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8 **IN THE SUPREME COURT**  
9 **STATE OF ARIZONA**

10 In the Matter of:

11 **PETITION TO AMEND RULE**  
12 **34(e) OF THE ARIZONA RULES**  
13 **OF SUPREME COURT**

Supreme Court No. R-26-0006

**STATE BAR OF ARIZONA**  
**COMMENT**

14 Pursuant to Rule 28(e) of the Arizona Rules of Supreme Court, the State Bar  
15 of Arizona (the “State Bar”) hereby submits the following as its Comment to the  
16 above-captioned Petition. The Petition seeks to amend Rule 34(e), Ariz. R. Sup. Ct.,  
17 which provides the process for attorneys admitted in other states to become  
18 authorized to practice law in Arizona.  
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21 Petitioners propose four amendments to Rule 34(e), which purportedly create  
22 an easier path for lawyers licensed in other jurisdictions to become authorized to  
23 practice in Arizona.

24 After careful consideration, the State Bar has decided to oppose the Petition  
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1 in its entirety for the following reasons.

2 First, this Petition is substantially similar to a petition filed by Petitioners in  
3 2024. In that matter, the State Bar submitted a comment opposing, among other  
4 things, the proposed elimination of the active practice requirement and changes to  
5 the Committee on Character and Fitness process. The Court denied the 2024 petition  
6 in its entirety. Given the recency of that decision, the State Bar defers to the Court's  
7 prior ruling and maintains that the proposed amendments remain unwarranted, as  
8 Petitioners have not presented sufficient new information or data to justify  
9 reconsideration at this time.  
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12 Second, since the filing of the 2024 petition, the Court has taken several  
13 different actions with the specific intent to bridge the justice gap in Arizona's "legal  
14 deserts" as well as create innovative programs to expand access to legal services, not  
15 only geographically, but to low-income and underserved individuals, across  
16 Arizona. With so many of the Court's programs being new, and the results of such  
17 not fully realized, the State Bar maintains it is most prudent to wait to see the  
18 collective impact of these programs before considering significant changes to Rule  
19 34(e).  
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22 As noted by Petitioners, prior to 2024, Arizona already implemented  
23 significant reforms expanding access to legal services, including adoption of the  
24 Uniform Bar Examination, authorization of Alternative Business Structures, and the  
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1 creation and recognition of Legal Paraprofessionals.

2 In addition to these reforms, and after Petitioners filed their 2024 petition, the  
3 Court established three additional programs, two in 2025, and one in 2026, all with  
4 the goal to improve access to justice across our state.  
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6 The Court established the Government Law Admission Program for Lawyers  
7 from Non-Reciprocal States (GLAP). GLAP allows lawyers to become certified to  
8 practice law in Arizona in a publicly funded government law office if they are  
9 admitted to the practice of law in another state, or territory of the United States, that  
10 does not allow for admission on motion.  
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12 The Court also approved a new rule codifying the Community-Based Justice  
13 Worker Service Delivery Model, which sets out permanent pathways for the  
14 authorization of a nationally emergent category of legal professionals known as  
15 community-based justice workers and advocates.  
16

17 And, just this year, the Court expanded the Arizona Lawyer Apprenticeship  
18 Program providing an additional route to admission to the practice of law to advance  
19 the Court's goal of closing the access to justice gap, while also protecting consumers  
20 of legal services in rural Arizona and through publicly funded government law  
21 offices.  
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23 At the same time, the State Bar has seen significant growth in the number of  
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1 licensed Alternative Business Structures,<sup>1</sup> and an increase in the number of licensed  
2 Legal Paraprofessionals, with the Court-approved expanded scope of practice areas  
3 for Legal Paraprofessionals.  
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5       Moreover, the Petition does not provide empirical support demonstrating that  
6 any of the proposed amendments—individually or collectively—would  
7 meaningfully improve access to justice, increase the number of competent  
8 practitioners in underserved areas, or reduce costs for consumers. In the absence of  
9 such evidence, the State Bar cannot support changes that would materially alter the  
10 existing admission framework.  
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12       The State Bar maintains that the Court should allow these alternative  
13 programs, collectively, to further develop and mature, to fully realize their  
14 measurable impact on expanding access to legal services across Arizona before  
15 adopting additional structural changes to Rule 34.  
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24 <sup>1</sup> As of March 2026, there are approximately 150 licensed [Alternative Business](#)  
25 [Structures](#) in Arizona, making it the leader in the U.S. for non-lawyer ownership of  
legal services. At the end of 2024, there were 114 active licenses.

1 **CONCLUSION**

2 For the reasons stated above, the State Bar respectfully requests that the Court  
3 deny the changes proposed in the Petition.  
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5 RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of May, 2026.

6 *Jessica J. Fotinos*  
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8 Jessica J. Fotinos  
9 General Counsel

10 Electronic copy filed with the  
11 Clerk of the Supreme Court of Arizona  
12 this 1<sup>st</sup> day of May, 2026.

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by: PSequin