

ABA Code of Judicial Conduct – Current Code, Proposed Revisions and Judge Yoder’s Comments

<p>Color Key</p>	<p>Red – Indicates language that has changed between the current and proposed Code</p> <p>Green – Indicates that language has been moved from Commentary to Canon or from Canon to Commentary</p> <p>Blue – Indicates language from the Current Code that is not found in the proposed Code</p> <p>Black – Indicates that there has been no change in language between the current Code and the proposed Code</p> <p>Purple – Indicates Judge Yoder’s revisions and comments</p> <p>Brown – Indicates that language has been moved from Canon or Commentary to Terminology</p> <p>Yellow: Indicates a grammatical correction</p>	<ul style="list-style-type: none"> In general, any changes in the Code should be justified as better than the previous text or arrangement.
<p>Canon Number</p>	<p>Current Code</p>	<p>Proposed Code</p>
<p>Canon 4D</p>	<p>Canon 4D(5) A judge shall not accept, and shall urge members of the judge’s family residing in the judge’s household* not to accept, a gift, bequest, favor or loan from anyone except for:</p> <p>Commentary Canon 4D(5) - Section 4D(5) does not apply to contributions to a judge’s campaign for judicial office, a matter governed by Canon 5.</p>	<p>4.13 Solicitation and Acceptance of Gifts. (a) A judge shall not solicit or accept and shall urge members of the judge’s family residing in the judge’s household* not to solicit or accept a gift* from anyone except that a judge may accept:</p> <p>Commentary Canon 4.13 - [5] Rule 4.13 does not apply to contributions to a judge’s campaign for judicial office, a matter governed by Canon 5. Rule 4.13 likewise does not apply to the reimbursement for or waiver of charges for travel-related expenses, which is governed by 4.14. See the Terminology section for the definition of “gift”</p>

	<p>Because a gift, bequest, favor or loan to a member of the judge's family residing in the judge's household might be viewed as intended to influence the judge, a judge must inform those family members of the relevant ethical constraints upon the judge in this regard and discourage those family members from violating them. A judge cannot, however, reasonably be expected to know or control all of the financial or business activities of all family members residing in the judge's household.</p> <p>Canon 4D(5)(a) a gift incident to a public testimonial, books, tapes and other resource materials supplied by publishers on a complimentary basis for official use, or an invitation to the judge and the judge's spouse or guest to attend a bar-related function or an activity devoted to the improvement of the law,* the legal system or the administration of justice;</p> <p>Commentary Canon 4D(5)(a) - Acceptance of an invitation to a law-related function is governed by Section 4D(5)(a); acceptance of an invitation paid for by an individual lawyer or group of lawyers is governed by Section 4D(5)(h).</p>	<p>and its exclusions.</p> <p>Commentary Canon 4.13 - [2] Because a gift to a member of the judge's family residing in the judge's household might be viewed as intended to influence the judge, a judge must inform those family members of the relevant ethical constraints upon the judge in this regard and discourage those family members from violating them. A judge cannot, however, reasonably be expected to know or control all of the financial or business activities of all family members residing in the judge's household.</p> <p>Canon 4.13(a) -</p> <ol style="list-style-type: none"> 1. a gift* incident to a public testimonial; 2. books, magazines, journals, audio-visual materials and other resource materials supplied by publishers or organizations on a complimentary basis for official use; 3. an invitation to the judge and the judge's spouse or guest to attend without charge a widely attended event or a bar-related function or any activity devoted to the improvement of the law,* the legal system or the administration of justice; <p>Commentary Canon 4.13 - [6] Acceptance of an invitation to a law-related function is governed by Rule 4.13(a)(1); acceptance of an invitation paid for by an individual lawyer or group of lawyers is governed by Rule 4.13(a)(5).</p>
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	<p>A judge may accept a public testimonial or a gift incident thereto only if the donor organization is not an organization whose members comprise or frequently represent the same side in litigation, and the testimonial and gift are otherwise in compliance with other provisions of this Code. See Sections 4A(1) and 2B.</p> <p>Canon 4D(5)(b) a gift, award or benefit incident to the business, profession or other separate activity of a spouse or other family member of a judge residing in the judge’s household, including gifts, awards and benefits for the use of both the spouse or other family member and the judge (as spouse or family member), provided the gift, award or benefit could not reasonably be perceived as intended to influence the judge in the performance of judicial duties;</p> <p>(c) ordinary social hospitality;</p> <p>(d) a gift from a relative or friend, for a special occasion, such as a wedding, anniversary or birthday, if the gift is fairly commensurate with the occasion and the relationship;</p> <p>Commentary Canon 4D(5)(b) - A gift to a judge, or to a member of the judge’s family living in the judge’s household, that is excessive in value raises questions about the judge’s impartiality and the integrity of the judicial office and might require disqualification of the judge where disqualification would not otherwise be required.</p>	<p>[1] A judge may accept a public testimonial or a gift incident thereto only if the donor organization is not an organization whose members comprise or frequently represent the same side in litigation, and the testimonial and gift are otherwise in compliance with other provisions of this Code. See Rules 4.01 and 2.09.</p> <p>Canon 4.13(a) –</p> <p>4. a gift*, award or benefit incident to the business, profession or other separate activity of a spouse or other family member of a judge residing in the judge’s household, including gifts, awards and benefits for the use of both the spouse or other family member and the judge (as spouse or family member), provided the gift, award or benefit could not reasonably be perceived as intended to influence the judge in the performance of judicial duties;</p> <p>[see Terminology Section of Current Code below]</p> <p>5. a gift* from a relative or friend, for a special occasion, such as a wedding anniversary or birthday, if the gift is fairly commensurate with the occasion and the relationship;</p> <p>Commentary Canon 4.13 - [3] A gift to a judge or to a member of the judge’s family living in the judge’s household that is excessive in value raises questions about the judge’s impartiality and the integrity of the judicial office, and might require disqualification of the judge where disqualification would not otherwise be</p>
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	<p>See, however, Section 4D(5)(e).</p> <p>Canon 4D(5)(e) a gift, bequest, favor or loan from a relative or close personal friend whose appearance or interest in a case would in any event require disqualification under Section 3E;</p> <p>Canon 4D(5)(f) a loan from a lending institution in its regular course of business on the same terms generally available to persons who are not judges;</p> <p>Canon 4D(5)(g) a scholarship or fellowship awarded on the same terms and based on the same criteria applied to other applicants; or</p> <p>Canon 4D(5)(h) any other gift, bequest, favor or loan, only if: the donor is not a party or other person who has come or is likely to come or whose interests have come or are likely to come before the judge; and, if its value exceeds \$150.00, the judge reports it in the same manner as the judge reports compensation in Section 4H.</p>	<p>required.</p> <p>[7] Regardless of whether Rule 4.13 directly prohibits receipt of a particular gift by a judge or a member of the judge’s family residing in the judge’s household, other Rules may prohibit the gift. For example, Rule 4.01(b) would apply if the gift would cast reasonable doubt on the judge’s capacity to act with impartiality, integrity and independence.</p> <p>Canon 4.13(a) - 6. a gift* from a relative or close personal friend whose appearance or interest in a case would in any event require disqualification under Rule 2.12; or</p> <p>[see Terminology Section of Current Code below]</p> <p>[see Terminology Section of Current Code below]</p> <p>7. any other individual gift* valued at [\$50] or less, or any series of gifts from the same source whose value in the aggregate does not exceed [\$150], if the donor is not:</p> <ul style="list-style-type: none"> • The word “individual” is unnecessary and confusing due to the different meanings of “individual” here and in the definition of “gift.”
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	<p>Commentary Canon 4D(5)(h) - Section 4D(5)(h) prohibits judges from accepting gifts, favors, bequests or loans from lawyers or their firms if they have come or are likely to come before the judge; it also prohibits gifts, favors,</p>	<ul style="list-style-type: none"> • The word “any” is needed for clarity, otherwise “any other” continues as the modifier. <p>a. a lawyer, party, or third person who has come before the judge, or a person or entity whose interests have come before the judge; within the preceding five years, or</p> <ul style="list-style-type: none"> • The comma is unnecessary and allows the phrase to confusingly refer to the prior item in the series. <p>b. a lawyer, party, or third person who is likely to come before the judge, or a person or entity whose interests are likely to come before the judge; in the foreseeable future.</p> <ul style="list-style-type: none"> • The comma is unnecessary and allows the phrase to confusingly refer to the prior item in the series. <p>Canon 4.13(b) - (b) For any gift, other than a gift from a member of the judge’s family, that alone or in the aggregate with other gifts received from the same source in the same calendar year exceeds \$250.00 in value, the judge must publicly report in the same manner as the judge reports compensation, reimbursement, or waiver of charges pursuant to Rule 4.16.</p> <p>Canon Commentary 4.13 - [4] Rule 4.13 prohibits judges from accepting gifts from lawyers or their firms if they have come or are likely to come before the judge; it also prohibits gifts from clients of lawyers or their firms when</p>
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	<p>bequests or loans from clients of lawyers or their firms when the clients' interests have come or are likely to come before the judge.</p>	<p>the clients' interests have come or are likely to come before the judge. Rule 4.13(a)(7) prohibits a judge from accepting gifts, even of a nominal value, from people who are or will likely be substantively involved in a matter before the judge. The Rule requires a judge to consider whether a donor, or the donor's interest, might is likely to come before the judge in the foreseeable future.</p> <ul style="list-style-type: none"> • The second sentence is incorrect without the adjective "likely." • The use of the word "might" changes the standard.
<p>Canon 4E</p>	<p>E. Fiduciary Activities.</p> <p>(1) A judge shall not serve as executor, administrator or other personal representative, trustee, guardian, attorney in fact or other fiduciary,* except for the estate, trust or person of a member of the judge's family,* and then only if such service will not interfere with the proper performance of judicial duties.</p> <p>(2) A judge shall not serve as a fiduciary* if it is likely that the judge as a fiduciary will be engaged in proceedings that would ordinarily come before the judge, or if the estate, trust or ward becomes involved in adversary proceedings in the court on which the judge serves or one under its appellate jurisdiction.</p> <p>(3) The same restrictions on financial activities that apply</p>	<p>4.05 Appointments to Fiduciary Positions</p> <p>(a) A judge shall not serve as executor, administrator or other personal representative, trustee, guardian, attorney in fact or other fiduciary,* except for the estate, trust or person of a member of the judge's family,* and then only if such service will not interfere with the proper performance of judicial duties.</p> <p>(b) A judge shall not serve as a fiduciary* if it is likely that the judge as a fiduciary will be engaged in proceedings that would ordinarily come before the judge, or if the estate, trust or ward becomes involved in adversary proceedings in the court on which the judge serves or one under its appellate jurisdiction.</p> <p>(c) The same restrictions on financial activities that apply</p>

	<p>to a judge personally also apply to the judge while acting in a fiduciary* capacity.</p> <p>Commentary Canon 4E - The Time for Compliance provision of this Code (Application, Section F) postpones the time for compliance with certain provisions of this Section in some cases.</p> <p>The restrictions imposed by this Canon may conflict with the judge’s obligation as a fiduciary. For example, a judge should resign as trustee if detriment to the trust would result from divestiture of holdings the retention of which would place the judge in violation of Section 4D(4).</p>	<p>to a judge personally also apply to the judge while acting in a fiduciary* capacity.</p> <p>Commentary Canon 4.05 - [1] The Time for Compliance provision of this Code (Application, Section F) postpones the time for compliance with certain provisions of this Rule in some cases.</p> <p>Commentary Canon 4.05 - [2] The restrictions imposed by this Canon may conflict with the judge’s obligation as a fiduciary. For example, a judge should resign as trustee if detriment to the trust would result from divestiture of holdings the retention of which would place the judge in violation of Rule 4.11, or require frequent disqualification.</p>
Canon 4F	<p>F. Service as Arbitrator or Mediator. A judge shall not act as an arbitrator or mediator or otherwise perform judicial functions in a private capacity unless expressly authorized by law.*</p> <p>Commentary Canon 4F - Section 4F does not prohibit a judge from participating in arbitration, mediation or settlement conferences performed as part of judicial duties.</p>	<p>4.06 Service as Arbitrator or Mediator. A judge shall not act as an arbitrator or mediator or otherwise perform judicial functions in a private capacity unless expressly authorized by law*.</p> <p>Commentary Canon 4.06 - [2] Rule 4.06 does not prohibit a judge from participating in arbitration, mediation or settlement conferences performed as part of judicial duties.</p> <p>Commentary Canon 4.06 - [1] Judges regularly participate in arbitration, mediation or settlement conferences, either as part of their regular duties or as specially authorized by court rule or other law. The integrity of the judiciary judicial office is undermined, however, when judges take financial advantage of their</p>

		<p>offices by rendering private dispute resolution services for pecuniary gain as an extra-judicial activity. In such circumstances, the prestige of the judicial office would be used to advance the personal financial gain of the judge.</p> <ul style="list-style-type: none"> • The rule is not and should not be limited to financial gain. Regardless of financial gain, a judge's participation in arbitration, mediation or settlement conferences demeans the office if it is not done in the context of judicial duties or law.
<p>Canon 4G</p>	<p>G. Practice of Law. A judge shall not practice law. Notwithstanding this prohibition, a judge may act pro se and may, without compensation, give legal advice to and draft or review documents for a member of the judge's family.*</p> <p>Commentary Canon 4G - This prohibition refers to the practice of law in a representative capacity and not in a pro se capacity. A judge may act for himself or herself in all legal matters, including matters involving litigation and matters involving appearances before or other dealings with legislative and other governmental bodies. However, in so doing, a judge must not abuse the prestige of office to advance the interests of the judge or the judge's family. See Section 2(B).</p> <p>The Code allows a judge to give legal advice to and draft legal documents for members of the judge's family, so long as the judge receives no compensation. A judge must</p>	<p>4.08 Practice of Law. A judge shall not practice law. Notwithstanding this prohibition, a judge may act pro se and may, without compensation, give legal advice to and draft or review documents for a member of the judge's family.*</p> <p>Commentary Canon 4.08 - [1] This prohibition refers to the practice of law in a representative capacity and not in a pro se capacity. A judge may act for himself or herself in all legal matters, including matters involving litigation and matters involving appearances before or other dealings with legislative and other governmental bodies. However, in so doing, a judge must not abuse the prestige of office to advance the interests of the judge or the judge's family. See Rule 3.01.</p> <p>Commentary Canon 4.08 - [2] The Code allows a judge to give legal advice to and draft legal documents for members of the judge's family, so long as the judge</p>

	<p>not, however, act as an advocate or negotiator for a member of the judge’s family in a legal matter.</p> <p>*****</p> <p>Canon 6, new in the 1972 Code, reflected concerns about conflicts of interest and appearances of impropriety arising from compensation for off-the-bench activities. Since 1972, however, reporting requirements that are much more comprehensive with respect to what must be reported and with whom reports must be filed have been adopted by many jurisdictions. The Committee believes that although reports of compensation for extra-judicial activities should be required, reporting requirements preferably should be developed to suit the respective jurisdictions, not simply adopted as set forth in a national model code of judicial conduct. Because of the Committee’s concern that deletion of this Canon might lead to the misconception that reporting compensation for extra-judicial activities is no longer important, the substance of Canon 6 is carried forward as Section 4H in this Code for adoption in those jurisdictions that do not have other reporting requirements. In jurisdictions that have separately established reporting requirements, Section 4H(2) (Public Reporting) may be deleted and the caption for Section 4H modified appropriately.</p> <p>*****</p>	<p>receives no compensation. A judge must not, however, act as an advocate or negotiator for a member of the judge’s family in a legal matter.</p>
Canon 4H	H. Compensation, Reimbursement and Reporting.	Rule 4.14 Reimbursement or Waiver of Charges for Travel-Related Expenses of the Judge or the Judge’s Spouse or Guest.:

	<p>(1) Compensation and Reimbursement. A judge may receive compensation and reimbursement of expenses for the extra-judicial activities permitted by this Code, if the source of such payments does not give the appearance of influencing the judge’s performance of judicial duties or otherwise give the appearance of impropriety.</p>	<p><u>(a)</u> A judge may receive reimbursement, or accept a waiver of charges, from sources other than the judge’s employing entity for the expenses of necessary travel, food and lodging associated with the judge’s participation in extra-judicial activities permitted by this Code, if such receipt or acceptance does not east <u>reasonable doubt on create an appearance of impropriety or give an appearance of influencing the judge’s capacity to act with impartiality, integrity, or independence.</u></p> <ul style="list-style-type: none"> • Commas are needed if the “sources” clause is to modify both “reimbursement” and “waiver.” • It is unclear what “reasonable doubt” is. It seems to be less than actual “appearance of impropriety,” which is what the Commentary says the test is. <u>See Proposed Comentary [1] to Rule 4.14.</u> <p>4.15. Compensation for Extrajudicial Activities</p> <p>(a) A judge may receive compensation for the extra-judicial activities permitted by this Code, if such receipt or acceptance does not east reasonable doubt on <u>create an appearance of impropriety or give an appearance of influencing the judge’s capacity to act with impartiality, integrity, or independence.</u></p> <ul style="list-style-type: none"> • It is unclear what “reasonable doubt” is. It seems to be less than actual “appearance of impropriety,” which is what the Commentary
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	<p>(a) Compensation shall not exceed a reasonable amount nor shall it exceed what a person who is not a judge would receive for the same activity.</p> <p>(b) Expense reimbursement shall be limited to the actual cost of travel, food and lodging reasonably incurred by the judge and, where appropriate to the occasion, by the judge's spouse or guest. Any payment in excess of such an amount is compensation.</p>	<p>says the test is. See Proposed Comentary [1] to Rule 4.14.</p> <p>(b) Compensation shall not exceed a reasonable amount nor shall it exceed what a person who is not a judge would receive for the same activity.</p> <p>Rule 4.14(b)- <i>(b)</i> Expense reimbursement and waiver of charges shall be limited to the actual cost of travel, food and lodging reasonably incurred by the judge and, where appropriate to the occasion, by the judge's spouse or guest. Any reimbursement or waiver of charges that alone or in the aggregate with other costs reimbursed from the same source in the same calendar year exceeds \$100 shall be publicly disclosed and the information relating to such reimbursement and/or waiver of charges shall be reported as required by Rule 4.16 and made accessible to the general public at least quarterly."</p> <ul style="list-style-type: none"> • The quotation mark appears to have been added inadvertently. <p>Commentary Rule 4.14 - [1] Judicial education in law-related and academic disciplines is in keeping with a judge's duty to remain competent in the law and is consistent with the provisions of Canon 4. Attendance at educational seminars where the expenses are underwritten by individuals or entities other than the judge, the judicial system, or a government entity, should be evaluated by</p>
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		<p>the judge to determine whether attendance is consistent with the judge’s obligations under the Canons, particularly the duty to preserve impartiality and independence, and the appearance of impartiality and independence.</p> <ul style="list-style-type: none"> Note that the proposed rule differs from the “appearance” test described in the commentary. <u>See note supra, 69.</u> <p>[2] A variety of factors may affect the propriety of attendance at such seminars, including the educational nature of the seminar, the sources of funding, the identity of the seminar sponsor, and the reasonableness of the expenses paid or reimbursed. The judge should consider whether the sponsor or the funding source of the seminar is currently appearing, or likely to appear, before the judge in a matter. In addition, the judge should determine <u>consider</u> whether attendance may create a conflict of interest, may result in disqualification or recusal in matters coming before the judge, may give rise to the judge’s independence being questioned, or may interfere with the judge’s performance of his or her judicial duties. A judge’s decision whether to attend should be based on an assessment of all of the circumstances and the judge should undertake a reasonable inquiry to obtain the information necessary to make an informed judgment.</p> <ul style="list-style-type: none"> The word “determine” in the proposed rule creates an unreasonable burden and is inconsistent with the “reasonable inquiry”
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	<p>(2) Public Reports. A judge shall report the date, place and nature of any activity for which the judge received compensation, and the name of the payor and the amount of compensation so received. Compensation or income of a spouse attributed to the judge by operation of a community property law is not extra-judicial compensation to the</p>	<p>requirement.</p> <p>[3] Consistent with Rules 4.13(b) and 4.16, a judge should take reasonable steps to ensure that information concerning his or her participation in seminars and other events, as well as reasonable information regarding the nature and circumstances of such events, are available to the public. A judge should therefore promptly and publicly disclose participation in extra-judicial events at which the judge's expenses are paid by sources other than the judge's employing governmental entity.</p> <ul style="list-style-type: none"> • If the obligations discussed in Commentary [3] are required by proposed Rules 4.13(b) and 4.16, then Commentary [3] is unnecessary. If the obligations discussed in Commentary [3] are not required by proposed Rules 4.13(b) and 4.16, then it is not clear what Commentary [3] requires. In any event, the reporting requirements discussed in Commentary [3] should not extend beyond the reporting requirements in proposed Rules 4.13(b) and 4.16, or the requirements will be undefined. <p>4.16 Reporting of Compensation, Reimbursement and Waiver of Charges. A judge shall report the date, place and nature of any activity for which the judge received compensation, reimbursement or waiver of charges, and the name of the payor or waivor and the amount of compensation, reimbursement, or charges waived.</p>
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	<p>judge. The judge’s report shall be made at least annually and shall be filed as a public document in the office of the clerk of the court on which the judge serves or other office designated by law.*</p> <p>Commentary Canon 4H - See Section 4D(5) regarding reporting of gifts, bequests and loans.</p> <p>The Code does not prohibit a judge from accepting honoraria or speaking fees provided that the compensation is reasonable and commensurate with the task performed. A judge should ensure, however, that no conflicts are created by the arrangement. A judge must not appear to trade on the judicial position for personal advantage. Nor should a judge spend significant time away from court duties to meet speaking or writing commitments for compensation. In addition, the source of the payment must not raise any question of undue influence or the judge’s ability or willingness to be impartial.</p>	<p>Compensation or income of a spouse attributed to the judge by operation of a community property law is not extra-judicial compensation to the judge. The judge’s report shall be made at least quarterly and shall be filed as a public document in the office of the clerk of the court on which the judge serves or other office designated by law,* and when technically feasible, posted on the website of that court or office.</p> <p>Commentary 4.15</p> <p>[1] The Code does not prohibit a judge from accepting honoraria or speaking fees provided that the compensation is reasonable and commensurate with the task performed. A judge should ensure, however, that no conflicts are created by the arrangement. A judge must not appear to trade on the judicial position for personal advantage. Neither Nor should a judge spend significant time away from court duties to meet speaking or writing commitments for compensation. In addition, the source of the payment must not raise any question of undue influence or the judge’s ability or willingness to be impartial. See Rule 4.01.</p> <ul style="list-style-type: none"> • The use of the word “neither” does not improve the syntax.
Canon 4I	<p>I. Disclosure of a judge’s income, debts, investments or other assets is required only to the extent provided in this Canon and in Sections 3E and 3F, or as otherwise required by law.*</p>	

	<p>Commentary Canon 4I - Section 3E requires a judge to disqualify himself or herself in any proceeding in which the judge has an economic interest. See "economic interest" as explained in the Terminology Section. Section 4D requires a judge to refrain from engaging in business and from financial activities that might interfere with the impartial performance of judicial duties; Section 4H requires a judge to report all compensation the judge received for activities outside judicial office. A judge has the rights of any other citizen, including the right to privacy of the judge's financial affairs, except to the extent that limitations established by law are required to safeguard the proper performance of the judge's duties.</p>	
<p>Terminology Section</p>	<p>Current Code</p>	<p>Proposed Code</p>
		<p>“Gift” means any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or anything of monetary value, but does not include:</p> <ul style="list-style-type: none"> (a) Ordinary social hospitality extended for a non-business purpose by an individual, not a corporation, limited to the provision of modest items, such as food and refreshments common among people in the judge's community ; (b) items with little intrinsic value intended solely for presentation, such as plaques, certificates, trophies and greeting cards; (c) <u>any of the following which are made available on the same terms and based on the same criteria applied to non-judge applicants:</u> <ul style="list-style-type: none"> (1) loans from banks and other financial

		<p>institutions that are made available based on factors other than judicial status;</p> <p>(d) (2) opportunities and benefits, including favorable rates and commercial discounts, that are available based on factors other than judicial status;</p> <p>(e) (3) rewards and prizes given to competitors in contests or events, including random drawings, that are open to the public; and that are available based on factors other than judicial status; or</p> <p>(f) (4) scholarships and fellowships awarded on the basis of the same terms and based on the same criteria applied to non-judge applicants;</p> <ul style="list-style-type: none"> • There is no reason to differentiate these four rules or state the rule four times. “Based on factors other than judicial status” is less clear and determinable than the alternate formulation in proposed Rule (f). <p>(g) reimbursement or waiver of charges for travel-related expenses governed by Rule 4.14;</p> <p>(h) compensation for extra-judicial activities that is governed by Rule 4.15.</p> <p>“Widely attended event” means a convention, conference, symposium, forum, panel discussion, dinner, viewing, reception or similar event at which more than 25 persons are expected to attend.</p> <ul style="list-style-type: none"> • The “at” is unnecessary.
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