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September 14, 2006

**VIA EMAIL AND FEDERAL EXPRESS**

Mr. Thomas Hall  
Clerk of Court  
Florida Supreme Court  
500 South Duval Street  
Tallahassee, Florida 32399-1927

RE: Petition by The Florida Bar for Proposed Rule 20 – Florida Registered Paralegal Program  
Case No.: SC06-1622

Dear Mr. Hall:

Please accept this letter as public comment to the above-referenced matter now pending before the Florida Supreme Court.

As a paralegal working within the State of Florida, I support a mandatory regulation program for paralegals, with an independent governing board which is overseen by the Florida Supreme Court. What The Florida Bar proposes falls short of goals which were sought by paralegals in Florida, and would provide no mechanism for an ever-changing profession.

As a member of the South Florida Paralegal Association, I closely followed the development of this proposal over the past two years. As an observer, I attended some of the meetings of The Florida Bar's Committee which developed this proposal. It was clear to me that the two-tier, voluntary program which would be completely under control of The Florida Bar was formulated to appease those members on the Committee who wanted to continue to decide the definition of a paralegal for purely monetary reasons.

The few paralegals who served on the Committee acquiesced to this proposal because they wanted something to come out of the first proposal whatsoever from The Florida Bar which recognized the role of paralegals in the Florida legal system. If The Florida Bar is put in control over the regulation of the paralegal profession, it would create a conflict of interest which cannot be resolved. I have read numerous accounts of attempts by the paralegal associations within the State of Florida to work with The Florida Bar, and again and again, they were rebuffed. The Florida Bar insisted on this format for the program, because it has no intention of ever entertaining any changes to the program as it is now proposed. Even with regard to how The Florida Bar has posted the proposal on their website – under the section regarding the Unlicensed Practice of Law – indicates paralegals are viewed as interloper and not as a partnership. The only reason why The Florida Bar came to the table for this program was due to the perceived threat of regulation overseen by the Department of Business and Professional Regulation.

I strongly support the proposal as submitted by the South Florida Paralegal Association, which advocates a mandatory regulation program for paralegals, with an independent governing board which is overseen by the Florida Supreme Court.

Sincerely,

Lisa B. Vessels, CP  
Certified Paralegal