



# VIOLENCE AGAINST THE NEVADA LEGAL PROFESSION

## Results of the 2012 Survey

BY STEVE D. KELSON, ESQ.

### Introduction

An attorney's work day often includes meeting with clients, returning calls, drafting letters, responding to e-mails, preparing motions and memoranda and attending court. One rarely considers the possibility that this routine might be disrupted by work-related violence. However, just because one doesn't regularly hear of workplace threats and violence in the legal profession, it does not mean that it isn't regularly occurring.

The amount and level of violence against the Nevada legal profession is not as remote as you might believe. From May 17 through June 20, 2012, the State Bar of Nevada permitted a state-wide survey examining violence against its active membership. This article presents and examines the results of the survey, which show that members of the State Bar of Nevada regularly experience threats and violence from opposing parties, interested parties, their own clients and even opposing counsel, at any place and at any time.

### Studies of Violence Against the Legal Profession

Limited research exists on the subject of violence against the legal profession. However, studies do show that a substantial amount of violence is regularly directed at the legal profession, and appears to be increasing. For example, statistics gathered by the U.S. Marshals Service provide troubling information regarding violence against federal judicial officials in the United States. During the 13 fiscal years of 1980 through 1993, there were a total of 3,096 recorded inappropriate communications and threats involving federal judges – an average of 238 per year.<sup>1</sup> In comparison, during the following seven fiscal years of 2001 through 2007, the U.S. Marshals Service reported a total of 5,657 inappropriate communications or threats – an average of 808 per year.<sup>2</sup> The average number of inappropriate communications or threats has dramatically increased since that time. During the three fiscal years of 2008 through 2010 there were 4,062 inappropriate communications or threats – an estimated average of 1,354 per year.<sup>3</sup> See Table 1 below. There appears to be an increasing trend.

**Table 1:**  
U.S. Marshals Service  
Inappropriate Communications or Threats

Year	No.	Year	No.	Year	No.
2001	629	2005	953	2009	1,390
2002	565	2006	1,111	2010	1,395
2003	585	2007	1,140	2011	App. 1,300
2004	674	2008	1,278		

# VIOLENCE AGAINST THE NEVADA LEGAL PROFESSION

## Results of the 2012 Survey (Cont.)

While there is no national method for reporting attacks against the legal profession, analysis has revealed that threats against the legal profession at the state and local court levels are far more serious and occur more frequently than those at the federal level.<sup>4</sup> In 1999, a survey by the Administrative Office of Pennsylvania Courts found that of 1,029 judges, 23 percent had at some time received explicit threats; 17 percent reported physical assaults; and 44 percent experienced inappropriate approaches.<sup>5</sup> In 2001, the federal Bureau of Justice Statistics (BJS) conducted a study examining workplace aggression as it relates to prosecutors and their office personnel.<sup>6</sup> It reported that 81 percent of large state prosecutors' offices reported work-related threats or assaults in that year alone.<sup>7</sup> In 2005, a Canadian study of 1,152 lawyers in Vancouver and British Columbia indicated that 59.2 percent (583 lawyers) reported varying degrees and numbers of threats.<sup>8</sup>

Only two prior statewide surveys have been conducted regarding violence against the legal profession. In 2006, the Utah Bar Association conducted a survey of its 8,737 members, presenting surprising details of violence experienced by its membership.<sup>9</sup> In total, 984 members, representing 11.3 percent of the bar, responded to the survey. Of this number, 452 (45.9 percent) of the respondents reported that they had been threatened or physically assaulted at least once.<sup>10</sup> In 2008, the Idaho Bar Association conducted a similar survey of its 5,067 members.<sup>11</sup> In total 965 members, representing 19.05 percent of the bar, responded to the survey, of which 400 (41.5 percent) of respondents reported that they had been threat-

ened or physically assaulted at least once.<sup>12</sup> Many of these threats and acts of violence included death threats, assaults and vandalism to the attorney's property. The results show that violence against the legal profession is not as uncommon as was previously believed.

### The State Bar of Nevada's Statewide Survey of Violence Against the Legal Profession

From May 15 through June 20, 2012, the State Bar of Nevada permitted a statewide survey of violence against the legal profession. During the relevant time period of the survey, the State Bar of Nevada consisted of 8,245 active members, including out-of-state, affiliate and in-house counsel, and judges.

#### *The 2012 State Bar of Nevada Survey*

The survey was conducted online through <http://www.surveymonkey.com>, and all active members of the State Bar of Nevada with available e-mail addresses were requested to respond.<sup>13</sup> The survey consisted of 14 closed-ended questions with open-ended responses provided in two of the questions as they related to the category of law practiced and types of violence experienced. One descriptive question was also provided allowing respondents to provide a brief description of any threat(s) or physical assault event(s) experienced in their legal practice.

Of the survey's 14 close-ended questions, five were demographic in nature, and sought information from bar members regarding:

- Gender
- In-state or out-of-state

- practitioners
- Age
- Area of practice
- Years of practice

The remaining nine close-ended questions sought responses regarding:

- Whether respondent had ever received threats or been the victim of violence
- Types of threats and/or violence
- Number of threats received
- Location of threats or violent acts
- Association between threat and violent act
- Relationship with perpetrator
- Reported to police
- When threat and/or physical assault last occurred
- Change in conduct

Generally, the determination of whether a "threat" was made is a subjective determination by the recipient. For the purposes of the survey, and in an attempt to clarify the term, a "threat" was defined as: "A written or verbal intention to physically hurt or punish another, and/or a written or verbal indication of impending physical danger or harm." To simplify the survey, if a respondent indicated that they had not been a recipient of a threat or of a violent act, the survey skipped over otherwise irrelevant questions related thereto.

#### *The Results: Threats and Violence*

The survey received a total of 1,039 responses from 8,245 members of the State Bar of Nevada, representing 12.6 percent of its total active membership.<sup>14</sup> While the survey's responses present sufficient results to provide a thorough analysis of each

# VIOLENCE AGAINST THE NEVADA LEGAL PROFESSION

## Results of the 2012 Survey (Cont.)

of the close-ended questions as they relate to the five demographic close-ended questions, for practical purposes, this article focuses on the responses to the questions themselves and to the demographic questions solely as they apply to whether respondents have ever been the recipient of threats and/or violence.

### *Threats and Acts of Physical Violence*

The survey's primary question asked members if, whether while serving as a member of the legal profession, they had ever been the recipient of a threat or had been the victim of a violent act. Of the 1,029 responses to this question, 412 (40.0 percent) of the total respondents reported that they had been threatened and/or physically assaulted at least once. This percentage is lower than those reported in the prior Utah (45.9 percent) and Idaho (41.5 percent) surveys. Respondents to the survey identified over 280 examples of threats and/or acts of violence that had been perpetrated against them.

Although there are far too many examples to list in this article, a few are provided to show the kinds of violence that the Nevada respondents reported:

- "Death threats. Stalking. Letters. Dead animals on door step."
- "Defendant lunged toward me and threatened to go after me at home."
- "I was told by an incarcerated client that a former client was fixated on killing my children. I reported this to the prison warden and the former client's cell was searched. There were numerous items seized that contained pictures or private infor-

mation about my very young children."

- "Threatening letter with threats to office staff and attorneys."
- "Son of former client assaulted me and rammed [my] car after his father's bank account was garnished following entry of judgment obtained by attorney for collection agency...."
- "Numerous shot out car windows. Broken and shot out office windows."
- "I had a plaintiff come across a table at me during arbitration because he did not like my question."
- "Physical confrontation with blows thrown in court house."
- "Opposing party came to my office and left a suspicious package with the secretary ... They found an Order that was ripped up[] and soaked in feces and urine and more written threats."
- "Was battered and pushed to the ground by opposing counsel."
- "The opposing husband in a contested divorce hid near the courthouse with a rifle and scope waiting for me, but was discovered by police in the nick of time ...."
- "[I]ndividual stalked me and my family for better than a year ... After he went to prison, he attempted to engage an individual to blow up the propane tank on my property and/or cause physical harm to my ... brother."
- "I was also the victim of an attempt ... to throw a grenade through the window of my residence."
- "Phone threats of physical harm."
- "[A] male sexual assault victim became angry with my questions; he left the stand, and grabbed me by the throat."

- "Former client threatened to fire bomb our house; same client sat in car outside office watching office for approximately 30 min, then gave staff 'the middle finger' when they walked out."

• These responses are only representative of the numerous actual situations of threats and violence that members of the State Bar of Nevada have experienced.

### *Types of Threats and Violence*

The survey asked respondents to identify the type of threats and/or acts of violence received relating specifically to the recipients' responsibilities as a legal practitioner. There were 408 respondents who reported their responses set forth in Table 2 on the next page. Inappropriate and threatening communications were those communicated by letter, phone, fax or verbal interaction. Inappropriate approaches included being followed, face-to-face confrontations or attempts at violence. A total of 8.3 percent of respondents who identified themselves as recipients of threats and violence reported physical assaults.

The majority of respondents identified inappropriate and threatening communications. These communications were made primarily in person or by phone and often included veiled threats. For example, individuals made specific threats of "I'm going to get you;" "[let's] take it outside;" "I don't know why someone doesn't kill you;" and "I know where you live." These threats were generally made directly against the attorneys, but in some circumstances were made against attorneys' family and children. Several threats described by respondents showed the individual making the threat knew

# VIOLENCE AGAINST THE NEVADA LEGAL PROFESSION

## Results of the 2012 Survey (Cont.)

<b>n = 408</b>	
<b>Type</b>	<b>Number</b>
<b>Inappropriate Communications</b>	310
<b>Inappropriate Approaches</b>	191
<b>Physical Assault</b>	34
<b>Combination of two or more of the above</b>	117
<b>Other</b>	21

where the attorney lived and where their children went to school. For example, when one attorney withdrew from representing a client, the client called him on his unlisted home number at midnight to let him know that he would find him and his family anywhere unless he re-engaged the representation. In another incident, a client called from jail and threatened: "I know where your son goes to school. Tell him to be careful."

Many threatening approaches described by respondents occurred at the office, or during and after court hearings. In one incident, an opposing party sent an associate who "stalked" the attorney and followed a co-worker into their office on a weekend to serve an opposition memorandum. "He was menacing and would not tell me who he was or why he was there. I asked, and he said, 'Wouldn't you like to know?' as he got into my face."

Several respondents reported incidents resulting in assaults and physical violence. For example, in an estate matter, a beneficiary, angry with the time a condemnation process was taking and wanting his inheritance "now," showed up at the attorney's home with two loaded guns. Luckily, police were waiting for him. In a

criminal matter, a defendant smashed the prosecutor's car outside the courthouse with his pickup, and later returned and shot at the building. In another incident, an attorney was assaulted in the judge's chamber by the opposing party. Another attorney reported being "pushed, shoved, grabbed and had my life threatened in the courthouse."

Respondents who experienced other forms of threats and inappropriate communications were asked to identify how they occurred. In response, attorneys reported learning about threats and violence against them through other disturbing means, including: broken office windows, car windows shot out, slashed tires, "threat against my children," "dog

poisoned," "via law enforcement," "put on a web site as a target."

### *Number of Threats Received*

The survey requested those respondents who identified themselves as recipients of threats and/or violence to indicate the number of threats they received. A total of 403 of the 408 respondents reported they had received threats in the practice of law. Based on the responses shown in Table 3, respondents who were recipients of threats and/or violence, 318 (78.0 percent) have received more than one threat during their legal career.

### *Locations of Threats*

The survey asked members of the State Bar of Nevada to identify the location/s where they experienced threats or violent acts. See Table 4 below. Not surprisingly, the survey responses indicate that the most prominent locations of threats and violence have been the business office and courthouse. However, the responses to this question show that although threats and violence predominantly occur at an attorney's work-related environment, it also occurs beyond the office and court-

<b>n = 408</b>		
	<b>No. of Respondents</b>	<b>Percentage</b>
<b>None</b>	5	1.2%
<b>One</b>	85	20.8%
<b>Two</b>	106	26.0%
<b>Three</b>	84	20.6%
<b>Four</b>	19	4.7%
<b>More than 4</b>	109	26.7%
<b>Total</b>	408	100%

# VIOLENCE AGAINST THE NEVADA LEGAL PROFESSION

## Results of the 2012 Survey (Cont.)

n = 394	
Location	Number
Office	259
Residence	38
Courthouse	199
Elsewhere	110

house, including at home and other locations. For example, one attorney reported that his/her pregnant cat was killed and left in the driveway. Another attorney reported “[o]n three separate occasions my car windows have been shot out while parked in front of my house.” The shootings ended after video cameras were installed and the believed perpetrator was sent to prison on unrelated charges. Multiple respondents reported threats/violence that occurred in public places, including incidents where opposing parties followed the attorney in their car. One attorney reported being followed to a restaurant after oral argument before the Nevada Supreme Court.

### *Threats and Subsequent Assaults*

Attorneys that responded to receiving threats were asked to identify if the author or an individual connected to the author of an inappropriate or threatening communication subsequently physically assaulted the respondent. Of 394 responses, a total of 105 incidents of subsequent physical assaults were reported.

### *Relationship with the Perpetrator of Threats/Assaults*

Recipients of threats and violence were asked to identify the relationship with the individual who threatened and/or assaulted them. See Table 5 below.

The responses show that threats and

violence are primarily perpetrated by opposing parties and an attorney’s own client. Moreover, responses show that threats and violence can occur from any individual involved in a legal case, including other members of the bar. Some of the more disturbing results were the 75 incidents of threats and violence perpetrated by opposing counsel. Many respondents reported incidents of threatening approaches, threats of physical harm and assault from opposing counsel. For example, in one incident, opposing counsel challenged an attorney to a fist fight after a settlement offer was rejected. Another attorney recounted that “[a]n opposing attorney hit me in the knees with the swinging door up to the front of the courtroom over and over and told the judge he wanted to physically hurt me[.] [H]e also tried to run me off the road.”

### *Responses to Threats/Assaults*

n = 394		
Relationship	No.	Percentage
Client	143	36.7%
Relative/Associate of Client	59	15.1%
Opposing Party	212	54.4%
Relative/Associate of Opposing Party	78	20.0%
Unknown	39	10.0%
Opposing Counsel	75	19.2%
<b>Total</b>	<b>382</b>	<b>100%</b>

The survey asked respondents who had received threats or had been the victims of a physical assault if those incidents were reported to the police. Only 124 (31.8 percent) of 390 respondents who identified themselves as recipients of threats and/or violent acts, reported such incidents to the police.

### *When Threats/Assaults Last Occurred*

Respondents were asked when they last received a work-related threat or were the victim of a physical assault. See Table 6 below. Results show that of 384 respondents to the question, the majority, 246 (64.1 percent), reported such acts had last occurred within the past five years.

### *Change in Conduct*

The survey also asked those respondents that had received threats and/or had been the victim of physical assault if such threats and/or violence had altered the way they conducted their legal business. Only 26 respondents reported that such incidents had affected their conduct a great deal, 134 indicated that their conduct had been somewhat affected and 221 stated that it did not at all alter the way they conducted business. These percentages may be associated, in part,

to the perceptions reported by some attorneys that physical threats and violence are just part of the job, that threats are nothing more than empty words and “[n]o big deal so far,” and/or if reported, the police would do nothing.

# VIOLENCE AGAINST THE NEVADA LEGAL PROFESSION

## Results of the 2012 Survey (Cont.)

n = 384		
Time	No.	Percentage
Within the past year	79	20.6%
1 - 5 years ago	167	43.5%
6 - 10 years ago	63	16.4%
More than 10 years ago	75	19.5%
<b>Total</b>	<b>384</b>	<b>100%</b>

	Female	Male	Total
<b>Number Members</b>	2,534	5,724	8,258 <sup>15</sup>
<b>Percent Members</b>	30.7%	69.3%	100%
<b>Number Responding</b>	403	636	1,039
<b>Percent Responding</b>	38.8%	61.2%	100%
<b>Number Threats/Violence</b>	150	262	412
<b>Percentage Threats/Violence</b>	36.4%	63.6%	100%

### Demographic Survey Results

The survey's five demographic questions provide additional information regarding the distribution of threats and violence against members of the Nevada legal profession by gender, in-state/out-of-state membership, age, area of practice and years of practice.

#### Threats by Gender

Table 7 shows survey results regarding threats and violence experienced by active members of the State Bar of Nevada as distinguished by gender. Similar to the prior surveys conducted in Utah and Idaho, results of the survey reveal that more female attorneys and fewer male attorneys responded to the survey than is representative of the total active membership of the State Bar of Nevada. However, the percentage of threats/violence reported by each gender closely resembles the representative percentage of each gender. Female attorneys represented 38.8 percent of the total respondents who identified they had been the recipients of threats and/or violence, while male attorneys represented 61.2 percent. Where a respondent's experience with violence in the legal profession might have been a motivating factor

to answering the survey, a general overview of the results do not appear to show prevalence in threats and violence associated by gender.

#### In-State/Out-of-State Members

Of the 780 respondents who reported their in-state/out-of-state status, 363 of the responding in-state members and 49 out-of-state members identified that they had been the recipient of threats and /or violence arising from their work in the legal profession. Similar to the surveys conducted in Utah and Idaho, the survey's results reveal a disproportionately smaller percentage of out-of-state members responded to the survey than in-state members. The greater number of responses from in-state members arguably provides a more realistic representation of the level of

threats and violence experienced by practitioners in Nevada.

#### Age

Table 9 sets forth the results of the survey regarding threats and/or violence experienced by active members of the State Bar of Nevada of different age groups. An examination of the survey reveals what appears to be a correlation between the number of respondents who identify themselves as recipients of threats and violence, and their reported age. This corresponds with what also appears to be a strong correlation between the number of years an individual has practiced law and the number of threats and violence reported.

	In-State	Out-of-State	Total
<b>Number Members</b>	6,817	1,428	8,245
<b>Percent Members</b>	82.7%	17.3%	100%
<b>Number Respondents</b>	862	177	1,039
<b>Percentage Respondents</b>	83%	17%	100%
<b>Number Threats/Violence</b>	363	49	412
<b>Percentage Threats/Violence</b>	88.1%	11.9%	100%

# VIOLENCE AGAINST THE NEVADA LEGAL PROFESSION

## Results of the 2012 Survey (Cont.)

Age Category	≤ 30	31-40	41-50	≥ 51	Total
<b>Number Respondents</b>	79	266	273	421	1,039
<b>Percent Respondents</b>	7.6%	25.6%	26.3%	40.5%	100%
<b>Number Threats/Violence</b>	9	76	125	202	412
<b>Percentage Threats/Violence</b>	2.2%	18.4%	30.3%	49%	100%

An examination of Table 11 reveals an increase of the percentage of violence from new practitioners to those that have been practicing for more than 31 years. The dramatic decrease in the percentage of threats/violence experienced by respondents with one to five years of practice, from those with less than one year of practice, is arguably due to the limited number of respondents with less than one year of practice.

### Conclusion

The purpose in examining violence against members of the State Bar of Nevada is not to instill fear in attorneys or in any way to discourage the practice of law. Instead, the results of the survey show that, contrary to the general assumption, a significant percentage of active members of the State Bar of Nevada have and do face threats and/or violence in their practice. Although the amount of violence experienced by the bar's members may vary due to factors such as area of practice, age and years of practice, the survey's results clearly show that no member of the State Bar of Nevada can simply assume that they are immune from the potential of workplace violence. The reality is that violence in the legal profession can come from any side of a given case and can reach into every aspect of an attorney's life. There is no basis to presume that threats and violent acts against members of the legal profession are extremely rare incidents or do not occur because they are not being reported in the media.

### Area of Practice

The survey also requested that respondents identify what area of law comprises the majority of their legal practice. Table 10 shows that, by percentage, the greatest number of threats and/or violence were received by attorneys who practice in the areas of criminal defense, state/federal prosecution, family/divorce, and general litigation. However, results also show that a significant number of threats and violence occur against

attorneys who practice in the survey's other identified areas of practice.<sup>16</sup> These results are supported by both the Utah and Idaho surveys.

### Years of Practice

Lastly, respondents were asked to identify the number of years that they have been in practice. Table 11 demonstrates the survey results regarding threats and/or violence experienced by respondents, as distinguished by their years of practice.

	Number of Respondents	Percentage Respondents	Number Threats/Violence	Percentage Threats/Violence
<b>Criminal Defense</b>	116	11.2%	67	16.3%
<b>State/Federal Prosecution</b>	66	6.4%	43	10.5%
<b>Family/Divorce</b>	108	10.4%	50	12.2%
<b>Wills/Estates</b>	41	4.0%	17	4.1%
<b>Administrative</b>	49	4.7%	18	4.4%
<b>Corporate/Commercial/Real Estate</b>	138	13.3%	41	10%
<b>General Litigation</b>	293	28.2%	96	23.3%
<b>Labor/Employment/Civil Rights</b>	32	2.8%	9	2.2%
<b>Other</b>	196	18.9%	70	17%
<b>Total</b>	1,039	100%	412	100%

# VIOLENCE AGAINST THE NEVADA LEGAL PROFESSION

## Results of the 2012 Survey (Cont.)

	Number Respondents	Percentage Respondents	Number Threats/Violence	Percentage Threats/Violence Category
< 1	27	2.6%	2	7.4%
1 - 5	178	17.2%	34	1.9%
6 - 10	180	17.4%	62	34.4%
11 - 15	129	12.5%	56	43.4%
16 - 20	124	12%	59	47.6%
21 - 30	226	21.9%	112	49.6%
> 31	170	16.4%	87	51.2%
<b>Total</b>	<b>1034</b>	<b>100%</b>	<b>412</b>	<b>100%</b>

### ENDNOTES

1. FREDERICK S. CALHOUN, HUNTERS AND HOWLERS: THREATS AND VIOLENCE AGAINST FEDERAL JUDICIAL OFFICIALS IN THE UNITED STATES, 1789-1993, 51 (U.S. Marshals Service, 1998).
2. See OFFICE OF PUBLIC AFFAIRS, U.S. MARSHALS SERVICE, PUB. NO. 23, FACTS AND FIGURES AT A GLANCE (2002); OFFICE OF PUBLIC AFFAIRS, U.S. MARSHALS SERVICE, Pub. No. 23, Facts and Figures at a Glance (2003); OFFICE OF PUBLIC AFFAIRS, U.S. MARSHALS SERVICE, PUB. NO. 21-B, FACTS AND FIGURES AT A GLANCE (2004); OFFICE OF PUBLIC AFFAIRS, U.S. MARSHALS SERVICE, PUB. NO. 21-D, FACTS AND FIGURES AT A GLANCE (2005); OFFICE OF PUBLIC AFFAIRS, U.S. MARSHALS SERVICE, PUB. NO. 21-D, FACTS AND FIGURES AT A GLANCE (2006); OFFICE OF PUBLIC AFFAIRS, U.S. MARSHALS SERVICE, PUB. NO. 21-D FACTS AND FIGURES AT A GLANCE (2007); see also U.S. Marshals Service: Judicial and Court Security, available at <http://www.usmarshals.gov/judicial/index.html>.
3. See Alan Silverleib, *Report: Threats Against Federal Judges, Prosecutors Rise Sharply*, CNN .COM, Jan. 4, 2010, available at [http://articles.cnn.com/2010-01-04/justice/judges.threats\\_marshall-service-federal-judges-report?s=PM:CRIME](http://articles.cnn.com/2010-01-04/justice/judges.threats_marshall-service-federal-judges-report?s=PM:CRIME); U.S. Marshals Service, Judicial Security (2009), available at <http://www.justice.gov/marshals/judicial/>; *The Third Branch: Ensuring*

*Safety and Security: An Interview with the Director of the U.S. Marshals Service*, March 2011, available at <http://www.uscourts.gov/news/>; The Third Branch/11-03-01/Ensuring\_Safety\_and\_Security\_An\_Interview\_with\_the\_Director\_of\_the\_U\_S\_Marshals\_Service.aspx; U.S. Judicial Security, Judicial Security (2011), available at <http://usmarshals.gov/judicial/index.html>.

4. CALHOUN, note 1, at 29.
5. Don Hardenbergh & Neil Allen Weiner, Preface, in THE ANNALS OF THE AMERICAN ACADEMY OF POLITICAL AND SOCIAL SCIENCE 2001: 576, 13-15 (Alan W. Heston, et al. eds., July 2001).
6. DeFrances, C.J., "State Court Prosecutors in Large Districts, 2001," Bureau of Justice Statistics Bulletin. Washington, D.C.: U.S. Department of Justice (2001); De Frances, C. J., "Prosecutors in State Courts, 2002," Bureau of Justice Statistics Bulletin. Washington, DC: U.S. Department of Justice. (2002).
7. *Id.*
8. Karen N. Brown, An Exploratory Analysis of Violence and Threats Against Lawyers (2005) (unpublished M.A. thesis, Simon Fraser University)(on file with the Simon Fraser University), available at <http://ir.lib.sfu.ca/retrieve/2110/etd1740.pdf>.
9. Stephen D. Kelson, *Violence Against the Utah Legal Profession – a Statewide Survey*, 19 UTAH BAR J. 4, July/Aug 2006, at 8.
10. *Id.*

11. Stephen D. Kelson, *Violence Against the Idaho Legal Profession: Results of a 2008 Survey*, 52 Advocate (Idaho) 28, January 2009, available at <http://isb.idaho.gov/pdf/advocate/issues/adv09jan.pdf>.
12. *Id.*
13. The survey questions consisted of a hybrid of several prior surveys, including the 1999 survey performed by the Administrative Office of the Pennsylvania Courts, the 2005 survey conducted of lawyers in Vancouver and British Columbia, Canada, the 2006 survey of the Utah Bar Association, and the 2008 survey of the Idaho Bar Association.
14. There were 1,250 bounce-back emails from the State Bar of Nevada's service list of active members. Accordingly, the survey actually received a total of 1,039 responses from 6,995 members of the State Bar of Nevada, representing 14.85 percent of the active membership surveyed.
15. The State Bar of Nevada's count of Male/Female membership occurred at a different time of year than the count of total membership, creating the identified variance in Table 7 from the total membership of 8,245.
16. Due to a format error, question number 4 of the survey did not allow respondents to choose the option of "Other" as the area of law that comprises the majority of the attorney's legal practice without also choosing a second area of practice. However, using electronic filters provided by [surveymonkey.com](http://www.surveymonkey.com), it was possible to recalculate and correct results for survey question number 4, to include "Other," and similarly ascertain the correct results for reported threats/violence for each identified area of law.