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IN THE SUPREME COURT OF CALIFORNIA

In Re SERGIO C. GARCIA on Admission
Bar Misc. 4186

APPLICATION AND PROPOSED BRIEF FOR AMICUS CURIAE THE UNITED STATES OF AMERICA

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TABLE OF CONTENTS

Page

STATEMENT OF FACTS 3

I. STATUTORY FRAMEWORK 3

A. Alien Eligibility for State and Local "Public Benefits" 3

B. Employment of Aliens 4

II. FACTUAL BACKGROUND 5

ARGUMENT 5

I. Because this Court Is Funded Through Appropriations, Section 1621 Precludes Licenses Issued by this Court 5

II. Possession of a State Bar License Does Not Imply that the Licensee May Be Legally Employed as an Attorney 12

CONCLUSION 17

CERTIFICATE OF COMPLIANCE WITH CALIFORNIA RULES OF COURT 8.204(c) AND 8.520(c)

CERTIFICATE OF FILING AND SERVICE

TABLE OF AUTHORITIES

Cases: **Page**

Arizona v. United States,
132 S. Ct. 2492 (2012) 2, 5, 11, 13

Department of Rev. of Oregon v. ACF Indus., Inc.,
510 U.S. 332 (1994) 8

Hubbard v. United States,
514 U.S. 695 (1995) 8

Matter of Kanwal,
24 So. 3d 189 (La. 2009) 15

Matter of Kanwal,
No. M.R. 23912 (Ill. Sept. 20, 2010) 15

Keller v. State Bar of California,
496 U.S. 1 (1990) 10

In the Matter of Noel Peter Mpaka Canute,
D2010-124 (OCIJ March 16, 2011) 15

Matter of Noel P. Mpaka,
No. D-6-12 (N.Y. App. Div. Feb. 23, 2012) 15

In the Matter of Ravindra Singh Kanwal,
D2009-053 (OCIJ July 8, 2009) 15

Matter of Tong,
16 I&N Dec. 593 (BIA 1978) 14

United States v. Bean,
537 U.S. 71 (2002) 11

Statutes:

8 U.S.C. § 1182(d)(5) 3

8 U.S.C. § 1227(a)(1) 4, 5

8 U.S.C. § 1255(c)(8) 5

8 U.S.C. § 1324a 4, 13

8 U.S.C. § 1324a(a)(1)(A) 4

8 U.S.C. § 1324a(a)(1)(B) 4

8 U.S.C. § 1324a(a)(2) 4

8 U.S.C. § 1324a(a)(4) 14

8 U.S.C. § 1324a(e)(4) 4

8 U.S.C. § 1324a(h)(3) 14

8 U.S.C. § 1324a(f) 4

8 U.S.C. § 1611(c) 6, 11

8 U.S.C. § 1621 ..... 1, 2, 7, 8, 9, 12, 16

8 U.S.C. § 1621(a) 3

8 U.S.C. § 1621(c) 2, 3, 6, 9, 10

8 U.S.C. § 1621(d) 4, 6, 12

8 U.S.C. § 1641 3

42 U.S.C. § 666(a)(5)(D)(i)(II) 8

42 U.S.C. § 666(a)(15) 8

Cal. Bus. & Prof. Code § 6060 5

Cal. Gov. Code § 68807 9

Cal. Gov. Code § 68843 9

Pub. L. No. 104-193, 110 Stat. 2105 (Aug. 22, 1996) 3

Regulations:

8 C.F.R. § 214.2(e) 4

8 C.F.R. § 274a.5 14

8 C.F.R. § 274a.10 4

8 C.F.R. § 274a.12 ..... 4, 13

8 C.F.R. § 274a.12(c)(18) 13

8 C.F.R. § 274a.12(f)(15)(i) 13

Rules:

California Rules of Court 8.200(c) 1

California Rules of Court 8.520(f) 1

IN THE SUPREME COURT OF CALIFORNIA

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APPLICATION AND PROPOSED BRIEF FOR AMICUS CURIAE
THE UNITED STATES OF AMERICA

APPLICATION FOR LEAVE TO FILE BRIEF AS AMICUS CURIAE[1]

Pursuant to California Rules of Court 8.200(c) and 8.520(f) and this Court's Order of May 16, 2012, the United States respectfully moves this Court for leave to submit this brief as *amicus curiae* to address two questions of federal law raised by this Court's Order of May 16, 2012:

1. Whether 8 U.S.C. § 1621, which governs the terms under which a state may make an alien eligible for state and local public benefits, prohibits the issuance of a law license to an alien without lawful presence in the country.

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[1] Pursuant to Cal. Rules of Court 8.200(c) and 8.520(f), undersigned counsel certifies that no party or any counsel for a party in this matter authored any part of this proposed amicus brief or made a monetary contribution intended to fund the preparation or submission of this brief. In addition, counsel certifies that no person or entity aside from the United States made a monetary contribution intended to fund the preparation or submission of the brief.

2. Whether issuing a law license would imply that the alien may lawfully be employed in the United States.

In the view of the United States, 8 U.S.C. § 1621 prohibits this Court from issuing a law license to an unlawfully present alien. Although this Court may not be an "agency of a State" within the meaning of the federal statute, this Court, its Justices, and its staff are funded through appropriations. The issuance of a license requires an order of this Court, and the license is therefore "provided . . . by appropriated funds of a State." 8 U.S.C. § 1621(c).

Because the issuance of a license is prohibited, the Court need not reach the question whether bar admission would imply that Mr. Garcia may lawfully work in the United States. We nonetheless briefly address the issue to emphasize that admission to the bar has no bearing on the application of the federal statutes that govern an alien's employment in the United States. As the Supreme Court recently reiterated in *Arizona v. United States*, 132 S. Ct. 2492 (2012), Congress has comprehensively regulated the field of alien employment. Under the governing federal statutes, an alien's employment authorization is determined solely by reference to federal law.

STATEMENT OF THE FACTS

I. STATUTORY FRAMEWORK

A. Alien Eligibility for State and Local "Public Benefits"

In 1996, Congress enacted the Personal Responsibility and Work Opportunity Reconciliation Act ("PRWORA"), Pub. L. No. 104-193, 110 Stat. 2105 (Aug. 22, 1996). Title IV of that Act prohibits certain categories of aliens from obtaining certain public benefits, unless a state enactment directs otherwise.

The statute first defines the categories of aliens who are "eligible for any State or local public benefit" to include "qualified" aliens (as defined in 8 U.S.C. § 1641), nonimmigrant aliens, and aliens who are "paroled" into the United States (under 8 U.S.C. § 1182(d)(5)) for less than one year. 8 U.S.C. § 1621(a). Other categories of aliens, including those who lack lawful immigration status, are presumptively ineligible for such benefits.

The statute then defines the "public benefit[s]" for which these other categories of aliens are presumptively ineligible. That category of benefits includes, subject to certain exceptions that are not relevant here, "any grant, contract, loan, professional license, or commercial license provided by an agency of a State or local government or by appropriated funds of a State or local government." *Id.* § 1621(c).

The statute also provides that a State may make additional categories of aliens eligible for public benefits. A "State may provide that an alien who is not lawfully present in the United States is eligible for any State or local public benefit for which such alien would otherwise be ineligible under subsection (a) of this section." *Id.* § 1621(d). A State may do so "only through the enactment of a State law after August 22, 1996, which affirmatively provides for such eligibility." *Id.*

B. Employment of Aliens

Employment authorization is determined solely with reference to federal law. *See, e.g.*, 8 U.S.C. §§ 1227(a)(1), 1324a; 8 C.F.R. §§ 214.2(e), 274a.12. Among other things, federal law makes it illegal for employers to knowingly hire, recruit, refer, or continue to employ unauthorized workers, *see* 8 U.S.C. § 1324a(a)(1)(A) and (a)(2), or to fail to comply with a statutory requirement to verify the employment authorization status of those they hire, *id.* § 1324a(a)(1)(B). These requirements are enforced through civil and criminal penalties on employers who knowingly hire, recruit, or retain unauthorized aliens. *See id.* § 1324a(e)(4) and (f); 8 C.F.R. § 274a.10. Unauthorized employment can also result in civil consequences for an alien, including removal from the United States and, in certain cases, ineligibility to obtain lawful status. *See, e.g.*, 8 U.S.C.

§§ 1227(a)(1), 1255(c)(8). "This comprehensive framework does not impose federal criminal sanctions on the employee side," however. *Arizona v. United States*, 132 S. Ct. 2492, 2504 (2012).

II. FACTUAL BACKGROUND

This matter arises out of Sergio C. Garcia's attempt to gain admission to the California Bar. Mr. Garcia, an alien without lawful immigration status, graduated from law school in California and passed the California bar exam. The Committee of Bar Examiners of the State Bar of California ("Committee") determined that Mr. Garcia met the eligibility criteria for admission to the California Bar, *see* Cal. Bus. & Prof. Code § 6060, and moved his admission while noting his lack of lawful immigration status.

This Court then ordered the Committee to show cause why the motion should be granted, and invited amici, including the United States, to express their views on whether the motion for admission should be granted.

ARGUMENT

I. Because this Court Is Funded Through Appropriations, Section 1621 Precludes Licenses Issued by this Court.

Mr. Garcia's bar application presents a narrow issue of statutory construction: whether the professional license Mr. Garcia seeks is

"provided by an agency of a State or local government or by appropriated funds of a State or local government." 8 U.S.C. § 1621(c). As explained below, while the license Mr. Garcia seeks may not be "provided by an agency of a State," it is "provided . . . by appropriated funds of a State." *Id.* Under federal law, undocumented aliens like Mr. Garcia are therefore ineligible for these licenses absent the "enactment of a State law after August 22, 1996, which affirmatively provides for such eligibility," *id.* § 1621(d).

In PRWORA, Congress created two parallel provisions that address issuance of licenses and benefits by federal and state agencies. In the first provision, Congress provided that aliens who are not in certain specified categories are ineligible for *federal* public benefits, which are defined to include "any grant, contract, loan, professional license, or commercial license provided by an agency of the United States or by appropriated funds of the United States." 8 U.S.C. § 1611(c).

In the second provision, which is at issue here, Congress set a default rule (alterable by states) that makes certain aliens ineligible for *state* public benefits, similarly defined to include "any grant, contract, loan, professional license, or commercial license provided by an agency of a State or local government or by appropriated funds of a State or local government." *Id.* § 1621(c).

These provisions were plainly designed to preclude undocumented aliens from receiving commercial and professional licenses issued by States and the federal government. Their sweeping language demonstrates that Congress intended to act comprehensively in prohibiting receipt of such benefits by undocumented aliens, and they should be construed in a manner that furthers that evident purpose. Other than the law license at issue here, Mr. Garcia and his supporters identify no other type of commercial or professional license which is not provided by an agency, provided by appropriated funds, or both. It is anomalous to suggest that Congress, despite explicitly including "any professional license" within the scope of the statute, nonetheless did not intend to include licenses to practice law.

Congress created no such anomaly. Whether or not this Court is an "agency" for purposes of 8 U.S.C. § 1621, there is no doubt that this Court is the entity that issues the license, and that this Court operates using appropriated funds. Mr. Garcia's application should therefore be denied.

Although section 1621 does not define "agency," the customary use of that term in federal statutes does not encompass the judicial branch. "In ordinary parlance, federal courts are not described as 'departments' or 'agencies' of the Government," and "it would be

strange indeed to refer to a court as an 'agency.'" *Hubbard v. United States*, 514 U.S. 695, 699 (1995) (citation omitted). Accordingly, absent contextual indications to the contrary, statutory references to a federal "agency" are generally interpreted to exclude the federal courts.

The background presumption of interpretation noted above indicates that "an agency of the United States" as used in Section 1611 should not be read to include federal courts, *see Hubbard*, 514 U.S. at 699, and this Court may therefore ascribe a similar interpretation to "agency" as used in Section 1621, *see Department of Rev. of Oregon v. ACF Indus., Inc.*, 510 U.S. 332, 342 (1994) ("[T]he normal rule of statutory construction [is] that identical words used in different parts of the same act are intended to have the same meaning." (internal quotation marks and citations omitted)).[2]

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[2] Unlike 8 U.S.C. § 1621, other provisions of PRWORA specify that they cover both state courts and state agencies. For example, Title III of the law, which governs child support obligations, notes that a father's name can be included on the birth certificate of a child born to unmarried parents if "a court or an administrative agency of competent jurisdiction has issued an adjudication of paternity." 42 U.S.C. § 666(a)(5)(D)(i)(II) (emphasis added). Similarly, Section 365 of PRWORA, which concerns the work requirements for persons with past-due child support obligations, provides that a state may enter an order, or "request that a court or an administrative process established pursuant to State law issue an order" that requires a person to "pay such support in accordance with a plan approved by the court, or . . . the State agency administering the State program under this part." 42 U.S.C. § 666(a)(15) (emphasis added).

On the other hand, because of the broad sweep of 8 U.S.C. § 1621, it would be possible to construe the term "agency" as used in that provision to cover any instrumentality of the State. *See* Webster's Third New Int'l Dictionary 40 (definition 2 of "agency": "a person or thing through which power is exerted or an end is achieved: INSTRUMENTALITY, MEANS"). There is no need to definitively determine the meaning of "agency" here, however, because Congress in any event covered the actions of this Court by making section 1621 applicable when a "professional license" is "provided . . . by appropriated funds of a State or local government." 8 U.S.C. § 1621(c).[3]

There is no dispute that Mr. Garcia seeks a "professional license." Nor is there any dispute that the issuance of the license would require an order of this Court. *See, e.g.*, Committee Br. 4 ("It is this Court that makes the ultimate decisions under its plenary power over the practice of law in California."). And it is similarly undisputed that this Court and its officers are funded through appropriations. *See, e.g.*, Cal. Gov. Code §§ 68807, 68843. Therefore, Mr. Garcia seeks a "professional license . . . provided . . . by appropriated funds of a State or local government." 8

[3] Section 1621(c)(2) contains several exceptions to the general prohibition on the issuance of professional licenses, including for licenses for certain lawfully admitted nonimmigrants in the United States or for foreign nationals not physically present in the United States, but Mr. Garcia has not urged that any of these exceptions apply here.

U.S.C. § 1621(c). Indeed, because the federal prohibition applies when appropriated funds are used whether or not the relevant benefit is directly conferred by the government, there is no basis for excluding a license issued by an organ of the State itself that is funded by appropriations.

Mr. Garcia and his supporters miss the mark when they emphasize that the Committee conducts its examination through the use of funds other than appropriated funds. *See, e.g.*, Garcia Br. 9; Committee Br. 12. Although the Committee provides considerable assistance to this Court, the "State Bar does not admit anyone to the practice of law." *Keller v. State Bar of California*, 496 U.S. 1, 11 (1990). Rather, that function is "reserved by California law to the State Supreme Court," *id.*, which is funded by state appropriations.

The Committee asserts without explanation that although "the final act of issuing the order of admission is done by this Court, such involvement does not change the fact that the license is not 'provided by appropriated funds.'" Committee Br. 13. The federal statute does not depend upon which entity performs the background analysis of the application, but rather depends upon the source of funding through which the license is "provided."

Mr. Garcia and his supporters fare no better in pointing out that no funds have been set aside specifically for the granting of licenses by this Court, or that the amount of expenditures by this Court for that purpose may be small. The statute does not speak of funds appropriated for a particular purpose, or set a threshold amount of appropriated funds before the prohibition kicks in. Rather, the statute speaks generally of appropriated funds. Prohibitions on the use of appropriated funds for a particular purpose prohibit the use of *any* appropriated funds for that purpose. *See, e.g.*, *United States v. Bean*, 537 U.S. 71, 74-75 (2002). The prohibition on public benefits "provided . . . by appropriated funds of the United States," 8 U.S.C. § 1611(c), thus prohibits the use of any federal funds in the course of providing such benefits, and Mr. Garcia and his supporters provide no explanation for why the parallel state provision should be interpreted differently.

Mr. Garcia suggests, incorrectly, that the application of section 1621 in this case would raise constitutional concerns. *See* Garcia Br. 15-16. "The Government of the United States has broad, undoubted power over the subject of immigration and the status of aliens." *Arizona*, 132 S. Ct. at 2498. There is therefore no doubt that Congress can enact a law rendering unauthorized aliens ineligible for state benefits. Likewise, Congress can make the ineligibility provision applicable to all organs of

state government, including the courts. Mr. Garcia's Tenth Amendment argument is further undermined by the fact that Mr. Garcia could not in any event engage in employment not authorized by federal law, a restriction that Mr. Garcia does not and could not challenge.

Moreover, as this Court noted in its Order (*see* May 16, 2012 Order, Issue 2), Congress has accommodated state interests by allowing States to enact measures that would provide benefits to unlawfully present aliens, *see* 8 U.S.C. § 1621(d), and the State could do so here. Accordingly, the statute presents no Tenth Amendment issue.

II. Possession of a State Bar License Does Not Imply that the Licensee May Be Legally Employed as an Attorney.

Because 8 U.S.C. § 1621 precludes issuance of a bar license in these circumstances, this Court need not reach any of the additional questions posed to the parties and amici. We nonetheless briefly discuss one additional issue to clarify the interaction of state and federal law.

A. As both the Committee and Mr. Garcia correctly recognize, admission to the California bar would not constitute an implicit representation that Mr. Garcia may be legally employed in the United States. *See* Committee Br. 19-24; Garcia Br. 22-26. A law license cannot permit an unauthorized alien to perform work if such conduct is prohibited by federal law.

Congress has comprehensively regulated the field of the employment of aliens. *Arizona*, 132 S. Ct. at 2504. Federal law sets the terms of employment for aliens and imposes civil and criminal penalties on employers who attempt to recruit or hire an "unauthorized alien." *See, e.g.*, 8 U.S.C. § 1324a.

A person's status as an "authorized" or "unauthorized" alien is determined solely by federal law, and, as noted, is distinct from the issuance of a state license. *See* 8 C.F.R. § 274a.12 (setting forth categories of aliens authorized for employment). Authorization to work is not determined solely by a person's immigration status. Some individuals without lawful immigration status nonetheless can be granted work authorization, such as certain aliens with a final order of removal who cannot be removed, *id.* § 274a.12(c)(18). Other aliens with lawful status cannot legally be employed, such as spouses of academic students, *id.* § 214.2(f)(15)(i).

In all instances, however, authorization to work is determined exclusively by reference to federal law. Although a state legislature may expand eligibility for benefits under Section 1621, it has no similar power to expand the category of aliens authorized to work under federal law.

B. The Committee, Mr. Garcia, and several amici suggest ways in which Mr. Garcia might use a law license in this country. *See* Committee

Br. 27; Garcia Br. 24-25; ACLU Br. 20-25; Cal. Atty Gen. Br. 25; Law School Deans Br. 7-9. Even if the state legislature were to affirmatively determine that undocumented aliens should be entitled to receive law licenses, the United States does not endorse the assertion that any particular use of a law license would comply with relevant federal law, and in particular disagrees with the assertion that Mr. Garcia can work legally as an independent contractor or solo practitioner without federal work authorization. *See* 8 U.S.C. § 1324a(h)(3) (defining "unauthorized alien" as an alien who is neither lawfully admitted for permanent residence nor otherwise authorized to be employed); *Matter of Tong*, 16 I&N Dec. 593 (BIA 1978) (holding that self-employment qualifies as working without authorization); *see also* 8 U.S.C. § 1324a(a)(4); 8 C.F.R. § 274a.5 (explaining that a client may be subject to penalties if he knowingly hires an independent contractor who lacks work authorization).

As explained above, however, work authorization is distinct from licensure, and the only question relevant to this Court's inquiry is whether granting a law license would constitute authorization to work in the United States, which all parties agree it would not. Accordingly, the United States does not consider it necessary to address these assertions about Mr. Garcia's use of that license in greater detail at this time, other

than to note that even if Mr. Garcia obtained a license he would continue to have an obligation to abide by all federal laws governing the performance of work by aliens. *Cf. In the Matter of Ravindra Singh Kanwal*, D2009-053 (OCIJ July 8, 2009), and *In the Matter of Noel Peter Mpaka Canute*, D2010-124 (OCIJ March 16, 2011) (disciplinary actions against licensed attorneys who filed petitions for immigration benefits, and appeared in immigration courts, on behalf of clients, even though they lacked authorization to work in the United States)[4]; *People v. Kanwal*, No. 09PDJ071 (Colo. July 21, 2009) (same attorney subsequently suspended in Colorado)[5]; *Matter of Kanwal*, 24 So. 3d 189 (La. 2009) (reciprocal suspension in Louisiana); *Matter of Kanwal*, No. M.R. 23912 (Ill. Sept. 20, 2010) (reciprocal suspension in Illinois); *Matter of Noel P. Mpaka*, No. D-6-12 (N.Y. App. Div. Feb. 23, 2012) (finding attorney guilty of professional misconduct and imposing stayed suspension from practice of law).[6]

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[4] Available at: http://www.justice.gov/eoir/profcond/FinalOrders/KanwalRavindraS_FinalOrder.pdf, and http://www.justice.gov/eoir/profcond/FinalOrders/CanuteMpakaNoelPeter_FinalOrder.pdf (last visited July 16, 2012).

[5] Available at: http://www.coloradosupremecourt.com/PDJ/ConditionalAdmissions/Kanwal,Conditional%20Admission,09PDJ071,07-21-09.pdf (last visited July 16, 2012).

[6] Available at: http://decisions.courts.state.ny.us/ad3/decisions/2012/d-6-12%20mpaka.pdf (last visited July 16, 2012).

Likewise, the United States urges this Court not to base any decision about its authority to grant the license on an assumption that Mr. Garcia would be authorized to use that license to provide legal services in the United States in some form. Nor should the Court attempt to resolve any question about the types of legal services that Mr. Garcia may provide if granted a license. The enforcement of the federal provisions governing employment by aliens is a responsibility of the federal government, and is not the proper subject of state-court proceedings, particularly in the context of state licensing.

Instead, the only question before the Court is whether Mr. Garcia meets the criteria for admission to the bar under state and federal law. Because he is not an eligible alien under 8 U.S.C. § 1621, and thus does not satisfy a condition set out in federal law, the bar application should be denied.

CONCLUSION

For the foregoing reasons, it is the view of the United States that 8 U.S.C. § 1621 precludes issuance of a law license to Mr. Garcia, and that his possession of such a license would not imply authorization to work in the United States.

Respectfully submitted,

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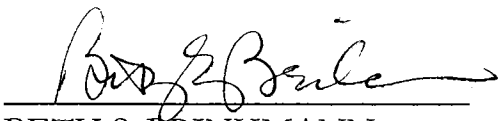

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AUGUST 2012

CERTIFICATE OF COMPLIANCE WITH CALIFORNIA RULES OF COURT 8.204(c) AND 8.520(c)

I hereby certify that the foregoing brief contains 3,455 words, according to the count of Microsoft Word.

Daniel Tenny

Daniel Tenny

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on August 1, 2012, and pursuant to Cal. Rules of Court 8.25(b)(3), 8.44(a), I filed the foregoing Application and Proposed Brief for Amicus Curiae the United States of America with this Court by causing an original and thirteen copies to be sent via Federal Express overnight delivery to the Clerk of the Court at the following address:

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