



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

Amended Sandbox Authorization Packet

The Fiduciary Law Firm

August 10, 2022

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In the Supreme Court of the State of Utah

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In re: Application of R&R Legal Services PLLC

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 R&R Legal Services PLLC is authorized to practice law within the regulatory sandbox and subject to the restrictions outlined below.

The Court has reviewed the amended recommendation of the Office of Legal Services Innovation ("Innovation Office") dated October 5, 2020, for R&R Legal Services, formally the Fiduciary Law Firm, to be authorized to practice law.

The Innovation Office has assessed the risk of harm to R&R Legal Services' targeted consumers relative to the risk of harm they currently face and has determined that the risk of harm presented by R&R Legal Services' services is Low.

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. R&R Legal Services is authorized to offer legal services through the following methods:
 - a. Lawyer employed or managed by a nonlawyer
 - b. Lawyers sharing profits with nonlawyers
 - c. Nonlawyer ownership

2. R&R Legal Services is authorized to provide legal services across the following legal service areas, subject to the restrictions outlined below:
 - a. Accident / Injury
 - b. Adult Care
 - c. Business
 - d. Consumer Financial Issues
 - e. Domestic Violence
 - f. End of Life Planning
 - g. Healthcare
 - h. Marriage and Family
 - i. Public Benefits
3. R&R Legal Services shall conform to the Low Innovation reporting requirements imposed by the Innovation Office.
4. R&R Legal Services will prominently display the following disclosure requirements:
 - a. Innovation Office Badge
 - b. Nonlawyer ownership disclosure

If R&R Legal Services wishes to alter the terms of the authorization, 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 risk 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 R&R Legal Services' 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 10th day of August, 2022.



Matthew B. Durrant
Chief Justice

Document 2



OFFICE OF LEGAL SERVICES INNOVATION

An Office of the Utah Supreme Court

AMENDED RECOMMENDATION TO THE COURT

APP 0007 - THE FIDUCIARY LAW FIRM (R&R LEGAL SERVICES)

OCTOBER 5, 2020

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EXECUTIVE SUMMARY

The Innovation Office submits this amended recommendation and order based on the request by The Fiduciary Law Firm to change its name to R & R Legal Services LLC. No other aspects of the recommendation or order are changed.

Recommendation: Authorize

Applicant: R & R Legal Services LLC

Proposed Services: Law firm majority owned by nonlawyer and operating as part of a group of professional service entities

Sandbox Qualifiers: Partial non-lawyer ownership - over 50%

Privately-held, for-profit corporation

Lawyers employed or managed by a nonlawyer

Utah Qualifier: Adapted for Utah requirements

Implementation Qualifier: Services ready for market now

Regulatory Objective Qualifier: Increased likelihood of consumer engagement with legal services related to other areas of R&R Group, Inc. business and because of marketing platforms. Likely increased efficiencies in their multidisciplinary model.

Qualitative Requirements: Standardized disclosure statements on website, in mobile applications, and in service terms/terms of engagement:

- Badge
- Nonlawyer Ownership Disclosure Statement

See Innovation Office Manual for requirement details.

Data Reporting Requirements: Low / moderate risk data reporting requirements.

See Innovation Office Manual requirements.

SANDBOX RECOMMENDATION

We recommend the Court **authorize** the R & R Legal Services LLC (“R & R”) 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 R & R 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 R & R to practice law only across the following categories of legal service:
 - a. Service Models:
 - i. Lawyers employed or managed by a nonlawyer
 - ii. 50% or more nonlawyer ownership
 - b. Areas of Service:
 - i. Accident/Injury
 - ii. Adult Care
 - iii. Business
 - iv. Domestic Violence
 - v. End of Life Planning
 - vi. Financial Issues
 - vii. Healthcare

- viii. Marriage and Family
- ix. Public Benefits

3. Relevant requirements:

- a. Relevant disclosure requirements as outlined in Innovation Office Manual.
- b. Low/moderate risk data reporting requirements as outlined in Innovation Office Manual.
- c. Compliance with all relevant statutory and regulatory requirements.

PROPOSED SERVICES

R & R Legal Services is a proposed new law firm entity to be launched with 100% ownership held by R&R Group, Inc. R&R Group, Inc. is a privately-held, for-profit corporation currently operating in the state of Utah. Majority ownership is held by Rick Stanzione. The company owns multiple subsidiaries offering a variety of services, including financial and investment advising, basic tax and accounting services (no CPA or public company auditing services), and insurance.

R & R will offer legal services to the clients of other R&R Group entities and to the public generally. Once the entity is formed, R&R Group will bring on at least one Utah licensed lawyer as a minority owner of the firm. Additional lawyers will work as employees of R & R. The law firm and all its files and materials will be maintained entirely separately from R&R Group and its other subsidiaries. Lawyer owners and employees will maintain their duties under the Utah Rules of Professional Conduct.

RISK ASSESSMENT

Target Market: Clients of their other professional service entities; general public.

General Assessment: Low / Moderate risk

Specific Risks:

1. Nonlawyer investment ownership - more than 50%
2. User communications