



Office of Legal Services Innovation

An Office of the Utah Supreme Court

INNOVATION OFFICE ACTIVITY REPORT

APRIL 2021

DRAFT AS OF MAY 21, 2021

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OVERALL METRICS

Total Applications Received	47
Applicants Recommended to Court for Authorization	28
Applicants Denied Recommendation from Innovation Office	1
Applicants Denied Authorization by Court	0
Applicants Tabled (referral fees)	8
Inactive or Withdrawn Applicants Before Recommendation	7
Currently Under Office Review	3
Recommended to Court for Authorization Decision	2
Authorized Entities	26
Entities Reporting Data (this month)	10
Entities Recommended to Exit the Sandbox	0
Key Risks and Trends	There was one reported consumer complaints from reporting entities.



SUMMARY

This report summarizes activities and negative risk assessment of entities approved by the Utah Supreme Court to implement legal services within the Utah Sandbox and monitored by the Office of Legal Services Innovation. This report covers the period of October 2020 through April 2021.

SANDBOX ACTIVITY (OCTOBER 2020 - APRIL 2021)

- **26 entities approved to offer services**
 - **Low Risk=4** (AGS Law, Blue Bee, Firmly, Hello Divorce)
 - **Low/Moderate=10** (FOCL Law, Jordanelle Blocks, LawPal, Legal Claims, Inc., Mountain West Legal Protective, R&R, Robert Debry & Associates, Rocket Lawyer, Tanner, Xira)
 - **Moderate=12** (1Law, Davis & Sanchez, DSD Solutions, Estate Guru, LawGeex, Law HQ, Law on Call, Nuttall, Brown & Coutts, Off the Record, Pearson Butler, Sudbury Consulting, Timpanogos Legal Center)
 - **High=0**
 - **46% of authorized entities were moderate risk; 39% low/moderate risk; 15% low risk**

- **12 entities reporting** data to date.
 - 2 low risk entities; 6 low/moderate risk entities; 4 moderate entities

- **1195 legal services sought** from approximately **1000 unduplicated clients**
 - Low=113 legal services sought
 - Low/Moderate=413 legal services sought
 - Moderate=669 legal services sought
 - 56% of legal services produced via moderate risk entities
 - **826** legal services have been delivered by a **lawyer** (or lawyer employee) or **software for form or document completion only** with lawyer involvement
 - **326** legal services have been delivered by **software with lawyer involvement**

 - The rank of legal category addressed has been 1) End of Planning; 2) Business; 3) Marriage/Family; 4) Financial; 5) Accident/Injury. **Five legal categories** accounted for **81% of legal services**. The remaining 15 possible legal categories accounted for 19%. The top three categories accounted for 60% of legal service.

 - To date, one complaint has been communicated by entities to the Office that would indicate potential for consumer harm. After follow-up by the Office during May 2021, it was concluded that the potential for consumer harm was appropriately responded to and mitigated by the entity.

Consumer Complaint Assessment: All Reporting Entities to Date



Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	1	<1%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%

- Based on reviewing mismatches of services sought and received given fees paid, there was no evidence supporting unnecessary or inappropriate purchases of legal services. In communicating with entities regarding the amount paid for services, the amount paid reasonably fit their respective business models.
- Applicable mismatches between services sought and received were linked to quality control of legal service intake coding (improving service sought identification methods) and error in the process of linking life events to appropriate legal needs. The Office concluded that mismatches were not harms.
- Other identified data reporting issues were linked to entities having difficulty pulling data from internal systems to align with Sandbox prescribed coding. These issues were resolved through follow-up communications and/or data clarification requests.
- Legal results were appropriate given legal matters and scope of service.
- Services will continue to be monitored for complaints and outcomes.
- The Office is developing a harm framework that describes the harm assessment framework in plain language.
- The pilot of the vanguard service audit of a moderate risk entity is ongoing. Two entities are preparing to each submit data on 20 services selected by the Office. The Office is working through mechanisms to pay auditors and may use volunteers to pilot the audit method during May/June.



TABLE 1: AUTHORIZED ENTITIES

Entity Name	Risk Level	Service Models	Service Categories
10 - Blue Bee Bankruptcy	Low	Lawyers employed / managed by nonlawyers	Education
		<50% nonlawyer ownership	Consumer Financial Issues
15 - AGS Law	Low	<50% nonlawyer ownership	Business
			End of Life Planning
			Real Estate
19 - Firmly, LLC	Low	<50% nonlawyer ownership	Business
44 - Hello Divorce	Low	Lawyers employed / managed by nonlawyers	Marriage and Family
		<50% nonlawyer ownership	
04 - Lawpal	Low / Moderate	Lawyers employed / managed by nonlawyers	End of Life Planning
		50+% nonlawyer ownership	Consumer Financial Issues
		Software provider /w lawyer - doc completion	Housing (Rental) Marriage and Family
05 - Rocket Lawyer	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Criminal (Other)
			Discrimination
			Domestic Violence
			Education
			Employment
		End of Life Planning	
50+% nonlawyer ownership	Consumer Financial Issues		



Entity Name	Risk Level	Service Models	Service Categories
			Healthcare
			Housing (Rental)
			Immigration
			Marriage and Family
			Military
			Public Benefits
			Real Estate
07 - R & R Legal Services	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Domestic Violence
			End of Life Planning
		50+% nonlawyer ownership	Consumer Financial Issues
			Healthcare
			Marriage and Family
14 - FOCL Law	Low / Moderate	Lawyers employed / managed by nonlawyers	Marriage and Family
		50+% nonlawyer ownership	
		Software provider /w lawyer - doc completion	
32 - Tanner LLC (Withdrawn from Sandbox)	Low / Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% nonlawyer ownership	
33 - Xira Connect	Low / Moderate	50+% nonlawyer ownership	Accident / Injury
			Adult Care
			Business



Entity Name	Risk Level	Service Models	Service Categories
			Criminal Expungement
			Discrimination
			Domestic Violence
		Fee Sharing	Education
			Employment
			End of Life Planning
			Consumer Financial Issues
			Healthcare
			Housing (Rental)
			Immigration
		Intermediary Platform	Marriage and Family
			Military
			Native American / Tribal
			Public Benefits
			Real Estate
			Traffic Citations
37 - Robert DeBry	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
		50+% nonlawyer ownership	
38 - Davis & Sanchez	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
		50+% nonlawyer ownership	Education
39 - Legal Claims Benefits	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Education
		50+% nonlawyer ownership	Healthcare
			Military
			Public Benefits



Entity Name	Risk Level	Service Models	Service Categories
41 - Mountain West Legal Protective	Low / Moderate	Lawyers employed / managed by nonlawyers	Housing - Rental
		50+% nonlawyer ownership	Real Estate
02 - 1Law	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Criminal (Other)
		50+% nonlawyer ownership	Discrimination
			Domestic Violence
			Education
			Employment
			End of Life Planning
		Software provider w/ lawyer involvement	Consumer Financial Issues
			Healthcare
			Housing (Rental)
			Immigration
		Non-lawyer provider w/ lawyer involvement	Marriage and Family
			Public Benefits
Real Estate			
Traffic Citations			
03 - Law HQ	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
		50+% nonlawyer ownership	Business
		Software provider w/ lawyer involvement	Employment
12 - Nuttall Brown	Moderate	Lawyers employed / managed by nonlawyers	Accident Injury



Entity Name	Risk Level	Service Models	Service Categories
		50+% nonlawyer ownership	Business
		Software provider w/ lawyer involvement	Discrimination
		Non-lawyer provider w/ lawyer involvement	Employment
			Marriage and Family
13 - Estate Guru	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% nonlawyer ownership	End of Life Planning
		Fee Sharing	Consumer Financial Planning
		Software provider /w lawyer - doc completion	Healthcare
		Software provider w/ lawyer involvement	Real Estate
		Non-lawyer provider w/ lawyer involvement	
23 - Off the Record	Moderate	50+% nonlawyer ownership	Traffic Citations
		Fee Sharing	
		Software provider w/ lawyer involvement	
27 - Sudbury Consulting	Moderate	Software provider w/ lawyer involvement	Criminal Expungement
			Employment
28 - Pearson Butler	Moderate	50+% nonlawyer ownership	Accident / Injury
			Adult Care
			Business
			Discrimination
			Education
		Fee Sharing	Employment
			End of Life Planning
			Consumer Financial Issues



Entity Name	Risk Level	Service Models	Service Categories
		Non-lawyer provider w/ lawyer involvement	Housing (Rental)
			Immigration
			Marriage and Family
			Military
			Native American / Tribal
			Public Benefits
			Real Estate
30 - Law on Call	Moderate	Lawyers employed / managed by nonlawyers	Business
			End of Life Planning
		50+% nonlawyer ownership	Consumer Financial Issues
			Housing (Rental)
		Non-lawyer provider w/ lawyer involvement	Real Estate
31 - DSD Solutions	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Business
			Criminal Expungement
		50+% nonlawyer ownership	Domestic Violence
			Employment
			End of Life Planning
		Software provider w/ lawyer involvement	Housing (Rental)
			Immigration
			Marriage and Family
		Non-lawyer provider w/ lawyer involvement	Public Benefits
			Real Estate
			Traffic Citations
		36 - Timp. Cert. Advocates	Moderate
Marriage and Family			



Entity Name	Risk Level	Service Models	Service Categories
42 - Jordanelle Blocks	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% nonlawyer ownership	
		Fee Sharing	Housing - Rental
		Software provider /w lawyer - doc completion	
		Software provider w/ lawyer involvement	Real Estate
		Non-lawyer provider w/ lawyer involvement	
43 - LawGeex	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% nonlawyer ownership	Healthcare
		Software provider w/ lawyer involvement	
45 - Holy Cross Ministries	Moderate	Non-lawyer provider w/ lawyer involvement	Financial Issues
			Immigration
			Health Care
			Public Benefits
47 - AAA Fair Credit	High	Non-lawyer provider w/out lawyer involvement	Financial Issues
			Healthcare
			Public Benefits



TABLE 2: AUTHORIZED ENTITIES REPORTING STATUSES

Entity Name	Risk Category	Launch Date	First Report Due	Frequency
Blue Bee Bankruptcy	Low	Oct. 1, 2020	Jan. 5, 2021	Quarterly
AGS Law	Low	Oct. 1, 2020	Jan. 5, 2021	Quarterly
Firmly LLC	Low	Jan. 1, 2021	Apr. 5, 2021	Quarterly
Hello Divorce	Low	TBD	TBD	Quarterly
Rocket Lawyer	Low-Moderate	Oct. 1, 2020	Nov. 5, 2020	Monthly
R&R Legal Services	Low-Moderate	Jan. 1, 2021	Feb. 5, 2021	Monthly
LawPal	Low-Moderate	Jan. 15, 2021	Jan. 5, 2021	Monthly
FOCL Law	Low-Moderate	Jan. 1, 2021	Feb. 5, 2021	Monthly
Tanner (Withdrawn)	Low-Moderate	Jan. 1, 2021	Feb. 5, 2021	Monthly
Xira Connect	Low- Moderate	Jun. 1, 2021	Jul. 5, 2021	Monthly
Davis & Sanchez	Low-Moderate	TBD	TBD	Monthly
Legal Claims Benefits	Low-Moderate	TBD	TBD	Monthly
Robert Debry	Low-Moderate	April 15, 2021	May 5, 2021	Monthly
1Law	Moderate	Oct. 1, 2020	Nov. 5, 2020	Monthly
LawHQ	Moderate	TBD	TBD	Monthly
Nuttal Brown	Moderate	Feb. 1, 2021	Mar. 5, 2021	Monthly
Estate Guru	Moderate	Dec. 1, 2020	Jan. 5, 2020	Monthly
Sudbury Consulting / Code for America	Moderate	TBD	TBD	Monthly
Off the Record	Moderate	TBD	TBD	Monthly
Law on Call	Moderate	Feb. 1, 2021	Mar. 5, 2021	Monthly
DSD Solutions	Moderate	TBD	TBD	Monthly
Pearson Butler	Moderate	Mar. 1, 2021	Apr. 5, 2021	Monthly
Timp Cert. Legal Advocates	Moderate	TBD	TBD	Monthly
Mountain West Legal Protective	Moderate	TBD	TBD	Monthly
Jordanelle Blocks	Moderate	TBD	TBD	Monthly
Law Geex	Moderate	TBD	TBD	Monthly
Holy Cross Ministries	Moderate	TBD	TBD	Monthly
AAA Fair Credit	High	TBD	TBD	Monthly



TABLE 3: PENDING SUBMITTED APPLICANTS

		35 - SoloSuit	40 - UT Legal Advocates	46 - Gregory Hawkins	
Risk Level		Moderate	Moderate	Moderate	
Total Categories		1	8	2	
		3	2	3	Total Models
Accident/Injury	-				1 Lawyers employed / managed by nonlawyers
Adult Care	-				- <50% nonlawyer ownership
Business	1		X		- 50% + nonlawyer ownership
Criminal Expungement	1		X		2 Fee sharing
Discrimination	1		X		- Software provider w/ lawyer - doc completion
Domestic Violence	1		X		2 Software provider w/ lawyer
Education	-	X			- Software provider w/out lawyer
Employment	1		X		2 Non-lawyer provider w/ lawyer
End of Life Planning	1			X	- Nonlawyer provider w/ out lawyer
Financial Issues	-				- Intermediary Platform
Healthcare	1			X	
Housing (Rental)	1		X		
Immigration	-				
Marriage and Family	1		X		
Military	-				
Native American / Tribal Issues	-				
Public Benefits	-				
Real Estate	-				
Traffic Citations	1		X		



TABLE 4: DENIED, POSTPONED, AND WITHDRAWN APPLICANTS¹

		01 - PainWorth	06 - Fluent Worlds	09 - Legal Different	11 - Louis Hansen	17 - CBLP	18 - Smith Gold	20 - US Arb	21 - Arch Media	
	Status	Withdrawn - Unresponsive	Withdrawn - Unresponsive	Withdrawn - Not Qualified	Withdrawn	Resubmit	Withdrawn	Withdrawn	Denied	
	Total Categories	1	-	3	3	7	13	4	4	
		3	1	-	-	5	3	4	1	Total Models
Accident/Injury	2	X					X			3 Lawyers employed/ managed by nonlawyers
Adult Care	3						X	X		2 <50% nonlawyer ownership
Business	5			X		X	X	X	X	2 50% + nonlawyer ownership
Criminal Expungement	1					X				- Fee sharing
Discrimination	1			X						4 Software provider /w lawyer - doc completion
Domestic Violence	1						X			2 Software provider w/ lawyer
Education	1						X			1 Software provider w/out lawyer
Employment	3			X		X	X			3 Nonlawyer provider w/ lawyer
End of Life Planning	3				X	X			X	1 Nonlawyer provider w/out lawyer
Financial Issues	4				X	X	X	X		
Healthcare	3						X	X	X	
Housing (Rental)	-									
Immigration	1						X			
Marriage and Family	2						X		X	
Military	2					X	X			
Native American / Tribal Issues	1						X			
Public Benefits	-									
Real Estate	3				X	X	X			
Traffic Citations	-									

¹ This table does not include those applicants tabled under the Court’s Dec. 10, 2020 statement on referral fees. Those 8 applicants are: 08-Shumway Van, 16-Efficient Attorneys, 22-Nelson Jones, 24-Legal Services Link, 25-Michael Loveridge, 26-First Professional Services, 29-RMPIC, and 34-Woodbury.



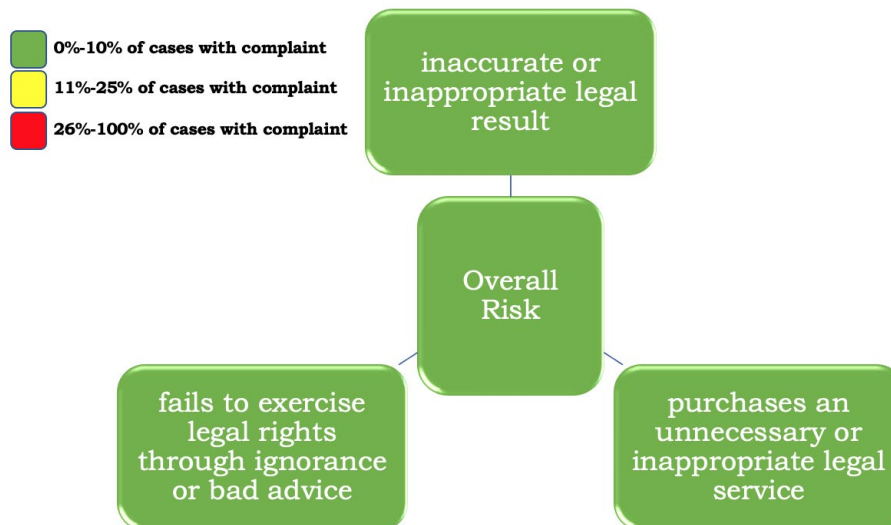
APRIL 2021 ACTIVITY RISK REPORT - HARM ASSESSMENT

Depending on an entity’s assessed risk level (the risk level assigned at authorization), OLSI collects a range of measures from the entity designed to assess the occurrence of three harms to consumers (this can also be understood as “actualized risk”):

- Consumer achieves an inaccurate or inappropriate legal result.
- Consumer fails to exercise legal rights through ignorance or bad advice.
- Consumer purchases an unnecessary or inappropriate legal service.

As service activity increases among sandbox participants, the Office will receive more kinds of information. For entities assigned higher risk levels, this will include information about legal outcomes, financial outcomes, and expert audits of a sample of work product. As these data accumulate, harm assessments will be based on a review of all applicable measures.

In these early stages of service provision and reporting, the assessment of consumer harm is based on the prevalence of consumer complaints indicating the occurrence of one or more of the three harms. Social scientific studies grounded in expert peer review of lawyers’ work product typically find that lawyers commit errors in one fifth to one quarter of the cases reviewed. Taking this finding as a baseline, the harm assessment classifies receipt of harm-related complaints from more than 25% of customers as a significant warning of harm (red), which would indicate an immediate need for the entity to work with OLSI to develop and implement quality improvement plans to prevent harms and might also lead the Office to recommend that the Court suspend the entity’s operations in the sandbox. Receipt of harm-related complaints from 11-25% of consumers would trigger a watch (yellow) to better understand and prevent potential harms and would likely include the requirement of additional information from entities so classified. Receipt of harm-related complaints from 10% or fewer of an entity’s consumers is considered reasonable risk (green) and does not trigger the need for any additional risk assessment.



ROCKET LAWYER

APRIL ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

During April 2021, Rocket Lawyer reported participation in 57 consumer legal services. These consumer engagements were completed by a lawyer employee in a nonlawyer-owned entity. 42 of the legal services opened in April were closed during the month. Regarding consumer risk, 0 consumer complaints were reported. Rocket Lawyer is a low/moderate risk project and is assessed for actualized risk by monitoring consumer complaints across three risk categories (Table 5). Rocket Lawyer was categorized as green (satisfactory; no to minimal negative actualized risk) for the month of April 2021 based on consumer complaints.

Table 5. Consumer Risk Assessment: Rocket Lawyer, April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%

OCTOBER 2020-APRIL 2021 CUMULATIVE ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

Cumulatively across October 2020 through April 2021, Rocket Lawyer reported participation in 284 legal matters. These consumer engagements were completed by a lawyer employee in an entity with nonlawyer ownership. Two previous services from March were also captured in this report after further reporting reconciliation. 213 of the 284 consumer legal services were closed during the month the service was opened. 265 of the 284 consumer legal services are now complete, with 264 closed (due to an expected conclusion linked to the practice of law) and 1 lost to follow-up (meaning the client/customer was unresponsive). Of those services not opened and closed within the same month, most closed by the subsequent month. 19 legal services currently remain open. One service sought has been reported as lost to follow-up. Regarding consumer risk year-to-date, 0 consumer complaints were reported overall. Rocket Lawyer was categorized as green (satisfactory) for the months of October 2020 through April 2021 based on consumer complaints (Table 6).



Table 6. Consumer Risk Assessment: Rocket Lawyer, October 2020 - April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



1LAW

APRIL ACTUALIZED RISK ASSESSMENT: GREEN - SATISFACTORY

During April 2021, 1Law reported 54 inquiries for consumer legal services. 16 of the 54 inquiries remained open during the month of April. Thirty-eight services were completed due to loss to follow-up. All 54 services sought were noted as limited assistance, legal advice. All of the lost to follow-up completed services received a question answered, not legal advice. All the completed services lost to follow-up received a question answered by software with lawyer involvement. The open services were currently receiving services from a lawyer/lawyer employee and were reportedly receiving limited assistance, legal advice. After clarifying with 1Law, the open services were receiving assistance from a lawyer and lawyer employee as well as software with lawyer involvement; in these services, software assists with intake and as a platform for legal services (i.e., telelaw). Regarding services sought and received during April, among closed services, services sought were solely legal advice, which resulted in questions answered, not legal advice, among completed services. The open services of legal advice were being addressed by a lawyer. The amount paid for services was \$0 for the month. Despite the mismatch of service sought and received, there was no evidence of upselling or over-payment. Based on conversations with the entity, one of the functions of the software is to answer questions related to customer reported life events that may or may not be legal needs. The software is in part serving a customer intake and legal matter identification function (similar to an intermediary platform), which explains the shift from legal advice sought and question answered. Additionally, when an intake progresses from web-based and app-based intake to legal services, a lawyer uses technology to assist customers using a “telelaw” approach. Additionally, \$0 was paid for services during April, which further diminishes potential negative risk for the mismatch of services sought and received. There is no evidence of inappropriate or unnecessary purchase of services related to the mismatch. There were also no complaints for inadequate results or failure to identify/exercise rights. During the month of April, zero financial and legal outcomes were reported, though open services included a pending outcome note among those services initiated during the month. Consumers paid \$0 for services during April thereby setting the outcome to paid service ratio to 0:0 further decreasing risk of unknowable/pending outcomes at this time. 1Law was green (satisfactory; no to low risk) in all three categories of consumer risk-related complaints (Table 7) for the month. 1Law performed in the green (satisfactory) for complaints and amount paid (\$0) for April specifically. Legal/financial outcomes will be monitored on a monthly basis to evaluate service outcomes, due to lack of applicable data at this time.

Table 7. Consumer Risk Assessment: 1LAW, April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



OCTOBER 2020-APRIL 2021 CUMULATIVE ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

Cumulatively across October 2020 through April of 2021, 1Law reported 337 inquiries for consumer legal matters. Note that, beyond the 337 inquiries noted in this report, 13 services were excluded due to limited information at intake meaning that consumers discontinued very early in the intake process. 62 legal matters remained open during April, if including the excluded services noted as open. The open services approached 50 when adjusting for excluded services meaning that these services are still noted as open but are likely lost to follow-up. To date, 213 of the consumer engagements for legal services were completed primarily by a lawyer/lawyer employee. During the months of October-December 2020, legal service delivery was only applicable to the Utah Sandbox under the less than 100% lawyer owner condition. January was the first month when services were offered by software with lawyer involvement (during January through April of 2021 a total of 124 services were provided primarily by software with lawyer involvement). Almost all services sought (~99%) were limited assistance legal advice, and a similar percentage received limited assistance-legal advice (60%) or a question answered-not legal advice (36%). Two of the legal services received limited assistance for document completion, and three legal services involved full representation assistance. Approximately 2% of the services received were noted as not service due to loss to follow-up. During the months of October 2020 through April 2021, zero financial and legal outcomes were reported since applicable services remained open or have not reached a known outcome. Consumers paid \$0 for services during October 2020 through April 2021 thereby setting the outcome to paid service ratio to 0:0 further decreasing risk of unknowable outcomes at this time. Additionally, 0 consumer complaints were reported. 1Law was green (satisfactory) in all three categories of consumer risk-related complaints (Table 8). 1Law is a moderate risk project and will be assessed for risk by monitoring consumer complaints across three risk categories as well as legal/financial outcomes and amount paid for services. 1Law performed in the green for complaints and amount paid (\$0). Legal/financial outcomes will be monitored on a monthly basis to evaluate service outcomes. The mismatch between services sought and received will also be reviewed on a monthly basis. The services sought and received mismatch is in part due to the legal service intake function performed by the software that attempts to link reported life events to types of legal matters. Additionally, based on additional conversations during May 2021, it was learned that mismatch of services sought and received from March through April is also in part a result due to method legal service progression. All participants begin with a web-based interaction. Some progress to an app (software application). From the app or website intake, a subset progress to technologically mediated interactions with the lawyer employee. Due to payments totalling \$0 to date, there is no evidence of inappropriate purchases. There were also no complaints related to inadequate results nor lack of identification/exercising rights. During May 2021, 1Law progressed to a point of service delivery to begin the audit process. 1Law was categorized as green (satisfactory) overall regarding risk for the months of October 2020 through December 2020 and February through April of 2021. Due to data quality and service delivery questions, 1Law was moved to yellow (watch) for the month of January 2021. The Office followed up with the entity to resolve data reporting and method of service delivery questions, which were reasonably resolved by the entity.



Table 8. Consumer Risk Assessment: 1LAW, October 2020-April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



BLUE BEE BANKRUPTCY LAW

JANUARY 2021-MARCH 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

Blue Bee Law was approved by the court on August 30, 2020. Note that these service estimates were updated between the March and April data report, after follow-up and clarification in the interim during April. Blue Bee is a low-risk entity that reports quarterly. This is Blue Bee’s second reporting period. Blue Bee reported 29 inquiries for legal matters (adjusted from 32 in the March report). 17 of the 29 services have progressed beyond triage and preliminary advice. 1 of the 29 legal matters has closed. The other 28 remain open. All of the matters fell under the Financial legal category. All consumer engagements were completed by a lawyer non-employee or lawyer employee during the reporting period. Blue Bee was green (no to low risk) in all three categories of consumer risk-related complaints (Table 9). Blue Bee Law is a low-risk project, due to ownership, and will be assessed for risk by monitoring consumer complaints across three risk categories on a quarterly basis. Blue Bee was categorized as green (no to low risk) overall regarding risk for this reporting period.

Table 9. Consumer Risk Assessment: Blue Bee, January 2021 - March 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%

SEPTEMBER 2020 - MARCH 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

Blue Bee Law was approved by the court on August 30, 2020. Blue Bee is a low-risk entity that reports quarterly. Note that these service estimates were updated between the March and April data report, after follow-up and clarification in the interim during April. Blue Bee reported approximately 95 inquiries for consumer legal matters. 69 of the 95 services have progressed beyond triage and preliminary advice as estimated for payment for services. 28 of the legal matters have closed. 99% of the cases fell under the Financial legal category, and the remaining percentage involved debt related to the Education legal category. All consumer engagements were completed by a lawyer non-employee or lawyer employee during the reporting period. Blue Bee was green (no to low risk) in all three categories of consumer risk-related complaints (Table 10). Blue Bee Law is a low-risk project, due to ownership, and will be assessed for risk by monitoring consumer complaints across three risk categories on a quarterly basis. Blue Bee was categorized as green (no to low risk) overall regarding risk for this reporting period. This will not, however, impact complaints, which is the primary measure of potential harm.



Table 10. Consumer Risk Assessment: Blue Bee, September 2020 - March 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



AGS LAW

JANUARY 2021 - MARCH 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

AGS Law was approved by the court on September 22, 2020. AGS Law is a low-risk entity that reports quarterly. AGS Law reported initiating 15 consumer legal services from January 2021 through March 2021. Seven of the 15 services sought remained open during the month of March 2021. All of the legal services fell under the category of business. All consumer engagements were completed by a lawyer or lawyer employee during the reporting period. AGS was green (satisfactory; no to low risk) in all three categories of consumer risk-related complaints (Table 11). AGS Law is a low-risk entity, due to non-lawyer ownership, and will be assessed for risk by monitoring consumer complaints across three risk categories on a quarterly basis. AGS was categorized as green (satisfactory) overall regarding risk for this reporting period.

Table 11. Consumer Risk Assessment: AGS Law, January 2021 - March 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%

SEPTEMBER 2020 - MARCH 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

Since Sandbox approval during September of 2020, AGS Law has reported 18 legal services sought all under the legal category of business. Eleven of the 18 services have closed as of the end of March 2021, and seven of the 18 services remained open as of March 2021. All consumer engagements were completed by a lawyer or lawyer employee during the first two reportable quarters. AGS was green (satisfactory) in all three categories of consumer risk-related complaints (Table 12).

Table 12. Consumer Risk Assessment: AGS Law, September 2020 - March 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



ESTATE GURU

APRIL 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

Estate Guru Law began offering Utah Sandbox qualifying services during December 2020. Estate Guru is a moderate-risk entity, due to non-lawyer provision of legal services, that reports monthly. During April 2021, Estate Guru reported 49 consumer legal services. All 49 legal services were opened and closed during the month of reporting and fell under the category of End-of-Life Planning. 30 of the services sought were full representation, and 19 services sought were limited assistance for documentation preparation. There was a 100% match between legal services sought and legal services received. The legal outcome for all closed legal matters was drafting end of life documents. 49 of consumer engagements were completed by a software provider with lawyer involvement. Five of the 49 services were paid services (meaning that 44 services cost \$0). The mean average cost across all monthly end of life services was \$57 (per closed service including those costing \$0). Given paying for service (n=5), the mean average was \$560. The most typical payment for a service, assuming payment, was between \$500 and \$650. The service charge for all limited assistance services was \$0. The 5 service charges were for full representation. The amount paid spread across all full representation services provided (n=30) was \$93 (mean average). The ratio of the amount paid to end of life legal service was \$57:1. The average number of services per unique client was 3.1. All unique clients (n=16) experienced at least one full representation service. The average service cost per unique client was \$175. The overall cost per bundle of client end of life document drafting was therefore also \$175. With zero risk-related complaints, Estate Guru was green (satisfactory) in all three categories of consumer risk-related complaints (Table 13). There was also a 100% match between services sought and received, which further diminished actualized risk. All services received were linked to an applicable material outcome. The per client and per service cost also seemed reasonable. Estate Guru is a moderate-risk project, due to nonlawyer service provision with lawyer involvement, and will be assessed for risk by monitoring consumer complaints across three risk categories, service sought versus received, outcomes, and cost of services on a monthly basis. Estate Guru was categorized as green (satisfactory) overall regarding risk for this reporting period. During May, the preliminary audit process with Estate Guru will also begin.

Table 13. Consumer Risk Assessment: Estate Guru, April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



DECEMBER 2020 - APRIL 2021 CUMULATIVE ACTUALIZED RISK ASSESSMENT: GREEN - SATISFACTORY

Estate Guru Law was approved by the court on October 2, 2020 and began offering Utah Sandbox qualifying services during December 2020. Estate Guru is a moderate-risk entity, due to non-lawyer software provision of legal services, that reports monthly. To date, Estate Guru customers/clients sought 247 legal services from December 2020 to April 2021. All legal services were opened and closed during the month they were opened and fell under the category of End-of-Life Planning. Note that one service opened at the end of March and closed in the beginning of April was not captured in the March data report but was captured here. 158 of the services were delivered by full representation, and 89 services were delivered as limited assistance for documentation preparation. There was a 100% match between legal services sought and legal services received. The legal outcome for all closed legal matters was drafting end of life documents. 245 engagements were completed by a software provider with lawyer involvement, and the remaining two involved software completion of forms/documents only. Thirty-nine of the 247 services were paid services (meaning that 214 services cost \$0). The mean average cost across all monthly end of life services was \$78 (per closed service including those costing \$0). Given paying for service (n=39), the mean average was \$494. The most typical payment for a service, assuming payment, was approximately \$100 or \$650 (bimodal average). The service charge for all limited assistance services was \$0. The 39 service charges were for full representation. The amount paid spread across all full representation services provided (n=108) was \$178 (mean average). The ratio of the amount paid to end of life document preparation service was \$78:1. The average number of services per unique client was 3.7. All of the unique clients (n=69) experienced at least one full representation service. The average service cost per unique client was \$279. The overall cost per bundle of client end of life document drafting was therefore also \$279. With zero risk-related complaints, Estate Guru was green (satisfactory) in all three categories of consumer risk-related complaints (Table 14). There was also a 100% match between services sought and received, which further diminishes actualized risk. All services received were linked to an applicable material outcome. The per client and per service cost also seemed reasonable, and the amounts charged (most charges fell within the range of \$350 to \$650). Estate Guru is a moderate-risk project, due to nonlawyer service provision with lawyer involvement, and will be assessed for risk by monitoring consumer complaints across three risk categories, service sought versus received, outcomes, and cost of services on a monthly basis. Estate Guru was categorized as green (satisfactory; no to low risk) overall regarding risk for this reporting period.

Table 14. Consumer Risk Assessment: Estate Guru, December 2020 and April 2021.

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



FOCL LAW

APRIL 2021 ACTUALIZED RISK ASSESSMENT: **NOT APPLICABLE (NO SERVICE)**

FOCL Law was approved by the court on September 20, 2020 and was approved as a low/moderate risk entity. FOCL Law will primarily be assessed for consumer harm by monitoring complaints, which includes reasonable data quality and timely response. FOCL Law reported no services offered during April 2021 and therefore the month of April was noted as not applicable.

FEBRUARY - APRIL 2021 ACTUALIZED RISK ASSESSMENT: **GREEN (FEBRUARY) - SATISFACTORY**

FOCL Law was approved by the court on September 20, 2020 and was approved as a low/moderate risk entity. FOCL Law will primarily be assessed for consumer harm by monitoring complaints, which includes reasonable data quality and timely response. FOCL Law reported on services offered during February 2021. FOCL Law provided one service for a fee of \$100 for software document/form completion related to marriage/family law. It is assumed that this service is still open as of April. There have been no risk-related complaints (Table 15). However, FOCL Law offered no services during March and April of 2021 and was not given a risk rating for the months of March and April.

Table 15. Consumer Risk Assessment: FOCL Law, February - April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



R & R GROUP / THE FIDUCIARY LAW GROUP

APRIL 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

R&R Group was approved by the court on September 21, 2020 and began offering Utah Sandbox qualifying services during January 2021. R&R Group is a low/moderate-risk entity due to >50% non-lawyer ownership and being employed/managed by a non-lawyer. As pertinent to the April data report, 2 new services initiated in April. All legal services were delivered by a lawyer/lawyer employee. Both of the services initiated during April fell under the category of end of life planning. With zero risk-related complaints, R&R Group was green (satisfactory) in all three categories of consumer risk-related complaints. R&R Group was categorized as green (satisfactory) overall regarding risk for this reporting period.

JANUARY 2021-APRIL 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

R&R Group has delivered 15 services in the area of end of life planning and 1 in the area of business. R&R Group is a low/moderate-risk entity due to >50% non-lawyer ownership and being employed/managed by a non-lawyer. During the first two reporting periods, R&R Group reported 4 services (January=1; February=3). However, subsequent follow-up in the March and April reporting periods supported that services initiated during February should be updated to 9. Previously unreported services that initiated in late February were reported during March and substantiated in this reporting period. 14 of the 16 services remained open as of the April reporting window. R&R Group reported one service during January, nine services during February, four services during March, and two services during April. 14 of the 16 services remained open during the April reporting period and the remaining two services were abandoned-- both of the abandoned services fell under End of Life Planning. All of the legal services for January through April were completed by a lawyer/lawyer employee. With zero risk-related complaints, R&R Group was green (satisfactory) in all three categories of consumer risk-related complaints (Table 15). R&R Group was categorized as green (satisfactory) overall.

Table 16. Consumer Risk Assessment: The Fiduciary Law Group, January 2021 to April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



TANNER, LLC

JANUARY-MARCH 2021 ACTUALIZED RISK ASSESSMENT: **WITHDRAW - EXITED SANDBOX**

Tanner LLC was approved by the court on December 9, 2020 and began offering Utah Sandbox qualifying services during January 2021. Tanner, LLC is a low/moderate-risk entity due to >50% non-lawyer ownership and being employed/managed by a non-lawyer. Tanner, LLC., reported 5 legal services during January and 1 during February. Three of the five legal services were opened and closed during the month that they opened. All legal services fell under the legal category of business. As of February reporting, one service remained open. All legal services were completed by a lawyer/lawyer employee. With zero risk-related complaints, Tanner LLC was green (satisfactory) in all three categories of consumer risk-related complaints during January and February (Table 17). During March 2021, Tanner, LLC., requested to withdraw (exit) the Sandbox due to losing the entity's attorney and lacking intent to replace the attorney.

Table 17. Consumer Risk Assessment: Tanner LLC, January 2021 to February 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



DBA LAWPAL

APRIL 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

DBA LawPal was approved by the court on September 22, 2020 and began offering Utah Sandbox qualifying services late January 2021. LawPal is a low/moderate-risk entity due to >50% non-lawyer ownership. LawPal reported 1 legal services starting during April 2021. The services remained open during April. The legal services fell under the legal category of Marriage and Family and were completed by a software provider with lawyer involvement for legal document/ form completion only. \$0 were paid for services during the April reporting period. During the April reporting period a complaint was reported for a service initiated during April 2021 (Table 18). The cost of the disputed service was noted as \$199 during the March report but was reduced to \$0 during the April reporting period. The consumer submitted a complaint that the purchased product was not received. LawPal attempted to follow-up to resolve the disputed result, and LawPal refunded the \$199 paid amount after the consumer was unresponsive to follow-up. This complaint will be noted in the cumulative complaints. LawPal was categorized as green (satisfactory) overall regarding risk for this reporting period, due to no risk-related complaints.

JANUARY/FEBRUARY 2021-APRIL 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

DBA LawPal reported 34 legal services sought during January/February-April of 2021 (two services from late January were linked to the February data report). 33 of the 34 services remained open as of the April reporting period. All legal services fell under the legal category of Marriage and Family. All legal services were completed by a software provider with lawyer involvement for legal document/form completion only. One complaint linked to results was made for service initiated during March (as noted above). The Office addressed the complaint with LawPal and found that the company had addressed the complaint through outreach and refunding of money paid by the consumer. The Office notes that one complaint represents 2.9% of LawPal’s services and does not, on its own, reach the threshold level of harm requiring regulatory action.

Table 18. Consumer Risk Assessment: DBA LawPal, January/February 2021 to April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	1	2.9%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



LAW ON CALL

APRIL 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

Law On Call was approved by the court on December 9, 2020 and began offering Utah Sandbox qualifying services during April of 2021. Law On Call is a moderate-risk entity due to >50% non-lawyer ownership, lawyer employed/managed by a nonlawyer, and nonlawyer service provision with lawyer involvement. LawPal reported 7 legal services starting during April 2021. Five of the 7 services closed during April-- two services remained open. Five of the legal services fell under the legal category of Business, and two were categorized as End of Life Planning. All services completed by a lawyer/lawyer employee. \$198 were paid for services during the April reporting period; the cost of both services was \$99. Both services with payments were under the legal category of Business for the service sought of form/document completion. Three of the five services sought matched. The two mismatches shifted from legal advice sought to question answered not legal advice received. Neither of the mismatches included a paid amount. During the April reporting period, zero complaints were reported for a service initiated during April 2021 (Table 19). Law On Call was categorized as green (satisfactory) overall regarding risk for this reporting period, due to no risk-related complaints. Additionally, there was no evidence that supported inaccurate or inappropriate rights, results, or payments.

Table 19. Consumer Risk Assessment: Law On Call, April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



ROBERT DEBRY & ASSOCIATES

APRIL 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

Robert DeBry & Associates was approved by the court on March 22, 2021 and began offering Utah Sandbox qualifying services during April of 2021. Robert DeBry & Associates is a low/moderate-risk entity due to >50% non-lawyer ownership and lawyer employed/managed by a nonlawyer. Robert DeBry & Associate reported 72 legal services initiating during April 2021. All of those services remained open during the month of April. The 72 services were categorized as Accident/Injury. All services completed by a lawyer/lawyer employee. During the April reporting period, zero complaints were reported (Table 19). Robert DeBry & Associates was categorized as green (satisfactory) overall regarding risk for this reporting period, due to no risk-related complaints. Robert DeBry began the process to withdraw from the Sandbox in early May due to the law firm’s sale to a lawyer and therefore shifting out of Sandbox qualifying alternative business structures.

Table 19. Consumer Risk Assessment: Robert DeBry & Associates, April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%



PEARSON & BUTLER

APRIL 2021 ACTUALIZED RISK ASSESSMENT: **GREEN - SATISFACTORY**

Pearson & Butler was approved by the court on March 22, 2021 and began offering Utah Sandbox qualifying services during April of 2021. Pearson & Butler is a moderate-risk entity due to >50% non-lawyer ownership, fee sharing, lawyer employed/managed by a nonlawyer, and nonlawyer provider with lawyer involvement. Pearson & Butler reported 78 legal services initiating during April 2021. 73 of the 78 services remained open during the month of April; the 5 completed services were closed. The services were categorized as: Accident/Injury=12; Business=20; Criminal=2; Employment=1; End of Life=10; Financial=11; Immigration=9; Marriage/Family=7; and Other=6 (other was noted as civil litigation; it was recommended, prior to the next reporting period, to re-categorize services currently categorized as Other). \$19,488 was paid for services. Three of the services cost <\$500 and two of the services cost >\$7800. The high cost services were linked to Marriage and Family or Business. Currently, Pearson & Butler is reporting as a low/moderate risk entity since they are only providing services through an alternative business structure and not unconventional providers of service. When services are being offered by nonlawyer providers with lawyer oversight, those higher risk services will include information of services sought/received as well as outcomes. All services to date have been completed by a lawyer/lawyer employee. During the April reporting period, zero complaints were reported for a service initiated during the month (Table 20). Pearson & Butler was categorized as green (satisfactory) overall regarding risk for this reporting period, due to no risk-related complaints.

Table 20. Consumer Risk Assessment: Pearson & Butler, April 2021

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	0	0%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%

