

FELONS IN THE LEGAL FIELD

By

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Abstract

Felons convicted of first-degree murder, second-degree murder, or manslaughter have a disadvantage to becoming a licensed attorney. There are some states that will allow felons to become licensed attorneys, but not all. Although some of the states do have exceptions to the rule barring the admission of felons to practice law, only a select few of those states' exceptions are reasonable.

The problem with not allowing felons convicted of first-degree murder, second-degree murder or manslaughter to become licensed attorneys at all is it takes away their chance at a fresh start. These former felons are trying to start over, and some states are barring them from doing that. If a felon has gone through rehabilitation and shown a positive change in character and fitness, then there is no reason that a former felon should not be allowed to become a licensed attorney.

There should be fair proceedings for each felon who attempts to become an attorney. Using some guidelines discussed in this work, admissions authorities should review each case differently depending on the facts and other circumstances of that specific case. Rehabilitation must be proven as well as a confirmed change in character and moral qualities.

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Introduction

Felons convicted of first-degree murder, second-degree murder or manslaughter are trying every day to get a fresh start with their life and do something good. One of the ways some felons are doing that is trying to become a licensed attorney. There are many laws in place that bar felons from doing this. Majority of states do allow felons to become licensed attorneys, but some still do not allow it. Each state has its own rules regarding the admission to practice law in the state. The ability to practice depends on the laws of the state in which they wish to practice. There are many cases in history regarding this issue and even more cases appearing today.

This paper will discuss first-degree murder, second-degree murder and manslaughter because although these crimes are atrocious, felons that commit them still deserve a second chance, as everyone in life deserves a second chance to start over. If felons are willing to admit what they did was wrong, prove they have changed, and want to ethically practice law, society should not deprive them of that chance. Felons who have committed first- or second-degree murder or manslaughter are still people and deserve the chance to show society that they have changed.

This paper will discuss the background of the law regarding felons convicted of first- or second-degree murder or manslaughter becoming licensed attorneys as well as examples of relevant cases. The problem with the way things are currently regarding the admission to the practice of law of those convicted of these crimes will then be discussed as well as a solution to the issue. The goal of this paper is to bring to light a current issue that is not well known and consider possible ways to fix it. Some new or amended guidelines should be put into place for those convicted of the aforementioned crimes, but ultimately, felons convicted of first-degree murder, second-degree murder, or manslaughter should be allowed to become licensed attorneys.

A fair trial, guidelines, and the character and fitness board all together can help create a way to fix this issue. This paper will focus on convictions, but in the states there is still a chance that without a conviction a person can be denied admission to the bar.

Background Law

The current definitions for first- and second-degree murder and manslaughter are all rather straight forward. The legal definition, according to Black's Law Dictionary, of first-degree murder is "the deliberate and premeditated killing of another." The sentencing of first-degree murder varies based on each state. Some states have the option of sentencing the defendant to death or life in prison, while in other states the maximum sentence is life without parole. Second-degree murder is similar to first-degree murder except it is not premeditated. Justia, for example, notes that the legal definition of second-degree murder is "an intentional killing that was not premeditated." Second-degree murder is essentially in between first-degree and manslaughter. Second-degree murder is more severe than manslaughter but not as severe as first-degree murder. The sentencing for second-degree murder varies based on the aggravating and mitigating factors. Manslaughter is defined by Black's Law Dictionary as "the unlawful killing of another without malice, either express or implied, which may be voluntary, upon a sudden heat of passion, or involuntary, in the commission of an unlawful act, or a lawful act without due caution and circumspection." The sentencing for manslaughter varies by state as well. The sentencing can vary from stiff criminal fines to prison sentencing. The length of the prison sentence varies based on the facts of the situation, with murder convictions typically receiving harsher penalties than manslaughter convictions.

Law of States

Every state in the United States has guidelines that convicted felons must meet to become a licensed attorney¹. Only some states, however, do not allow convicted felons to become licensed attorneys at all. There are ten states in the country that do not allow felons convicted of first or second-degree murder or manslaughter to become licensed attorneys in their state.² Those states are: Texas, Ohio, Oregon, Missouri, Kansas, Illinois, Georgia, Florida, Alabama, and Mississippi. Nine of the states has an exception to the law. The only state that does not have an exception to the law barring felons from becoming licensed attorneys is the state of Mississippi.

The states have been grouped into categories based on the exceptions. Group one has the most relaxed exception and only requires a certification stating that the felons have present good moral character and fitness and includes the state of Illinois. Group two requires the completion of the sentence and a “cooling off period.” The states in Group two are Texas, Missouri and Kansas. Group three has slightly stricter exceptions that include the completion of the sentence, all rights restored, and a potential hearing with the Supreme Court to prove change in character. Group three is the state of Ohio. Groups four and five are both very restrictive exceptions. The

¹ The following case is an example from Georgia of the general process that an applicant would go through to become a licensed attorney. In the case *In re Cason*, Cason had committed criminal offenses, none of which were felonies. When applying to become a licensed attorney, Cason failed to disclose all of her criminal offenses to the Character and Fitness Board. Due to the fact that Cason did not fully disclose her criminal past, she had failed to show adequate present moral and character fitness. The Board denied Cason’s application to become a licensed attorney (*In re Cason*, 249 Ga. 806). Cason appealed, but the court upheld the decision of the Character and Fitness Board (*In re Cason*, 249 Ga. 806). Cason had not shown proper rehabilitation and was therefore not allowed to become an attorney. Although this case does not deal with felons convicted of first-degree murder, second-degree murder or manslaughter, the process that felons must go through is still shown. Felons must go before the Character and Fitness Board, after their rights have been restored, and show adequate change and rehabilitation of their moral character and fitness.

² Some of the laws discussed are in reference to felonies and not murder or manslaughter specifically.

states in group four require a full pardon and civil rights restored and are Georgia, Alabama and Florida. Group five has no exception to the law and is the state of Mississippi. Although the state of Oregon technically has an exception to its law, it is too strict to apply, and thus Oregon is included in group five.

Group One

Illinois has the most relaxed rule regarding a convicted felon becoming a licensed attorney. The Article 7 Rules on Admission and Discipline of Attorneys Part A of the Illinois Supreme Court Rules discusses their exception to the rule. Rule 704(b) states that “in the event the character and fitness registration application and the separate application to take the bar examination shall be satisfactory to the board, the applicant shall be admitted to the examination; provided, however, that the following applicants must first receive certification of good moral character and general fitness to practice law by the Committee on Character and Fitness pursuant to Rule 708 before they will be permitted to write the bar examination: applicants who have been convicted of felonies, applicants against whom are pending indictments, criminal information, or criminal complaints charging felonies....” This means that Illinois does allow felons to become licensed attorneys, if they go through a character and fitness evaluation and get a certification of approval.³

Group Two

³ Illinois’s exception is similar to the majority approach in the states in the sense that applicants must satisfactorily pass the character and fitness committee before bar admission.

Texas determines whether an applicant should become a licensed attorney based on a few considerations. The Rule of the Supreme Court Governing Admission to the Bar of Texas, Rule 4 states the “Good Moral Character and Fitness Requirements.” Rule 4 Section D(1)(2)(3) specifically discusses the rules regarding felons. Whether the felony conviction was in Texas or another state does not matter, so long as it qualifies as a felony in Texas. Rule 4 Section D(1)(2)(3) states that “an applicant may be found lacking in present moral character and fitness under this rule based on the underlying facts of a felony conviction as well as based on the conviction or probation through deferred adjudication itself. The record of conviction or order of deferred adjudication is conclusive evidence of guilt. An individual guilty of a felony under this rule will be deemed to not have present good moral character and fitness until five years after the completion of the sentence and/or period of probation. Upon credible showing that a felony conviction or felony probation has been reversed on review by an appellate court, or that an executive pardon has been granted, the applicant will be permitted to apply to become a licensed attorney in the state of Texas.” The state of Texas does allow for felons to become attorneys only if it has been five years or their felony conviction was reversed.

The state of Missouri does not allow convicted felons to become licensed attorneys with an exception similar to the state of Texas. The Supreme Court Rules Governing the Missouri Bar and the Judiciary states the one exception. Rule 8.04(a)(b) states that:

[A]ny person, whether sentenced is imposed or not, who has pleaded guilty to or been found guilty of any felony of the United States, this state, any other state or any United States territory is not eligible to apply for admission to the bar of this state until five years after the date of successful completion of any sentence or period of probation as a result of the conviction, plea, or finding of guilt. Any application for admission to the bar from a person who has pleaded guilty or been found guilty as specified in Rule 8.04(a) shall show affirmatively, in addition to the other requirements of the application, that: any sentence or period of probation was completed at least five years ago, the cause has abated, any person injured as a result of the conduct of the applicant has received restitution, the claims have been

discharged by operation of law, or that the person has been notified at least ten days, but not more than ninety days, in advance of the filing of the application, all special conditions, if any, imposed have been accomplished, and the best interest of the public will be served if the applicant receives a license.

Missouri thus has the similar exception to Texas as they both require a five-year period after the felony before becoming a licensed attorney.

Kansas Supreme Court has a similar view on this issue as Missouri and Texas. The Kansas Supreme Court Rules Relating to the Admission of Attorneys discusses the rules barring convicted felons from becoming licensed attorneys and the exception to the rule. Rule 715(a) of the Rules Relating to the Admission of Attorneys states that “any person who, as an adult or juvenile, has been found guilty by plea or by trial of any felony crime, whether sentence was imposed or not, or who participated in a pretrial diversion or similar program for a felony crime is not eligible to apply for admission to the bar of the State of Kansas until five years after the date of successful completion of any sentence, period of probation or parole, or term of pretrial diversion. A felony crime includes any crime which is punishable by incarceration for more than one year or any crime which is designated as a felony by the State of Kansas, the United States of America, any state, or any United States territory.” Rule 715(b) states that “any person who, as an adult or juvenile, has been found guilty, by plea or by trial of any felony crime, or who has participated in a pretrial diversion or similar program for a felony crime, shall show affirmatively, in addition to the other requirements of the application, that: any sentence, period of probation, or term of pre-trial diversion was completed at least five years prior to the date of the application; the circumstances which led to the commission of the offense have changed; full restitution has been paid; all special conditions imposed have been fulfilled; the applicant’s civil rights have been restored; and the applicant meets all qualifications for character and fitness

pursuant to Rule 707.” Kansas is similar to Missouri and Texas with the difference being that Kansas also requires for the applicant’s civil rights to have been restored.

Group Three

Ohio does not allow for felons convicted of murder to become licensed attorneys in the state unless certain conditions are met. According to the Supreme Court Rules for the Government of the Bar of Ohio, Section 11(D)(5)(a), in order for felons convicted of first or second degree murder or manslaughter to become a licensed attorney they must have an “amount of time passed since the conviction that the applicant is no longer on parole, probation, in prison, or continuing any post-release control. The applicant must have had all rights restored to them by operation of the law, expungement, or pardon under the Ohio law. If the applicant was convicted of the felony in a different state, they must be eligible to have their rights restored under the Ohio law. The applicant must not be disqualified from holding an office of public trust. It must also be considered how an approval of the applicant would impact the public perception of the legal profession.” Section 11(D)(5)(b) states that “if the Board votes to approve the applicant, the Board must make a final report to be submitted to the Supreme Court who will make the final decision on whether the applicant should become a licensed attorney.” There are ways that the applicant can make an appeal to the board of commissioners on character and fitness to try and be admitted. Section 12 of the Supreme Court Rules for the Government of the Bar of Ohio discusses a hearing in which the applicant can prove their current character is different than what it was at the time of the felony.⁴

⁴ Section 12(C)(6) states that the “burden of proof falls on the applicant to establish by clear evidence that their present character, fitness, and moral qualifications for admission to the practice of law in Ohio.”

Group Four

Georgia, Florida, and Alabama all have similar, if not the same, conditions that must be met for felons to become licensed attorneys. The three states have very strict standards that felons must meet. For the state of Georgia, in order for felons to become licensed attorneys they must be pardoned or have their full civil rights restored (Mick, 2013). Alabama follows the strict standards like Georgia and Florida. For the state of Alabama, felons must have received a full pardon and have full civil rights restoration as well⁵ (Alabama Code Title 15).

For the state of Florida, according to the Rules of the Supreme Court Relating to Admissions to the Bar, a person convicted of a felony is not allowed to become a licensed attorney with one exception to the rule. Rule 2-13.3 of the Rules of the Supreme Court Relating to Admissions to the Bar states that “a person who has been convicted of a felony is not eligible to apply until all civil rights have been restored.” Rule 2-13.4 also states that “a person who is serving a sentence of felony probation, regardless of adjudication of guilt, is not eligible to apply until termination of the period of probation.”

Group Five

Mississippi is the only state that does not have an exception to the rule barring felons to become licensed attorneys. Ohio is similar as it has very strict and specific conditions that must be met to become a licensed attorney. Although Ohio states that it has exceptions, they are so strict that it is nearly impossible for felons to become licensed attorneys. The Rules Governing

⁵ Georgia and Alabama differ from Florida only in the sense that those state require full pardons as well as full restoration of civil rights whereas Florida only requires full restoration of civil rights.

Admission to the Mississippi Bar Rule 8 Section 6 states that “every person who has been or shall hereafter be convicted of a felony, in a court of this or any state or a court of the United States, manslaughter or a violation of the Internal Revenue Code excepted, shall be incapable of obtaining a license to practice law. Conviction of manslaughter or a felony violation of the Internal Revenue Code or commission of acts constitution felonious conduct not resulting in a conviction or the conviction of a misdemeanor involving moral turpitude may constitute grounds for a denial of an application for admission to practice.”

According to the Oregon State Bar Rules an applicant is able to become a licensed attorney with one exception. According to the Oregon Bar Admission Rules Section 3.10, “an applicant shall not be eligible for admission to the Bar after having been convicted of a crime, the commission of which would have led to disbarment in all circumstances present, had the person been an Oregon attorney at the time of conviction.” Given this rule, and there being no exception to it, a person convicted of first or second-degree murder or manslaughter would most likely not be allowed to practice in the state of Oregon at all.

Cases Regarding States

There are many cases regarding the topic of a felon convicted of first or second-degree murder or manslaughter wanting to become a licensed attorney. The cases below are from both states that do allow felons to become licensed attorneys with some guideline and states that do not allow felons to become licensed attorneys with some exceptions.

The first case is *Matter of Wiesner*, 94 A.D.3d 167. This case is from the Supreme Court of New York, Appellate Division from 2012. Neal Eugene Wiesner wanted to become a licensed attorney in the state of New York. Wiesner was arrested and convicted for his role in the

operation of an illegal business, attempted murder in the second-degree, burglary, unlawful imprisonment, criminal possession of a fire arm and criminal use of a fire arm. Wiesner plead guilty to the charges relating to the operation of the illegal business, but said nothing of the other charges. Later Wiesner took a plea deal for the attempted murder in the second-degree for a shortened sentence of only 2-6 years. Wiesner did not have to verbally say he was guilty of second-degree attempted murder.

Wiesner was released from prison in 1990. Shortly afterwards Wiesner attained a college degree, a law degree, and passed the bar exam. Wiesner accomplished all of this by 1994. These factors helped greatly in showing how far Wiesner had come. Wiesner then just had to get approval to become a licensed attorney. The character and fitness board did not approve Wiesner's application. The board felt that in accordance with Judiciary Law Section 90, it had not been enough time since the conviction to show proper rehabilitation.

Wiesner applied to become a licensed attorney in the state of New York a total of 10 times before he finally was approved. The Judiciary Law Section 90 for New York does not set out any specific guidelines on how to evaluate applicants with a criminal record. The character and fitness board of New York had to simply use the general guidelines that are set in place by the American Bar Association. The character and fitness board of New York must determine if the applicant currently possess the character and fitness needed to practice law. In order to decide if the felon has completely rehabilitated they look at how long the criminal activity persisted for and how much time has passed since the crime. In the end Wiesner was able to show rehabilitation and a change in his character so he could become a licensed attorney (*Matter of Wiesner*, 94 A.D.3d 167).

The state of New York has no law barring convicted felons of first or second-degree murder or manslaughter from becoming licensed attorneys. There are no specific guidelines set in place or rules that must be followed. If the character and fitness board feels that a felon has met the requirements set out by the American Bar Association and has successfully rehabilitated themselves, then they are allowed to become a licensed attorney for that state.

The next case is *Matter of Anonymous*, 116 A.D.3d 62. This case is also a New York Supreme Court case. In this case, it was the applicants third time attempting to become a licensed attorney. One of the factors that New York considers when dealing with felons attempting to become licensed attorneys is how honest they are with the incidents in their past. This felon was convicted of second-degree murder from the suffocation of an elderly female victim during a home invasion robbery.

Since being out of prison, the applicant had led a very good and well managed life. The felon had shown signs of rehabilitation and a change in character. He passed the bar but was not accepted to become a licensed attorney. For his third attempt at becoming a licensed attorney he was not completely honest about his criminal history. He also did not fully take responsibility for the crimes he committed. The court stated that the felon said he did it but would create excuses that would not fully place the blame on him. The court asked him about his crime in which the female victim died during a home invasion. The felon stated that before he left he made an excuse to go back upstairs and “untied the bonds and removed the gag”. He stated that when he left he thought she was okay and alive (*Matter of Anonymous*, 116 A.D.3d. 62). When asked if one of his crimes involving drug sales was the felons first time being arrested he lied to the court and stated that it was (*Matter of Anonymous*, 116 A.D.3d. 62).

In the end the felon was not able to become a licensed attorney. The character and fitness board felt that the felon did not meet their standard of candor when it came to his application to practice law. The court stated that they “concur with the committee’s findings, adopt its recommendation and deny the admission to the bar of the State of New York” (*Matter of Anonymous*, 116 A.D.3d. 62).

Another case is *In re King* from the Supreme Court of Arizona. In this case the felon was convicted of one count of attempted murder after having shot two victims. The felon, Lee Keller King, was a deputy constable and was at a bar one night when he saw two convicted felons. King left the bar and the men soon followed. King then proceeded to use his service weapon and shoot at the two men. One of the men was in critical condition and needed surgery.

While on parole in 1985, King completed mental health counseling and therapy. King then went to college and obtained his degree, went to law school, and applied to become a licensed attorney in the state of Texas in 1994. The Texas character and fitness board felt that King had good moral character and he was able to become a licensed attorney.

King moved to Arizona in 2003 and attempted to become a licensed attorney in the state of Arizona. His application to become a licensed attorney was denied. The character and fitness board stated that “although King had presented strong evidence of rehabilitation and positive social contributions since the shootings, the Committee was unable to overlook the seriousness of his crime” (*In re King*, 212 Ariz. 559).

This case is an example of a felon having their second chance almost taken from them due to the state. Arizona does not have a rule barring convicted felons of first or second-degree murder or manslaughter from becoming licensed attorneys, but King was negatively affected due to this felony conviction and almost unable to practice law in Arizona. King had been practicing

law in Texas for years and had shown good moral character and rehabilitation and was still declined at first from becoming a certified attorney.

The final case is from the state of California. *In re Gossage* involves a felon convicted of homicide attempting to become a licensed attorney. Gossage had been convicted of homicide and other felonies (*In re Gossage*, 23 Cal. 4th 1080). After being released from prison, Gossage showed many achievements in successful character changes as well as community involvement. Gossage was discharged from parole in 1994 which is also the year that he applied for bar admission to the state of California. Gossage had specifically applied for a “moral character determination” (*In re Gossage*, 23 Cal. 4th 1080).

After review of Gossage’s application, the Committee found many different things. The Committee discovered that Gossage had shown great change in his character, but had failed to disclose some information. Gossage had multiple vehicle offenses in the years between his release from prison and his discharge from parole. The Committee decided that due to these factors, Gossage was denied application to become a licensed attorney in the state of California and had not shown present good moral character (*In re Gossage*, 23 Cal. 4th 1080).

The state of California has no laws barring convicted felons from becoming licensed attorneys. However, all people, convicted felon or not, must show present good moral character to be admitted to practice law. Gossage was not able to prove that he had present good moral character and was therefore not allowed to become a licensed attorney.

Problem at Issue

Not allowing felons convicted of first or second-degree murder or manslaughter the ability to become a licensed attorney is problematic because they are attempting to change the

direction of their life and do something good. There are some states that are making it so felons cannot do this. Although most of the states that have the laws barring felons from becoming attorneys have exceptions, not all do and not all the exceptions are reasonable. Some of the states have exceptions that are too strict, making it nearly impossible for felons to get a second chance at starting over.

Once felons get out of prison and complete their parole or probationary periods, they attempt to get back into a normal life. Simply because of the fact that they are felons makes this very difficult. Many felons are barred from certain jobs and activities (American Bar Association, 2018). Without a chance to start over fresh, most felons will end up committing crimes again and end up right back in jail (Staff, 2016). Society is continuing the cycle for these felons who want a second chance and a fresh start.

The exception of Georgia, Florida, and Alabama is too strict. The exception to the rule that a felon is barred from becoming a licensed attorney “until all civil rights are restored” is not realistic. It often is nearly impossible for a person that was convicted of first or second-degree murder or manslaughter to completely have their rights restored to them. This exception makes it nearly impossible for felons to have a second chance at a new life and starting over in a profession that motivates and inspires them.

The most common exception to the law regarding the barring of felons convicted of first or second-degree murder or manslaughter is a five-year waiting period after the completion of sentencing. Texas, Missouri, and Kansas all have this exception. Each state has a variant or a possible extra step that the applicant must qualify for, but the core exception is the same for those three states.

States should consider reasonable exceptions to the laws that are set in place. There are pros and cons to having a reasonable exception to the law. The pros of having reasonable exceptions are that it allows more people to have the chance at a fresh start and to have the chance to make a difference. Some of the people could be amazing attorneys that do great things for their state. However, the cons of having reasonable exceptions are that it allows for the possibility that some felons could become attorneys without fully being rehabilitated. Some people would slip through and become licensed attorneys and possibly tarnish the reputation of legal professionals for that state and harm clients.

Resolution

There is a resolution to this issue. Felons convicted of first or second-degree murder or manslaughter should be allowed to become licensed attorneys with some guidelines. The first step to fixing this issue is that all applicants should have their own, full and fair review based off their individual case and the facts and factors surrounding it. No single incident or person is the same, so the cases should not be viewed as the same to determine acceptance to practice law in that state.

The next step in resolving this issue is to set some guidelines that the felons convicted of first or second-degree murder or manslaughter would have to meet. Although each case is different, there must still be standards that the felons must meet. One standard would be successfully completing rehabilitation and showing with convincing evidence that there has been a change in their character and fitness. The burden of proving rehabilitation would fall on the applicant. Another standard would be a certain amount of time since the conviction of the felony. There should be a five-year period after the completion of the jail/prison term, as well as

probation or parole, before the felon can become a licensed attorney. During those five years, the convicted felons would have to prove that they have become a law-abiding citizen who wants to make a difference and has changed their actions. Five years is the right amount of time because it is long enough that it allows time for the felons to show they have changed, but it is also short enough that it still gives them a chance at a new life. If the time-period was shorter and only three years, for example, there likely is not enough time for the felons to show a true transformation in their character. There is no need for the time-period to be longer. Five years gives ample time for the felons to show they have changed and anything beyond that is excessive.

The final step in resolving the issue is to let the character and fitness board decide on whether the felon should become a licensed attorney. Some states have the Supreme Court of that state make the final decision on whether the felon should become licensed. I do not think this is right since it is the job of the character and fitness board to determine if an applicant should be accepted or not. I think that whether the applicant is a person with no criminal history or a felon the character and fitness board should have the final decision. Allowing the character and fitness board to decide whether the felons should be admitted to practice law would save the applicants time and money since they would not have to wait for the state supreme court to hear their case. In the case that the character and fitness board denies the felons application, I feel that the applicants should have a chance to appeal the decision in the state supreme court if they would like to do so.

I think that with the combination of these steps and remembering that each case and each person is different, the issue regarding convicted felons of first or second-degree murder or manslaughter becoming licensed attorneys can be more fair and equal to everyone.

If a person who was accused of first-degree murder, second-degree murder, or manslaughter was found innocent and the criminal analysis did not result in a conviction, I think a different approach should be taken. The United States Constitution states that citizens have “equal protection under the law” (Constitution of the United States). Therefore, if a person is found innocent in the eyes of the law, then they should be considered innocent when attempting to become a licensed attorney and should be viewed in a different light than that of someone who was convicted. The Board should have an open mind and view the applicant as any other citizen. This paper is designed specifically for murder and manslaughter, but this reasoning would apply with equal or greater force to lesser crimes.

Conclusion

In conclusion, felons convicted of first or second-degree murder or manslaughter should have the opportunity to become licensed attorneys. One mistake that they made should not dictate their entire life if they are attempting to turn their life around. By not allowing felons to become licensed attorneys some states are taking away the possibility that they could change the legal field and their life for the better. As people, they deserve a second chance at a good life if they are willing to work for it and change.

There are currently ten states in the United States that do not allow felons to become licensed attorneys, nine of which have exceptions to the rule. Each states law varies and each exception also varies. Texas, Missouri, and Kansas have an exception that five years must pass before the felon can become a licensed attorney. This guideline along with rehabilitation and a change in character should allow felons convicted of first or second-degree murder or manslaughter to become licensed attorneys.

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