



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

---

# INNOVATION OFFICE ACTIVITY REPORT

## *EXECUTIVE SUMMARY*

### JULY 2022

DRAFTED AUGUST 17, 2022

---

# Table of Contents

|  |    |
|--|----|
| Overall Metrics                                  | 1  |
| Executive Summary                                | 2  |
| Sandbox Activity (October 2020 - July 2022)      | 2  |
| Authorized Entities                              | 8  |
| Authorized Entities Reporting Statuses           | 18 |
| July 2022 Activity Risk Report - Harm Assessment | 20 |



## OVERALL METRICS

|   |   |
|---|---|
| Total Applications Received                             | 79  |
| Applicants Recommended to Court for Authorization       | 46  |
| Applicants Denied Recommendation from Innovation Office | 2   |
| Applicants Denied Authorization by Court                | 0   |
| Applicants Tabled (referral fees)                       | 10  |
| Inactive or Withdrawn Applicants Before Recommendation  | 13  |
| Currently Under Office Review                           | 10  |
| Recommended to Court for Authorization Pending Decision | 1   |
| Authorized Entities                                     | 42 (plus 2 entities withdrawn and 1 terminated after authorization; 45 total) |
| Entities Reporting Data (this month)                    | 16  |
| Entities Recommended to Exit the Sandbox                | 0   |
| Key Risks and Trends                                    | 1 non-harm related complaint was made for a sandbox service this month.       |



## EXECUTIVE SUMMARY

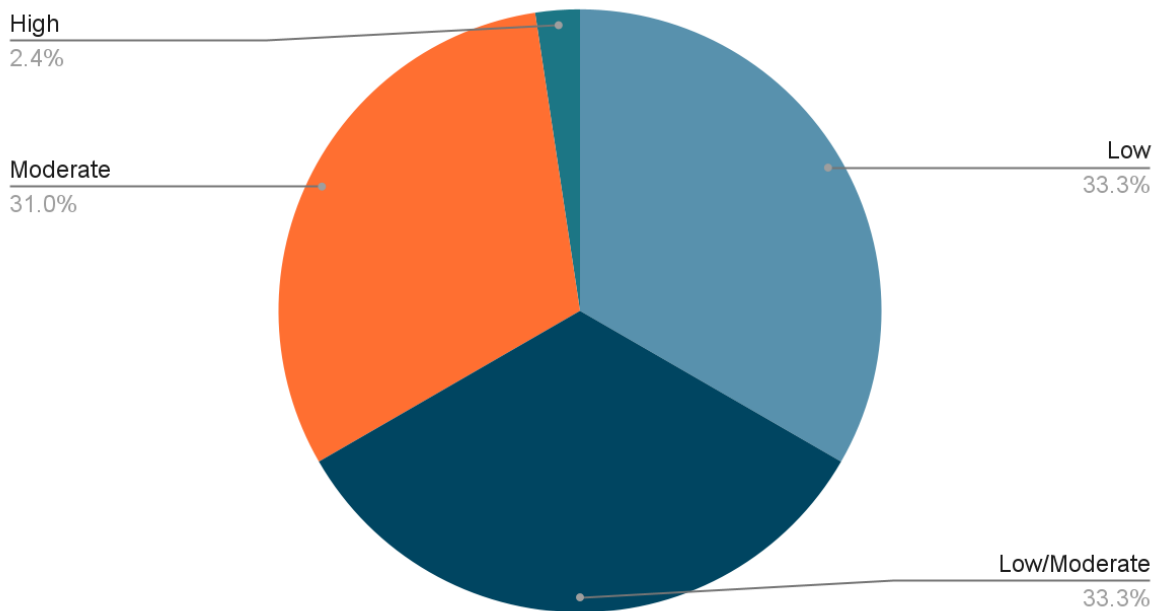
This report summarizes activities and negative risk assessment (i.e., harms) of entities approved by the Utah Supreme Court to implement legal services within the Utah Sandbox and monitored by the Office of Legal Services Innovation. This report covers the period of October 2020 through July 2022.

### SANDBOX ACTIVITY (OCTOBER 2020 - JULY 2022)

#### Active Entities Authorized to Offer Sandbox Legal Services

- 42 active entities approved to offer services

#### Entities Authorized



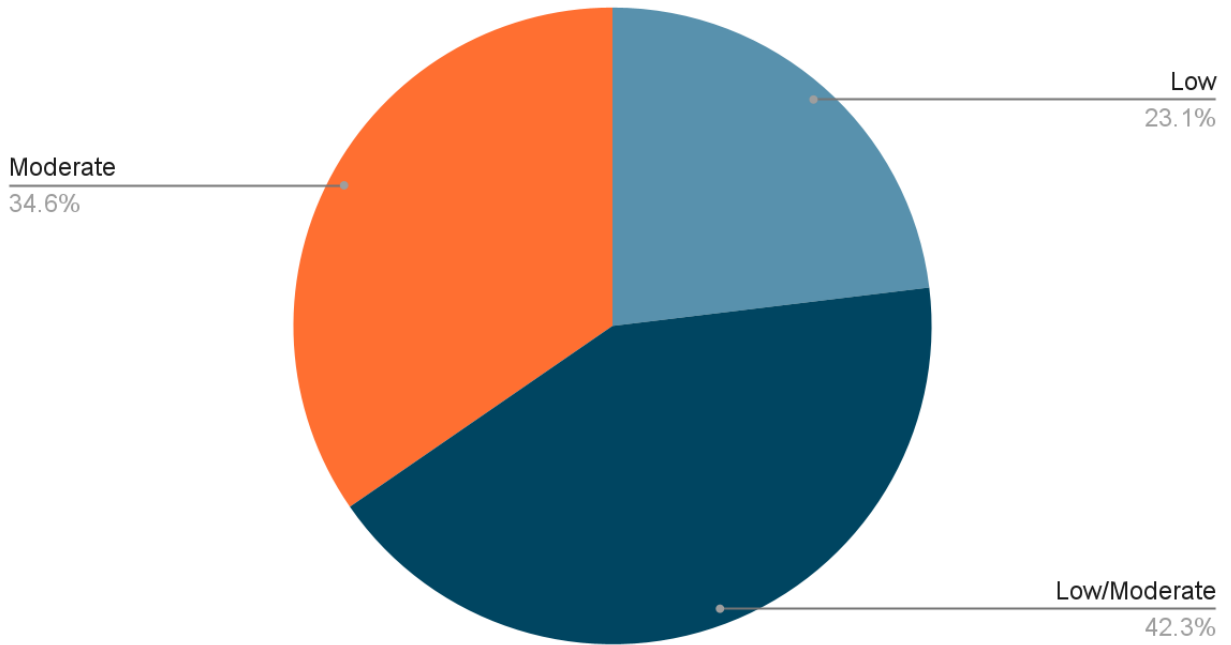
- o **Low Risk=14** (AGS Law, Believe First, Blue Bee, Blue Ridge Law Group, Boundless Immigration, Esquire Law, Fair Credit LLC [formerly Credit Cop], Firmly, Hello Divorce, Herbert-Greenwald Law, Immigration Office Solutions, Rocky Mountain Justice, Savvi Technologies, Trajan Estate)
- o **Low/Moderate=14** (Bike Legal, Davis and Sanchez, GovAssist Legal, LawPal, Legal Atoms, Mountain West Legal Protective, My Immigration, Off the Record, PD Digital Logistics Design, R&R Legal Services PLLC, Rocket Lawyer, Trajector Legal [formerly Legal Claims, Inc.], WayLit, Xira)
- o **Moderate=13** (1Law, DSD Solutions, Estate Guru, Holy Cross Ministries, Jordanelle Blocks, LawGeex, Law HQ, Law on Call, Nuttall, Brown & Coutts, Pearson & Butler, Rasa [formerly Sudbury Consulting], Timpanogos Legal Center, Utah Legal Advocates)
- o **High=1** (AAA Fair Credit)



## Authorized Entities Reporting Data through July 2022

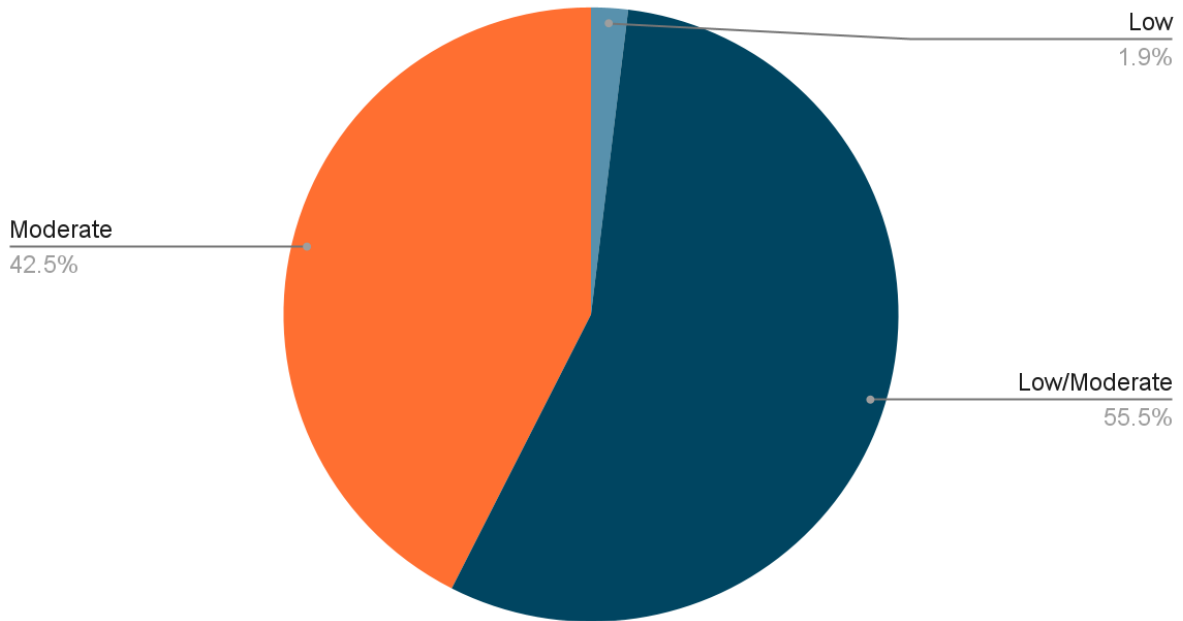
- 26 entities reporting data to date; 16 reporting this period
  - o 6 low risk entities; 11 low/moderate risk entities; 9 moderate entities

### Entities Reporting Data to Date



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

Legal Services by Entity Risk

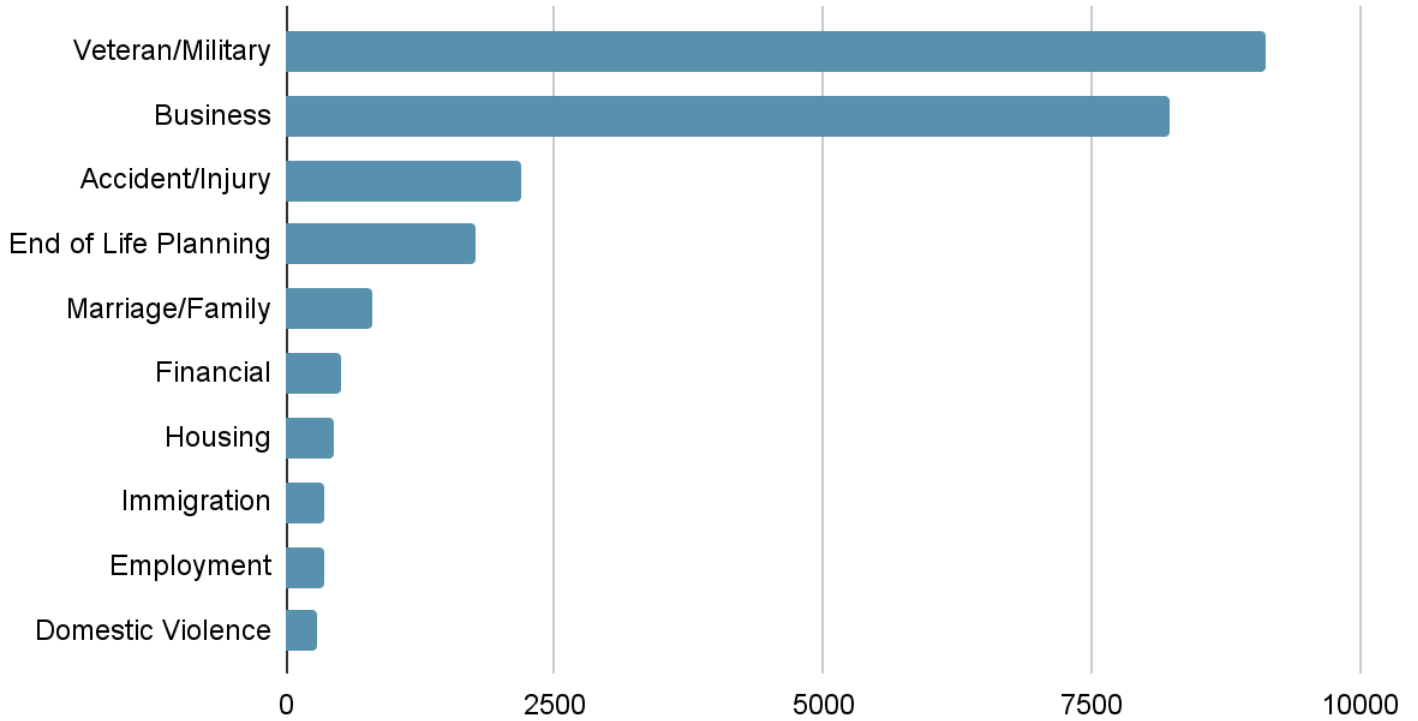


- 24,977 legal services sought from ~19,000 unduplicated clients
  - Low=483 legal services sought; Low/Moderate=13,874 legal services sought; Moderate=10,620 legal services sought
  - 98.1% of legal services were produced via low/moderate or moderate risk entities
  - 22,101 (88%) legal services have been delivered by a lawyer (or lawyer employee) or software for form or document completion only with lawyer involvement
  - 2,876 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 [36.5%]
    - 2) Business [32.9%; e.g., intellectual property, contracts/warranties, and entity incorporation]
    - 3) Accident/Injury [8.7%]
    - 4) End of Life Planning [7.1%];



- 5) Marriage/Family [3.2%];
- 6) Financial [e.g., individual bankruptcy and collections practices; 2.1%];
- 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 78% of legal services.

## Total Services by Legal Areas (Top 10)

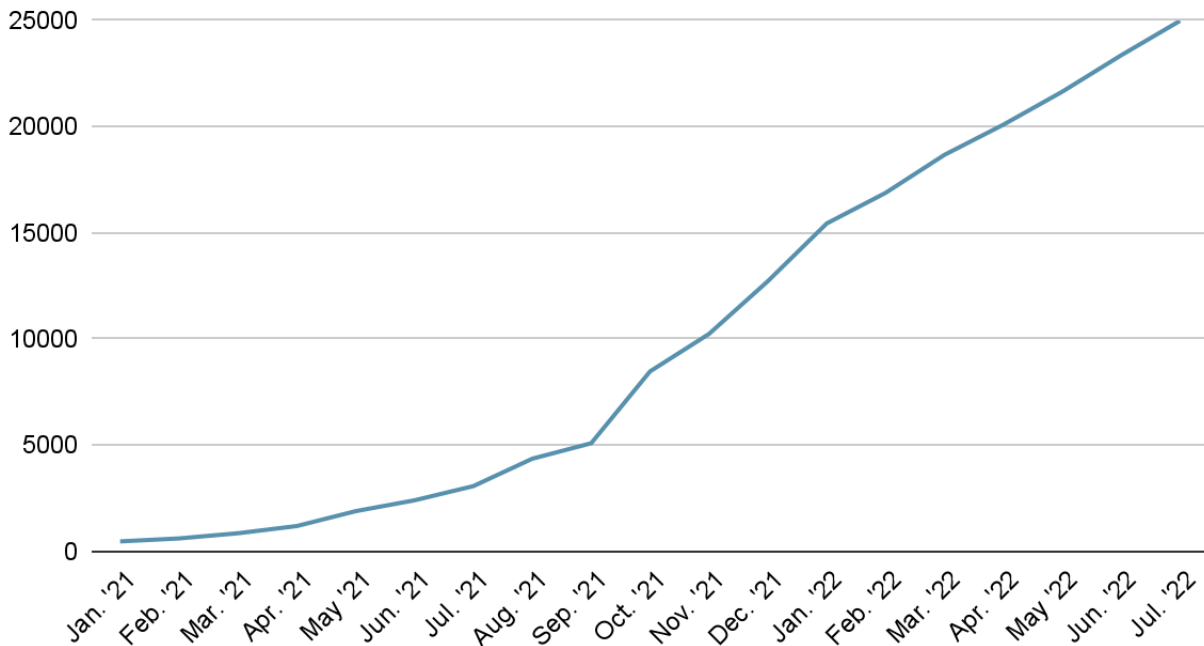


*Note that housing rental and housing ownership (real estate) legal matters were collapsed to create the category of Housing.*



## Growth of Services Across Time

Cumulative Legal Services by Month



## Complaints and Audits

- To date, entities have reported twelve complaints to the Office, approximately 1 complaint per 2,081 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. During April 2022, two complaints were received by the Office; one complaint was harm-related and classified as a harm to a legal result, and the other complaint was found to not be associated with a rights-, results-, or payment-harm. Two complaints were made during June 2022, with one not being harm-related and the other related to a payment harm. One complaint, not harm-related, was made during July of 2022. The ratio of harm-related complaints to services was approximately 1 complaint per ~4,163 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 Harm-Related Complaints | % Services with a Harm-Related Consumer Complaint |
|--|------------------------------------|---|
| Consumer achieves an inaccurate or inappropriate legal result.           | 2                                  | <0.01%  |
| Consumer fails to exercise legal rights through ignorance or bad advice. | 3                                  | ~0.01%  |
| Consumer purchases an unnecessary or inappropriate legal service.        | 1                                  | <0.01%  |

- o Audit materials have been collected from three moderate risk entities, with three reviewed by the Office. Independent lawyer audit panelists reviewed randomly selected representative legal services of two entities. Two entities’ audit reports were completed and distributed to the Executive Committee of the Office of Legal Services Innovation and the Utah Supreme Court for review. Based on audit findings, there was no evidence of material or substantial harm to consumers, and services were found to be at least adequate by the Office, its Executive Committee, and independent lawyer auditors. At this time, a fourth entity’s services have been reviewed by an independent lawyer audit panel, and auditor feedback was synthesized and summarized by the Office of Legal Services Innovation.



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 - Savvi Technologies, Inc. | Low        | Lawyers employed / managed by nonlawyers | Business                  |
|                               |            | Non lawyer ownership                     |                           |
|                               |            | Lawyers sharing fees with nonlawyers     |                           |
| 56 - Blue Ridge Law Group     | Low        | Lawyers employed / managed by nonlawyers | Accident / Injury         |
|                               |            | Non lawyer ownership                     |                           |
|                               |            | Lawyers sharing fees with nonlawyers     |                           |
| 57 - Believe First            | Low        | Lawyers employed / managed by nonlawyers | Adult Care                |
|                               |            |  | 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          |
| 58 - Herbert Greenwald Law Group            | Low | Lawyers employed / managed by nonlawyers                    | Accident / Injury    |
|   |     | Less than 50% nonlawyer ownership                           |                      |
|   |     | Lawyers sharing profits with nonlawyers                     |                      |
| 60 - Trajan Estate                          | Low | Lawyers employed / managed by nonlawyers                    | End of Life Planning |
|   |     | Non lawyer ownership  |                      |
|   |     | Lawyers sharing profits with nonlawyers                     |                      |
| 62 - Fair Credit, LLC (formerly Credit Cop) | Low | Lawyers employed / managed by nonlawyers                    | Financial            |
|   |     | Non lawyer ownership  |                      |
|   |     | Lawyers sharing profits with nonlawyers                     |                      |
| 63 - Immigration Office Solutions           | Low | Lawyer employed / managed by nonlawyers                     | Immigration          |
|   |     | Nonlawyer ownership   |                      |
|   |     | Lawyers sharing profits with nonlawyers                     |                      |
|   |     | Software with lawyer involvement- legal document completion |                      |
| 64 - Boundless Immigration                  | Low | Lawyer employed / managed by nonlawyers                     | Immigration          |
|   |     | Nonlawyer ownership   |                      |
|   |     | Lawyers sharing profits with nonlawyers                     |                      |
|   |     | Software with lawyer involvement- legal document completion |                      |
| 67 - Esquire Law                            | Low | Lawyer employed / managed by nonlawyers                     | Accident / Injury    |
|   |     | Nonlawyer 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, PLLC | 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 |                           |
| 23 - Off the Record                                 | Low / Moderate | 50+% non lawyer ownership                    | Traffic Citations         |
|   |                | Intermediary Platform                        |                           |
| 32 - Tanner LLC (Withdrawn from Sandbox March 2021) | 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)          |
|   |                |  | Immigration               |



|  |                   |  |                          |
|--|-------------------|--|--------------------------|
|  |                   | Intermediary Platform                        | Marriage and Family      |
|  |                   |  | Military                 |
|  |                   |  | Native American / Tribal |
|  |                   |  | Public Benefits          |
|  |                   |  | Real Estate              |
|  |                   |  | Traffic Citations        |
| 37 - Robert DeBry<br>(Withdrawn from<br>Sandbox May<br>2021) | Low /<br>Moderate | Lawyers employed / managed by nonlawyers     | Accident / Injury        |
|  |                   | 50+% non lawyer ownership                    |                          |
| 38 - Davis and<br>Sanchez                                    | Low /<br>Moderate | Lawyers employed / managed by nonlawyers     | Accident / Injury        |
|  |                   | 50+% non lawyer ownership                    | Education                |
| 39 - Legal Claims<br>Benefits (Trajector<br>Legal)           | Low /<br>Moderate | Lawyers employed / managed by nonlawyers     | Accident / Injury        |
|  |                   |  | Education                |
|  |                   | 50+% non lawyer ownership                    | Healthcare               |
|  |                   |  | Military                 |
|  |                   | Public Benefits                              |                          |
| 41 - Mountain<br>West Legal<br>Protective                    | Low /<br>Moderate | Lawyers employed / managed by nonlawyers     | Housing - Rental         |
|  |                   | 50+% non lawyer ownership                    | Real Estate              |
| 48 - Legal Atoms   | Low /<br>Moderate | 50+% non lawyer ownership                    | Immigration              |
|  |                   | Software provider /w lawyer - doc completion | Marriage and Family      |
|  |                   | Fee sharing                                  | Domestic Violence        |
|  |                   |  | Housing - Rental         |
| 50 - GovAssist<br>Legal                                      | Low /<br>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                         |                |  |                      |
| Native American and Tribal Law   |                |  |                      |
| Public Benefits                  |                |  |                      |



|                 |                |   |                           |
|-----------------|----------------|---|---------------------------|
|                 |                |   | Real Estate               |
|                 |                |   | Traffic Citation          |
| 66 - Bike Legal | Low / Moderate | Lawyers employed / managed by nonlawyers  | Accident / Injury         |
|                 |                | Non lawyer ownership                      |                           |
|                 |                | Lawyers sharing fees with nonlawyers      |                           |
| 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    |                             |
| 27 - Rasa<br>(Sudbury Consulting) | Moderate | Software provider w/ lawyer involvement      | Criminal Expungement        |
|                                   |          | Lawyers sharing fees with nonlawyers         | Employment                  |
|                                   |          | Non-lawyer provider w/ lawyer involvement    |                             |
| 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 |
| Trajan Estate                      | Low           | Apr. 1, 2022                   | Jul. 5, 2022                   | Quarterly |
| Believe First                      | Low           | May 1, 2022                    | Aug. 5, 2022                   | Quarterly |
| Sarvi Technologies, Inc.           | Low           | Jun. 15, 2022                  | Sept. 5, 2022                  | Quarterly |
| Fair Credit, LLC (Credit Cop)      | Low           | Jul. 1, 2022                   | Oct. 5, 2022                   | Quarterly |
| Herbert-Greenwald                  | Low           | Oct. 1, 2022                   | Jan. 5, 2023                   | Quarterly |
| Hello Divorce                      | Low           | Dec. 1, 2022                   | Mar. 5, 2023                   | Quarterly |
| Rocky Mountain Justice             | Low           | TBD                            | TBD                            | Quarterly |
| Boundless Immigration              | Low           | TBD                            | TBD                            | Quarterly |
| Immigration Office Solutions       | Low           | TBD                            | TBD                            | Quarterly |
| Blue Ridge Law Group               | Low           | TBD                            | TBD                            | Quarterly |
| Esquire Law                        | Low           | TBD                            | TBD                            | Quarterly |
| Rocket Lawyer                      | Low-Moderate  | Oct. 1, 2020                   | Nov. 5, 2020                   | Monthly   |
| The Fiduciary Law Firm (R&R Legal) | Low-Moderate  | Jan. 1, 2021                   | Feb. 5, 2021                   | Monthly   |
| FOCL Law                           | Low-Moderate  | Jan. 1, 2021<br>(relaunch TBD) | Feb. 5, 2021<br>(relaunch TBD) | Monthly   |
| LawPal                             | Low-Moderate  | Feb. 1, 2021<br>(relaunch TBD) | Mar. 5, 2021<br>(relaunch TBD) | Monthly   |
| Davis and Sanchez                  | Low-Moderate  | Jul. 1, 2021                   | Aug. 5, 2021                   | Monthly   |
| Legal Claims Benefits (Trajector)  | Low-Moderate  | Aug. 15, 2021                  | Sept. 5, 2021                  | Monthly   |
| GovAssist Legal                    | Low-Moderate  | Feb. 1, 2022                   | Mar. 5, 2022                   | Monthly   |
| My Immigration                     | Low-Moderate  | Mar. 1, 2022                   | Apr. 5, 2022                   | Monthly   |
| Off the Record                     | Low-Moderate  | Apr. 1, 2022                   | May 5, 2022                    | Monthly   |
| Bike Legal                         | Low-Moderate  | Aug. 1, 2022                   | Sep.5, 2022                    | Monthly   |
| Legal Atoms                        | Low-Moderate  | TBD                            | TBD                            | Monthly   |
| Xira Connect                       | 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 (Elysium Holdings)<br>(Elysium Legal) | Moderate     | Apr. 1, 2021<br>(moderate launch TBD<br>Pearson & Butler;<br>moderate launch<br>Elysium Legal October<br>1, 2022) | May 5, 2021<br>(moderate launch<br>TBD Pearson &<br>Butler; Elysium<br>Legal Sep. 5, 2022) | Quarterly<br>(Elysium<br>Holdings)<br>Monthly<br>(Pearson &<br>Butler moderate<br>and Elysium<br>Legal moderate) |
| 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  |
| Utah Legal Advocates                                   | Moderate     | Mar. 1. 2022  | Apr. 5, 2022   | Monthly  |
| Rasa (Sudbury Consulting)                              | Moderate     | May 1, 2022   | Jun. 5, 2022   | Monthly  |
| DSD Solutions  | Moderate     | TBD   | TBD  | Monthly  |
| LawHQ  | Moderate     | TBD   | TBD  | Monthly  |
| Jordanelle Blocks                                      | Moderate     | TBD   | TBD  | Monthly  |
| Holy Cross Ministries                                  | Moderate     | TBD   | TBD  | Monthly  |
| AAA Fair Credit  | High         | TBD   | TBD  | Monthly  |



## JULY 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.

