



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

Amended Sandbox Authorization Packet

My Immigration

August 10, 2022

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In the Supreme Court of the State of Utah

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In re: Application of My Immigration

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 My Immigration is authorized to provide legal services 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 October 27, 2021, for My Immigration to be authorized to provide legal services.

My Immigration, a subsidiary of Full Right, a privately held, for-profit corporation, seeks to provide legal technology to prepare automated immigration documents with individualized assistance by licensed Utah lawyers employed by My Immigration.

The Innovation Office has assessed the risk of harm to My Immigration's targeted consumers relative to the risk of harm they currently face and has determined that the risk of harm presented by My Immigration's service 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. My Immigration is authorized to offer legal services through the following models:
 - a. Lawyers employed or managed by nonlawyers
 - b. Nonlawyer ownership
 - c. Lawyers sharing profits with non-lawyers

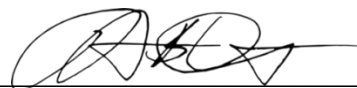
The Supreme Court of Utah does not have the jurisdiction to determine what constitutes the practice of law in immigration court and does not take a position on whether or not the software, as currently used by My Immigration, constitutes the practice of law as defined in 8 CFR 1.2. My Immigration is solely responsible to assure that they are in compliance with federal law.

2. My Immigration is authorized to provide legal services across the following legal service areas, subject to the restrictions outlined below:
 - a. Immigration
3. My Immigration shall conform to the Low innovation reporting requirements imposed by the Innovation Office.
4. My Immigration will prominently display the following disclosure requirements:
 - a. Innovation Office Badge
 - b. Nonlawyer ownership disclosure

If My Immigration 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 potential harm to consumers. If the Innovation Office finds a material increase in potential harm, 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 My Immigration'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 10th day of August, 2022.



Matthew B. Durrant
Chief Justice

Document 2



Recommendation to the Court

App No. 0052 - My Immigration LLC

November 4, 2021

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Executive Summary

Recommendation: Authorize

Applicant: My Immigration LLC

Proposed Model/Service: My Immigration seeks to combine legal form software with individualized attorney consultations to consumers seeking assistance with immigration services.

Target Consumer Market: Individuals and families with immigration needs including but not limited to: seeking U.S. citizenship, permanent residence, work, residence or education visas, DACA status, other.

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 more
 - Lawyers sharing fees with non-lawyers
 - Software provider with lawyer involvement
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Regulatory Objective Qualifier:¹ My Immigration's proposal seeks to bridge a gap between existing software services and full lawyer representation to offer more affordable, accessible legal assistance.

Utah Qualifier: Adapted for Utah requirements

Implementation Qualifier: Implementation dependent upon authorization and completion of website

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)

Innovation Assessment

General Assessment: Low/Moderate Innovation Model

Specific Potential Harms: While the Utah attorneys will be employed by My Immigration, My Immigration is 95% owned by Full Right Corp which is a for profit entity. The attorneys employed by My Immigration will own a minority 5% share of My Immigration.

1. Potential risk that nonlawyer owners / investors, unfamiliar with and unlimited by the legal Rules of Professional Conduct, could undermine the legal services model to the consumer's detriment.
2. It potentially increases the likelihood of implementing business practices that increase consumer harm.
3. The potential risks presented by fee sharing could include compromised lawyer independence and loyalty, conflicts issues, and increased likelihood of the lawyer advancing non-meritorious claims.

Sandbox Recommendation

We recommend the Court authorize My Immigration to offer legal services 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 and/or permanent exit authorization.

Any request for extension is subject to the applicant complying with the conditions and requirements set forth below.

Any request for permanent authorization requires a showing that the entity meets the exit criteria, specifically, that My Immigration has a record of compliance with all requirements and the entity's services are not causing harm to consumers. The Innovation Office, with the approval of the court, has discretion to authorize exit for the scope of services tested in the sandbox, as stated above, and continual regulatory authority.

Recommended legal service models	<p>This section presents a numbered list of the recommended service models.</p> <ol style="list-style-type: none"> 1. Lawyers employed or managed by nonlawyers 2. Nonlawyer ownership 50% or more 3. Lawyers sharing fees with non-lawyers 4. Software provider with lawyer involvement- legal document completion
Legal service models not recommended	None
Recommended consumer service areas	1. Immigration
Recommended waivers	None
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 disclosure <p>Note: All lawyers employed by My Immigration remain subject to the rules of professional conduct and the disclosure requirements imposed by Rule 5.4.</p>
Recommended data reporting requirements	Low/Moderate innovation data reporting requirements (see Manual)