SUPREME COURT OF WISCONSIN

OFFICE OF LAWYER REGULATION
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DATE: September 24, 2014

TO: Chief Justice Abrahamson
Board of Administrative Oversight

FROM: Keith L. Sellen - Office of Lawyer Regulation

SUBJECT: OLR Response to the Gleason-Larkin Consultation Report

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In my May 14, 2014, memorandum to the Board, I informed the Board of my decision to consult with Mr. John Gleason of Colorado and Mr. Jerry Larkin of Illinois to identify ways to improve management of OLR and to discuss changes that would advance the interests of the public and the profession. I selected them because both are prominent nationally and well respected for their work in lawyer regulation. It was an appropriate time for a consultation: it has been 14 years since the current lawyer regulation system was established; changes have occurred in lawyer regulation throughout the country; and the Supreme Court has expressed concerns about the system in recent disciplinary decisions.

Mr. Gleason and Mr. Larkin came to Madison the week of July 21st. They met with the Preliminary Review Committee and the Board of Administrative Oversight via webcast on July 22nd. They met with two respondents' counsel and three referees on July 23rd. They consulted with OLR's managers over the course of both days. On September 8th, Mr. Gleason and Mr. Larkin submitted a consultation report, enclosed with this memorandum.

OLR deeply appreciates Mr. Gleason's and Mr. Larkin's gracious offer of time and expertise. They offered their services freely. OLR paid only their expenses, which included travel, lodging, and meals in an amount less than $1,300. Their visit was encouraging and enlightening. Their report provides many helpful and forward-thinking recommendations. As you will note in their description of the scope of their consultation, they closely reviewed the system.

As I provide this report to you, I wish to address the recommendations which Mr. Gleason and Mr. Larkin present in their report. While I will not address all the recommendations in this memorandum, I am available to discuss any of them with you.

Before proceeding further, I wish to echo their praise for "the dedication of OLR staff and volunteers, many of whom have devoted decades to this public service, and [for] Respondent's counsel, who demonstrate a commitment to their clients and to the effectiveness of the regulatory system."

Recommendation 1
OLR must come to terms with its caseload backlog.

OLR agrees, and will address the proposals presented here as they appear in later specific recommendations.

The caseload was not caused by the organizational structure or grievance process. Annual Reports of the Lawyer Regulation System show the workload demand increased from 1,896 new grievances in fiscal year 2007 to 2,677 in fiscal year 2012, an increase of 40%.

During the past two years, OLR has reduced the number of pending formal investigations by 150. This year, funds were budgeted for further reduction in the caseload, which is projected to finish reducing the caseload within the next two years.

The report recommends helpful measures that would have better enabled OLR to cope with the increased workload, and in the future, could significantly improve the timeliness of the processing of grievances.

Recommendation 2
The Director should reorganize staff divisions and assignments.

The report recommends assigning additional staff to the Trust Account Program sufficient to handle its caseload or assign duties to other divisions. OLR has assigned a full-time investigator to work with the trust account program in response to this recommendation.

The report also recommends merging the Investigation and Litigation Divisions. The synergy obtained from a merger would likely improve the timeliness of the process; but it is noteworthy that this would occur only if OLR exercises more discretion in the disposition of matters. It may be possible to achieve the same synergy by changing office procedures without changing the structure.

Merger would require re-designation of investigator positions as assistant litigation counsel positions, recruitment of assistant litigation counsel, and reclassification of two assistant litigation counsel positions to compensate supervisory responsibilities.

OLR will evaluate the policy and fiscal aspects of merger and provide further information to the Board.

Recommendation 3
The Director and Staff must exercise more discretion.

OLR recognizes that disciplinary counsel in other states routinely exercise discretion to close matters regarding minor violations, and that the Supreme Court's recent disciplinary decisions strongly suggest that OLR exercise more discretion. OLR agrees that technical violations resulting in no harm could be properly dismissed. Whether a change to rules in SCR, Chapter 22, is required for OLR to exercise more discretion is reasonably debated. There are some rules

[SCR 22.001(2), SCR 22.02(2)(c), SCR 22.03(1), and SCR 22.05(1)(a)] which appear to require OLR to investigate or to seek discipline whenever the evidence supports any rule violation. Amending the rules would clarify the discretion given to OLR, as well as the expectations of the public and profession. OLR intends to prepare a petition to modify the aforementioned rules and corresponding language in SCR 22.25 relating to special investigations.

The report recommended that the Preliminary Review Committee "limit its cause to proceed determination to whether there is cause to proceed" in a matter. The report further clarified, "The PRC should discontinue its practice of determining whether to authorize each alleged rule violation."

A count-by-count determination is a better protection against the filing of unwarranted charges, and involves little cost or delay. SCR 22.11(2) states that a complaint "shall set forth only those facts and misconduct allegations for which the preliminary review panel determined there was cause to proceed." OLR will refer this recommendation to the Preliminary Review Committee for its consideration; but does not propose the change.

Recommendation 4
The Director and Staff should implement more effective investigative practices.

OLR is reviewing its current investigative procedures to identify ways to eliminate duplication of effort and to improve efficiency. OLR will continue to to provide reports to grievants and respondents for comment prior to presentation to the Preliminary Review Committee, as this contributes to the fairness of the process and the accuracy of the information upon which the Committee relies.

Recommendation 8
The OLR and the Director should encourage discipline on consent.

OLR recognizes the efficiencies from the enhanced use of consent dispositions, both before and during litigation. OLR acknowledges "[w]hile some charges are central to the misconduct for which the Court would be asked to impose discipline, others are more technical in nature." OLR will endeavor to negotiate more consent dispositions.

Recommendation 9
The OLR should articulate and communicate its mission as assisting lawyers to represent clients effectively.

The Preamble to SCR, Chapter 21 says the purpose of the lawyer regulation system is to supervise the practice of law and to protect the public. SCR 21.02 describes the mission of the OLR.

OLR recognizes that its purpose and mission require it to assist lawyers to represent clients well. OLR will continue the lawyer support and monitoring program, educational seminars, consumer protection initiatives, public information presentations, and developing electronic banking procedures for trust accounts. Information about these programs and initiatives is available in

the Annual Reports and in other information available from OLR's website: www.wicourts.gov/olr.

Respectfully,

Keith L. Sellen
Director

cc: Preliminary Review Committee
OLR Staff

Consultation with the Wisconsin Office of Lawyer Regulation (OLR)
July 21-23, 2014

John S. Gleason, Of Counsel, Colorado Supreme Court Office of Attorney Regulation Counsel
Jerome E. Larkin, Administrator, Attorney Registration and Disciplinary Commission,
Supreme Court of Illinois

Scope of Consultation:

1. Review of current and past OLR Annual Reports;
2. Review of SCR Chapters 21 & 22;
3. Review of March, 2014 Director's Report;
4. Review of February, 2012 Report on the Wisconsin Lawyer Regulation System
5. Review of the March, 2004 Board of Administrative Oversight report on The Function and Operation of District Committees;
6. Review of several Wisconsin Supreme Court discipline opinions;
7. Review of probable cause reports, complaints, diversions and other OLR reports;
8. Meetings with OLR Director and his management team (intake, investigation, trial and trust account);
9. Meeting with Respondent's counsel; and,
10. Meeting with Referees

Preliminary Statement:

We are honored to consult with the OLR regarding the Wisconsin lawyer regulatory system. Some 15 years ago, much thought and leadership resulted in the formation of the present system, which for many years has served the Court, the profession and the public well. We are impressed with the dedication of OLR staff and volunteers, many of whom have devoted decades to this public service, and with Respondent's counsel, who demonstrate a commitment to their clients and to the effectiveness of the regulatory system. Nonetheless, recent opinions of the Supreme Court make it clear that the system is due for a comprehensive review. Questions regarding the timeliness and effectiveness of the OLR require answers.

In our meetings, we advised participants that we looked forward to their frank comments and that our report would not attribute statements to any particular person. Generally speaking, those with whom we spoke (collectively, "commentators") expressed support for the system, but expressed strong conviction that change is necessary for the OLR to meet changing regulatory expectations. We received many thoughtful suggestions for improvement. We are not surprised. As with all organizations, new approaches can lead to invigoration and more productive outcomes. We are also guided by our understanding of the many significant changes underway in the profession and lawyer regulation nationally and internationally.

We observe that in 2012 the OLR completed a study of the efficacy of its system and expressed recognition that systemic change would be beneficial. We both believe that the time is right to leverage the talent and dedication of commentators to make significant changes in OLR's approach.

Key Recommendations:

1. The OLR Must Come to Terms With Its Caseload Backlog.

We heard from most commentators that the current docket is unsustainable, particularly in the trust account, investigative, and litigation divisions. The OLR must come to terms with the fact that its present approach to handling its caseload has led to a substantial backlog and an unsustainable work flow.

Each level of the system has operational strengths and weaknesses. Many matters are resolved well and within reasonable time frames. Unfortunately, other matters are delayed substantially. We attribute much of the delay to limited use of discretion, unnecessary and time consuming approaches to the handling of cases at certain levels, and the bifurcation of the Investigation and Litigation Divisions, which causes unnecessary duplication of work and interferes with development of a more effective, team oriented approach to litigation. Rather than the commonly used vertical method of case management, the OLR uses a horizontal approach to moving cases. A case will be handled by multiple staff members in succession at intake, investigation and litigation. There seems to be little communication among the various divisions, which exacerbates the review process. The four distinct divisions operate as "silos," which creates *unnecessary and costly replication.* Based on our discussions with the management staff, these divisions appear engrained in the culture of the office. Arguments of certain staff members for continued separation and specialization are stated with conviction and power. We respectfully disagree.

We provide our observations regarding each division: Trust Account, Intake, Investigation, and Litigation.

Trust Account Program: Currently, the Program Administrator handles overdraft notifications, about 40 trust account investigations, forensic litigation support and educational programming, without professional assistance for those assignments. The scope of this workload is not sustainable as presently structured. Although the numbers of overdraft reports coming into the Trust Account Program are steady (about 100 annually), the demand for forensic analysis in investigation and litigation matters is significant. Educational duties are critical as well. The importance of early detection of trust account concerns, public confidence in lawyers and the potential for significant client harm warrant a review of staffing in this division or early assignment of discrete matters to intake or litigation.

The Intake Division: The division, including a Deputy Director and four lawyers serving in investigator positions, was assigned 2,324 matters in the 2012-13 year. The division concludes

the vast majority of grievances that it receives in an effective and timely manner. On average, cases were closed within 63 days in 2013. As of July 17, 2014, 405 inquiries were pending in intake, about 17% of its annual docket, or a two month inventory, which is consistent with its days to disposition figure.

Intake's processing of these grievances is laudable; nonetheless, Intake is looking for ways to improve its effectiveness. Of its 2013 dispositions, 12% were deferred, many of which might have been closed with a caution, and 17% were referred to investigation. Those percentages appear high for an intake operation. Many diversions appear to result from the fact that OLR staff believe that they cannot close an investigation if there is evidence of a violation, albeit a minor acknowledged violation with no harm to the public. This leads to devotion of scarce resources to the monitoring of the diversion. About 200 lawyers are in a diversion program, about 8% of all Wisconsin lawyers, according to the OLR's 2012-13 Annual Report. We believe that diversion is overused as an alternative to closing grievances that involve minor violations. If we are correct, this approach imposes unnecessary burden on lawyers whose conduct poses no risk to clients. Unnecessarily extended disciplinary intervention causes frustration among lawyers and may create unrealistic expectation for complainants. Although it is difficult to precisely determine the recidivism rate in the discipline system, it is clear that the overuse of diversion directly impacts the rate. The use of a *better practices* letter that addresses the minor violation vs. a diversion accomplishes the same goals of protecting the public and educating the lawyer.

Investigation Division: The docket of the Investigation Division is not sustainable at the current rates of case resolution. The number of matters transferred to investigation is consistent over the past several years. The current caseload on July 1, 2014 was 469, less approximately 80 trust account or special investigations handled by others, for a total of about 389 assigned to 11 FTE investigators. The division is typically assigned about 360 investigations each year. According the 2012-13 OLR Annual Report, 30% of dispositions of the Investigations Division resulted in assignment to litigation or discipline and 36% resulted in dismissal or diversion.

The March 31, 2014 Director's report reflects that a significant percentage of pending investigations are delayed. Of the 478 pending, 130, or 27.2% are over two years old. An additional 103 (21.5%) are over one year old, for a total number of 233 investigations older than one year (48.7%). The stale docket of the Investigation Division accounts for a ten year high in the number of matters that are one year or older (41% - 2012-13 Annual Report, Appendix 5).

We do not attribute these delays to the size of the Investigation Division. The staff includes 11 FTE investigators, all but two of whom are lawyers. This would result in assignment of about 30 investigations per year to each investigator.

We attribute delay to practices in the handling of investigations. The number and complexity of investigative steps and reports seems unnecessary. Some of the approach may arise from a sense that the Director and staff have little discretion to dismiss an investigation without

pursuit of every detail. Some appears to be a defensive approach born of staff reaction to the grievance appeal process by the PRC, which rarely reverses a staff dismissal. Some appears to relate to performance by some staff, who appear to resist management direction.

One commentator suggested that investigations that involve detail or complexity appear to stall. We did not observe a sense of urgency in this division, but rather a commitment to get every procedure and detail "right." Another commentator remarked that investigators appeared "overwhelmed" and that delay is a significant problem. Another comment was that OLR may focus on the "bad guys." This is an unfortunate unintended perception, as the OLR meticulously avoids a "bad guy" approach, focusing on deciding each investigation on its own merits.

Litigation Division: When a matter is assigned to litigation, an investigator has already obtained a probable cause determination from the Preliminary Review Committee without the benefit of an assigned litigator. The PRC authorizes each violation charged in each count, rather than proceedings as a whole.

Each year, Litigation is typically assigned about 45 new matters. Ninety-nine cases are currently assigned to litigators, about evenly divided between four in-house counsel and 16 retained counsel. Investigative support is available upon request from the Investigation Division. Contested cases may take more than two years to conclude.

The litigation docket presents challenge. The docket of pending cases represents a two year "inventory." Contested cases take two years, at times on top of two or more years of investigation. Consent and stipulated dispositions are used sparingly. According to a "2013 Sanction Chart," 37 original jurisdiction disciplinary cases were decided by the Court in 2013. Exclusive of reciprocal matters and consent revocations, 6 cases were resolved by stipulated disposition and the remaining 26 cases were contested, a 23% rate.

Note 1: The extent of appeals available to all parties at all levels is noteworthy simply because of the unnecessary delays appeals generate. Supreme Court Rules currently provide multiple appeals or reviews by the Director and the PRC. A grievant may appeal the decision to dismiss the closing of a matter both prior to investigation and following an investigation. Appeals to the Director average between 35 and 40 a month. The March 2014 Director's Report reflects 44 appeals to the PRC with 1 referred back to the OLR. Rarely does an appeal change the course of a grievance and we could not find any matter where an appeal of a dismissal resulted in discipline. We are not suggesting that appeals of dismissals are not warranted. Rather, we suggest a limit of one appeal at any one level. Many jurisdictions place this appeal at the Director level.

Note 2: Commentators mentioned and we are concerned about the infrequency of PRC meetings. Based on the Director's report and commentators' statements, the PRC meets 4 times a year. This is not consistent with the quarterly meeting requirement set forth in the rules or the practice in most jurisdictions, whose probable cause panels meet more regularly.

We heard that the infrequency of meetings is one cause of delay, which is of concern. While the number of matters reviewed is modest, the seriousness of many matters and the time gap between meetings warrants more frequent meetings.

These issues across the caseload do not result, in our view, from modest spikes in routine grievances during certain of the last several years or the size of the staff. We propose, in recommendations that follow this one, ways that other disciplinary authorities commonly use to address issues of caseload delay.

2. The Director Should Reorganize Staff Divisions and Assignments.

Trust Account Program: The Director should assign additional staff to the Trust Account Program sufficient to handle its caseload responsibilities (Overdraft Notifications, Investigations, and Forensic Support) or assign some of those duties to other divisions.

Investigation and Litigation Divisions: The Director should merge the Investigations and Litigation divisions, and should direct that litigation counsel be assigned responsibility for investigations and resulting proceedings, with the assistance of investigators working under their supervision. (Some lawyers within the Investigation Division may apply for a litigation position.) Lawyers should direct investigators and investigations and prepare and pursue charges that are warranted. This would avoid the unnecessary duplication that we saw in the separate divisions.

We strongly favor a vertical system from the point that an investigation moves beyond the intake stage. The use of a vertical system encourages a quick assessment of critical information by the assigned lawyer. In a relatively small office like OLR, separation and specialization limit the core functions of the office: productivity, efficiency and protection of the public. The use of a vertical system will address our concerns about over staffing in the investigation division and under staffing in the trust account division.

3. The Director and Staff Must Exercise More Discretion.

The Director and his management team believe they have limited discretion at most levels of the disciplinary process. This position dramatically impacts the movement of cases at all levels. Depending on one's perspective, SCR Chapter 21 does allow the Director discretion in resolving matters and, in some instances, the Director and his staff do exercise discretion, *e.g.* determinations not to initiate an investigation and dismissals with caution. The very decision whether a violation has occurred requires discretion. We believe the rules as currently written provide the Director more discretion than is exercised. The reluctance to use discretion adds to the delay at all levels of the regulation system.

We believe that disciplinary counsel in most states routinely exercise discretion to close investigations regarding minor violations. Not all rule violations require discipline or referral to a probable cause panel. The Preamble to the Wisconsin Rules of Professional Conduct for

Attorneys recognizes that the rules of conduct are rules of reason that require interpretation (par. 14) and that a violation is a basis for invoking the disciplinary process and the determination whether discipline is to be imposed is dependent upon an assessment of the related facts and circumstances (par. 19).

We believe that disciplinary counsel can and should dismiss minor violations without diversion if circumstances warrant, *e.g.* the attorney acknowledges the violation and the violation has caused no harm Giving staff lawyers the discretion to close such investigations avoids cumbersome, unnecessary diversions or protracted investigations later dismissed by the PRC.

The system for appeals of dismissal should be considered as a safety net that supports the exercise of discretion. If staff has closed an investigation prematurely or improperly, the review process can identify such decisions. The Director would then be in a position to reopen the investigation.

The Director should consider moving to a true telephone based intake system that will resolve intake matters more quickly. Current average processing time (63 days) is good for a paper based system. The processing time and the effectiveness of a telephone based system would be an improvement, but would require the exercise of more discretion.

The Preliminary Review Committee should limit its determination to whether there is cause to proceed and litigation counsel should be given discretion regarding which rule violations are warranted. The PRC should discontinue its practice of determining whether to authorize each alleged rule violation. If litigation counsel limits charges only to those necessary to present the misconduct to the Supreme Court, consents and stipulated dispositions would be more likely. This proposed change of **only** determining cause to proceed is consistent with most jurisdictions and will streamline the review process and not adversely impact the validity of formal complaints. Furthermore, the practice of the PRC determining which rules to charge is **not** required by the rules. Rather, it seems to be a culture developed by the PRC and sanctioned by the OLR.

4. The Director and Staff Should Implement More Effective Investigative Practices.

We are convinced that the Director should reform the approach to investigations. Currently, most investigations appear to be conducted from desks at the OLR office. The process is laden with correspondence and cumbersome paperwork. Interviews are conducted mostly by telephone. We sense a high degree of caution and timidity in investigations, which we attribute to concern that decisions may be second-guessed, although, according to the Director's March 2014 report, only 44 dismissals were appealed to the PRC during a two year period and all but one were affirmed. The cautious approach includes elaborate reports drafted and shared with the Respondent and complainant for comment. This results in unnecessarily delayed investigations, creating unrealistic expectations among grievants and unwarranted frustrations among lawyers.

We believe that investigative approach needs to be reformed. Lawyers should direct investigations and use discretion during the investigation and in determining a proper disposition. Practices should focus on quickly getting the facts necessary to a decision. Documents should be drafted to memorialize significant information gathered and, for dismissals, a concise closing statement should be prepared.

5. The Director and Managers Should Require Employees to Meet Expectations.

During our consultation regarding the Investigation Division, we heard that some employees resist direction regarding the handling of cases and that progressive disciplinary measures are ineffective. While we value the importance of and contributions of employees and recognize the significance of their rights, we urge the Director and his management team to maintain their management efforts. If some employees handle cases in their own way and at their own pace, other employees may become demoralized. Regulatory offices depend upon the talent and dedication of employees working in a collegial, but well managed environment.

We note that the Investigation Division relies on part-time and limited-term employees. Although staff numbers appear more than satisfactory for the number of new matters, the character of the staffing is concerning. In a staff consisting of a deputy director and 11 investigators, too many appear to work part-time, telecommute or are limited-term workers. These practices bring into question the efficiency and consistency of the division.

The Litigation Division heavily relies on outside counsel. The OLR refers about one-half of its proceedings to one of 16 retained outside counsel. As retained counsel do not concentrate their practice in disciplinary proceedings, training and management present a more difficult challenge. We recommend a de-emphasis of the practice of referring proceedings to retained counsel. A greater percentage of proceedings should be assigned to in-house counsel in order to take advantage of the expertise of counsel who handle disciplinary cases on a daily basis.

6. Intake Investigators Who Act as Legal Counsel in Making Intake Decisions Must Be Recognized and Compensated as Counsel.

We urge the OLR to treat intake staff as counsel and compensate them at that level. They exercise legal judgment in their decisions. Other states recognize that intake lawyers are acting as counsel. The intake lawyers are a critical and essential core function of the office and are every bit as important as the investigation and litigation counsel. As such, they should be treated exactly the same with regard to pay and stature.

7. The Supreme Court Should Consider Whether District Committees Continue to Serve a Useful Investigative Purpose.

We observe and support a trend of reducing OLR's referral of investigations to the 16 District Committees. In 2011, OLR made 69 referrals, followed by 44 in 2012, 29 in 2013 and 11 through March of 2014. As of the Director's March 2014 report, 11 committees had no

investigations pending, four others had two or fewer pending, and the remaining committee had 11 pending.

We heard from many sources that the process and outcome of committee investigations are less predictable than that of OLR staff. The use of volunteers to conduct investigations is not in keeping with national best practices. Investigations require the focus and diligence that a skilled full-time investigator brings to bear. OLR's role in training and managing such an extensive system of committees requires resources better allocated to handling its caseload. We do not believe that there is any reason why District Committees may not continue to carry their other duties enumerated in the rules, *e.g.* referring matters to the OLR and monitoring diversions.

8. The OLR and the Director Should Encourage Discipline on Consent.

The OLR and its Director should continue to encourage stipulated and consent dispositions within the parameters set by the Court. The number of these dispositions appears low to us. In 2013, the Court disposed of 5 cases by consent revocation and 6 cases by stipulated disposition. The remaining 26 original jurisdiction cases were contested. In many states, up to one-half of the cases are resolved on consent.

We heard that referees and the parties recognize early on in most proceedings the scope of the misconduct and the range of discipline required by the Court's precedent. That is consistent with our own experience in our states. We recognize that the Court has made it clear that plea bargaining, as it is practiced in criminal cases, is not allowed. That is the prevailing approach in most state Supreme Courts. Disciplinary cases are within the inherent and exclusive jurisdiction of each Supreme Court.

Nonetheless, we hear that the specific enumerated charges, not the wrongful conduct itself or the severity of the discipline, often are the obstacle to consent dispositions. While some charges are central to the misconduct for which the Court would be asked to impose discipline, others are more technical in nature and can appear to reflect an effort to load up a charging document. We do not believe that a lawyer is disciplined for the number of charges, but rather the conduct itself. We urge the Director and management staff to take this theme into account in formulating the charging document and in consent negotiations with the Respondent.

Two other consent items were raised during our consultation: first, a pre-filing conference with an experienced referee (who would not hear the case, of course) to explore consent options and, second, a greater focus on the advantage to the Respondent in stipulating or consenting to discipline by the elimination or reduction of costs assessed.

9. The OLR Should Articulate and Communicate Its Mission as Assisting Lawyers to Represent Clients Effectively.

We have heard that the OLR's handling of certain investigations has led to negative media attention and a level of public mistrust. At the same time, we have heard from some commentators that the OLR's detailed pursuit of investigations leads some lawyers to believe that the OLR is "out to get" lawyers.

The OLR should seek the guidance of the Court in engaging the profession and the public in a process of defining the OLR mission. This undertaking should focus on key OLR principles: assistance to lawyers in complying with professional standards and in representing clients effectively; prompt resolution of disciplinary grievances and proceedings; pursuit of remedies for aggrieved clients; and prosecution of those relatively few lawyers whose conduct warrants discipline.

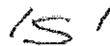
Once the mission is determined, the OLR should establish a program of communicating its mission to the public, lawyers, and the courts. This outreach should include an explanation of the OLR mission and how the OLR handles investigations and proceedings. The OLR must approach change with a spirit of boldness and innovation. The regulation and admission of lawyers is increasingly a prominent topic of supreme courts around the nation and internationally. Now is the time to shape the future of the OLR.

We will make ourselves available to discuss our findings and this report with the Supreme Court or the OLR upon request.

September 8, 2014

Respectfully submitted,

John S. Gleason



Jerome Larkin