



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

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# INNOVATION OFFICE ACTIVITY REPORT

## OCTOBER 2021

DRAFTED NOVEMBER 20, 2021

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## OVERALL METRICS

|   |  |
|---|--|
| Total Applications Received                             | 52   |
| 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| Inactive or Withdrawn Applicants Before Recommendation  | 9  |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| Authorized Entities                                     | 31 (including 2 withdrawn)   |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)                    | 9  |
| 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 October activity period. |



## EXECUTIVE SUMMARY

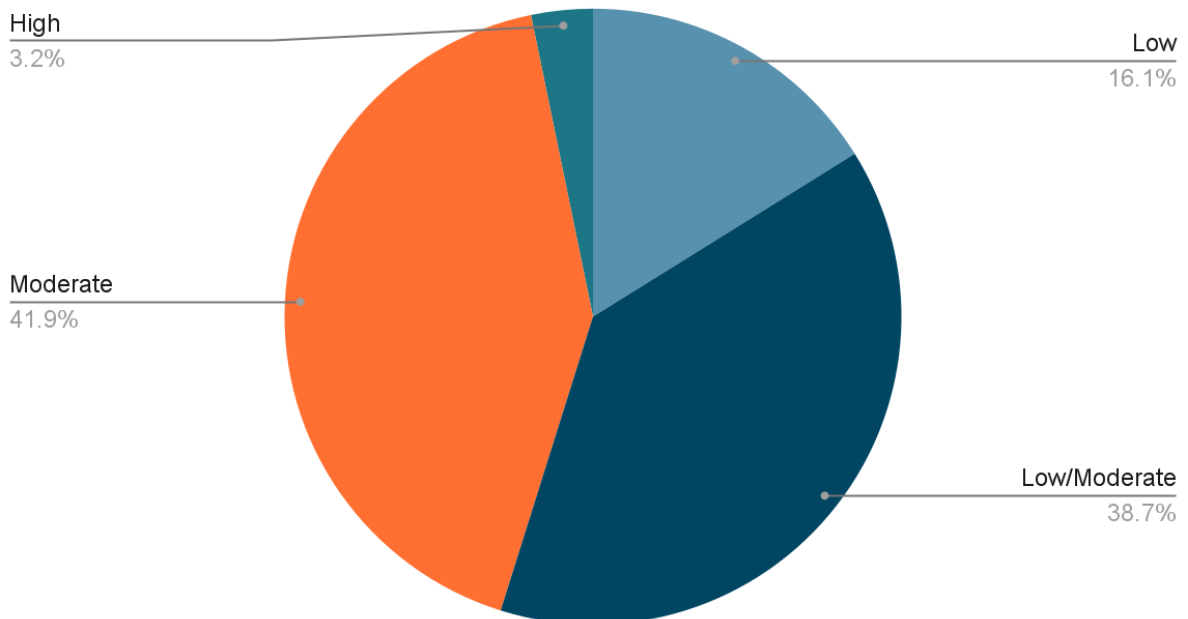
This report summarizes activities and negative risk assessment of entities approved by the Utah Supreme Court to implement legal services within the Utah Sandbox and monitored by the Office of Legal Services Innovation. This report covers the period of October 2020 through October 2021.

### SANDBOX ACTIVITY (OCTOBER 2020 - OCTOBER 2021)

#### Entities Authorized to Offer Sandbox Legal Services

- 31 entities approved to offer services

#### Entities Authorized



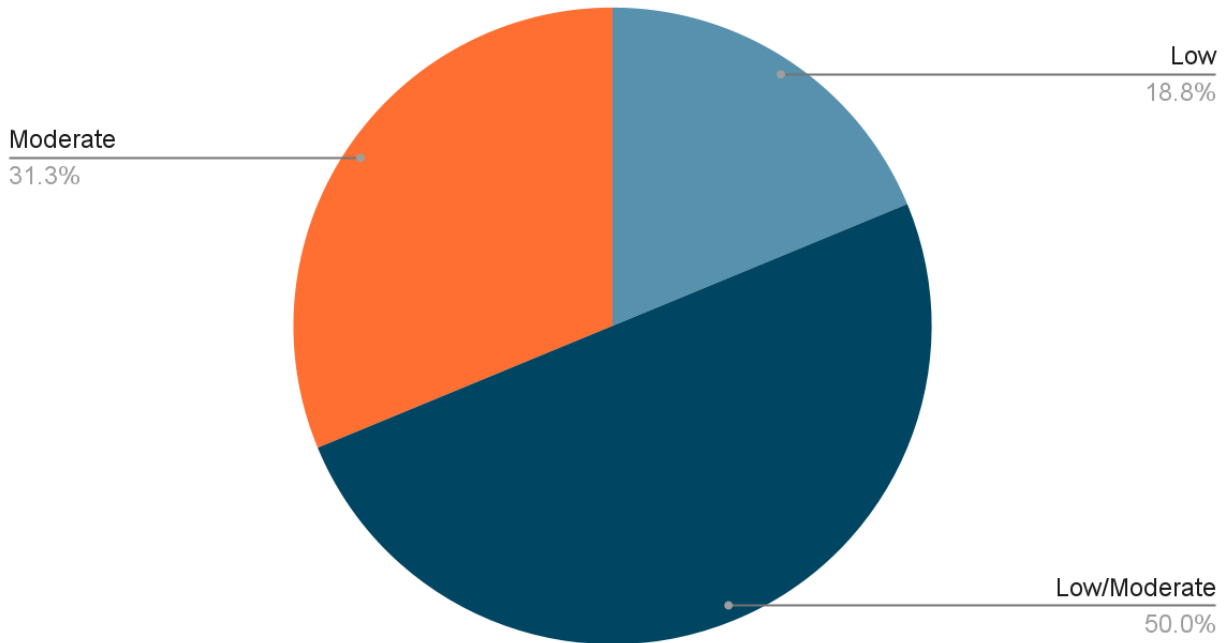
- o Low Risk=5 (AGS Law, Blue Bee, Firmly, Hello Divorce, Rocky Mountain Legal)
- o Low/Moderate=12 (Gregory Hawkins, FOCL Law, Jordanelle Blocks, LawPal, Legal Atoms, Legal Claims, Inc., Mountain West Legal Protective, R&R, Robert Debry & Associates, Rocket Lawyer, Tanner, Xira)
- o Moderate=13 (1Law, 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 October 2021

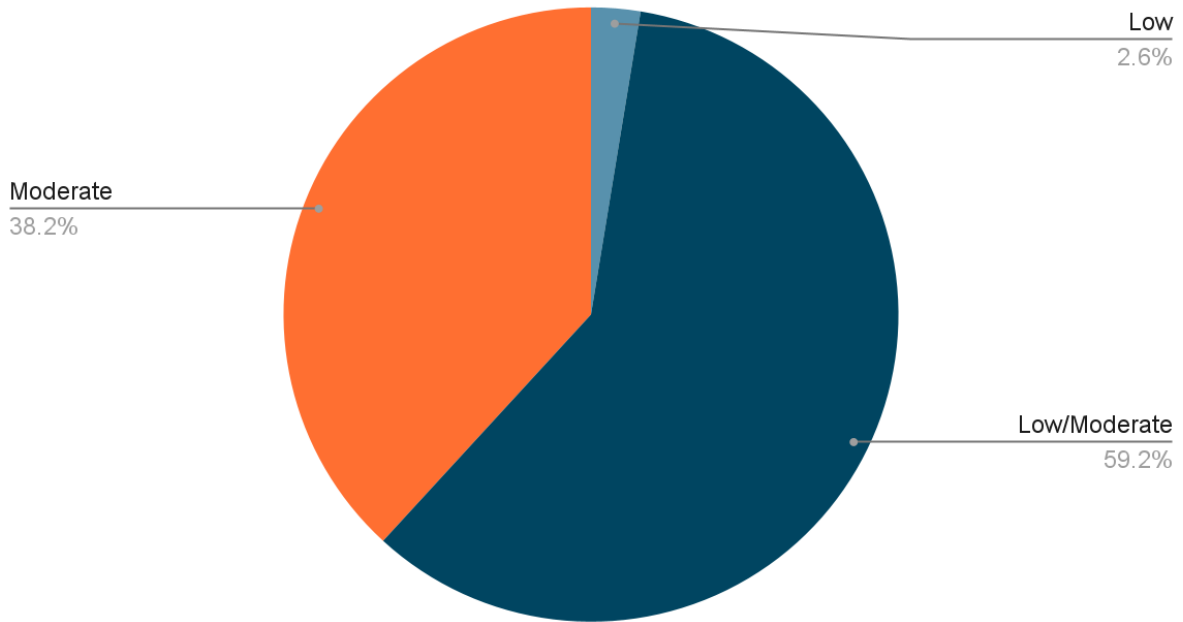
- 16 entities reporting data to date; 9 reporting this period
  - o 3 low risk entities; 8 low/moderate risk entities; 5 moderate entities

### Entities Reporting Data to Date



# Proportion of Services by Entity and Legal Categories Addressed

Legal Services by Entity Risk



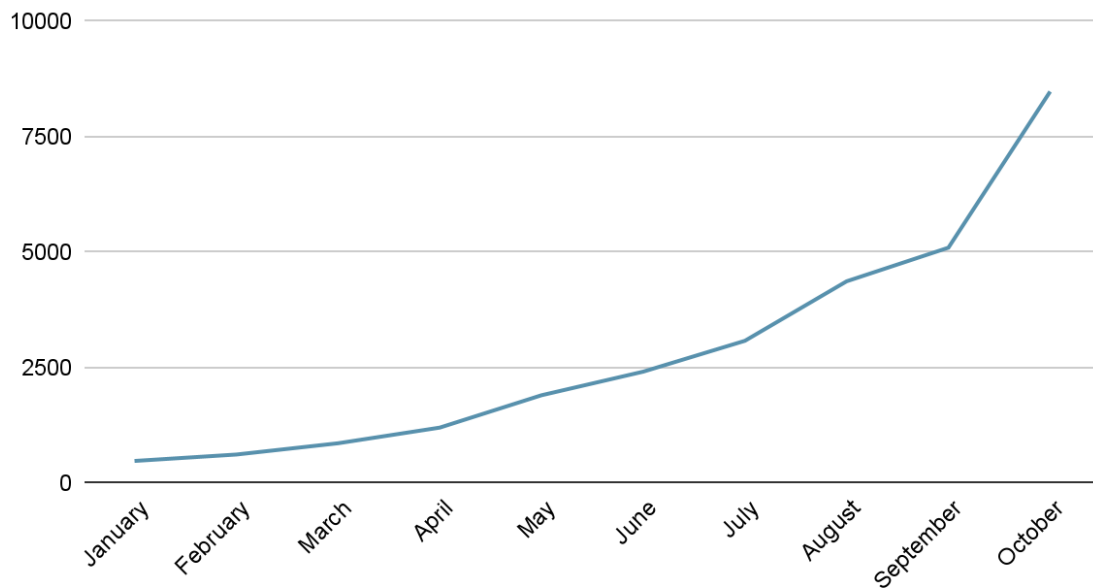
- 8475 legal services sought from >7000 unduplicated clients
  - Low=219 legal services sought (3 entities); Low/Moderate=5020 legal services sought (8 entities); Moderate=3236 legal services sought (5 entities)
  - 97% of legal services were produced via low/moderate or moderate risk entities
  - 7864 (93%) legal services have been delivered by a lawyer (or lawyer employee) or software for form or document completion only with lawyer involvement
  - 611 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) Military/Veterans Benefits [30.4%]
    - 2) Accident/Injury [18.8%]
    - 3) Business [15.5%; e.g., intellectual property, contracts/warranties, and entity incorporation]
    - 4) End of Planning [10.1%];
    - 5) Marriage/Family [6.8%];
    - 6) Financial [e.g., individual bankruptcy and collections practices; 4.3%];



- o Six legal categories accounted for 86% of legal services. The remaining 14 possible legal categories accounted for 14%.
- o The top four categories accounted for 75% of legal service.

## Growth of Services Across Time

Cumulative Legal Services by Month (2021)



## Complaints and Audits

- To date, entities have reported five complaints to the Office, approximately 1 complaint per ~1695 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, fourth, and fifth complaints were linked to exercising legal rights and were reported during June, September, October 2021 respectively. The ratio of harm-related complaints to services was approximately 1 complaint per ~2119 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                     | 0.01%                 |
| Consumer fails to exercise legal rights through ignorance or bad advice. | 3                     | <0.04%                |
| Consumer purchases an unnecessary or inappropriate legal service.        | 0                     | 0%                    |

- o Audit materials have been collected from three moderate risk entities, with one reviewed and another under review. The third is being prepared for external auditor review.

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 / 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+% 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 / Moderate | Lawyers employed / managed by nonlawyers     | Marriage and Family       |
|  |                | 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)       | Low / Moderate | Lawyers employed / managed by nonlawyers     | Accident / Injury         |



|  |                     |  |                           |
|--|---------------------|--|---------------------------|
| Sandbox)                                     |                     | 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           | Dec. 1, 2021                                    | Mar. 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<br>Dec. 1, 2021<br>(relaunch)      | Mar. 5, 2021     | Monthly   |
| FOCL Law                              | Low-Moderate  | Jan. 1, 2021<br>Nov. 1, 2021<br>(relaunch)      | Feb. 5, 2021     | Monthly   |
| Xira Connect                          | Low- Moderate | Dec.. 1, 2021                                   | Jan. 5, 2022     | 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      | Nov. 1, 2021                                    | Dec. 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<br>Jan.1 2022 (moderate<br>launch) | May 5, 2021      | Monthly   |
| Timp Cert. Legal Advocates            | Moderate      | Jun. 1, 2021                                    | Jul. 5, 2021     | Monthly   |
| Mountain West Legal Protective        | Moderate      | Dec. 1, 2021                                    | Jan. 5, 2022     | Monthly   |
| Jordanelle Blocks                     | Moderate      | TBD   | TBD              | Monthly   |
| Law Geex                              | Moderate      | Dec.. 1, 2021                                   | Jan. 5, 2022     | Monthly   |
| Holy Cross Ministries                 | Moderate      | TBD   | TBD              | Monthly   |





|                 |      |     |     |         |
|-----------------|------|-----|-----|---------|
| AAA Fair Credit | High | TBD | TBD | Monthly |
|-----------------|------|-----|-----|---------|

