

JUDICIAL COUNCIL OF CALIFORNIA MEETINGS

Open to the Public Unless Indicated as Closed (Cal. Rules of Court, rule 10.6(a))
Ronald M. George State Office Complex
William C. Vickrey Judicial Council Conference Center
Malcolm M. Lucas Board Room
455 Golden Gate Avenue • San Francisco, California 94102-3688
Thursday, December 11, 2014 • 2:30 p.m.–4:00 p.m.
Friday, December 12, 2014 • 8:30 a.m.–12:15 p.m.

Meeting materials will be hyperlinked to agenda titles as soon as possible after receipt by Judicial Council Support. For recent postings of hyperlinked reports, please check the agenda at http://www.courts.ca.gov/28107.htm.

THURSDAY, DECEMBER 11, 2014 AGENDA

CLOSED SESSION (RULE 10.6(b))—PERSONNEL AND OTHER CONFIDENTIAL MATTERS

Session 2:30-4:00 p.m.

FRIDAY, DECEMBER 12, 2014 AGENDA

OPEN SESSION (RULE 10.6(a))—MEETING AGENDA

8:30-8:40 a.m. Approval of Minutes

Approve minutes of the October 27–28, 2014, Judicial Council meeting.

8:40-9:00 a.m. Chief Justice's Report

Chief Justice Tani G. Cantil-Sakauye will report.

9:00–9:20 a.m. Administrative Director's Report

Mr. Martin Hoshino, Administrative Director, will report.

9:20-9:40 a.m. Judicial Council Committee Presentations

Executive and Planning Committee Hon. Douglas P. Miller, Chair

Policy Coordination and Liaison Committee

Hon. Kenneth K. So, Chair

Rules and Projects Committee Hon. Harry E. Hull, Jr., Chair

Technology Committee

Hon. James E. Herman, Chair

9:40–10:10 a.m. Judicial Council Members' Liaison Reports

Judicial Council members will report on their liaison work.

10:10–10:40 a.m. **Public Comment**

The Judicial Council welcomes public comment on general matters of judicial administration and on specific agenda items, as it can enhance the council's understanding of the issues coming before it.

Please see our public comment procedures.

- 1) Submit advance requests to speak by **4:00 p.m., Tuesday, December 9, 2014**.
- 2) Submit written comments for this meeting by 1:00 p.m. on Wednesday, December 10.

Contact information for advance requests to speak, written comments, and questions:

E-mail: judicialcouncil@jud.ca.gov

Postal mail or delivery in person:

Judicial Council of California 455 Golden Gate Avenue San Francisco, California 94102-3688 Attention: Cliff Alumno

CONSENT AGENDA (ITEMS A1-A5 THROUGH R)

A council member who wishes to request that any item be moved from the Consent Agenda to the Discussion Agenda is asked to please notify Nancy Carlisle at 415-865-7614 at least 48 hours before the meeting.

ITEMS A1-A5 RULES AND FORMS

Civil Jury Instructions

Item A1 Jury Instructions: New, Revised, Renumbered, and Revoked Civil Jury
Instructions and Verdict Forms (Action Required)

The Advisory Committee on Civil Jury Instructions recommends approving for publication the civil jury instructions prepared by the committee. On Judicial Council approval, the instructions will be published in the official 2015 edition of the *Judicial Council of California Civil Jury Instructions*.

Hon. Martin J. Tangeman, Chair, Advisory Committee on Civil Jury Instructions

Mr. Bruce Greenlee, Legal Services

Collaborative Justice Courts

Item A2 Military Service: Notification of Military Status (Action Required)

The Collaborative Justice Courts Advisory Committee recommends revisions to the optional Notification of Military Status form (form MIL-100). These revisions respond to recent legislation directing courts to (1) inform criminal defendants at arraignment that there are provisions of law designed for former or current military service members who have been charged with a crime and (2) that the defendant may request a copy of the Judicial Council military form explaining those rights. The legislation directs the Judicial Council to revise the military form accordingly.

Hon. Richard Vlavianos, Chair, Collaborative Justice Courts Advisory Committee

Ms. Adrienne Toomey and Ms. Carrie Zoller, Center for Families, Children & the Courts

Criminal Law

Item A3 Criminal Justice Realignment: Imposition of Mandatory Supervision (Action Required)

The Criminal Law Advisory Committee recommends amendments to rules 4.411 and 4.411.5 of the California Rules of Court and adoption of a new rule to govern the imposition of mandatory supervision under Penal Code section 1170(h)(5), including criteria for court consideration and the contents and requirements for related probation reports, as required by recent legislation that mandates adoption of these rules by January 1, 2015.

Hon. Tricia A. Bigelow, Chair, Criminal Law Advisory Committee

Mr. Arturo Castro, Criminal Justice Services

Family Law

Item A4 Family Law: Technical Change to Response for Dissolution, Legal Separation, and Nullity of Marriage and Domestic Partnership (Action Required)

The Family and Juvenile Law Advisory Committee recommends amending *Response–Marriage/Domestic Partnership (Family Law)* (form FL-120) to correct an error in a notification regarding when automatic restraining orders become effective on the respondent and to reinstate a provision notifying the respondent that a proof of service must be filed with the Response. These changes to the existing form were inadvertently made when the form was revised to look more similar to the *Petition–Marriage/Domestic Partnership (Family Law)* (form FL-100) and the error was identified after the Judicial Council meeting on October 24, when the revised form was adopted.

Hon. Mark Juhas and Hon. Jerilyn Borack, Co-Chairs, Family and Juvenile Law Advisory Committee

Ms. Bonnie Rose Hough and Ms. Gabrielle Selden, Center for Families, Children & the Courts

Miscellaneous

Item A5 Judicial Administration: Rules for Advisory Groups (Action Required)

The Executive and Planning Committee recommends that the Judicial Council adopt California Rules of Court for three Judicial Council advisory committees and amend two rules: one for an advisory committee and one that addresses concurrent membership on the council and a council advisory committee. At its meeting on April 25, 2013, the Judicial Council approved the *Report and Recommendations to Improve the Governance, Structure, and Organization of Judicial Council Advisory Groups (Report and Recommendations)* submitted by the Rules and Projects Committee, the Executive and Planning Committee, and the Technology Committee (available at www.courts.ca.gov/documents/jc-20130426-item4.pdf). Among the recommendations was the establishment by rule of the Trial Court

Facility Modification Advisory Committee (TCFMAC). This proposal would establish a rule for the TCFMAC, the Workload Assessment Advisory Committee, and the Judicial Branch Workers' Compensation Advisory Committee, and amend the rule for the Center for Judicial Education and Research Governing Committee.

Hon. Douglas P. Miller, Chair, Executive and Planning Committee

Ms. Susan R. McMullan, Legal Services

<u>Item B Access to Visitation: Program Funding Allocation for Federal Grant Fiscal</u> Years 2015–2016 through 2017–2018 (Action Required)

The Family and Juvenile Law Advisory Committee recommends that the Judicial Council approve Access to Visitation Grant Program funding allocation and distribution of approximately \$755,000 to \$770,000 statewide for federal grant fiscal years 2015–2016 through 2017–2018, which begins on April 1 and ends on March 31. The funding allocations will be directed to 11 superior courts representing 16 counties and involving 21 subcontractor agencies (i.e., local community nonprofit service providers) to support and facilitate noncustodial parents' access to and visitation with their children through supervised visitation and exchange services, parent education, and group counseling services. Family Code section 3204(b)(2) requires the Judicial Council to determine the final number and amount of grants to be awarded to the superior courts.

Hon. Jerilyn L. Borack and Hon. Mark A. Juhas, Cochairs, Family and Juvenile Law Advisory Committee

Ms. Shelly La Botte and Mr. Michael Wright, Center for Families, Children & the Courts

<u>Item C Judicial Council Report to the Legislature: California Parolee Reentry Court</u> Evaluation Report (Action Required)

Judicial Council staff recommend that the Judicial Council receive the *California Parolee Reentry Court Evaluation Report* and direct the Administrative Director to submit this report to the California Legislature and Governor, as mandated by Penal Code section 3015. Under the statute, the Judicial Council is required to submit a final evaluation report that assesses the pilot reentry court program's effectiveness in reducing recidivism no later than three years after the establishment of a reentry court. The report was developed in consultation with the California Department of Corrections and Rehabilitation.

Ms. Francine Byrne, Center for Families, Children & the Courts

Item D Trial Courts: Distribution Request Process for Children's Waiting Rooms and Distribution Request from a Court (Action Required)

The Trial Court Budget Advisory Committee recommends that the Judicial Council approve the Superior Court of San Francisco County's request for an increase in the court's children's waiting room distribution amount, effective January 1, 2015, as well as amendments to the process for courts to request children's waiting room distributions or distribution adjustments.

Hon. Laurie M. Earl and Mr. Zlatko Theodorovic, Cochairs, Trial Court Budget Advisory Committee

Mr. Steven Chang, Finance

Item E Court Interpreters: Revised Policy on Use of Unused Savings from Program 45.45 (Action Required)

The Court Interpreters Advisory Panel (CIAP) recommends that the Judicial Council update the action taken on January 23, 2014, on the proper usage of unused interpreter savings in light of the enactment of Assembly Bill (AB) 1657 (Stats. 2014, ch. 721). On January 23, 2014, the Judicial Council authorized the use of unused interpreter savings for civil matters where the parties are indigent. AB 1657, effective January 1, 2015, authorizes courts to provide interpreters to all parties in civil matters, regardless of income, and sets forth a priority and preference order when courts do not have sufficient resources to provide interpreters for all persons. CIAP recommends that the Judicial Council authorize the use of unused interpreter savings consistent with the requirements of the newly enacted statute.

Hon. Steven K. Austin, Chair, Court Interpreters Advisory Panel

Ms. Donna S. Hershkowitz, Court Operations Services

Item F Judicial Branch Administration: Amendment of the Conflict of Interest Code for the Judicial Council (Action Required)

This proposal would adopt amendments to the Judicial Council Conflict of Interest Code (Code) and bring the Code up to date with the current organizational structure that, after a recent consolidation, now includes the former Administrative Office of the Courts. In accordance with Government Code sections 87303 and 87306, the Code must be updated "when change is necessitated by changed circumstances" (*id.*, § 87306). The council must review proposed amendments and approve the Code as amended or direct that it be further revised and resubmitted for approval.

Ms. Linda M. Cox, Human Resources

Item G Judicial Council Report to the Legislature: Receipts and Expenditures From Local Courthouse Construction Funds (Action Required)

The Judicial Council Capital Program recommends approving *Receipts and Expenditures* From Local Courthouse Construction Funds: Report to the Budget and Fiscal Committees of the Legislature for submission to the Legislature. The report provides information for the reporting period of July 1, 2013, through June 30, 2014, on receipts and expenditures from local courthouse construction funds, as reported by each county. The annual submission of this report is required under Government Code section 70403(d).

Ms. Gisele Corrie and Mr. William Guerin, Capital Programs

Item H Judicial Council: 2014 Legislative Policy Summary (Action Required)

The Policy Coordination and Liaison Committee (PCLC) recommends that the Judicial Council adopt the updated Legislative Policy Summary reflecting actions through the 2014 legislative year. Adoption of this updated summary of positions taken on court-related legislation will assist the council in making decisions about future legislation, consistent with strategic plan goals.

Hon. Kenneth K. So, Chair, Policy Coordination and Liaison Committee

Ms. Laura E. Speed, Governmental Affairs

<u>Item I Judicial Council Report to the Legislature: Statewide Collection of</u> <u>Delinquent Court-Ordered Debt for Fiscal Year 2013–2014 (Action Required)</u>

The Revenue and Collections Unit of Judicial Council Finance recommends approving for submittal to the Legislature the attached report on the collection of delinquent court-ordered debt in California for fiscal year (FY) 2013–2014, in accordance with Penal Code section 1463.010.

Mr. Zlatko Theodorovic and Mr. Bob Fleshman, Finance

<u>Item J Judicial Council–Sponsored Legislation: Monetary Sanctions Against</u> <u>Jurors (Action Required)</u>

The PCLC and Criminal Law Advisory Committee (CLAC) propose amending Code of Civil Procedure section 177.5 to expressly include jurors in the category of persons subject to sanctions for violating a lawful court order under that section. The proposal was developed at the request of judges to eliminate any ambiguity about whether courts are authorized to sanction jurors.

Hon. Tricia A. Bigelow, Chair, Criminal Law Advisory Committee

Hon. Kenneth K. So, Chair, Policy Coordination and Liaison Committee

Mr. Arturo Castro, Criminal Justice Services

Ms. Sharon Reilly, Governmental Affairs

<u>Item K Judicial Council–Sponsored Legislation (Criminal Justice Realignment):</u> <u>Parole Holds (Action Required)</u>

The PCLC and CLAC recommend that the Judicial Council sponsor legislation to amend Penal Code sections 1203.2(a), 3000.08(c), 3056(a), and 3455(b) and (c) to provide courts with discretion to order the release of supervised persons from custody, unless otherwise serving a period of flash incarceration, regardless of whether a petition has been filed or a parole hold has been issued. This proposal was developed at the request of criminal law judges to enhance judicial discretion to decide the custody status of supervised persons.

Hon. Tricia A. Bigelow, Chair, Criminal Law Advisory Committee

Hon. Kenneth K. So, Chair, Policy Coordination and Liaison Committee

Ms. Eve Hershcopf, Criminal Justice Services

Ms. Sharon Reilly, Governmental Affairs

Item L Judicial Council–Sponsored Legislation: Recalling Felony Sentences Under Criminal Justice Realignment (Action Required)

The PCLC and CLAC propose amending Penal Code section 1170(d)(1) to apply existing court authority to recall felony prison sentences to sentences now served in county jail under section 1170(h). This proposal was developed at the request of criminal law judges to enhance judicial discretion by applying existing recall authority to a new category of felony sentences created by criminal justice realignment.

Hon. Tricia A. Bigelow, Chair, Criminal Law Advisory Committee

Hon. Kenneth K. So, Chair, Policy Coordination and Liaison Committee

Mr. Arturo Castro, Criminal Justice Services

Ms. Sharon Reilly, Governmental Affairs

Item M Judicial Council—Sponsored Legislation: Appeals of the Imposition or Calculation of Fines and Fees (Action Required)

The PCLC and CLAC propose adding Penal Code section 1237.2 and amending section 1237 to prohibit appeals in felony cases based solely on the grounds of an error in the imposition or calculation of fines, penalty assessments, surcharges, fees, or costs unless the defendant first presents the claim to the trial court. (All subsequent statutory references are to the Penal Code.) This proposal was developed at the request of courts to reduce the burdens associated with formal appeals and resentencing proceedings stemming from a common sentencing error.

Hon. Tricia A. Bigelow, Chair, Criminal Law Advisory Committee

Hon. Kenneth K. So, Chair, Policy Coordination and Liaison Committee

Mr. Arturo Castro, Criminal Justice Services

Ms. Sharon Reilly, Governmental Affairs

Item N Judicial Council-Sponsored Legislation: Evidentiary Objections in Summary Judgment Proceedings (Action Required)

The PCLC, Civil and Small Claims Advisory Committee, and the Appellate Advisory Committee (collectively "advisory committees") recommend that the Judicial Council sponsor legislation to amend Code of Civil Procedure section 437c to provide that in deciding a motion for summary judgment, the court need rule only on objections to evidence that is material to the disposition of the summary judgment motion and that objections not ruled on are preserved on appeal.

Hon. Kenneth K. So, Chair, Policy Coordination and Liaison Committee

Hon. Patricia M. Lucas, Chair, Civil and Small Claims Advisory Committee

Hon. Raymond J. Ikola, Chair, Appellate Advisory Committee

Mr. Daniel Pone, Governmental Affairs

Ms. Heather Anderson and Ms. Susan R. McMullan, Legal Services

<u>Item O Judicial Council–Sponsored Legislation: Sentencing Report Deadlines</u> (Action Required)

The PCLC and the CLAC recommend amending Penal Code section 1203 to require courts to find good cause before continuing a sentencing hearing for failure by the probation department to provide a sentencing report by the required deadlines.

Hon. Tricia A. Bigelow, Chair, Criminal Law Advisory Committee

Hon. Kenneth K. So, Chair, Policy Coordination and Liaison Committee

Ms. Kimberly DaSilva and Ms. Sharon Reilly, Governmental Affairs

Item P Judicial Council-Sponsored Legislation: State Court Facilities Construction Fund Report (Action Required)

Government Code section 70371.8 requires the Judicial Council to report annually, by March 1, to the Joint Legislative Budget Committee and the chairs of the Senate Committee on Budget and Fiscal Review and the Assembly Committee on Budget on the status of each project established by the State Public Works Board under Government Code section 70371.7 to be funded by the Immediate and Critical Needs Account of the State Court Facilities Construction Fund. The report is required to include an accounting of the revenues generated and the expenditures made in the Immediate and Critical Needs Account. In preparing this report for FY 2013–2014, the need to amend the due date in section 70371.8 for the report from March 1 to November 1 was raised. The actual expenditures per year-end Financial Statements for each fiscal year are not available until August. Judicial Council staff recommends sponsoring legislation that will change the due date from March 1 to November 1 to allow the report to be completed with the expenditure information as reported in year-end financial statements and to go through the Judicial Council review process before submission to the Legislature.

Hon. Kenneth K. So, Chair, Policy Coordination and Liaison Committee

Ms. Laura E. Speed, Governmental Affairs

<u>Item Q Judicial Council Report to the Legislature: Disposition of Criminal Cases</u> <u>According to the Race and Ethnicity of the Defendant (Action Required)</u>

Court Operations Services and its Office of Court Research recommends that the Judicial Council approve the report *Disposition of Criminal Cases According to the Race and Ethnicity of the Defendant* and direct staff to transmit it to the Legislature. Doing so fulfills

the requirements of Penal Code section 1170.45 which requires the Judicial Council to report annually on the disposition of criminal cases statewide according to the defendants' race and ethnicity. Since 2001 the Judicial Council's Office of Court Research has produced this report by analyzing the disposition of felony cases using data provided by the California State Department of Justice. Consistent with previous years, the 2014 report finds that when controlling for prior record and type of offense, the data show no consistent patterns in the severity of sentences that are principally related to the defendants' race/ethnicity.

Ms. Donna Hershkowitz, Ms. Leah Rose-Goodwin, and Mr. David Smith, Court Operations Services

Item R Uniform Bail and Penalty Schedules: 2015 Edition (Action Required)

The Traffic Advisory Committee recommends revisions to the Uniform Bail and Penalty Schedules, effective January 1, 2015. Vehicle Code section 40310 provides that the Judicial Council must annually adopt a uniform traffic penalty schedule for all nonparking Vehicle Code infractions. Under rule 4.102 of the California Rules of Court, trial courts, in performing their duty under Penal Code section 1269(b), must revise and adopt a schedule of bail and penalties for all misdemeanor and infraction offenses except Vehicle Code infractions. The penalty schedule for traffic infractions is established by the schedules approved by the Judicial Council. The recommended revisions bring the schedules into conformance with recent legislation.

Hon. Mark S. Borrell, Chair, Traffic Advisory Committee

Mr. Courtney Tucker, Criminal Justice Services

Break 10:40–10:55 a.m. (approx.)

DISCUSSION AGENDA (ITEMS S-U)

Item S 10:55-11:10 a.m.

<u>Judicial Branch Planning: Proposal to Re-Adopt the Strategic Plan for California's</u> <u>Judicial Branch for Fiscal Years 2006–2012 (Action Required)</u>

The chairs of the Judicial Council's five internal committees propose that the Judicial Council re-adopt *Justice in Focus: The Strategic Plan for California's Judicial Branch*, 2006 –2012 with an amendment to add a seventh goal on securing the funding necessary to meet the operational needs of the judicial branch and fulfill the branch's constitutional duties to the public. An extension of the goals and policies of the expired plan is necessary to maintain a guiding vision and direction for the judicial branch in the interim until the council adopts another successive plan. This extension is advised for the two-year period in which the Chief Justice's Commission on the Future of California's Court System will be conducting a

comprehensive examination of the priorities of the branch for the next decade and beyond. The addition of a new strategic goal, to secure and maintain adequate and predictable branch funding, is critical to the overall stability of the court system and the branch's capacity to fulfill its purpose. Together, the commission's final recommendations and a concerted effort to stabilize funding will provide a sound basis for the council's next strategic planning cycle and a durable foundation for a fully functioning judicial branch.

Public Comment and Presentation (10 minutes) • Discussion (5 minutes)

Speakers: Hon. Harry E. Hull, Jr., Chair, Rules and Projects Committee

Hon. Douglas P. Miller, Chair, Executive and Planning Committee

Hon. Kenneth K. So, Chair, Policy Coordination and Liaison Committee

Hon. David M. Rubin, Chair, Litigation Management Committee

Hon. James E. Herman, Chair, Technology Committee

Item T 11:10-11:50 a.m.

<u>Judicial Workload Assessment: 2014 Update of Judicial Needs Assessment and</u>

Proposed Revision to Methodology Used to Prioritize New Judgeships (Action Required)

The Workload Assessment Advisory Committee recommends that the Judicial Council approve the *Need for New Judgeships in the Superior Courts: 2014 Update of the Judicial Needs Assessment* for transmission to the Legislature and the Governor. This report, which fulfills the requirements of Government Code section 69614(c)(1), shows that nearly 270 new judicial officers are needed to meet the workload-based need for new judgeships. This report also includes information about the conversion of additional subordinate judicial officers to fulfill the reporting requirement of Government Code section 69614(c)(3). The advisory committee further recommends that the Judicial Council adopt a revision to the current methodology that is used to prioritize any new judgeships that may be authorized and funded by the Legislature for the trial courts. The proposed revision to the Judicial Council's methodology will allow smaller courts whose workload need is substantial, but less than the one full-time equivalent threshold currently required, to be eligible for consideration for a new judgeship.

Public Comment and Presentation (25 minutes) • Discussion (15 minutes)

Speakers: Hon. Lorna A. Alksne, Chair, Workload Assessment Advisory Committee

Ms. Leah Rose-Goodwin, Court Operations Services

Item U 11:50 a.m.-12:15 p.m.

Judicial Council: 2015 Legislative Priorities (Action Required)

Each year, the Judicial Council authorizes sponsorship of legislation to further key council objectives and establishes priorities for the upcoming legislative year. For the 2015 legislative year, the Policy Coordination and Liaison Committee recommends an approach similar to that of 2014, following the Chief Justice's Access 3D framework: (1) advocate for reinvestment in our justice system and avoid further reductions to preserve access to justice for all Californians,

including a method to provide stable and reliable funding; (2) advocate to secure new judgeships for communities most in need and ratify the authority of the council to convert vacant subordinate judicial officer positions to judgeships in eligible courts; and (3) advocate for legislation to expand access to interpreters.

Public Comment and Presentation (15 minutes) • Discussion (10 minutes)

Speakers: Hon. Kenneth K. So, Chair, Policy Coordination and Liaison Committee

Mr. Cory T. Jasperson, Governmental Affairs

INFORMATION ONLY ITEMS (NO ACTION REQUIRED)

INFO 1 Judicial Council: Implementation of Judicial Council Directives on Judicial Council Staff Restructuring

The chair of the Executive and Planning Committee (E&P) presents this informational report on the implementation of the Judicial Council Directives on Staff Restructuring, as approved by the Judicial Council on August 31, 2012. The Judicial Council Staff Restructuring Directives specifically direct the Administrative Director to report to E&P before each council meeting on every directive. This informational report provides an update on the progress of implementation efforts.

INFO 2 Government Code Section 68106: Public Notice by Courts of Closures or Reduced Clerks' Office Hours (Gov. Code, § 68106—Report No. 28)

Government Code section 68106 directs (1) trial courts to notify the public and the Judicial Council before closing courtrooms or clerks' offices or reducing clerks' regular office hours, and (2) the council to post all such notices on its website and also relay them to the Legislature. This is the 28th report to date listing the latest court notices received by the council under this statutory requirement; since the previous report, three superior courts—those of Calaveras, San Diego, and Mono Counties—have issued new notices.

INFO 3 Trial Courts: Quarterly Investment Report for Third Quarter of 2014

This *Trial Courts: Quarterly Investment Report for Third Quarter of 2014* provides the financial results for the funds invested by the Judicial Council on behalf of the trial courts as part of the judicial branch treasury program. The report is submitted under agenda item 10, Resolutions Regarding Investment Activities for the Trial Courts, approved by the Judicial Council on February 27, 2004, and the report covers the period of July 1, 2014, through September 30, 2014.

INFO 4 Court Facilities: Lease-Revenue Bond Issuances, Fall 2013, Spring and Fall 2014

As authorized and directed by the Judicial Council, the Administrative Director presents this report on actions taken in connection with lease-revenue bonds issued by the State Public Works Board in fall 2013, and spring and fall 2014 for the financing of court facilities projects.

There were no Circulating Orders since the last business meeting.

Appointment Orders since the last business meeting.