c/o Mary F. Chapman, Esq., 8440 W. Lake Mead Blvd., Suite 203, Las Vegas, NV 89128.

October 18, 2018

Ms. Elizabeth Brown Clerk of the Supreme Court 201 S. Carson Street, Ste. 250 Carson City, Nevada 89701 FLED

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CLERNOF SUPPEMS COURT
BY CHIEF DESIGN CLERK

RE: Amendment to ADKT 0499 filed October 1, 2018

The Southern Nevada Association of Women Attorneys (SNAWA) is a voluntary member organization with annual membership opportunities for attorneys, judges, Justices, and law students. Established in 1979, SNAWA traditionally has been an organization of women attorneys focused on professional development, support, and networking. The purpose of SNAWA is to provide meaningful services to members and to provide opportunities for collegiality and social interaction.

SNAWA does not receive grants nor any other form of outside funding, relying solely on voluntary dues membership. The SNAWA board and any committees are comprised entirely of volunteers.

SNAWA provides approximately 4 CLE opportunities at its luncheons each year, and generates no income (\$0.00) from its CLE seminars; only the cost of the lunch is charged to the attendees.

We are writing to express our concerns over the CLE Board's proposed "Application Fees for course approval" as set forth in Exhibit 2 to the October 1, 2018 Renewed Request for Amendment to ADKT 0499.

While we appreciate that SNAWA has been able to operate as an exempt provider, we are requesting that an exemption be created under the Amendment to ADKT 0499 for organizations which do not collect attendance fees from attorneys attending their seminars. This would



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preserve SNAWA's goal of providing substantial benefits to its members in the form of free CLE's.

Without this exemption, SNAWA would have to either pay the application fee, or submit a "hardship application" each month that a free CLE is presented. These requirements place an undue burden on small organizations such as SNAWA, whose board and committee members are all volunteering their time and energies, and *discourages* the offering of free CLE's. SNAWA operates on a very tight budget. The proposed changes, without some exemption for organizations like SNAWA, would impact that budget.

SNAWA is concerned that, given its commitment to providing service to the legal community and its members by offering free CLE, that an application fee would certainly jeopardize SNAWA's ability to continue to offer free CLE to members of the legal community.

In summary, SNAWA respectfully requests the proposed provider application fee be waived for organizations who do not charge for CLE seminars. SNAWA appreciates your consideration of this Request.

Sincerely,

Southern Nevada Association of Women Attorneys

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Stacy Rocheleau President 2018

¹ It is unlikely that a hardship application for SNAWA CLE's would be approved, since *Regulation 6* only has two exemptions: the attendees are required to each take a pro bono case, or the proceeds from the program be paid to the Nevada Bar Foundation. SNAWA has no requirement for pro bono for its attendees and as it does not charge for the CLE, it has no proceeds to pay to the Nevada Bar Foundation, therefore, its CLE's do not fall under either of these criteria.