



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

INNOVATION OFFICE ACTIVITY REPORT

EXECUTIVE SUMMARY

MARCH 2022

DRAFTED APRIL 13, 2022

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OVERALL METRICS

| | |
|---|---|
| Total Applications Received | 64 |
| Applicants Recommended to Court for Authorization | 42 |
| Applicants Denied Recommendation from Innovation Office | 2 |
| Applicants Denied Authorization by Court | 0 |
| Applicants Tabled (referral fees) | 9 |
| Inactive or Withdrawn Applicants Before Recommendation | 12 |
| Currently Under Office Review | 3 |
| Recommended to Court for Authorization Decision | 0 |
| Authorized Entities | 39 (plus 2 entities withdrawn; 41 total) |
| Entities Reporting Data (this month) | 16 |
| Entities Recommended to Exit the Sandbox | 0 |
| Key Risks and Trends | There were 0 reported consumer complaints during March 2022 |



EXECUTIVE SUMMARY

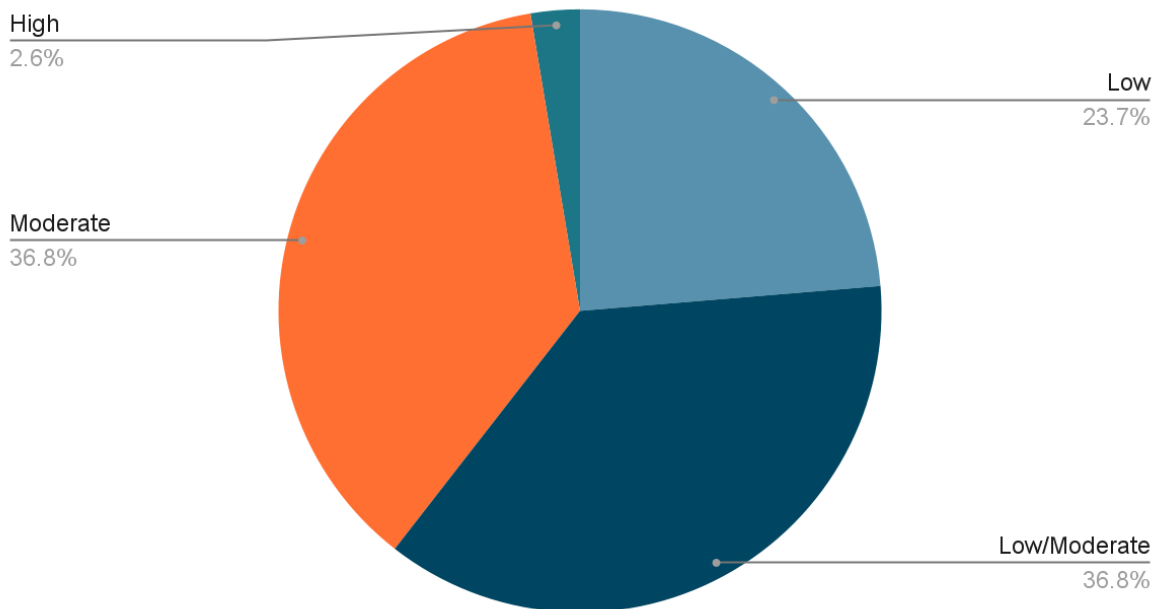
This report summarizes activities and negative risk assessment (i.e., harms) of entities approved by the Utah Supreme Court to implement legal services within the Utah Sandbox and monitored by the Office of Legal Services Innovation. This report covers the period of October 2020 through March 2022.

SANDBOX ACTIVITY (OCTOBER 2020 - MARCH 2022)

Active Entities Authorized to Offer Sandbox Legal Services

- 38 active entities approved to offer services

Entities Authorized



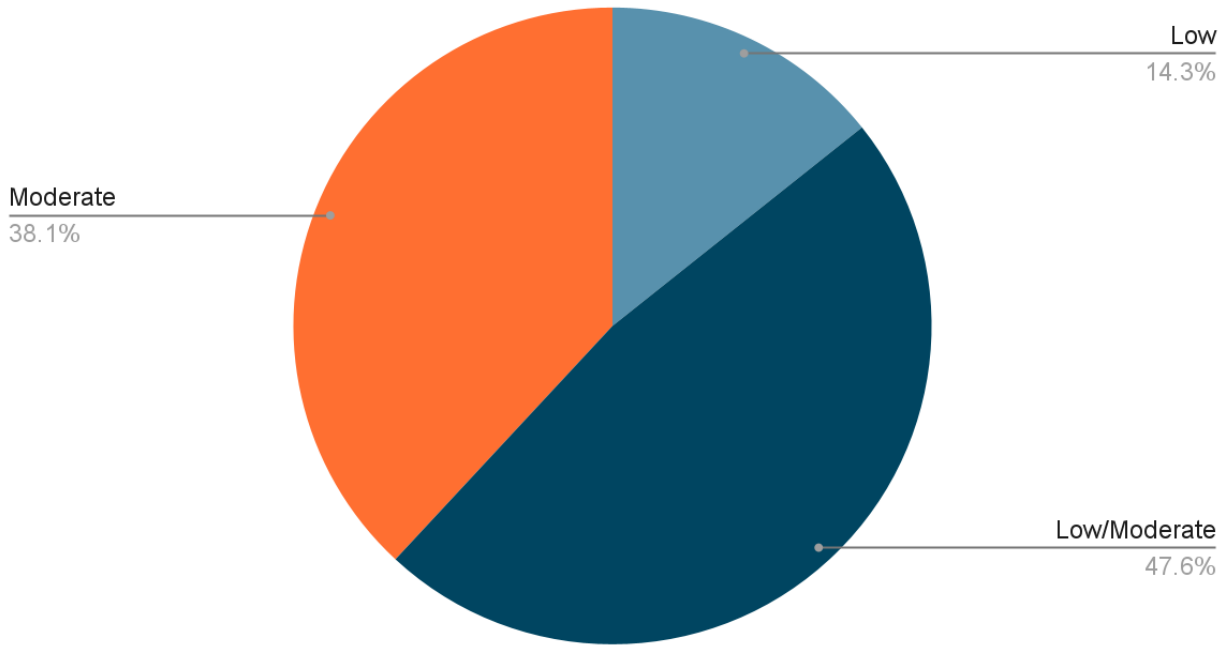
- o **Low Risk=9** (AGS Law, Believe First, Blue Bee, Credit Cop, Firmly, Hello Divorce, Rocky Mountain Justice, Saavi Technologies, Trajan Estate)
- o **Low/Moderate=14** (GovAssist Legal, Davis & Sanchez, FOCL Law, LawPal, Legal Atoms, Legal Claims, Inc. [Trajector Legal], Mountain West Legal Protective, My Immigration, PD Digital Logistics Design, R&R, Rocket Lawyer, Tanner, WayLit, Xira)
- o **Moderate=14** (1Law, DSD Solutions, Estate Guru, Holy Cross Ministries, Jordanelle Blocks, LawGeex, Law HQ, Law on Call, Nuttall, Brown & Coutts, Off the Record, Pearson Butler, Sudbury Consulting, Timpanogos Legal Center, Utah Legal Advocates)
- o **High=1** (AAA Fair Credit)



Authorized Entities Reporting Data through March 2022

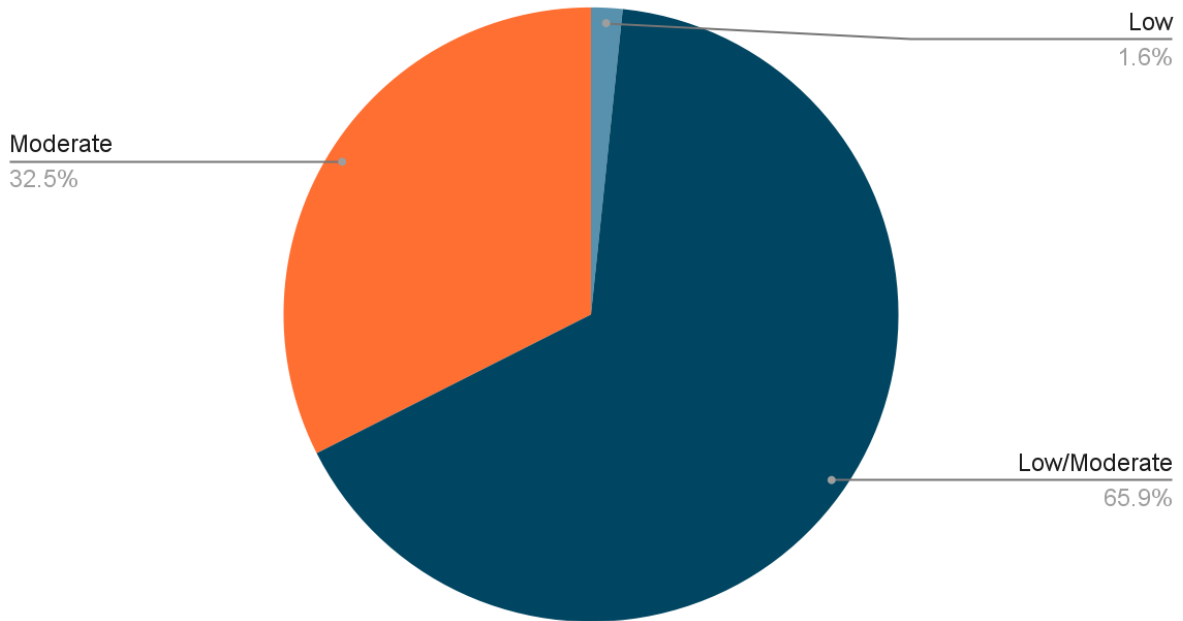
- 21 entities reporting data to date; 16 reporting this period
 - 3 low risk entities; 10 low/moderate risk entities; 8 moderate entities

Entities Reporting Data to Date



Proportion of Services by Entity Risk and Legal Categories Addressed through March 2022

Legal Services by Entity Risk



- 18,668 legal services sought from more than 10,000 unduplicated clients
 - Low=308 legal services sought; Low/Moderate=12,301 legal services sought; Moderate=6,059 legal services sought
 - 98% of legal services were produced via low/moderate or moderate risk entities
 - 17,097 (92%) legal services have been delivered by a lawyer (or lawyer employee) or software for form or document completion only with lawyer involvement
 - 1,571 legal services have been delivered by non-lawyers (software or person) with lawyer involvement

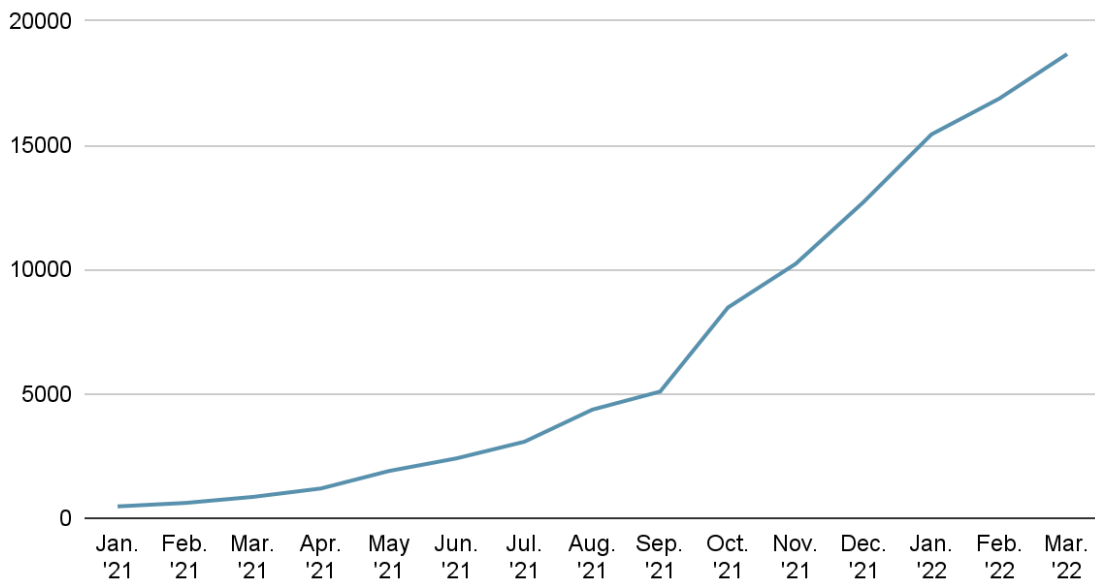
- *Legal Categories Addressed by Service*
 - The rank of legal category addressed has been:
 - 1) Military/Veterans Benefits [46.7%]
 - 2) Business [18.3%; e.g., intellectual property, contracts/warranties, and entity incorporation]
 - 3) Accident/Injury [11.2%]
 - 4) End of Life Planning [7.4%];



- 5) Marriage/Family [4.1%];
- 6) Financial [e.g., individual bankruptcy and collections practices; 3.5%];
- o Six legal categories accounted for 91% of legal services. The remaining 14 possible legal categories accounted for 9%.
- o The top three categories accounted for 76% of legal services.

Growth of Services Across Time

Cumulative Legal Services by Month



Complaints and Audits

- To date, entities have reported seven complaints to the Office, approximately 1 complaint per 2667 services delivered. The first complaint was reported in the April 2021 report and was linked to the harm of an inappropriate/inaccurate legal result. The second complaint was reported in the May 2021 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. Two complaints were reported during December 2021 but neither was harm-related. The ratio of harm-related complaints to services was approximately 1 complaint per ~4667 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 | <0.02% |
| Consumer purchases an unnecessary or inappropriate legal service. | 0 | 0% |

- o Audit materials have been collected from three moderate risk entities, with three reviewed. Audit reports were completed and distributed to the Executive Committee of the Office of Legal Services Innovation for 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 | |
| 51 - Rocky Mountain Justice | Low | <50% non lawyer ownership | Accident / Injury |
| 53 - Saavi Technologies | Low / Moderate | Lawyers employed / managed by nonlawyers | Business |
| | | Non lawyer ownership | |
| | | Lawyers sharing fees with | |



| | | | |
|---------------------|----------------|--|---------------------------|
| | | nonlawyers | |
| 57 - Believe First | Low | Lawyers employed / managed by nonlawyers | Adult Care |
| | | Non lawyer ownership | Business |
| | | Lawyers sharing profits with nonlawyers | Discrimination |
| | | | Domestic Violence |
| | | | Education |
| | | | Employment |
| | | | End of Life Planning |
| | | | Financial |
| | | | Healthcare |
| | | | Housing (Rental) |
| | | | Marriage and Family |
| | | | Public Benefits |
| Real Estate | | | |
| 60 - Trajan Estate | Low | Lawyers employed / managed by nonlawyers | End of Life Planning |
| | | Non lawyer ownership | |
| | | Lawyers sharing profits with nonlawyers | |
| 62 - Credit Cop | Low | Lawyers employed / managed by nonlawyers | Financial |
| | | Non lawyer ownership | |
| | | Lawyers sharing profits with nonlawyers | |
| 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 (Withdrew 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 |
| 48 - Legal Atoms | Low / Moderate | 50+% non lawyer ownership | Immigration |
| | | Software provider /w lawyer - doc completion | Marriage and Family |
| | | Fee sharing | Domestic Violence |
| | | | Housing - Rental |
| 50 - GovAssist Legal | Low / Moderate | Lawyers employed / managed by nonlawyers | Immigration |
| | | 50+% non lawyer ownership | |
| | | Fee sharing | |
| | | Software provider /w lawyer - doc completion | |
| 52 - My Immigration | Low / Moderate | Lawyers employed / managed by nonlawyers | Immigration |
| | | 50+% non lawyer ownership | |
| | | Lawyers sharing fees with nonlawyers | |
| | | Software provider /w lawyer - doc completion | |



| | | | |
|----------------------------------|----------------|--|----------------------|
| 59 - Waylit | Low / Moderate | Lawyers employed / managed by nonlawyers | Business |
| | | Non lawyer ownership | Employment |
| | | Intermediary platform | |
| 61 - PD Digital Logistics Design | Low / Moderate | Lawyers employed / managed by nonlawyers | Accident / Injury |
| | | Non lawyer ownership | Adult Care |
| | | Intermediary platform | Business |
| | | | Criminal Expungement |
| | | | Discrimination |
| | | | Domestic_Violence |
| | | | Education |
| | | | Employment |
| | | | End of Life Planning |
| | | | Financial |
| | | | Healthcare |
| | | | Housing (Rental) |
| | | | Immigration |
| | | | Marriage and Family |
| | | | Military |
| 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 | Lawyers employed / managed by nonlawyers | Accident / Injury |
| | | | 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 | Jul. 1, 2022 | Oct. 5, 2022 | Quarterly |
| Rocky Mountain Justice | Low | TBD | TBD | Quarterly |
| Saavi Technologies | Low | TBD | TBD | Quarterly |
| Believe First | Low | TBD | TBD | Quarterly |
| Trajan Estate | Low | TBD | TBD | Quarterly |
| Credit Cop | 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 |
| FOCL Law | Low-Moderate | Jan. 1, 2021 (relaunch TBD) | Feb. 5, 2021 | Monthly |
| LawPal | Low-Moderate | Feb. 1, 2021 May 1, 2022 (relaunch) | Mar. 5, 2021 Jun. 5, 2022 (relaunch) | Monthly |
| Davis & Sanchez | Low-Moderate | Jul. 1, 2021 | Aug. 5, 2021 | Monthly |
| Legal Claims Benefits (Trajector) | Low-Moderate | Aug. 15, 2021 | Sept. 5, 2021 | Monthly |
| My Immigration | Low-Moderate | Mar. 1, 2022 | Apr. 5, 2022 | Monthly |
| Xira Connect | Low- Moderate | Jun. 1, 2022 | Jul. 5, 2022 | Monthly |
| GovAssist Legal | Low-Moderate | Feb. 1, 2022 | Mar. 5, 2022 | Monthly |
| Legal Atoms | Low-Moderate | TBD | TBD | Monthly |
| Mountain West Legal Protective | Low-Moderate | TBD | TBD | Monthly |
| Waylit | Low-Moderate | TBD | TBD | Monthly |
| PD Digital Logistics Design | Low-Moderate | TBD | TBD | Monthly |
| 1Law | Moderate | Oct. 1, 2020 | Nov. 5, 2020 | Monthly |
| Estate Guru | Moderate | Dec. 1, 2020 | Jan. 5, 2021 | Monthly |
| Law on Call | Moderate | Apr. 1, 2021 | May 5, 2021 | Monthly |
| Pearson Butler | Moderate | Apr. 1, 2021 Apr.1 2022 (moderate launch) | May 5, 2021 May 5, 2022 (moderate launch) | Monthly |



| | | | | |
|---------------------------------------|----------|--------------|--------------|---------|
| Timp Cert. Legal Advocates | Moderate | Jun. 1, 2021 | Jul. 5, 2021 | Monthly |
| Law Geex | Moderate | Nov. 1, 2021 | Dec. 5, 2021 | Monthly |
| Nuttal Brown | Moderate | Dec. 1, 2021 | Jan. 5, 2022 | Monthly |
| LawHQ | Moderate | Mar. 1, 2022 | Apr. 5, 2022 | Monthly |
| Utah Legal Advocates | Moderate | Mar. 1, 2022 | Apr. 5, 2022 | Monthly |
| DSD Solutions | Moderate | Jun. 1, 2022 | Jul. 5, 2022 | Monthly |
| Sudbury Consulting / Code for America | Moderate | TBD | TBD | Monthly |
| Off the Record | Moderate | TBD | TBD | Monthly |
| Jordanelle Blocks | Moderate | TBD | TBD | Monthly |
| Holy Cross Ministries | Moderate | TBD | TBD | Monthly |
| AAA Fair Credit | High | TBD | TBD | Monthly |



MARCH 2022 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 inaccurate or inappropriate legal results.
- 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.

