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1 Board of Legal Document Preparers
2 Certification and Licensing Division
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FILED
APR 23 2013
JANET JOHNSON
CLERK SUPREME COURT
BY: *[Signature]*

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APR 23 2013

IN THE SUPREME COURT
STATE OF ARIZONA

CLERK SUPREME COURT

PETITION TO AMEND RULE 31(d)(24),)	Supreme Court No. R-13-0001
ARIZONA RULES OF THE SUPREME)	
COURT.)	
)	COMMENT IN RESPONSE TO
)	PETITION TO AMEND RULE 31(d)(24),
)	ARIZONA RULES OF THE SUPREME
)	COURT
)	
)	

Pursuant to Arizona Code of Judicial Administration (“ACJA”) § 7-208(D)(4)(b), the Board of Legal Document Preparers (“Board”) submits this comment in response to Rule Petition R-13-0001 requesting the Arizona Supreme Court amend Rule 31(d)(24) so that certified legal document preparers and others are expressly excluded from Supreme Court regulation when providing services in the area of immigration and nationality law. As proposed, Rule 31(d)(24) would read:

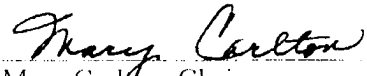
Except for federal immigration and nationality law, nothing in these rules shall prohibit a certified legal document preparers from performing services in compliance with Arizona Code of Judicial Administration, Part 7, Chapter 2, Section 7-208. This exemption is not subject to paragraph (c) of this rule, as long as the disbarred attorney or member has been certified as provided in § 7-208 of the Arizona Code of Judicial Administration.

The Board takes no position and offers no comment or opinion regarding the constitutional federal preemption issues. The Board does not agree with the Petitioners correlation of certified legal document preparers to notaries and “notarios.” With that in mind, the Board was established to assist in the regulation of non-lawyers pursuant to Rule 31(d)(24)

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and protect the interest of the public and to ensure certified legal document preparers ascribe to a statutory code of ethics and standards. The Board believes the public is best served by the Supreme Court's regulation of legal document preparers through the Board and ACJA § 7-201 and § 7-208.

DATED this 25th day of April, 2013.



Mary Carlson, Chair
Board of Legal Document Preparers

1 A copy of the foregoing hand delivered and/or mailed this 23rd day of April, 2013, to:

2 Arizona Supreme Court
3 Clerk of the Court
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