



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

Amended Sandbox Authorization Packet

Law on Call

August 15, 2022

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In the Supreme Court of the State of Utah

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In re: Application of Law on Call, LLC

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 Law on Call, LLC 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 December 7, 2020, for Law on Call, LLC to be authorized to practice law.

Law on Call proposes to be a for-profit entity offering legal services by lawyer employees, paraprofessionals, and nonlawyer customer service representatives ("CSRs"). The proposed entity will be owned by Northwest Registered Agent, LLC, an already established company offering registered agent and other corporate incorporation services.

The lawyer employees of Law on Call will be Utah-licensed lawyers and will provide the legal practice services (legal advice and guidance). The paraprofessionals and CSRs will provide legal information and legal process assistance; they will undergo training and job-shadowing before initiating services and will be supervised by Utah-licensed lawyers via regular, random review of a sample of work product. They will also be required to complete regular continuing legal education and training.

The Innovation Office has assessed the risk of harm to Law on Call's targeted consumers relative to the risk of harm they currently face and has determined that the risk of harm presented by Law on Call's 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:

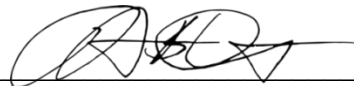
1. Law on Call is authorized to offer legal services through the following methods only:
 - a. Nonlawyer-owned entity
 - b. Lawyers employed or managed by a nonlawyer
 - c. Lawyers sharing profits with nonlawyers
 - d. Nonlawyer provider with lawyer involvement:
 - i) Nonlawyer providers shall not offer independent legal advice. Nonlawyer providers shall offer only:
 - (1) Legal information
 - (2) Legal process assistance (e.g. providing general information about rules, procedures, and practices)
 - ii) Lawyer involvement shall include:
 - (1) Nonlawyer providers completing training and job-shadowing period before offering legal services and continuing education and training throughout tenure
 - (2) Utah-licensed lawyers conducting regular, random reviews of a sample of work product
2. Law on Call is authorized to provide legal services across the following legal service areas only:
 - a. Business
 - b. Consumer financial issues
 - c. End of life planning
 - d. Housing (rental)
 - e. Real estate
3. Law on Call shall conform to the Moderate innovation reporting requirements imposed by the Innovation Office.
4. Law on Call will prominently display the following disclosure requirements:
 - a. Innovation Office Badge,
 - b. Nonlawyer ownership disclosure, and
 - c. Nonlawyer provider disclosure.

5. Utah lawyers partnering with Law on Call remain otherwise subject to the Utah Rules of Professional Conduct. However, to the extent that Law on Call's business model could be found to implicate Utah Rule of Professional Conduct 5.3, the Court waives application of that rule as to lawyers practicing as employees of Law on Call.

If Law on Call 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 Law on Call's 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. 0030 - LAW ON CALL

DECEMBER 7, 2020

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EXECUTIVE SUMMARY

Recommendation: Approve

Applicant: Law on Call, LLC

Proposed Model/Service: This proposal has been submitted by Northwest Registered Agent, LLC (“Northwest”). Northwest is a Wyoming company owned and run by nonlawyers offering registered agent and business incorporation services. Northwest proposes launching a new LLC, wholly owned by Northwest, called Law On Call.

Consumers using Law on Call will be able to get legal help from both Utah lawyers and nonlawyers (paraprofessionals and customer service representatives) supervised by Utah lawyers by paying a subscription fee of \$9/month. The focus is on providing direct and immediate access to legal assistance for their already existing customers and additional members of the public. The nonlawyer providers will provide primarily legal information rather than legal advice and their performance will be subject to regular review by Utah-licensed attorneys.

For an additional flat fee, consumers can purchase additional assistance such as legal document completion and review from a Utah lawyer. This would include: entity formation, operating agreements, by-laws, simple wills, trusts, powers of attorney, cease and desist letters, lease agreements, trademark and copyright registration, as well as document review and discussion.

Law on Call would be managed by Northwest’s officers and managers, with Northwest’s in-house legal team the direct supervisors of legal services provided through Law On Call. Lawyer employees of Law On Call will be salaried employees.

The proposed legal subject areas are:

- Business
- End of life planning
- Financial issues
- Housing (rental)
- Real estate

The proposed model requires the Sandbox for the following reasons:

- Nonlawyers own a for-profit company providing legal practice directly to consumers
 - Lawyers work as employees for a nonlawyer-owned company
 - Nonlawyers will provide limited legal assistance, including legal advice, to consumers
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| Target Consumer Market | This business model/service targets individuals and small businesses who may have some access to legal services and those who likely do not have access. |
| Sandbox Qualifiers: | This business model/service qualifies for the Sandbox because it would feature the following characteristics: <ul style="list-style-type: none">• Lawyers employed or managed by a nonlawyer• More than 50% nonlawyer ownership• Nonlawyer provider with lawyer involvement |
| Regulatory Objective Qualifier:¹ | The proposed service offers easily accessible and low cost legal advice provided by lawyers and nonlawyers. The service could benefit consumers by making it easier to get simple legal questions identified and answered, particularly for those already engaging in activities with legal implications (e.g. business formation). |
| Utah Qualifier: | Adapted for Utah requirements using Utah lawyers, paraprofessionals, and forms. |
| Implementation Qualifier: | The service is ready for immediate implementation. |

RISK ASSESSMENT

Target Market: Moderate income Utahns with business and legal needs.

General Assessment: MODERATE RISK

Specific Risks:

1. Nonlawyer ownership
2. Legal practice through nonlawyers
3. User communications

The Office notes that the subscription pricing model, although already a commonly available model (prepaid legal service plans such as Legal Shield), could present a risk of consumers spending money and not receiving the appropriate legal service. The MODERATE risk category requires Law On Call to report monthly on the amount consumers pay, what services they seek, what services they receive, legal and financial outcomes, and consumer complaints. The Office believes that this information should facilitate early identification of actualized risk in Law On Call's model should it exist.

¹ 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)

SANDBOX RECOMMENDATION

We recommend the Court **authorize** Law On Call, LLC to practice law in the state of Utah, subject to such requirements as the Innovation Office may impose.

We recommend the following scope of authorization:

1. The Innovation Office recommends that the authority be granted for an initial period of 24 months 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 below and also to a verification by the Innovation Office that Law on Call, LLC has a record of compliance with all requirements and the company's services are not causing harm to consumers.
2. The Innovation Office recommends authorizing Law on Call, LLC to practice law only through the following legal service models:
 - a. Nonlawyer ownership (more than 50%)
 - b. Lawyers employed or managed by a nonlawyer
 - c. Nonlawyer provider with lawyer involvement
3. The Innovation Office recommends the following compliance requirements for this entity. See Innovation Office Manual for requirement details.
 - a. **Qualitative Requirements:**
 - i. Standardized disclosure statements on website and in mobile applications:
 - Badge
 - Nonlawyer Ownership Disclosure Statement
 - Nonlawyer Service Provider Disclosure Statement
 - b. **Data Reporting Requirements:**
 - i. MODERATE risk data reporting requirements.