, and compliance with State Bar requirements, including Keller principles.

The financial challenges experienced by the Section between 2023 and early 2024 were not the result of declining relevance, diminished member engagement, or mismanagement. Rather, they stemmed from an outdated operating model reliant on hotel-based conferences and externally administered programming that carried significant fixed costs. Attendance variability and non-scalable expenses created recurring deficits that could not be reliably offset by dues or sponsorship revenue. This Plan directly addresses and eliminates those structural risks rather than attempting incremental or temporary adjustments.

Corrective measures are not prospective—they are already in effect. The Section has permanently discontinued hotel-based and fixed-cost events, exited high-cost third-party administrative arrangements, and transitioned to a scalable programming model utilizing the State Bar of Michigan building and municipal community centers. Administrative services are now capped, predictable, and subject to quarterly review. Programming expenses are aligned with actual participation, materially reducing financial risk.

Programming momentum has remained strong. In early 2026, the Section hosted a practice-focused webinar on Michigan’s Marijuana 24% Wholesale Tax, drawing substantial 270 plus participation leading to the new generating fee-supported revenue while advancing the Section’s core educational mission. The webinar also supported the Section’s strategic objective of constructive engagement with Treasury and the Cannabis Regulatory Agency on real-world compliance issues.

Loan Request and Repayment. To ensure uninterrupted operations through October 31, 2026, the Section requests a State Bar of Michigan working-capital loan of up to \$30,000 at no less than the applicable minimum interest rate set at loan execution. The loan amount is intended to (i) cover the current net shortfall associated with 2025 Fall Conference payables (\$43,228.53) relative to the Section’s current cash balance (\$33,389.29), and (ii) provide sufficient working capital to complete all budgeted FY 2026 activities and expenses while revenues are being collected. The Section will repay the loan from FY 2027 dues receipts and retire the loan in November 2027, with interest paid in accordance with the loan terms.

The Section’s revised financial model is conservative and transparent. Budgets are prepared using State Bar of Michigan account codes and assume steady-state operations rather than expansion. Modest program registration fees have been implemented to recover direct costs, and limited educational sponsorships are used only in a Keller-compliant manner. The FY 2026 budget

projects revenues of \$59,375 against operating expenses of \$20,600. Including the SBM loan interest assumption (estimated \$1,500), total FY 2026 expenses are projected at \$22,100, resulting in a projected surplus of \$37,275. Loan principal and remaining accrued interest are budgeted to be paid in FY 2027 from FY 2027 dues receipts, with the loan retired in November 2027. Importantly, this surplus does not assume growth in programming or extraordinary revenue and reflects disciplined cost recovery.

Multi-year projections through 2029 demonstrate recurring operating surpluses and gradual reserve rebuilding under conservative assumptions. These projections confirm that the Section can maintain solvency, absorb minor fluctuations, and continue delivering high-quality legal education without exposing the State Bar to undue financial risk or requiring extraordinary support.

Governance and compliance are institutionalized through formal controls. The Section Council approves budgets, conducts quarterly financial reviews, and utilizes a Conditions of Approval Compliance Checklist that is certified on a quarterly basis. This framework ensures ongoing adherence to the Plan and prevents a return to deficit spending. Compliance is embedded in the Section's governance practices and does not depend on individual leadership.

The Plan preserves and strengthens the Section's educational mission. Programming focuses on rapidly evolving and practice-critical issues, including cannabis taxation, regulatory compliance, criminal law implications, municipal regulation, and federal rescheduling developments. Education remains accessible, practice-focused, and aligned with the State Bar's core objectives of attorney competence and public protection.

In sum, this Plan represents a responsible, sustainable, and low-risk path forward. It resolves the structural causes of prior deficits, establishes durable financial controls, and aligns the Section's operations with State Bar expectations. The Cannabis Law Section respectfully submits this Plan in support of a favorable recommendation by the State Bar of Michigan Finance Committee.

SECTION 1

Purpose, Authority, and Statement to the State Bar of Michigan Finance Committee

This Comprehensive Fiscal Responsibility Plan and Strategic Roadmap (the "Plan") is submitted by the Cannabis Law Section of the State Bar of Michigan (the "Section") in response to guidance provided by State Bar leadership and the State Bar of Michigan Finance Committee. The purpose of this Plan is to demonstrate, in a clear and documented manner, that the Section has identified the structural causes of its prior financial deficits, implemented corrective measures sufficient to restore and maintain solvency, and adopted governance and financial controls that ensure long-term sustainability and compliance with State Bar requirements, including Keller principles.

This Plan is not aspirational. It is operational. It reflects decisions already made by the Section Council, actions already taken to reduce financial risk, and a conservative financial model designed to protect the State Bar while allowing the Section to continue fulfilling its educational mission.

The Section submits this Plan to support a favorable recommendation by the Finance Committee and to provide a transparent framework against which future performance may be evaluated.

The Section recognizes its obligation to operate as a component of the State Bar of Michigan and to steward its resources responsibly. This Plan is intended to give the Finance Committee confidence that the Section's financial practices are now disciplined, predictable, and aligned with the expectations of the State Bar.

SECTION 2

Background and Structural Causes of Prior Deficits

Between 2023 and early 2024, the Cannabis Law Section experienced recurring operating deficits. These deficits were not the result of declining relevance, reduced member engagement, or diminished demand for cannabis law education. Rather, they were the product of a structural cost model that exposed the Section to high fixed expenses without commensurate, reliable revenue.

Specifically, the Section relied heavily on hotel-based conferences and programming administered through external providers. These events carried significant fixed costs, including venue minimums, food and beverage commitments, audiovisual expenses, and administrative fees. Attendance variability—common in a rapidly evolving practice area—meant that even well-attended programs could fail to cover their full costs. When attendance fell short of projections, the Section absorbed losses that could not be offset elsewhere in the budget.

The use of third-party administrative services further constrained the Section's ability to adjust quickly. Costs were incurred regardless of final attendance or revenue performance, and the Section lacked the flexibility to scale programming up or down without incurring penalties or sunk costs. Over time, this model created a persistent mismatch between revenue and expense.

Importantly, these deficits did not reflect a failure of governance or commitment by the Section's leadership. They reflected an inherited operational model that was increasingly incompatible with prudent financial management in a Section environment. Once this became clear, the Section Council, in consultation with State Bar leadership, determined that incremental adjustments would be insufficient and that a comprehensive restructuring was required.

SECTION 3

Financial Diagnosis and Lessons Learned (2023–2025)

A review of the Section's historical financial statements confirms that the deficits experienced during this period were structural rather than episodic. Event-related expenses consistently represented the largest category of expenditures, and administrative costs consumed a disproportionate share of available revenue. Fixed costs limited the Section's ability to respond to normal fluctuations in attendance, sponsorship interest, and external market conditions.

When the Section discontinued hotel-based events and ceased reliance on high-cost third-party administration, its financial position stabilized rapidly. This outcome was instructive. It demonstrated that the underlying educational mission of the Section remained strong and that demand for cannabis law programming persisted. The problem was not the programming itself; it was the cost structure supporting it.

The Section also learned that financial sustainability requires predictability more than ambition. Large-scale events with significant upfront costs introduce risk that is difficult to manage in a Section context. By contrast, lower-cost venues, scalable programming, and internally managed administration allow the Section to align expenses more closely with actual demand.

These lessons inform every aspect of this Plan. The Section has deliberately chosen a conservative operating model that prioritizes solvency, flexibility, and accountability over scale. This approach reduces risk to the State Bar while preserving the Section's ability to provide timely, relevant education to Michigan attorneys.

SECTION 4

Path to Solvency and Corrective Strategy

The revised model materially reduces the likelihood that the Section would require extraordinary support from the State Bar. The Cannabis Law Section's path to solvency is grounded in a deliberate shift from a high-risk, fixed-cost operating model to a conservative, scalable, and internally controlled structure. This corrective strategy has already been implemented in key respects and is designed to ensure that annual revenues consistently meet or exceed expenses beginning in fiscal year 2026.

The Section's corrective strategy rests on three interrelated principles: (1) elimination of structural deficits, (2) alignment of expenses with actual demand, and (3) institutionalization of financial discipline through governance controls.

First, the Section has permanently exited the event model that generated recurring losses. Hotel-based conferences and externally administered programming have been eliminated. These events required significant upfront financial commitments that could not be adjusted once incurred, exposing the Section to losses even when programs were well received. By removing these fixed obligations, the Section eliminated the primary driver of its historical deficits.

Second, the Section adopted a scalable programming model that allows expenses to rise or fall in proportion to participation. Webinars and in-person programs held at State Bar facilities or municipal community centers can be adjusted in scope, frequency, and format without incurring penalties or sunk costs. This flexibility ensures that the Section can respond prudently to changes in attendance, economic conditions, or regulatory developments without jeopardizing solvency.

Third, the Section implemented governance-based financial controls to prevent a return to deficit spending. Budgets are prepared using conservative assumptions and reviewed by the Council prior to adoption. No program may proceed without an identified funding source, and no expenditure may be incurred outside the approved budget without Council authorization. Quarterly financial reviews provide ongoing oversight and allow for early intervention if variances arise.

Together, these measures create a clear and credible path to solvency. The Section is no longer dependent on optimistic attendance projections or high-risk events to balance its budget. Instead, solvency is achieved through predictable revenue, disciplined spending, and continuous oversight. This approach substantially reduces risk to the State Bar and provides the Finance Committee with confidence that deficits will not recur.

Chart I: FY 2026 Operating Budget (Revenue vs. Expenses)

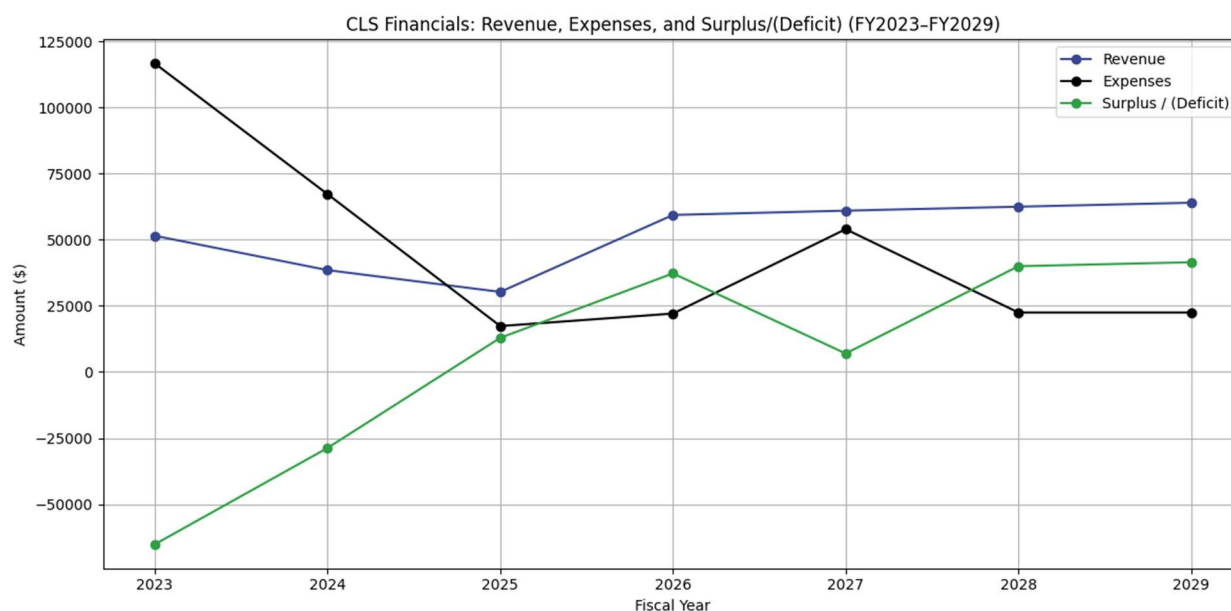


Figure 1 illustrates the elimination of structural operating deficits following the Cannabis Law Section’s transition away from fixed-cost, hotel-based programming, loan, with the implementation of a scalable, fee-supported educational model. The loan will expire in the 2027 fiscal year by Section’s dues.

SECTION 5

Revenue Model: Fees, Sponsorships, and Membership Stability

The Section’s revenue model is intentionally diversified, conservative, and aligned with its educational mission. Beginning in fiscal year 2026, revenues will be generated through three primary sources: Section dues, modest program registration fees, and limited educational sponsorships. No single revenue stream is relied upon to support core operations, reducing vulnerability to market fluctuations.

Section dues remain a foundational source of revenue and reflect the continued relevance of cannabis law as a practice area in Michigan. Membership levels have remained stable despite prior financial challenges, underscoring the Section's value to practitioners. The Plan does not assume aggressive membership growth; instead, it relies on conservative projections that reflect historical participation.

Program registration fees represent a necessary and reasonable adjustment to the Section's prior approach. Historically, many programs were offered at little or no cost, even when expenses were significant. Under the revised model, webinars, the Spring Conference, and the Annual Conference will carry modest registration fees designed to offset direct costs. These fees are set well below commercial CLE rates and are calibrated to ensure accessibility while supporting financial sustainability. Importantly, fees are directly tied to program delivery and are not used to subsidize unrelated expenses.

Educational sponsorships provide a supplementary revenue stream while remaining fully Keller-compliant. Sponsorship opportunities are limited in scope and designed solely to support educational programming. Sponsors may receive recognition, but they exert no influence over content, speaker selection, or programming decisions. All sponsorship arrangements are transparent and subject to Council oversight.

The combined effect of these revenue sources is predictability rather than maximization. The Section has deliberately avoided revenue assumptions that depend on extraordinary events, speculative growth, or external funding. Instead, the revenue model is designed to reliably cover expenses under ordinary conditions. This conservative approach aligns with the expectations of the Finance Committee and reflects prudent stewardship of State Bar resources.

SECTION 6

Expense Reduction and Permanent Cost Controls

Expense reduction is the cornerstone of the Section's financial turnaround and the primary safeguard against future deficits. The measures adopted are structural, permanent, and enforceable through governance mechanisms.

The most significant cost savings result from the elimination of hotel-based conferences and externally administered events. By transitioning all in-person programming to the State Bar of Michigan building in Lansing and to municipal community centers, the Section has reduced venue-related costs by an estimated 70–90 percent. These facilities eliminate or significantly reduce expenses associated with room rental, catering minimums, audiovisual services, and contractual penalties.

Chart II: Cost Reduction Comparison

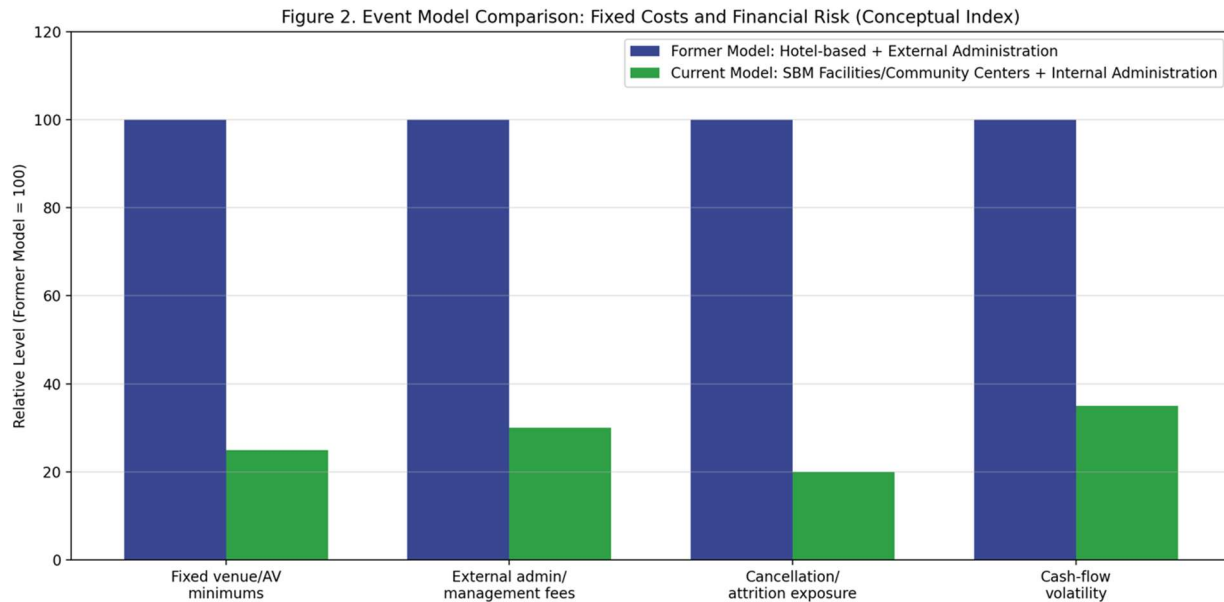


Figure 2 compares the Section’s former hotel-based, externally administered event model with the current model utilizing State Bar facilities, municipal community centers, and internal administration. The chart illustrates permanent reductions in fixed costs and materially lower financial risk.

Administrative expenses have also been substantially reduced and stabilized. The Section no longer relies on high-cost third-party administration for routine programming and coordination. Instead, administrative functions are managed internally under a clearly defined and capped arrangement. This shift provides cost predictability, improves accountability, and allows the Section to adjust workloads without incurring additional fixed expenses.

Travel and reimbursement policies have been tightened to reflect the Section’s emphasis on fiscal discipline. Travel reimbursements are limited, require advance approval, and are granted only when necessary to advance the Section’s educational mission. Remote participation is encouraged where feasible, further reducing costs.

These expense controls are reinforced by formal governance measures. The Council reviews financial performance quarterly, compares actual results against budgeted projections, and takes corrective action when necessary. No event or initiative may proceed without confirmation that sufficient funds are available to cover associated costs. These controls ensure that cost savings are not temporary but embedded into the Section’s operating practices.

By permanently reducing its cost base and institutionalizing oversight, the Section has created a durable financial structure. Expenses are now aligned with realistic revenue expectations, and the risk of unanticipated losses has been materially reduced. This approach provides the Finance

Committee with assurance that the Section’s financial recovery is sustainable and not dependent on favorable assumptions or short-term measures.

SECTION 7

Budget Framework and Financial Projections (SBM Account Codes)

The Cannabis Law Section’s budget framework is designed to be transparent, conservative, and consistent with State Bar of Michigan accounting practices. Budgets are prepared using established SBM account codes to ensure clarity, comparability, and ease of oversight by the Finance Committee and State Bar staff. This approach reinforces accountability and allows for meaningful monitoring of financial performance over time.

The Section’s operating budget focuses on a limited number of clearly defined revenue and expense categories. On the revenue side, the primary accounts include Section dues program registration fees, and educational sponsorship revenue. Expense accounts are similarly constrained and include administrative services, conference and program expenses, limited travel, and miscellaneous operational costs such as credit card processing and technology fees.

The FY 2026 budget reflects conservative assumptions across all categories. Revenue projections are based on historical membership levels and realistic participation in fee-based programming. No assumptions are made regarding extraordinary growth, unusually high attendance, or nonrecurring revenue sources. Sponsorship revenue is projected modestly and only to the extent that it can be reasonably supported by historical interest and market conditions.

FY 2026 Budget

Revenues (Operating)		
	40080 – Section Dues	\$30,000
	40085 – Section Affiliate Dues (minimum)	\$0
	42025 – Program/CLE & Conference Fees	\$24,375
	42010 – Educational Sponsorships	<u>\$5,000</u>
Total Operating Revenue		\$59,375
Expenses (Operating)		
	67010 – Administrative Services	\$15,000
	67020 – Conferences & Programming	\$4,000
	61200 – Travel	\$0
	64055 – Misc. / Processing Fees	\$1,600
	(TBD) – SBM Loan Interest (est.)	<u>\$1,500</u>
Total Operating Expenses		\$22,100
Net Operating Result (FY 2026)		
Projected Operating Surplus		\$37,275

Chart III and IV: FY 2026 Detailed Budget (By SBM Account Code)

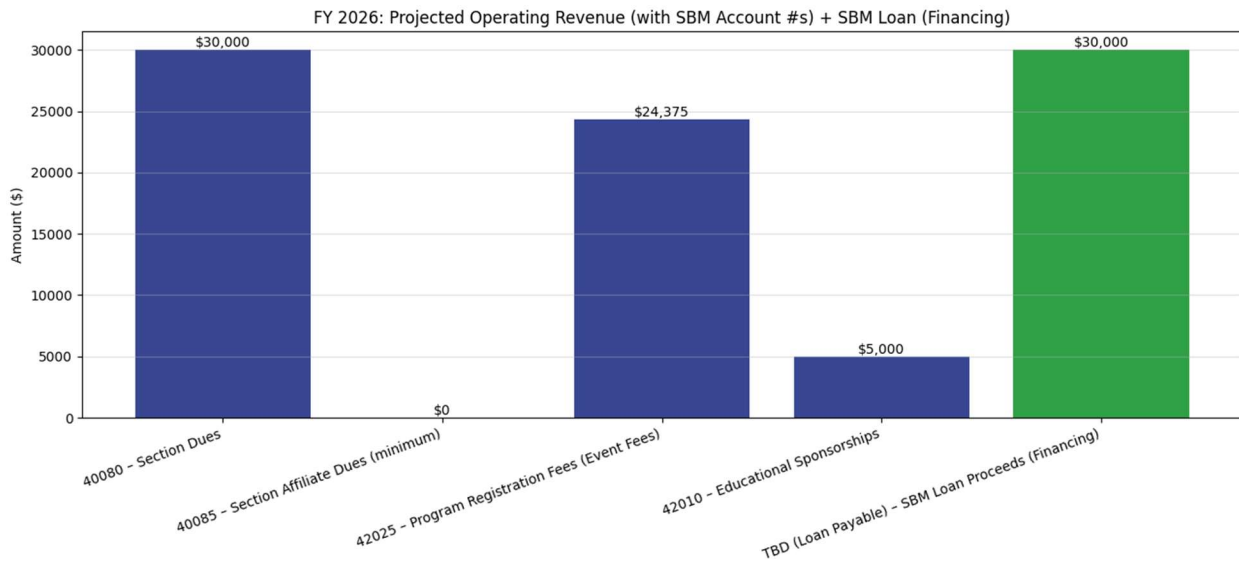
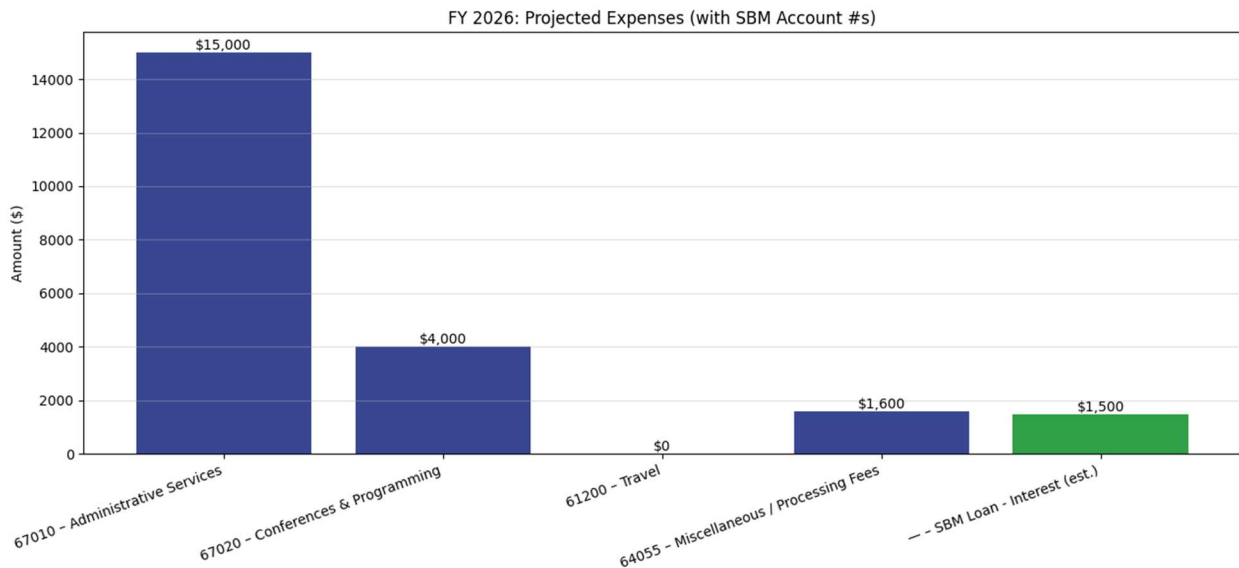


Figure 3 presents the FY 2026 revenue composition for the Cannabis Law Section, demonstrating diversification across dues, program fees, and limited educational sponsorships.

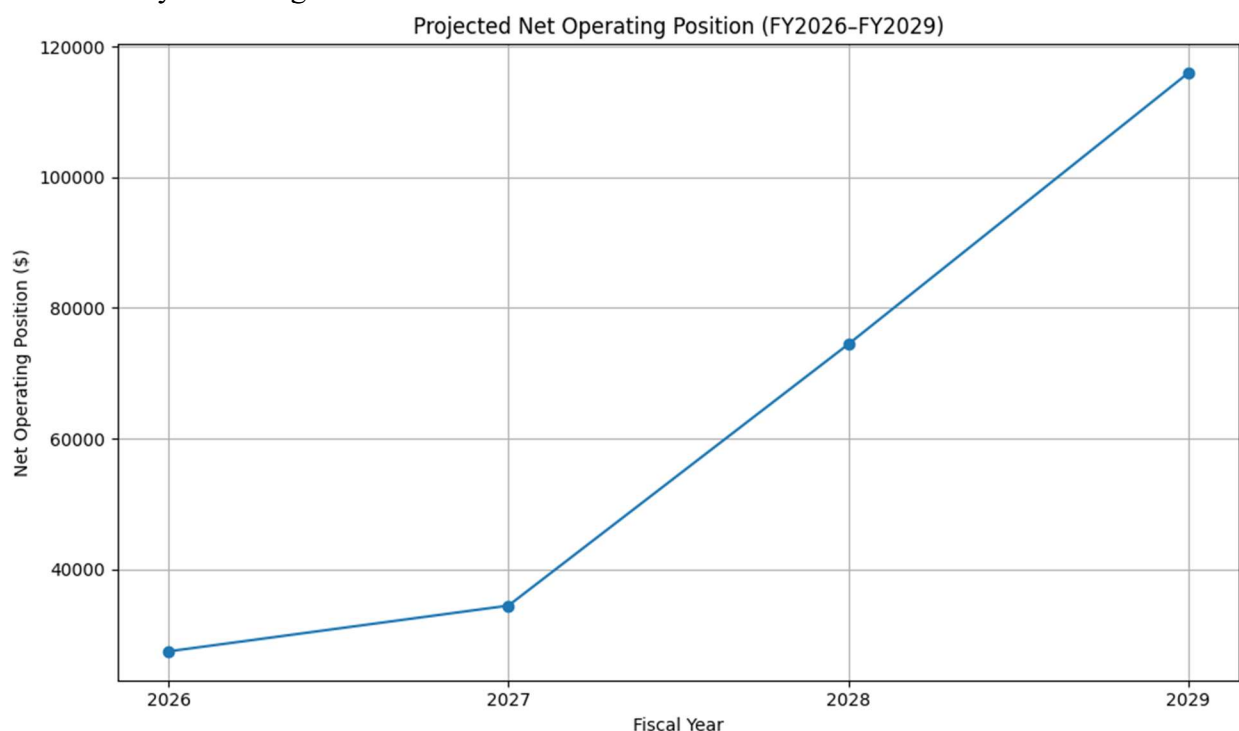


On the expense side, Figure 4 reflects the permanent structural changes adopted by the Section. Venue costs are minimized through exclusive use of State Bar facilities and municipal community centers. Administrative costs are capped and predictable. Travel expenses are limited and not assumed as a routine cost of operation. Importantly, the budget does not include contingency spending for unplanned initiatives; any such initiatives must be separately approved by the Council and supported by identified funding.

Multi-year projections extending through 2029 demonstrate a stable and improving financial position under this framework. Revenues are projected to exceed expenses annually, allowing the Section to rebuild reserves and absorb minor fluctuations without returning to deficit. These projections are intentionally conservative and assume steady-state operations rather than expansion. The result is a financial model that prioritizes sustainability and risk mitigation overgrowth for its own sake.

Chart V: Multi-Year Net Position (After SBM Loan Debt Service)

Figure 5 reflects conservative multi-year projections demonstrating the Section’s ability to meet operating obligations, repay the SBM loan in FY 2027, and rebuild positive net position under the revised financial model. These projections assume steady-state operations and do not rely on extraordinary revenue growth.



This budget framework provides the Finance Committee with confidence that the Section’s financial recovery is not dependent on optimistic assumptions. Instead, it is grounded in realistic projections, disciplined spending, and continuous oversight consistent with State Bar expectations.

SECTION 8

Risk Analysis and Contingency Planning

The Section recognizes that prudent financial management requires not only a balanced budget but also a clear understanding of potential risks and a plan to address them. The primary financial risks facing the Section under this Plan include lower-than-anticipated participation in fee-based

programs, reduced sponsorship interest, or unanticipated expenses related to compliance or technology.

These risks are mitigated by the Section's low fixed-cost structure. Because the Section no longer incurs significant upfront costs for venues or third-party administration, most expenses are variable and can be adjusted in response to actual demand. If participation in a particular program is lower than anticipated, the Section can scale back future programming without incurring losses. There are no long-term contracts or minimum spending commitments that would force the Section to operate at a deficit.

The Section has also adopted procedural safeguards to address financial variances as they arise. Quarterly financial reviews compare actual revenues and expenses against budgeted projections. Material variances are reported to the Council, along with recommended corrective actions. These may include adjusting the frequency of programming, modifying registration fees for future events, or deferring discretionary initiatives.

Importantly, the Plan does not rely on reserve depletion as a risk mitigation strategy. The goal of the multi-year projections is to rebuild reserves rather than draw them down. This ensures that the Section maintains a financial buffer to address unforeseen circumstances without seeking extraordinary assistance from the State Bar.

By combining a conservative budget, flexible cost structure, and active oversight, the Section has substantially reduced its financial risk profile. The likelihood of recurring deficits has been materially diminished, and any emerging risks can be addressed early and proportionately.

SECTION 9

Educational Mission and Importance to Michigan Practitioners

The Cannabis Law Section's financial restructuring has been undertaken in service of, not in opposition to, its educational mission. The Section's programming addresses a rapidly evolving and highly regulated area of law that affects a broad range of Michigan practitioners, including those practicing in administrative, criminal, tax, municipal, and business law.

Beginning in 2026, the Section's educational offerings will focus on developments of immediate and practical significance. These include the implementation of Michigan's 24 percent cannabis wholesale tax effective January 1, 2026; ongoing rulemaking and enforcement activity by the Cannabis Regulatory Agency; federal rescheduling of cannabis from Schedule I to Schedule III and its implications for medical marijuana and cannabidiol research; and the intersection of cannabis regulation with municipal licensing, zoning, and land use authority.

The Section also addresses criminal law implications that continue to arise as the industry evolves, including compliance enforcement, investigations, and collateral consequences for licensees and

individuals. These topics are directly relevant to public protection and attorney competence, core objectives of the State Bar.

By delivering timely, practice-focused education in a cost-effective manner, the Section supports Michigan attorneys in navigating a complex regulatory environment while reducing risk to clients and the public. The revised financial model ensures that this educational mission can be sustained without exposing the State Bar to undue financial risk.

The Section's commitment to collaboration further enhances the value of its programming. Educational partnerships with other SBM Sections, municipal regulators, and industry stakeholders—structured to remain strictly educational and Keller-compliant—provide practitioners with diverse perspectives while maintaining neutrality and independence.

In this way, the Section's educational mission and its financial responsibility are mutually reinforcing. The Plan ensures that high-quality cannabis law education remains available to Michigan attorneys while operating within a disciplined, transparent, and sustainable financial framework.

SECTION 10

Governance, Oversight, and Keller Compliance

Robust governance and strict adherence to Keller principles are central to the Section's financial turnaround and to the credibility of this Plan. The Section has implemented governance mechanisms designed to ensure that financial discipline is maintained, risks are identified early, and all activities remain within the permissible scope of Section operations under State Bar rules.

The Section Council exercises direct oversight of financial planning and performance. Annual budgets are reviewed and approved by the Council prior to the beginning of each fiscal year. Budgets are constructed using conservative assumptions and reflect only those programs and initiatives for which funding sources are clearly identified. No expenditures may be incurred outside the approved budget without express Council authorization.

Financial performance is monitored on a quarterly basis. Actual revenues and expenses are compared against budgeted projections, and material variances are reported to the Council. This review process is not perfunctory; it is intended to function as an early warning system that allows the Section to take corrective action before deficits can develop. The Council may adjust programming, defer discretionary initiatives, or revise future budgets as necessary to maintain solvency.

The Section has also adopted a formal Conditions of Approval Compliance Checklist, which operationalizes the commitments set forth in this Plan. The checklist is reviewed and certified by the Council on a quarterly basis and serves as a standing agenda item at Council meetings. This

process institutionalizes accountability and ensures that compliance is not dependent on individual leadership but embedded into the Section's governance structure.

All Section activities are conducted in strict compliance with Keller principles. Programming is educational in nature, germane to the practice of law, and designed to improve attorney competence and public protection. The Section does not engage in lobbying or advocacy, and mandatory dues are not used to support political or ideological activity. Educational sponsorships, where utilized, are limited to recognition and do not permit influence over content or programming decisions.

These governance and compliance measures provide the Finance Committee with assurance that the Section's financial recovery is accompanied by mature institutional controls. The Section is not merely solvent; it is governed in a manner that reduces risk and aligns with the State Bar's fiduciary responsibilities.

SECTION 11

Strategic Collaborations and Inter-Section Coordination

The Section's revised operating model emphasizes collaboration as a means of enhancing educational quality while controlling costs. Strategic partnerships allow the Section to deliver high-value programming without duplicating efforts or incurring unnecessary expenses.

Within the State Bar of Michigan, the Section will continue to collaborate with other Sections whose practice areas intersect with cannabis law. Coordination with the Taxation Section is particularly important in light of the implementation of Michigan's cannabis wholesale tax and the complex tax compliance issues facing licensees. Collaboration with the Criminal Law Section addresses enforcement actions, investigations, and compliance-related criminal exposure that remain a reality in the industry. Engagement with Sections focused on administrative and municipal law further strengthens programming related to licensing, zoning, and regulatory oversight.

The Section also recognizes the educational value of engagement with regulators and industry stakeholders, provided such engagement remains strictly educational and Keller-compliant. Programming may include perspectives from municipal cannabis regulators, the Cannabis Regulatory Agency, and industry associations such as the Michigan Cannabis Industry Association, where appropriate. These collaborations provide practitioners with insight into regulatory frameworks and enforcement priorities without advocating for particular policy outcomes.

From a financial perspective, collaboration reduces costs by enabling co-sponsored programs, shared administrative resources, and efficient use of venues. Joint programming expands the potential audience for events, improving cost recovery while maintaining conservative fee

structures. Importantly, collaborative initiatives are subject to the same budgeting, approval, and oversight processes as all other Section activities.

By leveraging collaboration thoughtfully, the Section enhances the relevance and reach of its educational offerings while reinforcing its commitment to fiscal responsibility.

SECTION 12

Multi-Year Sustainability and Conclusion

This Plan establishes a financial and governance framework designed to sustain the Cannabis Law Section through the 2026–2029 period and beyond. Sustainability, as defined here, does not mean expansion or growth for its own sake. It means the ability to continue delivering high-quality, relevant legal education while operating within a predictable, low-risk financial model.

The Section’s multi-year projections demonstrate that, under conservative assumptions, revenues will exceed expenses annually. This allows for the gradual rebuilding of reserves and provides a buffer against unforeseen circumstances. Because the Section’s fixed costs are minimal and its programming scalable, modest fluctuations in revenue do not threaten solvency.

Equally important, the Plan embeds financial discipline into the Section’s institutional practices. Governance controls, quarterly reviews, and compliance certifications ensure that the lessons learned from prior deficits are not forgotten. Future Councils will operate within a framework that prioritizes accountability, transparency, and alignment with State Bar expectations.

In conclusion, this Comprehensive Fiscal Responsibility Plan and Strategic Roadmap resolves the structural causes of the Section’s prior deficits and establishes a durable path forward. The Section has taken meaningful corrective action, adopted conservative financial practices, and implemented governance mechanisms that materially reduce risk to the State Bar. The Section respectfully submits this Plan to the Finance Committee in support of a favorable recommendation and stands ready to operate in accordance with the commitments set forth herein.

Multi-Year Financial Roadmap (2026–2029)

A. Key Planning Assumptions

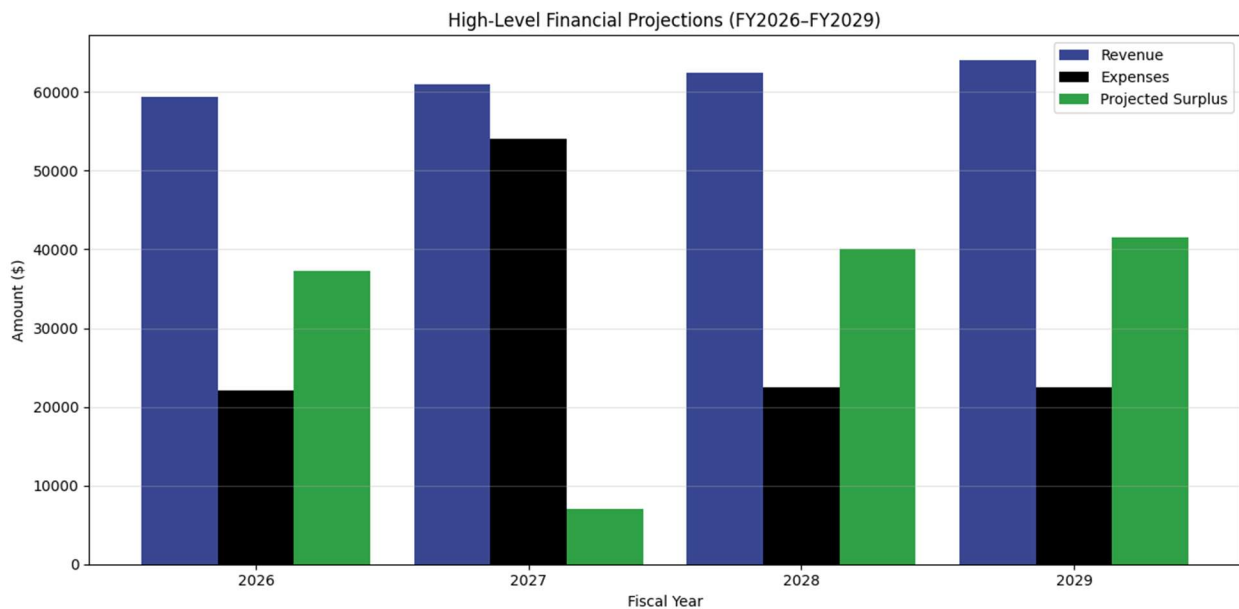
The projections below are based on the following assumptions:

- Section dues remain approximately \$30,000 annually, with modest growth potential.
- Event volume and fee levels stabilize following implementation in 2026.
- Educational sponsorship revenue grows gradually as relationships mature.
- Administrative services remain capped at \$15,000 annually, subject to Council review.
- Programming continues to rely on SBM facilities and municipal community centers.

No assumptions are made regarding extraordinary growth, expansion of programming, or external funding.

B. High-Level Financial Projections With Chart V

By FY 2029, the Section anticipates restoring and stabilizing a reserve position sufficient to absorb programmatic variability and support occasional larger initiatives without compromising fiscal discipline.



Fiscal Year	Revenue	Expenses	Projected Surplus
2026	\$59,375	\$22,100	\$37,275
2027	\$61,000	\$54,000	\$7,000
2028	\$62,500	\$22,500	\$40,000
2029	\$64,000	\$22,500	\$41,500

APPENDIX A
Council Resolution Adopting the Fiscal Responsibility Plan

Adopted ____ February, 2026

WHEREAS the Cannabis Law Section (the “Section”) has adopted a Financial Turnaround Plan and Strategic Roadmap (the “Plan”) to permanently reduce fixed costs and financial risk by shifting from hotel-based, externally administered events to programming using SBM facilities/municipal community centers with internal administration; and

WHEREAS the Section’s FY 2026 Operating Budget projects Revenue \$59,375, Expenses \$22,100, and Surplus \$37,275, and the Section requires short-term working capital through October 31, 2026; and

WHEREAS the Section intends any SBM loan be repaid from FY 2027 dues and retired in November 2027, with a minimum interest rate set at execution;

NOW, THEREFORE, BE IT RESOLVED that the Council:

1. Approves the FY 2026 Operating Budget: \$59,375 revenue; \$22,100 expenses; \$37,275 surplus;
2. Authorizes the Chair and Treasurer to request and execute an SBM loan up to \$30,000 to fund obligations and budgeted activities through October 31, 2026;
3. Directs the loan include a minimum interest rate set at execution and be repaid from FY 2027 dues and retired in November 2027; and
4. Authorizes the Chair and Treasurer to take all actions necessary to implement this Resolution and the Plan.

CERTIFICATION

Adopted by the Council on the ____ day of February, 2026.

_____\Secretary (or Designee)

_____\Chair

APPENDIX B

Member Fee Explanation and Rationale

The Cannabis Law Section has adopted a modest program fee structure as a necessary component of its long-term financial sustainability and in response to guidance from State Bar leadership regarding fiscal responsibility. This fee structure reflects a deliberate and measured shift away from subsidized programming that contributed to prior operating deficits and toward a model in which program costs are transparently and fairly allocated.

Historically, the Section offered many educational programs at little or no cost to participants, even when those programs incurred significant expenses. While well intentioned, this approach proved unsustainable. Fixed costs associated with venues, administration, and program delivery were not consistently offset by revenue, resulting in recurring deficits that ultimately required structural correction. The Section determined that continuing to offer free or heavily subsidized programming would perpetuate financial risk and undermine the Section's ability to operate responsibly within the State Bar framework.

Under the revised model, registration fees will be assessed for webinars, the Spring Conference, and the Annual Conference. These fees are intentionally modest and are set well below prevailing commercial CLE rates in Michigan. The purpose of the fees is not to generate surplus revenue, but to recover direct program costs, including technology, materials, and limited administrative support. Fees are calibrated to remain accessible to practitioners while ensuring that programs do not operate at a loss.

Importantly, registration fees are directly tied to educational programming and are not used to subsidize unrelated activities. This linkage promotes transparency and reinforces accountability. Members can be confident that fees paid support the delivery of high-quality, practice-relevant education and reduce the need for cross-subsidization from Section dues.

The Section recognizes that fee-based programming represents a change for some members. However, the Council believes that this approach is both reasonable and consistent with the practices of other State Bar Sections offering specialized CLE programming. Moreover, the revised model enhances fairness by aligning costs with participation, rather than distributing program expenses across the entire membership regardless of attendance.

The adoption of modest program fees is a key element of the Section's path to solvency. It ensures that educational offerings can be sustained over time without exposing the State Bar to financial risk. By implementing this fee structure, the Section demonstrates its commitment to fiscal responsibility while continuing to deliver valuable, timely education to Michigan attorneys practicing in the cannabis law space.

APPENDIX C

Educational Sponsorship Prospectus and Compliance Framework

Educational sponsorships are incorporated into the Cannabis Law Section's financial model as a limited, supplementary revenue source designed to support high-quality programming while maintaining strict compliance with Keller principles and State Bar policies. Sponsorships are not relied upon to fund core operations and do not replace membership dues or program registration fees. Instead, they provide targeted support for educational activities in a controlled and transparent manner.

Sponsorship opportunities are offered only in connection with specific educational programs, such as webinars, the Spring Conference, or the Annual Conference. Sponsorship recognition is limited to acknowledgment of financial support and may include the sponsor's name or logo in program materials. Sponsors do not receive speaking opportunities, content control, or preferential access to participants as a condition of sponsorship.

All sponsorship arrangements are reviewed and approved by the Section Council in advance. The Council ensures that sponsorships are educational in nature, germane to the practice of law, and do not involve advocacy or policy promotion. Mandatory dues are not used to subsidize sponsorship-related activities, and no sponsorship funds are commingled with resources dedicated to non-educational purposes.

This conservative approach reflects the Section's understanding of the sensitivities associated with sponsorship in a regulated industry. By limiting the scope of sponsorships and maintaining clear boundaries, the Section avoids reputational risk while benefiting from modest financial support that enhances educational offerings.

From a fiscal perspective, sponsorship revenue is projected conservatively and is not assumed to be recurring or guaranteed. The Section's budget remains balanced without sponsorship revenue, ensuring that sponsorships enhance sustainability rather than create dependency. This approach provides the Finance Committee with assurance that sponsorships do not introduce undue financial or compliance risk.

The adoption of modest program fees is a key element of the Section's path to solvency. It ensures that educational offerings can be sustained over time without exposing the State Bar to financial risk. By implementing this fee structure, the Section demonstrates its commitment to fiscal responsibility while continuing to deliver valuable, timely education to Michigan attorneys practicing in the cannabis law space.

APPENDIX D

Budget Tables, Financial Metrics, and Chart Explanations

This Appendix provides additional detail regarding the Section’s budget structure and the financial metrics referenced throughout the Plan. All budgetary information is organized using State Bar of Michigan account codes to facilitate review and oversight.

The FY 2026 operating budget reflects the Section’s revised financial model. Revenue is derived from Section dues (Account 40080), Section affiliate dues (Account 40085), program registration conference fees, (Account 42025), and limited educational sponsorships. (Account 42010). Expense categories include administrative services (Account 67010), conferences and educational programming (Account 67020), limited travel (Account 61200), and miscellaneous operational costs such as technology, credit card processing (Account 64055) and SBM Loan Interest Estimate (TBD).

Charts included in the Plan are intended to illustrate the practical impact of the Section’s corrective strategy. The revenue-versus-expense trend chart demonstrates the transition from a deficit-producing model to one in which revenues exceed expenses on a recurring basis. This trend is driven primarily by the elimination of fixed-cost events and the introduction of modest, predictable program fees.

The cost reduction comparison chart highlights the difference between the prior hotel-based, externally administered event model and the current approach utilizing State Bar facilities and municipal community centers. The reduction in venue-related expenses is substantial and permanent, forming the foundation of the Section’s improved financial position.

Multi-year projections extending through 2029 illustrate the Section’s ability to generate modest operating surpluses under conservative assumptions. These projections do not assume growth beyond historical norms and are intended to demonstrate sustainability rather than expansion. The resulting financial profile is stable, predictable, and aligned with the State Bar’s expectations for responsible Section management.

APPENDIX E

Conditions of Approval Compliance Framework

This Appendix formalizes the mechanisms by which the Cannabis Law Section will ensure ongoing compliance with the commitments set forth in this Plan and with any conditions imposed by the State Bar of Michigan Finance Committee or Board.

The Section has adopted a Conditions of Approval Compliance Checklist that translates the principles of this Plan into operational requirements. The checklist addresses, among other items, budget adherence, use of approved venues, fee-based programming implementation, sponsorship limitations, Keller compliance, and quarterly financial reporting.

The Compliance Checklist is reviewed and certified by the Section Council on a quarterly basis and is maintained as a standing agenda item at Council meetings. Certification requires confirmation that the Section remains in compliance with approved budgets, that no unapproved expenditures have been incurred, and that all programming remains educational and non-advocacy in nature.

If noncompliance or material deviation from the Plan is identified, the Council is required to take corrective action promptly. This may include modification of programming, adjustment of fees, deferral of discretionary initiatives, or consultation with State Bar staff. The objective of the framework is early intervention and continuous compliance, rather than retrospective correction.

By embedding this compliance framework into its governance practices, the Section ensures that financial discipline and accountability are sustained beyond the current leadership term. This institutional approach provides the Finance Committee with confidence that the Section's commitments are durable and enforceable.

Quarterly Certification Checklist

I. Budget Adherence and Financial Performance

(Plan Sections 4, 7, 9; Appendix D)

- ☐ The Section is operating within the Council-approved budget for the current fiscal year.
- ☐ No expenditures have been incurred outside the approved budget without prior Council authorization.
- ☐ Actual revenues and expenses have been reviewed against projections for the quarter.
- ☐ Any material variances have been identified, explained, and addressed by the Council.
- ☐ The Section's financial position remains solvent, with revenues meeting or exceeding expenses.

II. Revenue Controls and Fee Implementation

(Plan Sections 5, 7; Appendix B)

- ☐ Section dues continue to be collected and recorded under SBM Account 40080.
- ☐ Program registration fees (webinars, Spring Conference, Annual Conference) are being assessed consistently with the Plan.
- ☐ Registration fees are limited to cost recovery and do not exceed amounts approved by the Council.
- ☐ No program has been offered at a loss.
- ☐ Fee-based programming remains accessible and aligned with the Section's educational mission.

III. Expense Controls and Cost Reduction Measures

(Plan Sections 4, 6, 7)

- ☐ No hotel-based or fixed-cost venue events have been scheduled.
- ☐ All in-person programs utilize the State Bar of Michigan building or municipal community centers.
- ☐ Administrative services remain capped at the approved level and are subject to quarterly review.
- ☐ Travel reimbursements, if any, were pre-approved and necessary to advance the educational mission.
- ☐ No long-term contracts or minimum spending commitments have been entered into.

IV. Sponsorship Compliance

(Plan Section 5; Appendix C)

- ☐ Sponsorships are limited to educational programs only.
- ☐ Sponsorship recognition is limited to acknowledgment and does not include content control or speaking rights.
- ☐ All sponsorships were reviewed and approved by the Council in advance.
- ☐ Sponsorship funds are not commingled with mandatory dues for non-educational purposes.
- ☐ All sponsorship activity remains fully Keller-compliant.

V. Programming, Education, and Keller Compliance

(Plan Sections 9, 10)

- ☐ All Section programming is educational in nature and germane to the practice of law.
- ☐ No lobbying, advocacy, or ideological activity has been undertaken using Section resources.
- ☐ Mandatory dues have not been used for impermissible purposes.
- ☐ Programming topics remain focused on attorney competence, regulatory compliance, and public protection.

VI. Governance and Oversight

(Plan Sections 10, 12; Appendix E)

- ☐ The Council reviewed financial reports during the quarter.
- ☐ This Checklist was reviewed as a standing agenda item.
- ☐ Any compliance issues were identified and corrective action initiated.
- ☐ The Council affirms continued adherence to the Plan and its commitments.

Council Certification

By signature below, the Cannabis Law Section Council certifies that, to the best of its knowledge, the Section remains in compliance with the Fiscal Responsibility Plan and Strategic Roadmap (2026–2029) for the quarter indicated.

Quarter: _____

Date of Review: _____

Chair: _____ Date: _____

Treasurer / Finance Liaison: _____ Date: _____

11. Professional Standards

Presented by Suzanne C. Larsen

12. For the Good of the Public and the Profession

12.1. Comments or Questions from Commissioners

12.2. Public Comment

Any member of the public who wishes to address the commissioners during public comment must sign up before 9:30 a.m. on the date of the meeting using the “Public Comment Sign Up” sheet available at the front desk of the State Bar Building.

13. Adjournment