



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

Sandbox Authorization Packet

Visa Place

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Recommendation to the Court

VISA PLACE LLC- No. 88

April 6, 2023

Recommendation: Authorize ABS + Intermediary Platform

SUMMARY

Visa Place is an immigration law firm providing an end-to-end legal services solution for immigrants using a technology platform. While all legal services are handled and supervised by licensed immigration practitioners, Visa Place will rely heavily on technology services, vendors, and marketing outside of traditional venues. The technology side of the business will be managed by a seasoned team of professionals including a CTO who has over 4 years of experience in the immigration field, experienced immigration legal practitioners, as well as legal and technical support staff.

The legal tech will assist in the assessment, pre-qualification, and case management of applications providing an optimal, cost effective, and transparent process. Visa Place seeks to target clients who often are taken advantage of by the confusing immigration system and practitioners who do not serve their best interests, charging high legal fees with questionable outcomes.

Innovation Assessment: Visa Place intends to serve Utah's underserved immigrant community with immigration services. Mr. Niren, a legally trained chief technology officer, will help consumers receive the more appropriate legal service at a more affordable price point than traditional providers.

ENTITY MEMBERS	PRECEDENT
<p>Owners: Michael Niren Managers: Michael Niren Providers: Immigration attorneys already contracted with Visa Place</p>	<p>Same Service Method & Innovation Level: Alternative Business Structure</p> <ul style="list-style-type: none">• Gov Assist,• My Immigration,• Boundless,• Immigration Office Solutions

ENTITY/SERVICE METHOD(S)	LEGAL AREAS
<p>ABS</p> <ul style="list-style-type: none"> • Lawyers employed or managed by nonlawyer(s) • Nonlawyer ownership (50% or more) <p>Intermediary Platform</p> <ul style="list-style-type: none"> • Technology platform to connect lawyers with consumers 	<p>Key:</p> <ul style="list-style-type: none"> • Immigration

INNOVATION LEVEL REQUIREMENTS	CONDITIONS OF PARTICIPATION
<p>Low</p> <ul style="list-style-type: none"> • Every 3 Month(s) Data reporting • Badge • Nonlawyer ownership disclosure 	<p>All Managers and Owners must:</p> <ul style="list-style-type: none"> • Act in good faith to further a client’s best interests. • Not allow economic or other conflicts of interests to adversely affect the legal services rendered to a client. • Ensure that legal services are delivered with reasonable diligence and promptness. • Not reveal confidential information pertaining to the representation of a client without the client’s consent or as allowed or required by law. • Not engage in or allow any activity that misleads or attempts to mislead a client, a court, or others. • Not take any action or engage in activity that interferes with the professional independence of lawyers or others authorized to provide legal services. • Develop systems and processes within the entity applicant to ensure that each of the above duties are met and satisfied. • Complete a one-hour ethics training.

WAIVERS
<ul style="list-style-type: none"> • UCJA Rule 13-5.4

In the Supreme Court of the State of Utah

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In re: Application of Visa Place

ORDER FOR AUTHORIZATION TO PRACTICE LAW IN UTAH

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 Visa Place LLC ("Visa Place") is authorized to practice law in Utah 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 7, 2023 for Visa Place to be authorized to practice law in Utah as an ABS.

Visa Place is an immigration law firm providing an end-to-end legal services solution for immigrants using a technology platform. While all legal services are handled and supervised by licensed lawyers, Visa Place will rely heavily on technology services, vendors, and marketing outside of traditional venues. The legal tech will assist in the assessment, pre-qualification, and case management of applications providing an optimal, cost effective, and transparent process to consumers who often are taken advantage of by the confusing immigration system.

The Innovation Office has assessed Visa Place's proposed entity structure, service methods, and legal areas, and has determined that Visa Place is a Low Innovation entity and that the risk of harm to its targeted consumers, relative to the risk of harm they currently face, is acceptable for authorization.

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:

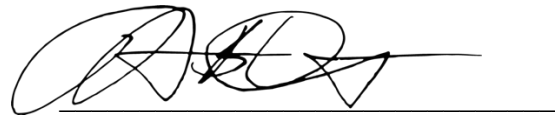
1. Visa Place is authorized to offer legal services through the following service **methods:**
 - a. ABS
 - i. Lawyers employed or managed by nonlawyer(s)

- ii. Nonlawyer ownership (50% or more)
 - b. Intermediary Platform
- 2. Visa Place is authorized to provide legal services across the following legal **areas**:
 - a. Key legal areas: Immigration
- 3. No Rules of Professional Conduct are **waived** as none were requested.
- 4. Visa Place shall conform to the Low Innovation reporting requirements imposed by the Innovation Office.
- 5. Visa Place shall prominently display the following disclosure requirements:
 - a. Innovation Office Badge
 - b. Nonlawyer ownership disclosure
- 6. 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.
- 7. All managers and owners are hereby ordered to:
 - a. Act in good faith to further a client's best interests.
 - b. Not allow economic or other conflicts of interests to adversely affect the legal services rendered to a client.
 - c. Ensure that legal services are delivered with reasonable diligence and promptness.
 - d. Not reveal confidential information pertaining to the representation of a client without the client's consent or as allowed or required by law.
 - e. Not engage in or allow any activity that misleads or attempts to mislead a client, a court, or others.
 - f. Not take any action or engage in activity that interferes with the professional independence of lawyers or others authorized to provide legal services.
 - g. Develop systems and processes within the entity applicant to ensure that each of the above duties are met and satisfied.
 - h. Complete a one-hour ethics training approved by the LSI Committee that explains these obligations.
- 8. Authorization is subject to Visa Place'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.
- 9. This authorization does not relieve Visa Place, its employees, or any associated lawyer from compliance with applicable state and federal laws and any rules of

another state or other governing body. Visa Place is responsible for assuring that it is in compliance with the laws and rules of any other affected jurisdiction.

If Visa Place 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.

DATED this 10 day of April, 2023.

A handwritten signature in black ink, appearing to read 'M. B. Durrant', written over a horizontal line.

Matthew B. Durrant
Chief Justice