

JUN 24 2026

IN THE SUPREME COURT OF GUAM

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BY: GA Time: 5:30pm

RE:) Supreme Court of Guam
GUAM AND CNMI ATTORNEY) Administrative Order No. ADM26-004
LICENSING RECIPROCITY)
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The Supreme Court of Guam, having supervisory authority over the courts of Guam and the practice of law, is keenly aware of the shortage of lawyers in Guam to meet the vast array of legal needs of our island. Lawyers play a vital role in the community by helping to ensure individual rights are protected and that everyone has access to justice. A shortage of lawyers undermines these protections: it increases the number of unrepresented individuals, causes delays and backlogs in the justice system, concentrates legal aid among those who can afford it, and raises the risk of poorer outcomes and burnout among overworked counsel. Ultimately, insufficient legal capacity can erode public trust, deepen inequality, and weaken the institutions that depend on robust, impartial legal advocacy. According to the American Bar Association's *2020 Profile of the Legal Profession's* section on Legal Deserts, there are roughly 4 lawyers per 1,000 residents nationwide, yet almost 1,300 counties in the United States have fewer than 1 lawyer per 1,000 residents. In Guam, there are fewer than 120 attorneys in the private sector, leaving the island far below the national average and resulting in a legal desert.

The Guam Bar Association ("GBA") surveyed its membership on the issue of bar reciprocity between active members admitted to practice in Guam and the Commonwealth of the Northern Mariana Islands ("CNMI"), with the majority of those surveyed favoring a reciprocity arrangement. On April 2, 2025, the GBA passed Resolution 2025-001, formally expressing its support for bar reciprocity admission to practice between Guam and the CNMI. In its Resolution, the GBA urged that "bar reciprocity admissions should require that an attorney applying for admission under the reciprocity program be fully licensed in either [] Guam or [the] CNMI (temporarily licensed attorneys would not qualify); that an attorney applying for reciprocity should

1 have a minimum number of years in active practice in either jurisdiction; must comply with all
2 other licensing requirements of the jurisdiction where they seek admission; and that once admitted,
3 an attorney would be fully licensed, with all of the attendant rights and responsibilities.” GBA
4 Resolution 2025-001 (Apr. 2, 2025).

5 Further, on February 2, 2024, this court issued Supreme Court Administrative Order No.
6 ADM24-002, *Relative to the Adoption of the NextGen Bar Examination in Guam*, in which the
7 court adopted the NCBE NextGen UBE Bar Examination beginning July 2026. Additionally, the
8 Guam Rules Governing Admission to the Practice of Law (“Admission Rules”) were amended in
9 December 2025 to allow for portability of NextGen and UBE scores to this jurisdiction, provided
10 the score is within the preceding three years of the Bar Examination for which the applicant
11 applies, the applicant has attained the minimum score designated by the Supreme Court, and the
12 applicant satisfies other admission requirements. These measures reflect efforts to increase the
13 number of attorneys practicing in Guam. The court finds that reciprocity between Guam and the
14 CNMI is another important measure that will be mutually beneficial and will serve the legal needs
15 of both communities.

16 **NOW THEREFORE**, under the authority to “govern ...the practice of law in Guam,
17 including admission to practice law,” 48 U.S.C. § 1424-1(a)(7) (3), it is **ORDERED** that Rule
18 9.04 of the Guam Rules Governing Admission to the Practice of Law shall be amended to
19 provide that attorneys regularly admitted to practice law in the Commonwealth of the Northern
20 Mariana Islands, through examination, may petition for admission to practice law in Guam as a
21 member of the Guam Bar Association without having to pass the Guam Bar Examination. The
22 court shall hereafter issue a separate promulgation order adopting the amendments to Rule 9.04.

23 **SO ORDERED** this 24th day of June, 2026.

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25 **F. PHILIP CARBULLIDO**
26 **Associate Justice**

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28 **ROBERT J. TORRES**
Associate Justice



KATHERINE A. MARAMAN
Chief Justice