



Office of Legal Services Innovation
An Office of the Utah Supreme Court

INNOVATION OFFICE ACTIVITY REPORT

MAY 2021

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OVERALL METRICS

Total Applications Received	47
Applicants Recommended to Court for Authorization	28
Applicants Denied Recommendation from Innovation Office	1
Applicants Denied Authorization by Court	0
Applicants Tabled (referral fees)	8
Inactive or Withdrawn Applicants Before Recommendation	7
Currently Under Office Review	2
Recommended to Court for Authorization Decision	1
Authorized Entities	28
Entities Reporting Data (this month)	7
Entities Recommended to Exit the Sandbox	0
Key Risks and Trends	There was one reported consumer-related complaint from reporting entities.



SUMMARY

This report summarizes activities and negative risk assessment of entities approved by the Utah Supreme Court to implement legal services within the Utah Sandbox and monitored by the Office of Legal Services Innovation. This report covers the period of October 2020 through May 2021.

SANDBOX ACTIVITY (OCTOBER 2020 - MAY 2021)

- 28 entities approved to offer services
 - Low Risk=4 (AGS Law, Blue Bee, Firmly, Hello Divorce)
 - Low/Moderate=10 (FOCL Law, Jordanelle Blocks, LawPal, Legal Claims, Inc., Mountain West Legal Protective, R&R, Robert Debry & Associates, Rocket Lawyer, Tanner, Xira)
 - Moderate=13 (1Law, Davis & Sanchez, DSD Solutions, Estate Guru, Holy Cross Ministries, LawGeex, Law HQ, Law on Call, Nuttall, Brown & Coutts, Off the Record, Pearson Butler, Sudbury Consulting, Timpanogos Legal Center)
 - High=1 (AAA Fair Credit)
 - 4% high risk; 46% moderate risk; 36% low/moderate risk; 14% low risk
- 12 entities reporting data to date; 8 reporting this period
 - 2 low risk entities; 6 low/moderate risk entities; 4 moderate entities
- 1896 legal services sought from over 1500 unduplicated clients
 - Low=113 legal services sought (2 entities)
 - Low/Moderate=491 legal services sought (6 entities)
 - Moderate=1292 legal services sought (4 entities)
 - 68% of legal services produced via moderate risk entities
 - 1459 legal services have been delivered by a lawyer (or lawyer employee) or software for form or document completion only with lawyer involvement
 - 437 legal services have been delivered by software with lawyer involvement
 - The rank of legal category addressed has been 1) End of Planning; 2) Business; 3) Marriage/Family; 4) Financial; 5) Accident/Injury. Five legal categories accounted for 77% of legal services. The remaining 15 possible legal categories accounted for 23%. The top three categories accounted for 58% of legal service.



- o To date, entities have reported two complaints to the Office. The first complaint was reported on in the previous report and received an appropriate response. The second complaint was found to fall outside of the three consumer harms.

Consumer Complaint Assessment: All Reporting Entities to Date

Complaint Risk Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	1	<1%
Consumer fails to exercise legal rights through ignorance or bad advice.	0	0%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%

- o Audit materials have begun to be collected from two moderate risk entities that have delivered sufficient moderate risk services.
- o Applicable mismatches between services sought and received were linked to quality control of legal service intake coding (improving service sought identification methods) and error in the process of linking life events to appropriate legal needs. The Office concluded that mismatches were not harms. Audits of moderate risk services will further inform the mismatch issue as applicable to two entities.
- o Other identified data reporting issues were linked to entities having difficulty pulling data from internal systems to align with Sandbox prescribed coding. These issues were resolved through follow-up communications and/or data clarification requests.
- o Legal results were appropriate given legal matters and scope of service. Some distal legal outcomes will not be knowable by reasonable means.
- o The pilot of the vanguard service audits of moderate risk entities is ongoing. One entity has submitted audit materials, and the second entity is preparing to submit data on a subset of moderate risk services as selected by the Office. The Office is working through mechanisms to recruit and pay auditors but may use volunteers to pilot the audit method during June/July to expedite the process.



TABLE 1: AUTHORIZED ENTITIES

Entity Name	Risk Level	Service Models	Service Categories
10 - Blue Bee Bankruptcy	Low	Lawyers employed / managed by nonlawyers	Education
		<50% nonlawyer ownership	Consumer Financial Issues
15 - AGS Law	Low	<50% nonlawyer ownership	Business
			End of Life Planning
			Real Estate
19 - Firmly, LLC	Low	<50% nonlawyer ownership	Business
44 - Hello Divorce	Low	Lawyers employed / managed by nonlawyers	Marriage and Family
		<50% nonlawyer ownership	
04 - Lawpal	Low / Moderate	Lawyers employed / managed by nonlawyers	End of Life Planning
		50+% nonlawyer ownership	Consumer Financial Issues
		Software provider /w lawyer - doc completion	Housing (Rental)
			Marriage and Family
05 - Rocket Lawyer	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Criminal (Other)
			Discrimination
			Domestic Violence
			Education
			Employment
			End of Life Planning
		50+% nonlawyer ownership	Consumer Financial Issues



			Healthcare
			Housing (Rental)
			Immigration
			Marriage and Family
			Military
			Public Benefits
			Real Estate
07 - R & R Legal Services	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Domestic Violence
			End of Life Planning
		50+% nonlawyer ownership	Consumer Financial Issues
			Healthcare
			Marriage and Family
			Public Benefits
14 - FOCL Law	Low / Moderate	Lawyers employed / managed by nonlawyers	Marriage and Family
		50+% nonlawyer ownership	
		Software provider /w lawyer - doc completion	
32 - Tanner LLC (Withdrawn from Sandbox)	Low / Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% nonlawyer ownership	
33 - Xira Connect	Low / Moderate	50+% nonlawyer ownership	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Discrimination



		Fee Sharing	Domestic Violence
			Education
			Employment
			End of Life Planning
			Consumer Financial Issues
			Healthcare
			Housing (Rental)
			Immigration
		Intermediary Platform	Marriage and Family
			Military
			Native American / Tribal
			Public Benefits
			Real Estate
			Traffic Citations
37 - Robert DeBry (Withdrawn form Sandbox)	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
		50+% nonlawyer ownership	
38 - Davis & Sanchez	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
		50+% nonlawyer ownership	Education
39 - Legal Claims Benefits	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Education
		50+% nonlawyer ownership	Healthcare
			Military
41 - Mountain West Legal Protective	Low / Moderate	Lawyers employed / managed by nonlawyers	Housing - Rental
		50+% nonlawyer ownership	Real Estate



02 - 1Law	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Criminal (Other)
		50+% nonlawyer ownership	Discrimination
			Domestic Violence
			Education
			Employment
			End of Life Planning
		Software provider w/ lawyer involvement	Consumer Financial Issues
			Healthcare
			Housing (Rental)
			Immigration
		Non-lawyer provider w/ lawyer involvement	Marriage and Family
			Public Benefits
Real Estate			
Traffic Citations			
03 - Law HQ	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
		50+% nonlawyer ownership	Business
		Software provider w/ lawyer involvement	Employment
12 - Nuttall Brown	Moderate	Lawyers employed / managed by nonlawyers	Accident Injury
		50+% nonlawyer ownership	Business
		Software provider w/ lawyer involvement	Discrimination
		Non-lawyer provider w/ lawyer involvement	Employment



			Marriage and Family
13 - Estate Guru	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% nonlawyer ownership	End of Life Planning
		Fee Sharing	Consumer Financial Planning
		Software provider /w lawyer - doc completion	Healthcare
		Software provider w/ lawyer involvement	Real Estate
		Non-lawyer provider w/ lawyer involvement	
23 - Off the Record	Moderate	50+% nonlawyer ownership	Traffic Citations
		Fee Sharing	
		Software provider w/ lawyer involvement	
27 - Sudbury Consulting	Moderate	Software provider w/ lawyer involvement	Criminal Expungement
			Employment
28 - Pearson Butler	Moderate	50+% nonlawyer ownership	Accident / Injury
			Adult Care
			Business
			Discrimination
			Education
		Fee Sharing	Employment
			End of Life Planning
			Consumer Financial Issues
			Housing (Rental)
			Immigration
		Non-lawyer provider w/ lawyer involvement	Marriage and Family
Military			



			Native American / Tribal		
			Public Benefits		
			Real Estate		
30 - Law on Call	Moderate	Lawyers employed / managed by nonlawyers	Business		
			End of Life Planning		
		50+% nonlawyer ownership	Consumer Financial Issues		
			Housing (Rental)		
		Non-lawyer provider w/ lawyer involvement	Real Estate		
		31 - DSD Solutions	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
Business					
Criminal Expungement					
50+% nonlawyer ownership	Domestic Violence				
	Employment				
	End of Life Planning				
Software provider w/ lawyer involvement	Housing (Rental)				
	Immigration				
	Marriage and Family				
Non-lawyer provider w/ lawyer involvement	Public Benefits				
	Real Estate				
	Traffic Citations				
36 - Timp. Cert. Advocates	Moderate			Nonlawyer provider w/out lawyer involvement	Domestic Violence
					Marriage and Family
42 - Jordanelle Blocks	Moderate			Lawyers employed / managed by nonlawyers	Business
		50+% nonlawyer ownership			
		Fee Sharing	Housing - Rental		
		Software provider /w lawyer - doc completion			



		Software provider w/ lawyer involvement	Real Estate
		Non-lawyer provider w/ lawyer involvement	
43 - LawGeex	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% nonlawyer ownership	Healthcare
		Software provider w/ lawyer involvement	
45 - Holy Cross Ministries	Moderate	Non-lawyer provider w/ lawyer involvement	Financial Issues
			Immigration
			Health Care
			Public Benefits
46 - Gregory Hawkins	Moderate	Lawyer sharing fees with nonlawyers	End of life planning
47 - AAA Fair Credit	High	Non-lawyer provider w/out lawyer involvement	Financial Issues
			Healthcare
			Public Benefits



TABLE 2: AUTHORIZED ENTITIES REPORTING STATUSES

Entity Name	Risk Category	Launch Date	First Report Due	Frequency
Blue Bee Bankruptcy	Low	Oct. 1, 2020	Jan. 5, 2021	Quarterly
AGS Law	Low	Oct. 1, 2020	Jan. 5, 2021	Quarterly
Firmly LLC	Low	Jan. 1, 2021	Apr. 5, 2021	Quarterly
Hello Divorce	Low	Aug. 1, 2021	Oct. 5, 2021	Quarterly
Rocket Lawyer	Low-Moderate	Oct. 1, 2020	Nov. 5, 2020	Monthly
R&R Legal Services	Low-Moderate	Jan. 1, 2021	Feb. 5, 2021	Monthly
LawPal	Low-Moderate	Jan. 15, 2021	Jan. 5, 2021	Monthly
FOCL Law	Low-Moderate	Jan. 1, 2021	Feb. 5, 2021	Monthly
Xira Connect	Low- Moderate	Jun. 1, 2021	Jul. 5, 2021	Monthly
Davis & Sanchez	Low-Moderate	TBD	TBD	Monthly
Legal Claims Benefits	Low-Moderate	TBD	TBD	Monthly
1Law	Moderate	Oct. 1, 2020	Nov. 5, 2020	Monthly
LawHQ	Moderate	TBD	TBD	Monthly
Nuttal Brown	Moderate	Feb. 1, 2021	Mar. 5, 2021	Monthly
Estate Guru	Moderate	Dec. 1, 2020	Jan. 5, 2020	Monthly
Sudbury Consulting / Code for America	Moderate	TBD	TBD	Monthly
Off the Record	Moderate	TBD	TBD	Monthly
Law on Call	Moderate	Feb. 1, 2021	Mar. 5, 2021	Monthly
DSD Solutions	Moderate	Aug. 1, 2021	Sept. 5, 2021	Monthly
Pearson Butler	Moderate	Mar. 1, 2021	Apr. 5, 2021	Monthly
Timp Cert. Legal Advocates	Moderate	TBD	TBD	Monthly
Mountain West Legal Protective	Moderate	Jul. 1, 2021	Aug. 5, 2021	Monthly
Jordanelle Blocks	Moderate	TBD	TBD	Monthly
Law Geex	Moderate	Aug. 2, 2021	Sept. 1, 2021	Monthly
Holy Cross Ministries	Moderate	TBD	TBD	Monthly
Gregory Hawkins	Moderate	TBD	TBD	Monthly
AAA Fair Credit	High	TBD	TBD	Monthly

