IN THE
SUPREME COURT
OF THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

IN RE GUAM BAR ADMISSION RECIPROCITY

SUPREME COURT NO. 2026-ADM-00_ _-BAR

PETITION FOR ADMISSION BY RECIPROCITY

I, _____, hereby petition the Supreme Court for admission to the practice law in the Commonwealth of the Northern Mariana Islands pursuant to Supreme Court Order No. 2026-ADM-0027-RUL. I declare that:

1. I am currently admitted to the Guam bar since _____, and am in good standing;
2. I am 18 years of age or older;
3. I have not been convicted of a felony within the past 5 years, or, if so convicted, have been granted full pardon;
4. Certificates of Good Standing from every jurisdiction I am barred in are enclosed;
5. All prescribed fees have been paid;
6. I satisfy the legal education requirements as set out in the Rules of Admission 71-2.

DATED this ____ day of _____, 20___.

_____
Signature of Petitioner

Attestation of Familiarity with CNMI Legal Authorities

This Attestation is executed in support of an application for reciprocal admission to the Commonwealth of the Northern Mariana Islands Bar Association (CNMI Bar Association) by an attorney currently admitted to practice law before the Guam Bar Association.

I, _____, hereby attest and affirm as follows:

1. I am an attorney in good standing admitted to the practice of law before the Guam Bar Association.

2. I am seeking admission to the Commonwealth of the Northern Mariana Islands Bar Association.

3. I have read and familiarized myself with, the following CNMI legal authorities:

(a) The Commonwealth Constitution

(b) The Covenant to Establish a Commonwealth of the Northern Mariana Islands in Political Union with the United States of America

(c) Rules of Probate Procedure

4. I acknowledge that I am responsible for maintaining ongoing familiarity with applicable CNMI statutes, court rules, case law, ethical obligations, and local practice requirements.

5. I understand that any misrepresentation contained in this Attestation may be grounds for denial of admission or for disciplinary action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this _____ day of _____, 20____.

_____
Signature

_____
Printed Name

_____
Guam Bar Number

_____
Telephone

_____
Email

APPLICATION FOR RECIPROCAL ADMISSION TO THE CNMI BAR
Supreme Court Order No. 2026-ADM-0027-RUL
(For Attorneys Licensed in Guam)

Full Name (Last, First Middle):

_____

Other names known by, if any:

_____

Date of Birth:

_____

Mailing Address:

_____
Address Line 1

_____
Address Line 2

_____ _____ _____
City State Zip Code

Telephone Number: Email Address:

_____ _____

Law School Name(s): Graduation Date: Degree Conferred:

_____ _____ _____

_____ _____ _____

Jurisdictions Admitted to Practice Law:	Date Admitted:	Bar Member Number:
1) **GUAM**		
Active □ Inactive □		
2)		
Active □ Inactive □		
3)		
Active □ Inactive □		

□ I am not currently the subject of any disciplinary investigation or proceeding in regard to my practice of law.

□ I will include with this application a *Certificate of Good Standing* from Guam and from every other jurisdiction I am admitted to practice law.

□ I will include with this application a signed Attestation of Familiarity with CNMI Legal Authorities.

□ I declare under penalty of perjury that the information provided is true and accurate.

□ I have paid the application fee of $100 and a copy of the receipt is enclosed.

_____ _____
Applicant Signature Date

Application must be filed on File&Servexpress. For assistance, email the Bar Administrator at Nora.Borja@NMIJudiciary.gov or call (670) 236-9716.

E-FILED
CNMI SUPREME COURT
E-filed: Jun 24 2026 05:29PM
Clerk Review: Jun 24 2026 05:29PM
Filing ID: 79856982
Case No.: ADM-2026
Judy Aldan

IN THE
SUPREME COURT
OF THE
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

IN RE GUAM BAR ADMISSION RECIPROCITY

SUPREME COURT NO. 2026-ADM-0027-RUL

ORDER

¶ 1 Attorneys support and defend the Constitution and laws of the Commonwealth of the Northern Mariana Islands ("CNMI"). They play a key role in the administration of justice and the rule of law. The CNMI has experienced an exodus of attorneys, with over 40 resignations within the past five years. The government faces ongoing difficulties in recruiting and retaining legal professionals, reflected in the adoption of the amended *Northern Mariana Islands Supreme Court Rule of Admission* 73-2 in 2022. Active attorneys continue to be affected by past and current economic hardships. According to the American Bar Association's *2020 Profile of the Legal Profession*'s section on Legal Deserts, nationwide there are roughly four lawyers for every 1,000 residents, yet almost 1,300 counties in the United States have less than one lawyer per 1,000 residents. In the CNMI, there are only around 40 attorneys in the private sector, leaving this jurisdiction a legal desert, with a disparity between lawyers and residents four times greater than the national average. Establishing reciprocity with neighboring jurisdictions, such as Guam, serves the best interests of both the CNMI and attorneys residing herein by revitalizing and supporting the local legal community. An increase in the number of practicing attorneys ultimately benefits the public.

¶ 2 On April 4, 2025, the Commonwealth of the Northern Mariana Islands Bar Association expressed its support for bar reciprocity between Guam and the CNMI through a *Resolution Regarding CNMI/Guam Attorney Licensing Reciprocation*. In its resolution, the Bar Association strongly encouraged that reciprocity would require "an attorney applying for admission under the reciprocity program be fully licensed in either the CNMI or Guam; comply with all other licensing requirements of the jurisdiction where they seek admission; and that once admitted, an attorney would be fully licensed, with all of the attendant rights and responsibilities."

¶ 3 This Court has undertaken other recent efforts to increase the number of attorneys practicing in the CNMI. On October 25, 2024, this Court issued Supreme Court Administrative Order No. 2024-ADM-0017-MSC, indicating the Court's intent to adopt the NCBE NextGen Bar Exam beginning July

2026. Additionally, the *Rules of Admission* were amended in August 2025 to permit the transfer of NCBE Bar scores to this jurisdiction, provided the score is within the preceding three years of the Bar Examination for which the applicant applies and the applicant has attained the minimum scaled score designated by the Supreme Court.

¶ 4 Rule 70-3 of the *Northern Mariana Islands Supreme Court Rules of Admission* allows the Board of Bar Examiners to suspend any provision of the rules in particular cases and order proceedings as it directs, for good cause. To support the local legal community and facilitate attorney licensing reciprocity between the CNMI and Guam, the Board of Bar Examiners adopted Resolution No. 2026-01 on June 17, 2026, suspending the requirements of Rule 71-1(a)(4) as applied to attorneys admitted to practice law in Guam who seek admission to the CNMI Bar. *See Exhibit A.* Pursuant to Resolution No. 2026-01, attorneys regularly admitted to the practice of law in Guam through examination, and who are in good standing, are not required to pass the CNMI bar examination or attorney's examination as a condition of admission to the CNMI Bar. This provision does not extend to attorneys granted temporary admission in Guam without examination.

¶ 5 Applicants regularly admitted to the practice of law in Guam will still need to meet certain requirements for admission to the Bar as required by Rule 71-1 and this Order. Applicants must:

(1) be eighteen (18) years of age or older at the time of applying;

(2) not have been convicted of a felony within the past five (5) years or, if so convicted, have been granted a full pardon by a competent authority;

(3) file all application requirements and pay all prescribed fees;

(4) satisfy the legal education requirements as set out in Rule 71- 2; and

(5) receive the approval of the Board as to eligibility for admission and character and fitness.

In addition, applicants must provide the Bar Administrator with a current Certificate of Bar Admission and a current Certificate of Good Standing from every jurisdiction from which the applicant is admitted pursuant to Rule 72-2(b) and pay the attorney applicant fee pursuant to the Judiciary Fee Schedule. In lieu of the Local Content Essays, applicants must complete the Local Content Attestation Form as prescribed by the Board of Bar Examiners.

¶ 6 For good cause shown and consistent with Rule 70-3 of the *Rules of Admission*, the Court approves, adopts, and affirms the Board of Bar Examiners' Resolution No. 2026-01, suspending Rule 71-1(a)(4) and imposing other requirements consistent with the *Rules of Admission* as applied to attorneys regularly admitted in Guam. Suspending the provisions of Rule 71-1(a)(4) will allow prospective applicants more opportunities to be admitted to the practice of law, while also ensuring that attorneys are familiar with the legal framework and the law of the CNMI. Therefore, the licensing reciprocity for applicants regularly admitted to the practice of law in Guam shall come into effect as of the date of this Order.

SO ORDERED this 24th day of June, 2026.

/s/
ALEXANDRO C. CASTRO
Chief Justice

/s/
JOHN A. MANGLOÑA
Associate Justice

/s/
ROBERTO C. NARAJA
Associate Justice

E-FILED
CNMI SUPREME COURT
E-filed: Jun 24 2026 05:29PM
Clerk Review: Jun 24 2026 05:29PM
Filing ID: 79856982
Case No.: ADM-2026
Judy Aldan

BOARD OF BAR EXAMINERS
RESOLUTION NO. 2026-01

RESOLUTION OF THE BOARD OF BAR EXAMINERS REGARDING THE TEMPORARY SUSPENSION OF RULE 71-4(a)(4) TO PERMIT RECIPROCAL ADMISSION OF ATTORNEYS ADMITTED IN GUAM

WHEREAS, attorneys support and defend the Constitution and laws of the Commonwealth of the Northern Mariana Islands and play an essential role in the administration of justice and the preservation of the rule of law;

WHEREAS, over the past five (5) years, the Commonwealth has experienced a significant loss of legal professionals, including more than forty (40) attorney resignations from public service and private practice, and a significant economic downturn, resulting in persistent challenges in recruiting and retaining qualified attorneys;

WHEREAS, the Commonwealth increasingly faces conditions characteristic of a legal desert, with limited access to legal services for residents, government agencies, and institutions, a challenge shared by other jurisdictions confronting attorney shortages and barriers to licensure;

WHEREAS, these ongoing challenges prompted amendments to the *Northern Mariana Islands Supreme Court Rules of Admission,* including the adoption of Rule 73-2 in 2022, reflecting the Judiciary's recognition of the need for adaptive and responsive attorney admission policies;

WHEREAS, attorneys currently practicing in the Commonwealth continue to be affected by past and ongoing economic hardships, further exacerbating difficulties in sustaining a robust local legal community;

WHEREAS, establishing limited reciprocity with the neighboring jurisdiction of Guam, would promote attorney mobility, strengthen the Commonwealth's legal workforce, and sustain and enhance access to justice for the people of the Northern Mariana Islands;

WHEREAS, on April 4, 2025, the Commonwealth of the Northern Mariana Islands Bar Association formally expressed its support for reciprocal attorney admission between Guam and the CNMI through a *Resolution Regarding CNMI/Guam Attorney Licensing Reciprocation*, recognizing the mutual benefit of such licensure flexibility;

WHEREAS, attorney licensing authorities are implementing reforms nationally aimed at increasing portability and access to licensure, including the NextGen bar examination framework and relaxed score-transfer rules scheduled in response to widespread concerns regarding attorney shortages and access to justice;

WHEREAS, the Local Content Essays portion of the CNMI Bar Examination is designed to ensure applicant familiarity with the unique constitutional, statutory, and jurisprudential framework of the Commonwealth, rather than to test general legal competency;

WHEREAS, the Board of Bar Examiners recognizes that familiarity with core CNMI legal authorities may be effectively assessed through alternative methods that are less burdensome while still preserving the integrity and local competency of the CNMI Bar;

WHEREAS, requiring applicants to demonstrate familiarity with selected CNMI legal authorities, including but not limited to the Covenant, Constitution of the Northern Mariana Islands, relevant Commonwealth statutes, Supreme Court rules, and controlling CNMI case law, advances the same substantive objectives as the Local Content Essays;

WHEREAS, replacing the Local Content Essays with a targeted familiarity requirement promotes efficiency, consistency, and accessibility in the attorney admission process while maintaining appropriate respect for the Commonwealth's distinct legal system;

WHEREAS, the suspension of the Local Content Essays portion of the bar examination, coupled with a structured requirement to attest to familiarity with designated CNMI legal authorities is narrowly tailored to address current attorney shortages without compromising professional standards;

WHEREAS, Rule 70-3 of the *Northern Mariana Islands Supreme Court Rules of Admission* authorizes the Board of Bar Examiners, for good cause shown, to suspend any provision of the Rules of Admission in particular cases and to direct proceedings accordingly; and

WHEREAS, the Board finds that it is in the best interest of the CNMI to permit reciprocity for attorneys who are fully admitted to practice law in Guam, excluding those admitted on a temporary basis or pursuant to pro hac vice admission;

NOW, THEREFORE, BE IT RESOLVED, that for good cause shown and in the interest of supporting the Commonwealth's legal community and access to justice, the Board of Bar Examiners hereby suspends Rule 71-4(a)(4) of the *Northern Mariana Islands Supreme Court Rules of Admission* for attorneys fully admitted to practice law in Guam;

BE IT FURTHER RESOLVED, that attorneys fully admitted to the practice of law in Guam shall not be required to sit for or pass the CNMI bar examination or attorney's examination as a condition of admission to the CNMI Bar, provided they satisfy all other applicable requirements and that Guam passes a substantially similar waiver provision for CNMI fully licensed attorneys;

BE IT FURTHER RESOLVED, that applicants admitted in Guam must comply with Rules 71-1 and 71-2 and this Resolution, including but not limited to the following requirements:

1. Be at least eighteen (18) years of age at the time of application;
2. Not have been convicted of a felony within the past five (5) years, or, if so convicted, have received a full pardon from a competent authority;
3. Submit a complete application and pay all prescribed fees;
4. Satisfy the legal education requirements set forth in Rule 71-2;
5. Receive approval of the Board or designee as to eligibility;

6. Provide the Bar Administrator with a current Certificate of Admission and a current Certificate of Good Standing from every jurisdiction in which the applicant is admitted, pursuant to Rule 72-2(b);

BE IT FURTHER RESOLVED, that in lieu of the Local Content Essays under Rule 72-1(b)(2), applicants admitted in Guam shall be required to complete the Local Content Attestation Form as prescribed by the Board of Bar Examiners to ensure familiarity with the laws and legal framework of the Commonwealth;

BE IT FURTHER RESOLVED, that this suspension of Rule 71-4(a)(4) for Guam licensed attorneys is intended to expand opportunities for qualified attorneys to practice law in the Commonwealth, and for Commonwealth attorneys to be able to more easily become licensed to practice on Guam, while maintaining professional standards and safeguarding the integrity of the CNMI Bar;

BE IT FURTHER RESOLVED, that Rule 70-3 vests the Board of Bar Examiners with the power and authority to establish a fee consistent with the *NMI Judiciary Fee Schedule*;

BE IT FURTHER RESOLVED, that this reciprocal admission process for attorneys fully admitted in Guam shall remain in effect until such time as a formal rule governing attorney reciprocity is adopted pursuant to Article IV, § 9 of the Northern Mariana Islands Constitution, or until further action by the Board of Bar Examiners; and

BE IT FINALLY RESOLVED, that by this Resolution the Board recommends that the Supreme Court enter an Order granting reciprocity for regular, qualified attorneys in Guam to practice law in the Commonwealth.

DATED this 17th day of June, 2026.

ALEXANDRO C. CASTRO, Chief Justice

JOHN A. MANGLONA, Associate Justice

ROBERTO C. NARAJA, Associate Justice

JOSEPH N. CAMACHO, Presiding Judge

GRETCHEN A. SMITH, NMI Bar President