

Subject: FW: Invitation to Comment: SEC Report
Date: Monday, July 23, 2012 9:31:26 AM

On Jul 20, 2012, at 12:59 PM, "Epstein, Norman" wrote:

Justice Miller: I am writing to acknowledge your email. I have not been able to prepare a suitable detailed response to your invitation to comment on the SEC report. It is my sense, however, that the conclusions and recommendations in the report appear to be well considered and, for the most part, appropriate. I do believe there has been some expansive drift in the scope of work done by AOC and that we need to concentrate on the core functions of that office. Some of this expansion, I believe, is due to policy directions of the Council, and new proposals in that direction should be especially scrutinized. For example, this may apply to the work of CJER in the area of non-judicial education.

It has been a long time since I was on the Council. But from my own recollection, and from what have heard from others who followed me on the Council, it is more important than ever that the Council focus its energies on policy issues and devote less time on show-and-tell presentations from staff. If, for example, it is necessary to reduce expenditures by X dollars, the Council should discuss the options available and decide a policy direction. Having just said that, I should add that it also is my impression that the Council has been doing that in coping with the current fiscal crises.

I hope these comments may be helpful.

Norman L. Epstein