



OFFICE OF LEGAL SERVICES INNOVATION
An Office of the Utah Supreme Court

Amended Sandbox Authorization Packet

Jordanelle Blocks

August 15, 2022

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In the Supreme Court of the State of Utah

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In re: Application of Jordanelle Blocks

AMENDED ORDER FOR AUTHORIZATION TO PRACTICE LAW

Based upon the Utah Supreme Court's plenary and constitutionally granted authority to regulate the practice of law in Utah, and the tenets of Standing Order 15, the Utah Supreme Court orders that Jordanelle Blocks, Inc. ("Jordanelle Blocks") is authorized to practice law within the regulatory sandbox and subject to the restrictions outlined below.

The Court has reviewed the recommendation of the Office of Legal Services Innovation ("Innovation Office") dated April 22, 2021, for Jordanelle Blocks, Inc. to be authorized to practice law.

Jordanelle Blocks seeks authorization to offer services in the Sandbox as an entity owned by nonlawyers, employing and partnering with lawyers and through which lawyers will share fees with nonlawyers to offer real estate services in Utah. The company also offers a sophisticated technology platform to facilitate the selection, completion, and execution of the relevant real estate transactional documents developed by Utah lawyers working for and with the company and seeks authorization for nonlawyer providers to offer basic legal information and process assistance to customers under the oversight of Utah-licensed lawyers.

The Innovation Office has assessed the risk of harm to Jordanelle Blocks targeted consumers relative to the risk of harm they currently face and has determined that the risk of harm presented by Jordanelle Blocks' services is Moderate.

In light of the Court's responsibility to the public to effectively regulate the practice of law in Utah and in keeping with the tenets of Standing Order 15, the Court now orders as follows:

1. Jordanelle Blocks is authorized to offer legal services through the following models:
 - a. Lawyers employed or managed by a nonlawyer
 - b. Nonlawyer ownership
 - c. Lawyers sharing profits with nonlawyers
 - d. Nonlawyer provider with lawyer involvement
 - i. Nonlawyer provider with lawyer involvement
 1. Nonlawyer providers offering only:
 - a. Legal information;
 - b. Legal process assistance; and
 - c. Form completion assistance.
 2. Lawyer involvement including:
 - a. Training;
 - b. Script development;
 - c. Regular quality checks of services provided.
 - e. Software provider with lawyer involvement
 - i. Software provider offering:
 1. AI and analytic-enhanced legal document selection, completion, and execution.
 - ii. Lawyer involvement including:
 1. Lawyer developed and customized platform;
 2. Triggers/fail-safes to pull out complex cases for attorney referral;
 3. Attorney, LPP, and customer service availability;
 4. Regular spot checks;
 5. Occasional review by outside counsel.
2. Jordanelle Blocks is authorized to provide legal services across the following legal service areas only:
 - a. Business
 - b. Housing - Rental
 - c. Real Estate
3. Jordanelle Blocks shall conform to the Moderate innovation reporting requirements imposed by the Innovation Office.
4. Jordanelle Blocks will prominently display the following disclosure requirements:
 - a. Innovation Office Badge
 - b. Nonlawyer ownership disclosure
 - c. Nonlawyer provider disclosure

If Jordanelle Blocks wishes to alter these conditions or requirements, it must submit any such change to the Innovation Office for further assessment. The Innovation Office will assess the proposed change and may permit the change if it deems the change does not materially increase the risks to consumers. If the Innovation Office finds a material increase in risk then it will present the issue to the Court for further consideration.

This authorization is granted for the duration of the existence of the Sandbox, or until exit and permanent licensure at the discretion of the Court. Authorization is subject to Jordanelle Blocks' compliance with the conditions and requirements set forth in the Innovation Office Manual and the Innovation Office Recommendation to the Court and to a verification by the Innovation Office that the company's services are not causing material harm to consumers.

DATED this 16th day of August, 2022.



Matthew B. Durrant
Chief Justice

Document 2



OFFICE OF LEGAL SERVICES INNOVATION

An Office of the Utah Supreme Court

RECOMMENDATION TO THE COURT

APP No. 0042 - JORDANELLE BLOCKS, INC.

APRIL 22, 2021

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EXECUTIVE SUMMARY

Recommendation: Authorize

Applicant: Jordanelle Blocks, Inc. (“Jordanelle Blocks”)

Proposed Model/Service: Jordanelle Blocks is a nonlawyer owned company seeking to offer legal services offered by Utah-licensed lawyers and software overseen by Utah lawyers in the area of real estate transactions. The company will offer services both through Utah lawyers as employees and as contractors/partners. The company will source business through real estate professionals and through other partnerships.

The tech platform will provide digital real estate legal services for more advanced legal documents beyond the licensure and expertise of real estate agents and brokers, who recommend to their clients to seek attorney guidance to complete the real estate transaction.

The company seeks authorization for both nonlawyer and software provider with lawyer involvement. The company’s nonlawyer providers are limited to the customer-service team who may, on occasion, provide legal information or process assistance to customers. The software provider is the company’s sophisticated technology platform which essentially offers the company’s attorneys (employee and partners) to scale their services through the development of bespoke software legal tools and document assistance. Consumers using the company’s platform will be able to complete their real estate transaction through an attorney-developed guided software (Tier 1). Consumers with complex transactions (as assessed by the software) will be referred out to Utah-licensed lawyers working with the company who will then enter into representation agreements with those consumers (Tier 2).

The proposed service model is:¹

- Lawyers employed or managed by nonlawyers
- Nonlawyer ownership (50% or over)
- Fee sharing with nonlawyers
- Nonlawyer provider with lawyer involvement
- Software provider with lawyer involvement

The proposed consumer service area is:

- Business
- Housing - Rental
- Real Estate

Waivers Sought N/A

¹ Although the applicant indicated it was seeking authorization for nonlawyer and software provider without lawyer involvement, follow up discussion with the applicant clarified that it is not seeking these authorizations.

Target Consumer Market Consumers purchasing residential real estate property in Utah.

Sandbox Qualifiers: This business model/service qualifies for the Sandbox because it would feature the following characteristics:

- Lawyers employed or managed by nonlawyers
- Nonlawyer ownership (50% or over)
- Fee sharing with nonlawyers
- Nonlawyer provider with lawyer involvement
- Software provider with lawyer involvement

Regulatory Objective Qualifier:² This proposal has the potential to increase consumer’s access to legal services through the use of a sophisticated technology platform developed and overseen by lawyers and marketed through partnerships with existing real estate and title service providers.

Utah Qualifier: Adapted for Utah requirements; using Utah-licensed lawyers.

Implementation Qualifier: Ready for immediate implementation.

RISK ASSESSMENT

Target Market: Consumers engaged with real estate

General Assessment: MODERATE RISK

Specific Risks: 1. Nonlawyer ownership
2. User communications

SANDBOX RECOMMENDATION

We recommend the Court authorize Jordanelle Blocks to practice law in the state of Utah, subject to such requirements as the Innovation Office may impose.

Scope of Recommended Authorization

Term of authorization The Innovation Office recommends that the authority be granted for an initial period of 24 months from the date of service launch with the possibility of extension or permanent authorization. Any such extension or permanent authorization would be subject to the applicant complying with the conditions and requirements set forth

² Regulatory Objective: To ensure consumers have access to a well-developed, high-quality, innovative, affordable, and competitive market for legal services. (Standing Order No. 15)

below and also to Jordanelle Blocks has a record of compliance with all requirements and the company’s services are not causing harm to consumers.

Recommended legal service models	<ol style="list-style-type: none"> 1. Lawyers employed or managed by a nonlawyer 2. Nonlawyer ownership (50% or more) 3. Lawyers sharing fees with nonlawyers 4. Nonlawyer provider with lawyer involvement <ol style="list-style-type: none"> a. Nonlawyer providers offering only: <ol style="list-style-type: none"> i. Legal information; ii. Legal process assistance; and iii. Form completion assistance. b. Lawyer involvement including: <ol style="list-style-type: none"> i. Training; ii. Script development; iii. Regular quality checks of services provided. 5. Software provider with lawyer involvement. <ol style="list-style-type: none"> a. Software provider offering: <ol style="list-style-type: none"> i. AI and analytic-enhanced legal document selection, completion, and execution. b. Lawyer involvement including: <ol style="list-style-type: none"> i. Lawyer developed and customized platform; ii. Triggers/fail-safes to pull out complex cases for attorney referral; iii. Attorney, LPP, and customer service availability; iv. Regular spot checks; v. Occasional review by outside counsel.
Legal service models not recommended	None (note: nonlawyer and software provider without lawyer involvement withdrawn as included erroneously)
Recommended consumer service areas	<ol style="list-style-type: none"> 1. Business 2. Housing - Rental 3. Real Estate
Recommended waivers	N/A
Recommended qualitative compliance requirements	<p>Standardized disclosure statements on website and in mobile applications (see Manual):</p> <ol style="list-style-type: none"> 1. Badge 2. Nonlawyer ownership disclosures

3. Nonlawyer provider disclosures
 4. Lawyers partnering with Jordanelle Blocks have fee sharing disclosures under Rule 5.4.
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Recommended data reporting requirements

MODERATE risk data reporting requirements (see Manual)