

STATEMENT OF PURPOSE: PROPOSED AMENDMENTS TO RULE 31

I. INTRODUCTION AND NECESSITY

The Petitioner submits this proposal to amend Arizona Supreme Court Rule 31 to formally recognize the roles of Qualified Administrative Representatives (QARs) and Qualified Regulatory Prosecutors (QRPs). This petition is driven by the urgent need to expand meaningful access to justice for Arizonans navigating complex administrative, regulatory, and public benefit systems. The current model, which relies exclusively on licensed attorneys, creates significant barriers to representation for vulnerable populations and limits the capacity of state agencies to ensure efficient, ethical, and transparent regulatory enforcement.

II. OBJECTIVES OF THE PROPOSED AMENDMENT

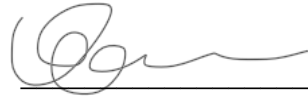
The proposed amendment serves several critical objectives:

- 1. Expanding Access to Justice:** By establishing a structured, competency-based framework for non-lawyer advocacy, the Court will empower individuals with Serious Mental Illness, developmental disabilities, and other protected status recipients to secure effective representation in administrative tribunals.
- 2. Ensuring Regulatory Accountability:** The formalization of the Qualified Regulatory Prosecutor (QRP) role, operating as a Private Attorney General, provides a necessary mechanism to enforce compliance and systemic accountability within administrative agencies, ensuring that government action remains aligned with constitutional protections.
- 3. Promoting Ethical and Procedural Uniformity:** The framework requires rigorous, multi-jurisdictional compliance oversight. By mandating the supervision of Licensed Compliance Attorneys (CLAs), this amendment guarantees that non-lawyer practice is subject to the same ethical rigor—including *Brady* disclosure obligations and duties of candor—that governs the practice of law.

III. CONCLUSION

This proposal replaces an outdated, exclusionary licensing model with a specialized competency framework. The Petitioner respectfully requests that the Court adopt these amendments to protect the public, enhance procedural fairness, and fulfill its constitutional mandate to ensure justice is accessible to all members of the public.

Respectfully submitted,



Petitioner