

IN THE SUPREME COURT OF FLORIDA

IN RE: AMENDMENTS TO THE RULES  
REGULATING THE FLORIDA  
BAR -- FLORIDA REGISTERED  
PARALEGAL PROGRAM

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CASE NO. SC06-1622

BRIEF OF THE FLORIDA BAR

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## STATEMENT OF THE CASE AND OF THE FACTS

On August 15, 2006, The Florida Bar filed a petition with this Court seeking to amend the Rules Regulating The Florida Bar to add Chapter 20, the Florida Registered Paralegal Program. Several individuals filed comments regarding the proposed rule. On December 20, 2006, this Court issued an Order setting this matter for oral argument and directing "The Florida Bar and any party who filed a timely comment to the proposed amendments to submit briefs on or before January 9, 2007, addressing the issue of whether this Court may properly exercise jurisdiction over and regulate nonlawyers who are not engaging in the unlicensed practice of law." This brief is being filed in response to the Court's Order.

## SUMMARY OF THE ARGUMENT

The proposed Florida Registered Paralegal Program does not establish regulation by The Florida Bar or by this Court. The proposed rule creates a voluntary program. Individuals who voluntarily become registered will enjoy certain benefits and privileges and voluntarily assume certain burdens. Joining the program is not mandatory. Individuals may continue to work as paralegals under the direction and supervision of a member of The Florida Bar without voluntarily joining the program. As the program is voluntary and individuals may continue to work as paralegals without joining the program, the proposed rule does not establish regulation.

Even if the proposed rule did establish regulation, this Court may exercise jurisdiction over and regulate the practice of law. Individuals who voluntarily join the Florida Registered Paralegal Program must work for members of The Florida Bar. This Court has the exclusive jurisdiction to regulate the conduct of members of The Florida Bar. In exercising this jurisdiction, this Court has adopted rules which govern the conduct of nonlawyer employees working for members of The Florida Bar. Thus, even if the proposed program establishes regulation, this Court may properly exercise jurisdiction over and regulate nonlawyers who are not engaging in the unlicensed practice of law.

## ARGUMENT

### Whether The Florida Bar And The Supreme Court Of Florida May Properly Exercise Jurisdiction Over And Regulate Nonlawyers Who Are Not Engaging In The Unlicensed Practice Of Law

In this Court's Order of December, 20, 2006, this Court asked The Florida Bar to answer the above question. However, this question presupposes that the rule establishes regulation. The preliminary question that needs to be answered is whether the proposed rule establishes regulation and, if so, whether this Court may regulate the practice of law. As more fully discussed below, the proposed rule does not establish regulation. However, if the proposed rule did establish regulation, this Court may adopt the proposed rule as this Court has the authority to regulate the practice of law.

### The Proposed Florida Registered Paralegal Program Does Not Establish Regulation

Black's Law Dictionary defines regulation as "the act or process of controlling by rule or restriction." *Black's Law Dictionary 1131 (8th ed. 2004)*. It is axiomatic that in order to control an individual or activity by rule or restriction, the rule or restriction would have to apply to everyone in that class or to everyone wishing to engage in that activity. For example, regulations requiring a driver's license in order to drive apply to everyone

who wishes to drive. An individual does not have to drive, but if an individual wishes to drive, they must have the proper license to do so. Driving without a driver's license has consequences and is therefore a regulation – it controls by rule or restriction.

By contrast, the proposed program pending before this Court does not establish a regulation. An individual does not have to comply with the program in order to engage in an activity. No person or activity is being controlled by rule or restriction. There are no consequences for failure to join the program. Accordingly, the proposed Florida Registered Paralegal Program does not establish regulation.

Chapter 20 creates the Florida Registered Paralegal program. The program sets up a two-tier system for paralegals. The first tier, incorporated in the chapter by definition only, includes a person with education, training, or work experience who works under the direction and supervision of a member of The Florida Bar and who performs specifically delegated substantive legal work for which a member of The Florida Bar is responsible. This language is similar to the existing definition of paralegal found in rule 10-2.1(b) of the Rules Regulating The Florida Bar. Rule 4-5.3 of the Rules Regulating The Florida Bar also contains definitional language.

No additional requirements are necessary to use the title paralegal and to perform paralegal work.

The second tier creates the classification of Florida Registered Paralegal. In order to reach this tier, the individual must have certain education and training or certification, complete an application, and be registered by The Florida Bar. The second tier is intended to set a high standard for individuals working as paralegals so that the employing lawyers and the lawyers' clients may rely on the paralegal's experience and qualifications.

Because the chapter creates a two tier system, those individuals currently working as paralegals may continue to do so without registering with The Florida Bar. Individuals who wish to obtain the higher level by joining the Florida Registered Paralegal program may do so, although joining the program is not mandatory for continuing to work as a paralegal.

The proposed rule does not seek to regulate nonlawyers who are not engaging in the unlicensed practice of law or establish regulation by this Court or The Florida Bar. The proposed rule seeks to set a higher standard for nonlawyers working as paralegals by creating a program which a paralegal may voluntarily join. As it is not mandatory to join the program to

continue to work as a paralegal, the program does not establish regulation.

No activity or person is being controlled by rule or restriction.

Although the program does not establish regulation, those who voluntarily join the program do enjoy some benefits and privileges and assume some burdens. Those who wish to join the program and become a Florida Registered Paralegal must meet the standards of the rule. Those who voluntarily agree to join the program enjoy the benefit and privilege of becoming a Florida Registered Paralegal. With this privilege comes certain burdens. For example, a Florida Registered Paralegal must complete 30 hours of continuing education in a three-year period. A Florida Registered Paralegal also agrees to abide by a code of ethics and can have their Florida Registered Paralegal status revoked for noncompliance.

Individuals who do not voluntarily agree to join the program and enjoy the benefits, do not undertake any of the burdens. A paralegal who does not register and join the program does not have to meet the standards of the rule. A paralegal who does not register and join the program does not have to comply with continuing education requirements. A paralegal who does not register and join the program does not agree to abide by a code of ethics. However, a paralegal who does not join the program may continue to work as a paralegal. Moreover, a paralegal who was once part of the

program but is no longer part of the program either by choosing not to rejoin or by having their Florida Registered Paralegal status revoked may continue to work as a paralegal. The adoption of Chapter 20 would not restrict an individual from engaging in the activity or profession of being a paralegal. Adoption of Chapter 20 does not establish regulation by The Florida Bar or this Court.

The Supreme Court Of Florida May Exercise Jurisdiction Over And Regulate Nonlawyers Who Are Not Engaging In The Unlicensed Practice Of Law As The Supreme Court Of Florida Has Jurisdiction Over And The Authority To Regulate The Practice Of Law

In addition to asking whether this Court and The Florida Bar could regulate nonlawyers who are not engaging in the unlicensed practice of law, this Court asked whether jurisdiction may properly be exercised over nonlawyers not engaging in the unlicensed practice of law. Nonlawyers who voluntarily join the program agree to be under the jurisdiction of this Court and, through delegation by this Court, The Florida Bar. It is not unlike litigants who voluntarily subjects themselves to the jurisdiction of the Florida courts. Therefore, this Court and, through delegation, The Florida Bar may properly exercise jurisdiction over nonlawyers who voluntarily join the Florida Registered Paralegal Program.

Furthermore, even if adoption of The Florida Registered Paralegal Program established regulation, this Court has jurisdiction over and the

authority to regulate the practice of law. A nonlawyer wishing to join the Florida Registered Paralegal Program must be working under the direction and supervision of a member of The Florida Bar. The nonlawyer is therefore working within the practice of law. This Court may regulate, and has regulated, the activities of nonlawyer employees working in a law office as paralegals.

Article V, section 15 of the Florida Constitution, gives this Court "exclusive jurisdiction to regulate the admission of persons to the practice of law and the discipline of persons admitted. This constitutional grant authority gives this Court inherent authority to regulate the practice of law. *The Florida Bar v. Sperry*, 140 So. 2d 587, 589 (Fla. 1962), *judg. revd. on other grounds*, 373 U.S. 379 (1963). Through this constitutional grant of authority, this Court delegated certain duties to The Florida Bar. *R. Regulating Fla. Bar Introduction*. The Rules Regulating The Florida Bar, adopted by this Court, contain Rules of Professional Conduct which Florida lawyers must follow. *R. Regulating Fla. Bar 1-10.1*. Any rules proposed by The Florida Bar as part of these rules must be approved by this Court. *R. Regulating Fla. Bar 1-12.1*. Several rules approved by this Court as part of the Rules of Professional Conduct which regulate the conduct of members of the bar also regulate the conduct and activities of nonlawyer employees

working in a law office. Accordingly, this Court can regulate the conduct and activities of nonlawyer employees working in a law office. This Court can properly exercise jurisdiction over and regulate nonlawyers who are not engaging in the unlicensed practice of law.

Rule 4-5.3 of the Rules of Professional Conduct is one rule which regulates the activities of nonlawyers who are not engaging in the unlicensed practice of law. Rule 4-5.3 makes a lawyer responsible for the conduct and activities of the lawyer's nonlawyer employees. This includes ensuring that the nonlawyer's conduct is "compatible with the professional obligations of the lawyer." *R. Regulating Fla. Bar 4-5.3*. It is the lawyer's responsibility to ensure that nonlawyer employees comply with the Rules of Professional Conduct. *R. Regulating Fla. Bar 4-5.3, Comment*. The conduct of nonlawyer employees, including paralegals, is therefore regulated.

Rule 4-5.3 specifically recognizes that a lawyer will utilize paralegals and that paralegals "may perform duties delegated to them by the lawyer without the presence or active involvement of the lawyer . . ." *R. Regulating Fla. Bar 4-5.3(c)*. What these duties are and how they can be performed are interpreted in ethics opinions issued by The Florida Bar after approval by the Board of Governors of The Florida Bar. The ethics opinions regulate the conduct of nonlawyer employees. For example, ethics opinions regulate

information a paralegal must put on business cards and letterhead, what information a paralegal can and cannot give at an initial interview of a client, what a paralegal can and cannot do at a real estate closing, what documents a paralegal may and may not sign, and what information must be given and may not be given when moving from one law firm to another. *Florida Bar Professional Ethics Comm. Op. 86-4 (Aug. 1, 1986), 88-6 (April 15, 1988), 89-5 (Nov. 1, 1989), 87-11 (April 15, 1988), and 86-5 (Aug. 1, 1986).*

Rules Regulating The Florida Bar adopted by this Court also regulate how a nonlawyer is paid. Rule 4-5.4 prohibits a lawyer from sharing fees with a nonlawyer. The rule goes on to allow the lawyer to pay a bonus to a nonlawyer employee and sets forth the circumstances under which the bonus may be paid. Paying a bonus for reasons other than those specified in the rule has been found to be unethical. *Florida Bar Professional Ethics Comm. Op. 02-1 (Jan. 11, 2002).*

Although the rules and opinions cited directly regulate the activities of members of The Florida Bar, they indirectly regulate the activities of nonlawyers who are working in a law office and not engaging in the unlicensed practice of law. Even though the program being proposed by The Florida Bar does not establish regulation, if it did so this Court has the

authority to regulate nonlawyers who are not engaging in the unlicensed practice of law as this Court has the authority to regulate the practice of law.

An analogy to the question presented by this Court can be found in the rules adopted by this Court governing nonlawyer mediators. Article V, section 2 of the Florida Constitution gives this Court jurisdiction over Florida courts. This Court relied on this constitutional grant of authority when it adopted rules governing the conduct of mediators. *In re: Amendments to the Florida Rules for Certified and Court-Appointed Mediators*, 762 So. 2d 441 (Fla. 2000). The rules specifically regulate a nonlawyer who is not engaging in the unlicensed practice of law. The rules regulate the qualifications a nonlawyer must meet to become a certified mediator. *Fla. R. Med. 10.100, et seq.* The rules also establish a code of conduct which a nonlawyer certified mediator must follow. *Fla. R. Med. 10.200, et seq.* Just as with the Florida Registered Paralegal Program, a nonlawyer may work as a mediator without becoming certified. Just as with the Florida Registered Paralegal Program, a nonlawyer who chooses to become a certified mediator has certain privileges and benefits and agrees to assume certain burdens. Just as this Court has the authority to adopt rules governing nonlawyer mediators who are not engaged in the unlicensed

practice of law, this Court has the authority to adopt the Florida Registered Paralegal Program.

## CONCLUSION

The Florida Registered Paralegal Program does not establish regulation. The Florida Registered Paralegal Program is a voluntary program which benefits members of the paralegal profession, members of The Florida Bar, and clients. Even if the Florida Registered Paralegal Program did establish regulation, this Court may properly exercise jurisdiction over and regulate nonlawyers who are not engaging in the unlicensed practice of law and this authority may be delegated to The Florida Bar.

WHEREFORE, The Florida Bar respectfully requests that this Court adopt Chapter 20 of the Rules Regulating The Florida Bar -- the Florida Registered Paralegal Program.

Respectfully submitted,

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CERTIFICATE OF TYPE, SIZE AND STYLE AND ANTI-VIRUS SCAN

Undersigned counsel does hereby certify that The Florida Bar's Brief is submitted in 14 point proportionately spaced Times New Roman font, and that the brief has been filed by e-mail in accord with the Court's order of October 1, 2004. Undersigned counsel does hereby further certify that the electronically filed version of this brief has been scanned and found to be free of viruses, by Symantec AntiVirus.

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