

IN THE SUPREME COURT OF THE STATE OF ARIZONA

In the Matter of: PETITION TO AMEND RULE 31, RULES OF THE SUPREME COURT OF ARIZONA

Supreme Court No. _____

Pursuant to Rule 28, Rules of the Supreme Court, the National Center for Vulnerable Communities (NCVC), under Mecartea and Associates PLLC, respectfully petitions this Court to amend Rule 31 as follows:

PROPOSED RULE 31(d)(31)

Qualified Administrative Representatives ("QARs") employed by Court-certified agencies may conduct administrative hearings and represent protected classes before Arizona agencies when accepted by the presiding tribunal.

QUALIFICATIONS Two years of administrative or regulatory agency experience; One year of specialized training; Competency in legal research, drafting, investigations, and administrative procedure; Documented advocacy experience before Arizona agencies; Assignment of a unique Agency Identification Number. **OVERSIGHT**

QARs shall remain subject to Arizona Supreme Court regulation and supervised by a licensed Arizona attorney serving as Private Attorney General.

PROTECTED CLASSES

Protected populations include pregnant individuals, persons with SMI, LGBTQIA+ individuals, persons with disabilities, vulnerable adults, youth, homeless individuals, trafficking survivors, and whistleblowers.

CONCLUSION

Petitioner respectfully requests adoption of the proposed amendment to modernize Arizona administrative representation procedures and improve access to justice.

DATED this 12 day of may, 2026

Respectfully submitted,

National Center for Vulnerable Communities
Mecartea and Associates PLLC
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STATEMENT OF PURPOSE AND NEED

I. ACCESS TO JUSTICE GAP

Arizona's vulnerable populations frequently face complex administrative hearings involving housing, healthcare, benefits, and child welfare without legal representation. Existing pro bono resources are insufficient to meet statewide demand.

II. SPECIALIZED ADMINISTRATIVE EXPERTISE

Administrative law depends heavily upon agency-specific regulations, policies, and procedural frameworks. A Qualified Administrative Representative (QAR) often possesses technical expertise developed through direct agency experience.

III. PUBLIC SAFETY AND SYSTEM EFFICIENCY

The proposed amendment creates a regulated and Court-monitored system of administrative representation: QARs remain accountable to the Arizona Supreme Court; Licensed attorneys provide statutory oversight; The system improves enforcement efficiency while reducing public costs. **IV. ALIGNMENT WITH MODERN ARIZONA LAW**

The proposal supports modern statutory protections involving healthcare access, vulnerable adults, trafficking survivors, disability rights, and protected civil rights categories.

V. CONCLUSION

The National Center for Vulnerable Communities respectfully requests modernization of Rule 31 to improve meaningful access to administrative justice for vulnerable Arizonans.

STATEMENT OF COMPETENCY

I. EQUIVALENCY OF EXPERIENCE AND SPECIALIZED TRAINING

The Petitioner asserts that competency in administrative representation is not derived solely from a Juris Doctor degree, but from deep, repetitive immersion in specific regulatory frameworks.

- Regulatory Immersion: A Qualified Administrative Representative (QAR) must possess at least two years of experience within administrative or regulatory agencies under A.R.S. § 41-1081.
- Specialized Training: One year of specialized procedural training ensures competency in agency hearing practices and administrative tribunal procedures.

II. DEMONSTRATED LEGAL LITERACY

A QAR must demonstrate competency in: Statutory interpretation and application; Administrative legal research; Evidence standards applicable to administrative proceedings; Formal document drafting and case management. **III.**

ADVOCACY FOR PROTECTED CLASSES

The competency standard requires experience serving vulnerable populations, including individuals with SMI, victims of trafficking, disabled persons, and other protected classes recognized under Arizona law.

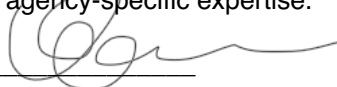
IV. ETHICAL OVERSIGHT

Each QAR operates under the supervision of a licensed Arizona attorney and remains subject to Arizona Supreme Court oversight and discipline.

V. CONCLUSION

The proposed QAR framework establishes a specialist model emphasizing practical competency, ethical accountability, and agency-specific expertise.

Signature _____



CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of _____, 2026, I electronically filed the foregoing: Petition to Amend Rule 31 Statement of Purpose and Need Statement of Competency with the Clerk of the Supreme Court of Arizona via the Arizona Court Rules Forum (or other approved electronic filing method).

I further certify that a true and correct copy of the foregoing was sent via U.S. First Class Mail and/or Electronic Mail to the following parties of record:

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DATED this 12 day of May, 2026

Respectfully submitted,

Petitioner
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