

OFFICE OF LEGAL AFFAIRS  
EXTERNAL OPINION

External Opinion # EX-2003-1013

T. J. Wedago Sentini Colberg, Esq.

Compliance Officer,  
Oficina del Director Ejecutivo  
Servicios Legal de Puerto Rico, Inc.  
Apartado 9134  
San Juan, Puerto Rico 00908-9134

**Date:** September 16, 2003

**Subject:** **Permissibility of PRLS Attorney Participation in Legislative  
Compilation of Puerto Rican Labor Laws**

---

You requested an Opinion from this Office as to whether the Puerto Rico Legal Services ("PRLS) may, consistent with the restrictions on lobbying at 45 CFR Part 1612 and the outside practice of law at 45 CFR Part 1604, allow attorneys in the PRLS Migrant Program to serve on a Commission developing a compilation of State labor laws at the request of an elected official on their own time and without the use of PRLS funds.

***Brief Answer***

PRLS may allow its attorneys to serve on a Commission developing a compilation of State labor laws at the request of an elected official on their own time and without the use of LSC funds.

***Background***

We understand the facts to be the following: Severo Colberg-Toro, President of the Labor Commission of the House of Representatives of Puerto Rico, has requested the participation of PRLS Migrant Program attorneys on a Commission which will be tasked with developing a compilation of Puerto Rican labor laws. The Commission will not be recommending changes to the laws, rather, it is seeking to compile Puerto Rico's various labor laws for recodification in one place. The attorneys serving on the Commission will not receive compensation for their participation. Further, PRLS is not funding the Commission, and the attorneys will serve entirely on their own time, without using and PRLS funds or resources.

***Analysis***

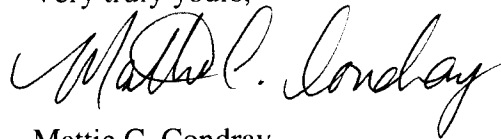
Commission are doing so on their own time, without the use of PRLS funds or resources.<sup>1</sup> Thus, PRLS is not engaging in any activities covered by Part 1612 so there are no 1612 compliance issues implicated in this situation .

1604 generally prohibits full-time recipient attorneys from engaging in the outside practice of law. Thus, Part 1614 would be violated if the participation of the PRLS attorneys in the Commission's activities constitutes the outside practice of law.

1604 defines "outside practice of law" as the "provision of legal

Commission is appropriately considered "consulting" and, as such, they may engage in the Commission's work consistent with the requirements of Part 1604.

Very truly yours,



Mattie C. Condray  
Senior Assistant General Counsel  
Office of Legal Affairs



Victor M. Fortuno  
General Counsel

mcondray@lsc.gov  
(202) 295-1624