



Office of Legal Services Innovation
An Office of the Utah Supreme Court

INNOVATION OFFICE ACTIVITY REPORT

SEPTEMBER 2021

DRAFTED OCTOBER 19, 2021

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OVERALL METRICS

Total Applications Received	51
Applicants Recommended to Court for Authorization	32
Applicants Denied Recommendation from Innovation Office	2
Applicants Denied Authorization by Court	0
Applicants Tabled (referral fees)	8
Inactive or Withdrawn Applicants Before Recommendation	9
Currently Under Office Review	3
Recommended to Court for Authorization Decision	1
Authorized Entities	31 (including 2 withdrawn)
Entities Reporting Data (this month)	12
Entities Recommended to Exit the Sandbox	0
Key Risks and Trends	There was 1 reported consumer-related complaint, linked to legal rights, from reporting entities during the September activity period.



EXECUTIVE SUMMARY

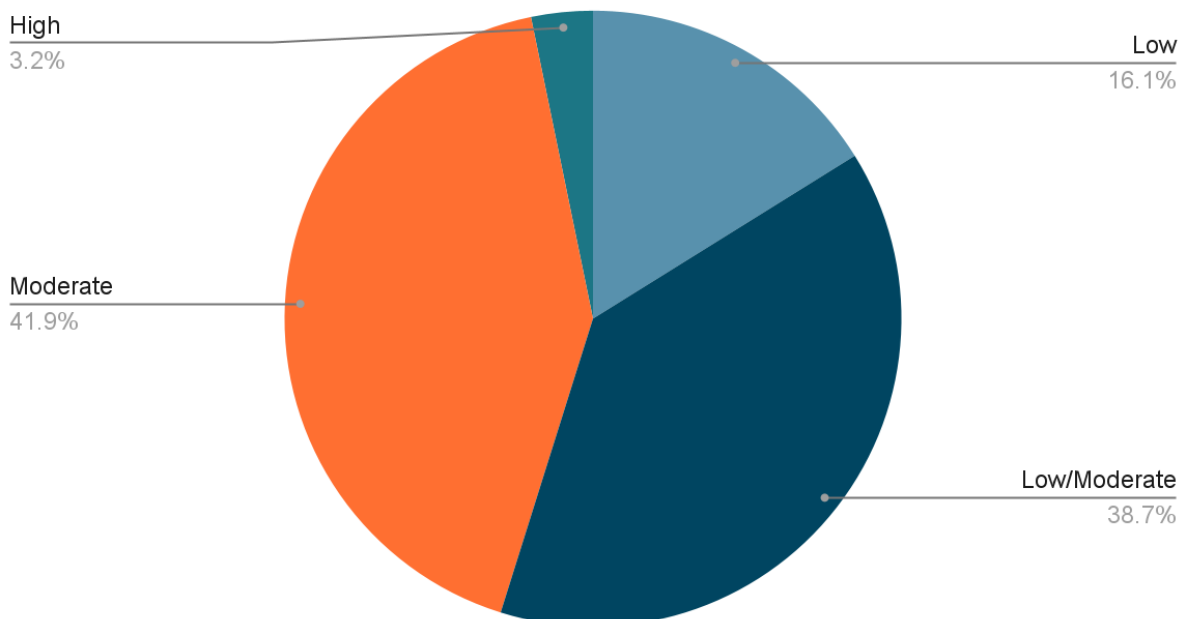
This report summarizes activities and negative risk assessment of entities approved by the Utah Supreme Court to implement legal services within the Utah Sandbox and monitored by the Office of Legal Services Innovation. This report covers the period of October 2020 through September 2021.

SANDBOX ACTIVITY (OCTOBER 2020 - SEPTEMBER 2021)

Entities Authorized to Offer Sandbox Legal Services

- 31 entities approved to offer services

Entities Authorized



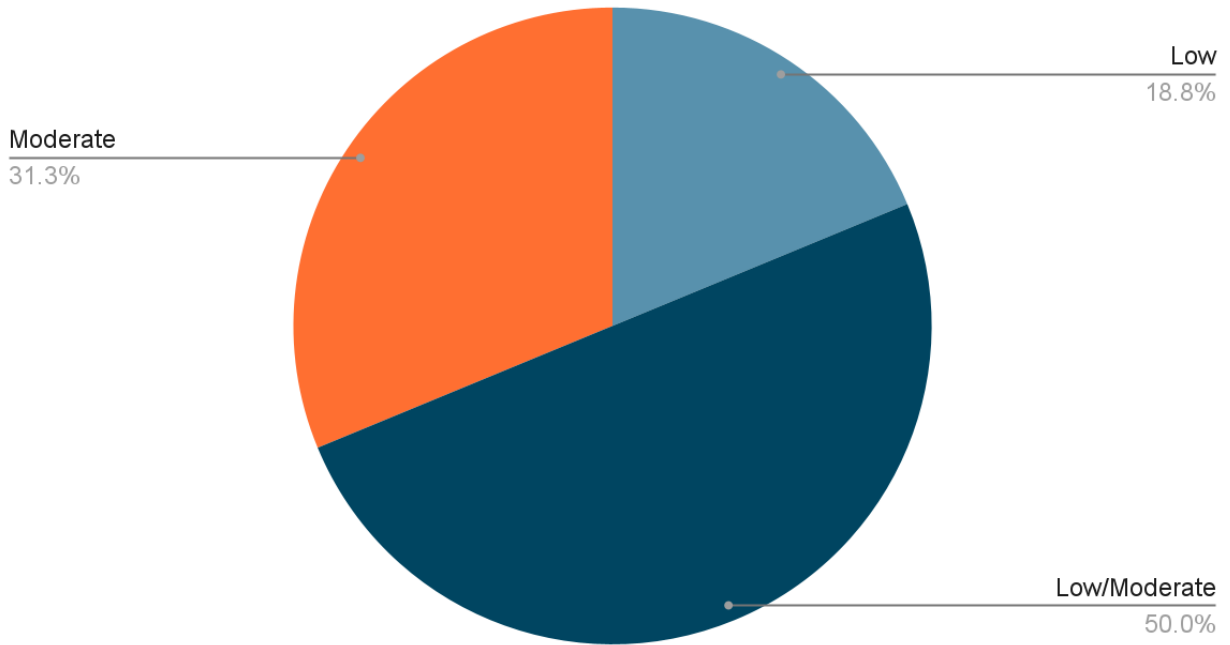
- o Low Risk=5 (AGS Law, Blue Bee, Firmly, Hello Divorce, Rocky Mountain Legal)
- o Low/Moderate=12 (Gregory Hawkins, FOCL Law, Jordanelle Blocks, LawPal, Legal Atoms, Legal Claims, Inc., Mountain West Legal Protective, R&R, Robert Debry & Associates, Rocket Lawyer, Tanner, Xira)
- o Moderate=13 (1Law, Davis & Sanchez, DSD Solutions, Estate Guru, Holy Cross Ministries, LawGeex, Law HQ, Law on Call, Nuttall, Brown & Coutts, Off the Record, Pearson Butler, Sudbury Consulting, Timpanogos Legal Center)
- o High=1 (AAA Fair Credit)



Authorized Entities Reporting Data through September 2021

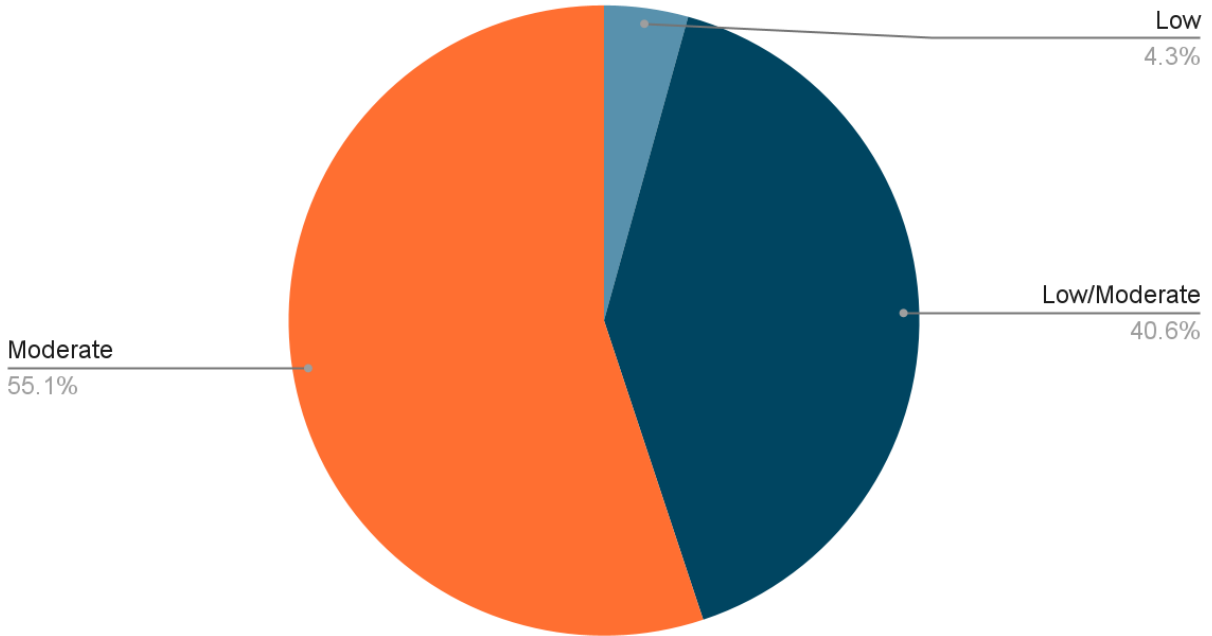
- 16 entities reporting data to date; 12 reporting this period
 - 3 low risk entities; 8 low/moderate risk entities; 5 moderate entities

Entities Reporting Data to Date



Proportion of Services by Entity and Legal Categories Addressed

Legal Services by Entity Risk



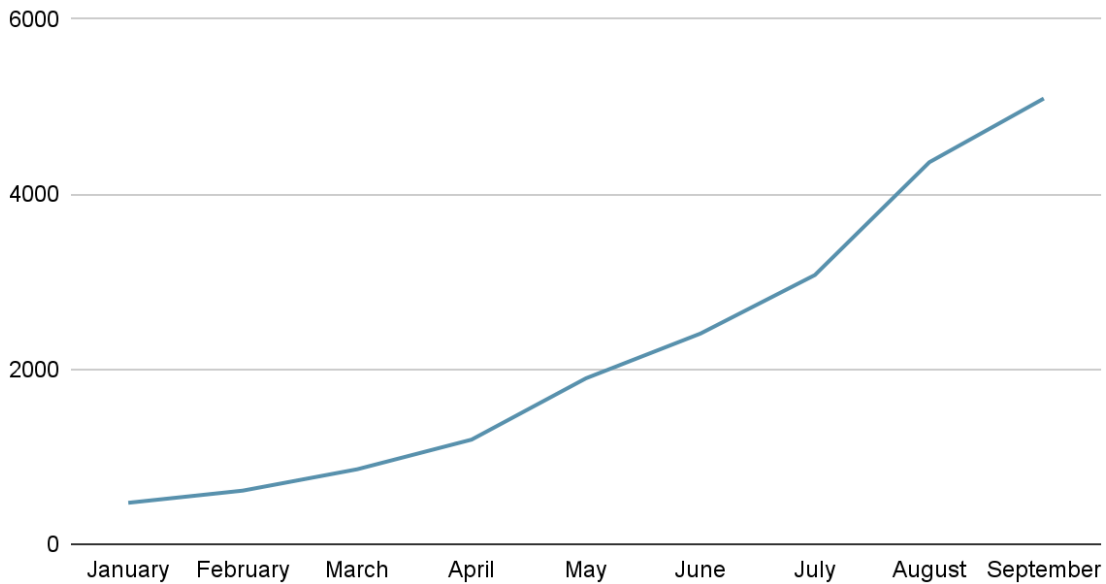
- 5093 legal services sought from approximately 4000 unduplicated clients
 - Low=219 legal services sought (3 entities); Low/Moderate=2068 legal services sought (8 entities); Moderate=2806 legal services sought (5 entities)
 - 55% of legal services produced via moderate risk entities
 - 4557 legal services have been delivered by a lawyer (or lawyer employee) or software for form or document completion only with lawyer involvement
 - 536 legal services have been delivered by non-lawyers (software or person) with lawyer involvement
- **Legal Categories Addressed by Service**
 - The rank of legal category addressed has been:
 - 1) Accident/Injury [26.1%]
 - 2) Business [21.2%; e.g., intellectual property, contracts/warranties, and entity incorporation]
 - 3) End of Planning [14.5%];
 - 4) Marriage/Family [10.9%];
 - 5) Financial [e.g., individual bankruptcy and collections practices; 6.8%];



- o Five legal categories accounted for 79% of legal services. The remaining 15 possible legal categories accounted for 21%.
- o The top three categories accounted for 62% of legal service.

Growth of Services Across Time

Cumulative Legal Services by Month (2021)



Complaints and Audits

- To date, entities have reported three complaints to the Office, approximately 1 complaint per ~1273 services delivered. The first complaint was reported in the April report and was linked to the harm of an inappropriate/inaccurate legal result. The second complaint was reported in the May report but was not linked to any of the three harms. The third and fourth complaints were linked to exercising legal rights and were reported during June and September 2021 respectively. The ratio of harm-related complaints to services was approximately 1 complaint per ~1698 services. The entity response to harm-related complaints has been adequate and acceptable as related to harm mitigation and prevention.



Consumer Complaint Assessment: All Reporting Entities to Date

Complaint Harm Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	1	<0.02%
Consumer fails to exercise legal rights through ignorance or bad advice.	2	<0.04%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%

- o Audit materials have been collected from two moderate risk entities and reviewed for one.

TABLE 1: AUTHORIZED ENTITIES

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



	Moderate	nonlawyers	Adult Care
			Business
			Criminal Expungement
			Criminal (Other)
			Discrimination
			Domestic Violence
			Education
			Employment
			End of Life Planning
		50+% non lawyer ownership	Consumer Financial Issues
			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+% non lawyer ownership	Consumer Financial Issues
			Healthcare
			Marriage and Family
			Public Benefits
14 - FOCL Law	Low /	Lawyers employed / managed by	Marriage and Family



	Moderate	nonlawyers	
		50+% non lawyer ownership	
		Software provider /w lawyer - doc completion	
32 - Tanner LLC (Withdrawn from Sandbox)	Low / Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% non lawyer ownership	
33 - Xira Connect	Low / Moderate	50+% non lawyer ownership	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Discrimination
			Domestic Violence
		Fee Sharing	Education
			Employment
			End of Life Planning
			Consumer Financial Issues
			Healthcare
			Housing (Rental)
		Intermediary Platform	Immigration
			Marriage and Family
			Military
Native American / Tribal			
Public Benefits			
			Real Estate
			Traffic Citations
37 - Robert DeBry (Withdrawn form Sandbox)	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury



		50+% non lawyer ownership	
38 - Davis & Sanchez	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
		50+% non lawyer ownership	Education
39 - Legal Claims Benefits (Trajector Legal)	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Education
		50+% non lawyer ownership	Healthcare
			Military
Public Benefits			
41 - Mountain West Legal Protective	Low / Moderate	Lawyers employed / managed by nonlawyers	Housing - Rental
		50+% non lawyer ownership	Real Estate
02 - 1Law	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Criminal (Other)
		50+% non lawyer 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+% non lawyer ownership	Business
		Software provider w/ lawyer involvement	Employment
12 - Nuttall Brown	Moderate	Lawyers employed / managed by nonlawyers	Accident Injury
		50+% non lawyer 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+% non lawyer 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+% non lawyer 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+% non lawyer ownership	Accident / Injury
			Adult Care
			Business
			Discrimination
			Education
		Fee Sharing	Employment
			End of Life Planning
			Consumer Financial Issues
			Housing (Rental)
			Immigration
		Non-lawyer provider w/ lawyer involvement	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+% non lawyer ownership	Consumer Financial Issues
			Housing (Rental)
		Non-lawyer provider w/ lawyer involvement	Real Estate
		31 - DSD Solutions	Moderate
Business			
Criminal Expungement			
50+% non lawyer 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	Nonlawyer provider w/out lawyer involvement	Domestic Violence
			Marriage and Family
40 - Utah Legal Advocates	Moderate	Nonlawyer provider w/ Lawyer Involvement	Domestic Violence
		Fee Sharing	Marriage and Family
42 - Jordanelle Blocks	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% non lawyer 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+% non lawyer 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	Jul. 1, 2021	Oct. 5, 2021	Quarterly
Hello Divorce	Low	Aug. 1, 2021	Nov. 5, 2021	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	Feb. 1, 2021	Mar. 5, 2021	Monthly
FOCL Law	Low-Moderate	Jan. 1, 2021 Oct. 1, 2021 (relaunch)	Feb. 5, 2021	Monthly
Xira Connect	Low- Moderate	Sept. 1, 2021	Oct. 5, 2021	Monthly
Davis & Sanchez	Low-Moderate	Jul. 1, 2021	Aug. 5, 2021	Monthly
Legal Claims Benefits	Low-Moderate	Aug. 15, 2021	Sept. 5, 2021	Monthly
1Law	Moderate	Oct. 1, 2020	Nov. 5, 2020	Monthly
LawHQ	Moderate	Sept. 1, 2021	Oct. 5, 2021	Monthly
Nuttal Brown	Moderate	Dec. 1, 2021	Jan. 5, 2022	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	Apr. 1, 2021	May. 5, 2021	Monthly
DSD Solutions	Moderate	Aug. 1, 2021	Sept. 5, 2021	Monthly
Pearson Butler	Moderate	Apr. 1, 2021	May 5, 2021	Monthly
Timp Cert. Legal Advocates	Moderate	Jun. 1, 2021	Jul. 5, 2021	Monthly
Mountain West Legal Protective	Moderate	Sept. 15, 2021	Oct. 5, 2021	Monthly
Jordanelle Blocks	Moderate	TBD	TBD	Monthly
Law Geex	Moderate	Nov.. 1, 2021	Nov. 5, 2021	Monthly
Holy Cross Ministries	Moderate	TBD	TBD	Monthly
AAA Fair Credit	High	TBD	TBD	Monthly



