



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

INNOVATION OFFICE ACTIVITY REPORT

EXECUTIVE SUMMARY

DECEMBER 2022

JANUARY 19, 2023

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OVERALL METRICS

Total Applications Received	95
Applicants Recommended to Court for Authorization	63
Applicants Denied Recommendation from Innovation Office	2
Applicants Denied Authorization by Court	0
Applicants Tabled (referral fees)	10
Inactive or Withdrawn Applicants Before Recommendation	13
Currently Under Office Review	10
Recommended to Court for Authorization Pending Decision	7
Authorized Entities	47 (plus 5 entities withdrawn and 1 terminated after authorization; 53 total)
Entities Reporting Data (this month)	20
Entities Recommended to Exit the Sandbox	0
Key Risks and Trends	The Office received 1 complaint for sandbox qualified legal services this month



EXECUTIVE SUMMARY

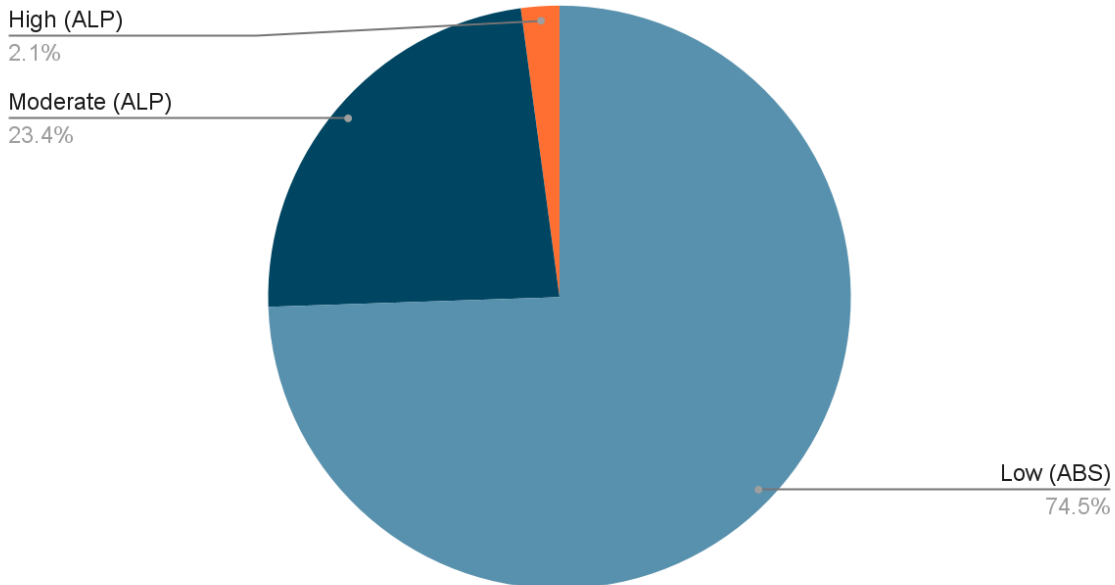
This report summarizes activities and negative risk assessment (i.e., harms) of entities approved by the Utah Supreme Court to implement legal services within the Utah Sandbox and monitored by the Office of Legal Services Innovation. This report covers the period of October 2020 through December 2022.

SANDBOX ACTIVITY (OCTOBER 2020 - DECEMBER 2022)

Active Entities Authorized to Offer Sandbox Legal Services

- 49 active entities approved to offer services

Entities Authorized



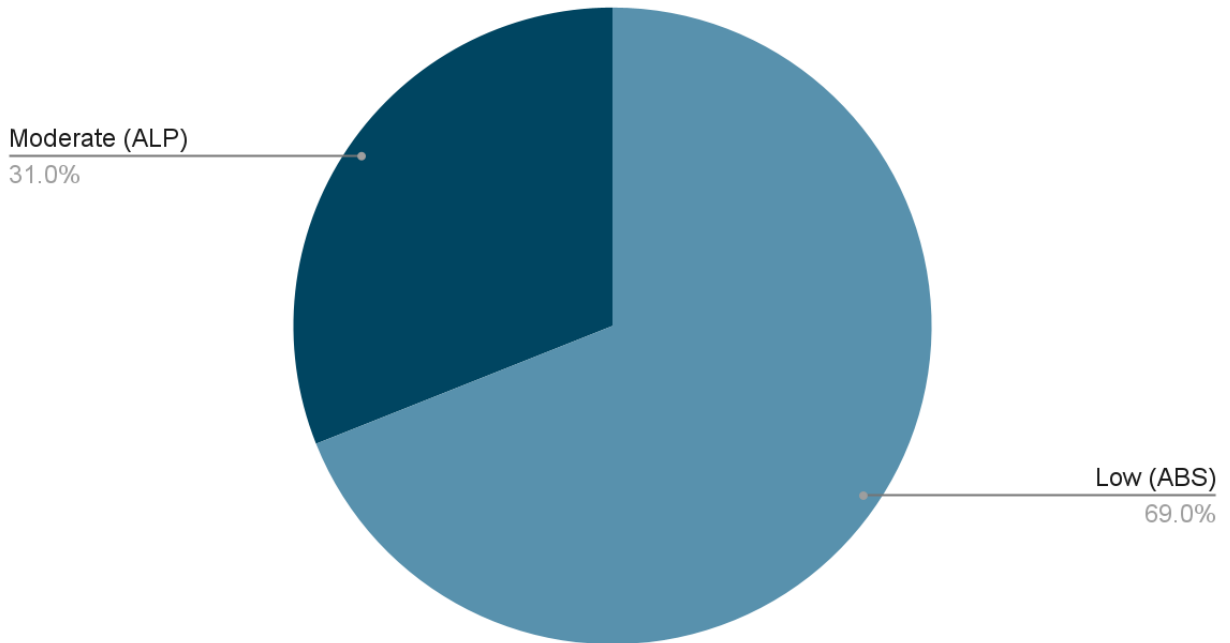
- o **Low Innovation (Alternative Business Structures)=37** (AGS Law, Angel Advocates, Believe First, Bike Legal, Blue Ridge Law Group, Boundless Immigration, D4U Immigration, Darrow AI, Davis and Sanchez, Esquire Law, Fair Credit LLC [formerly Credit Cop], Firmly, GovAssist Legal, Hello Divorce, Herbert-Greenwald Law, HW Human Capital, Immigration Office Solutions, LawPal, Legal Atoms, Lindenberg Law Group, Mina Legal Services, Motion Law LLC, Mountain West Legal Protective, My Immigration, Off the Record, Olsen & Partners Law, PD Digital Logistics Design, R&R Legal Services PLLC, Rocket Lawyer, Rocky Mountain Justice, Savvi Technologies, Standout Legal, Trajan Estate, Trajector Legal [formerly Legal Claims, Inc.], Truinta, WayLit, Xira)
- o **Moderate Innovation (Alternative Legal Providers)=11** (1Law, DSD Solutions, Estate Guru, Holy Cross Ministries, Jordanelle Blocks, LawGeex, Law on Call, Pearson & Butler, Rasa Public Benefit Corporation [formerly Sudbury Consulting], Timpanogos Legal Center, Zaf Legal [Nuttall, Brown & Coutts])
- o **High Innovation (Alternative Legal Providers)=1** (AAA Fair Credit)



Authorized Entities Reporting Data through December 2022

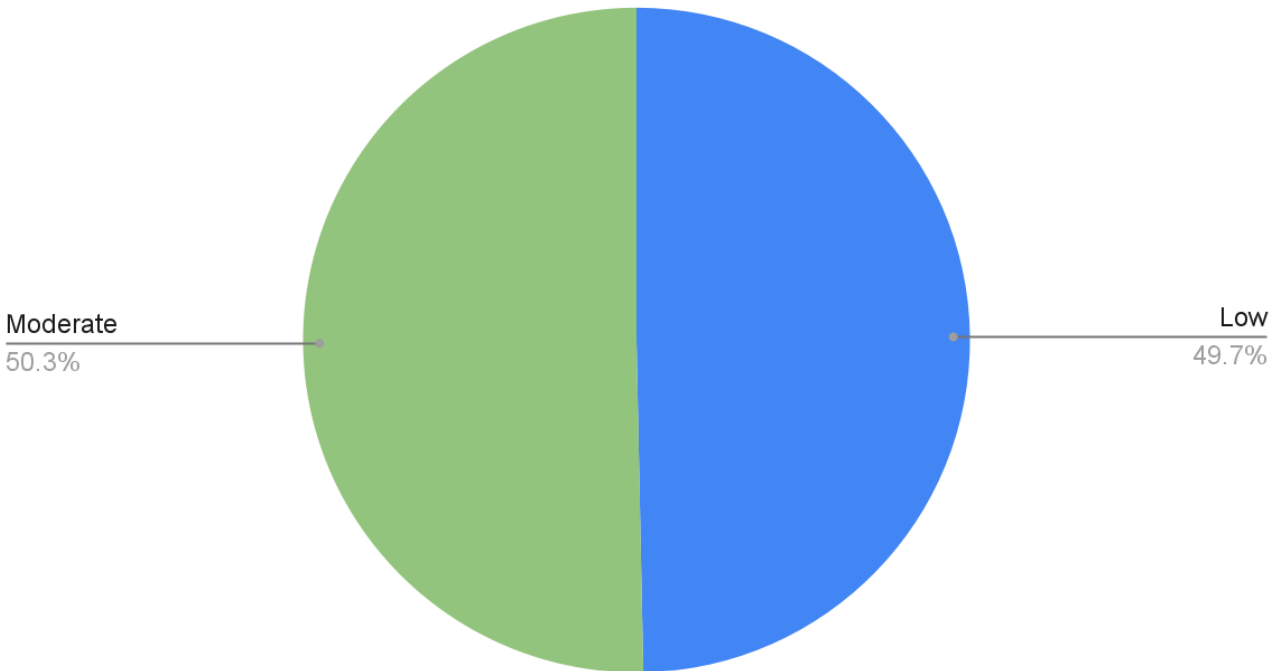
- 31 entities reporting data to date; 20 reporting this period
 - 20 low innovation entities (alternative business structures); 9 moderate innovation entities (alternative legal providers)

Entities Reporting Data to Date



Proportion of Services by Entity Innovation and Legal Categories Addressed through December 2022

Legal Services by Entity Risk

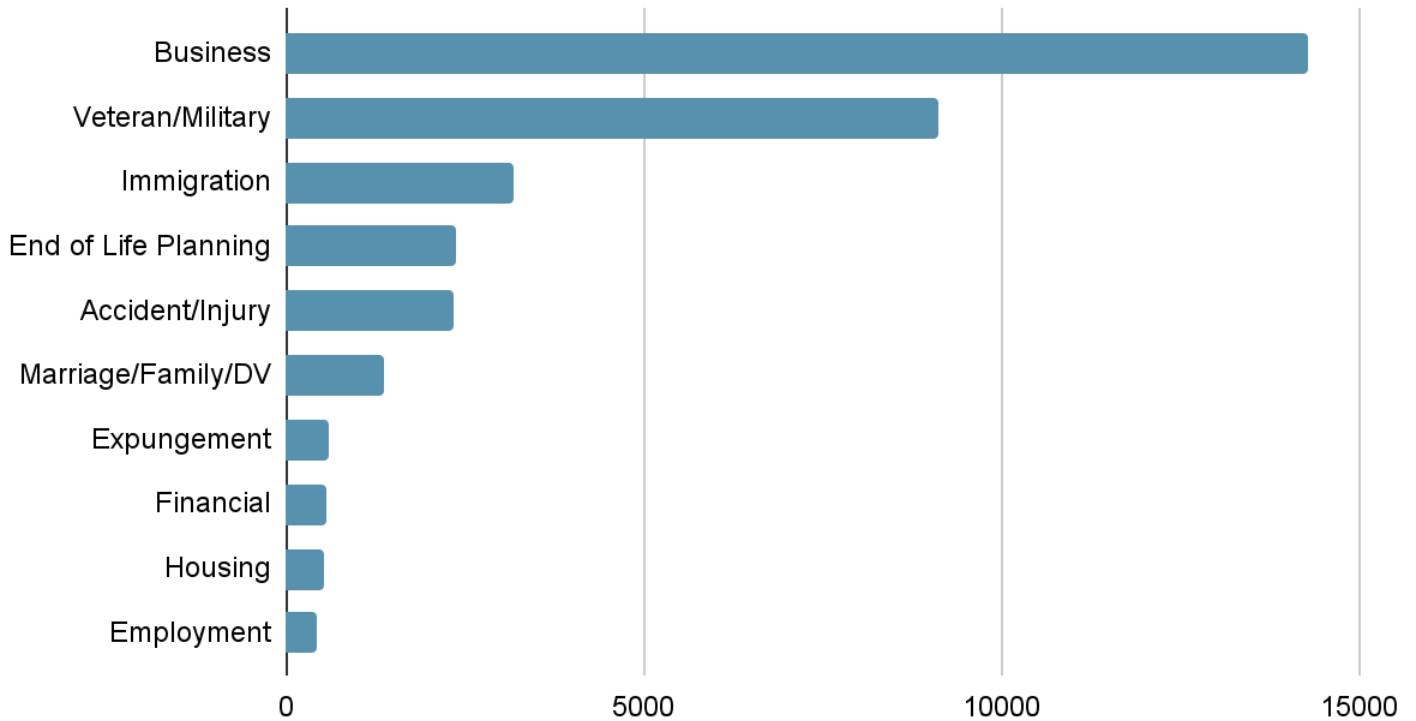


- 37,764 legal services sought from approximately 24,000 unduplicated consumers
 - Low (authorized as an alternative business structure)=18,759 legal services sought; Moderate (authorized as an alternative legal provider)=19,005 legal services sought
 - 32,827 (86.9%) legal services have been delivered by a lawyer (or lawyer employee) or software for form or document completion only with lawyer involvement
 - 4,937 (13.1%) legal services have been delivered by non-lawyers (software or person) with lawyer involvement
- *Legal Categories Addressed by Service*
 - The rank of legal category addressed has been:
 - 1) Business [41.7%; e.g., intellectual property, contracts/warranties, and entity incorporation];
 - 2) Military/Veterans Benefits [24.2%];
 - 3) Immigration [8.8%];
 - 4) End of Life Planning [6.5%];



- 5) Accident/Injury [6.3%];
- 6) Marriage/Family [2.7%];
- 7) Financial [e.g., individual bankruptcy and collections practices; 1.6%];
- o Seven legal categories accounted for 91.9% of legal services. The remaining 13 possible legal categories accounted for 8.1%.
- o The top three categories accounted for 74.6% of legal services.

Total Services by Legal Areas (Top 10)

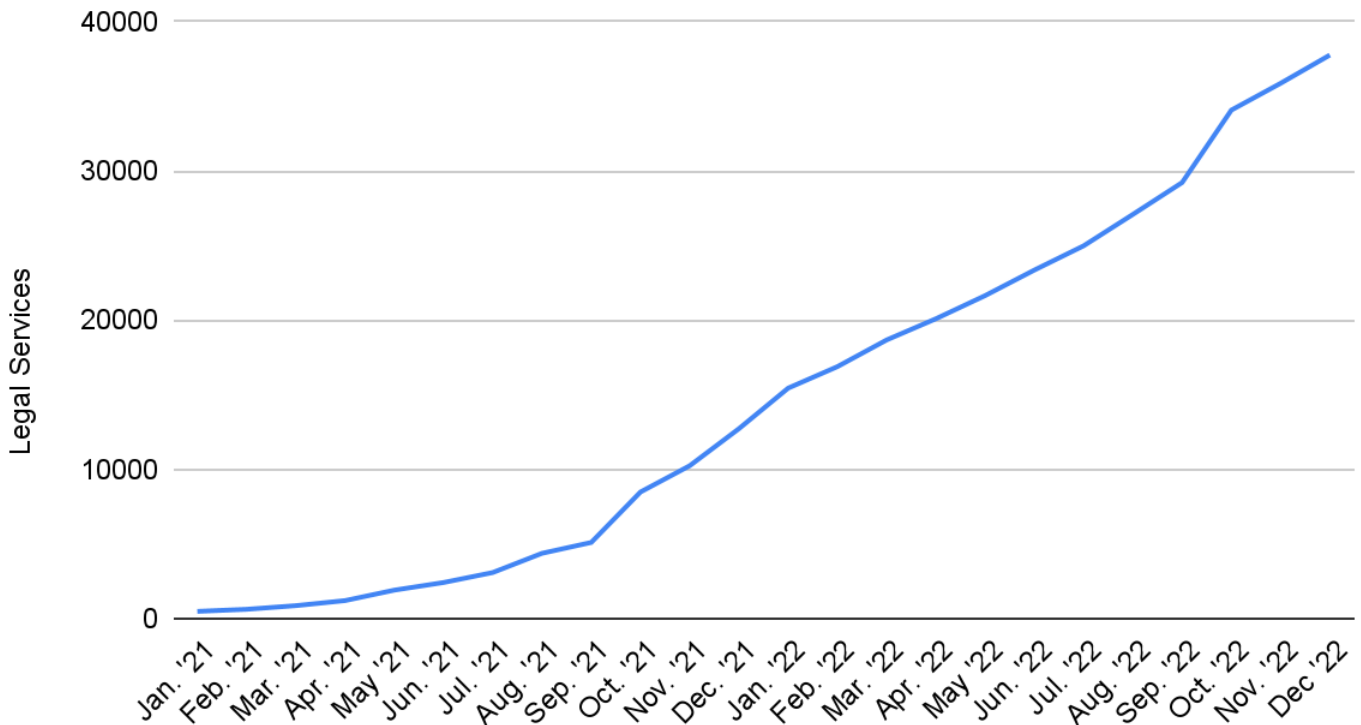


Note that housing rental and housing ownership (real estate) legal matters were collapsed to create the category of Housing and that Marriage & Family and Domestic Violence were collapsed into a single category.



Growth of Services Across Time

Cumulative Legal Services by Month



Complaints and Audits

- To date, entities have reported fourteen complaints to the Office, approximately 1 complaint per 2,905 services delivered. The first complaint was reported in the April 2021 report and was linked to the harm of an inappropriate/inaccurate legal result. The second complaint was reported in the May 2021 report but was not linked to any of the three harms. The third, fourth, and fifth complaints were linked to exercising legal rights and were reported during June, September, October 2021 respectively. Two complaints were reported during December 2021 but neither was harm-related. During April 2022, two complaints were received by the Office; one complaint was harm-related and classified as a harm to a legal result, and the other complaint was found to not be associated with a rights-, results-, or payment-harm. Two complaints were made during June 2022, with one not being harm-related and the other related to a payment harm. One complaint, not harm-related, was made during July of 2022. Another sandbox complaint, not



consumer harm-related, linked to entity disclosures was during November 2022. One complaint was made during December 2022 related to the purchase of an unnecessary legal service. The ratio of harm-related complaints to services was approximately 1 complaint per 5,395 services. To date, entity response to harm-related complaints has been adequate and acceptable as related to harm mitigation and prevention.

Consumer Complaint Assessment: All Reporting Entities to Date

Complaint Harm Category	# Consumer Harm-Related Complaints	% Services with a Harm-Related Consumer Complaint
Consumer achieves an inaccurate or inappropriate legal result.	2	<0.01%
Consumer fails to exercise legal rights through ignorance or bad advice.	3	<0.01%
Consumer purchases an unnecessary or inappropriate legal service.	2	<0.01%

- o Audit materials have been collected from three moderate risk entities, with three reviewed by the Office. Independent lawyer audit panelists reviewed randomly selected representative legal services of the three entities. Three entities’ audit reports were completed and distributed to the Legal Services Innovation Committee (formerly Executive Committee) of the Office of Legal Services Innovation and the Utah Supreme Court for review. Based on audit findings, there was no evidence of material or substantial harm to consumers, and services were found to be at least satisfactory by the Office, its Committee, and independent lawyer auditors. The three entities were authorized to continue to offer services within the sandbox.



TABLE 1: AUTHORIZED ENTITIES

Entity Name	Risk Level	Service Models	Service Categories
04 - Lawpal	Low	Lawyers employed / managed by nonlawyers	End of Life Planning
			Consumer Financial Issues
		50+% non lawyer ownership	Housing (Rental)
		Software provider /w lawyer - doc completion	Marriage and Family
05 - Rocket Lawyer	Low	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Criminal (Other)
			Discrimination
			Domestic Violence
			Education
		Employment	
		50+% non lawyer ownership	End of Life Planning
			Consumer Financial Issues
			Healthcare
			Housing (Rental)
			Immigration
			Marriage and Family
Military			
Public Benefits			



			Real Estate
07 - R & R Legal Services, PLLC	Low	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Domestic Violence
			End of Life Planning
		50+% non lawyer ownership	Consumer Financial Issues
			Healthcare
			Marriage and Family
			Public Benefits
10 - Blue Bee Bankruptcy	Low	Lawyers employed / managed by nonlawyers	Education
		<50% non lawyer ownership	Consumer Financial Issues
14 - FOCL Law	Low	Lawyers employed / managed by nonlawyers	Marriage and Family
		50+% non lawyer ownership	
		Software provider /w lawyer - doc completion	
15 - AGS Law	Low	<50% non lawyer ownership	Business
			End of Life Planning
			Real Estate
19 - Firmly, LLC	Low	<50% non lawyer ownership	Business
23 - Off the Record	Low	50+% non lawyer ownership	Traffic Citations
		Intermediary Platform	
32 - Tanner LLC (Withdrawn from Sandbox March 2021)	Low ¹	Lawyers employed / managed by nonlawyers	Business
		50+% non lawyer ownership	
33 - Xira Connect	Low	50+% non lawyer ownership	Accident / Injury
			Adult Care
			Business



			Criminal Expungement	
			Discrimination	
			Domestic Violence	
		Fee Sharing		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 from Sandbox May 2021)	Low ¹	Lawyers employed / managed by nonlawyers	Accident / Injury	
		50+% non lawyer ownership		
38 - Davis and Sanchez	Low	Lawyers employed / managed by nonlawyers	Accident / Injury	
		50+% non lawyer ownership	Education	
39 - Legal Claims Benefits (Trajector Legal)	Low	Lawyers employed / managed by nonlawyers	Accident / Injury	
			Education	
		50+% non lawyer ownership	Healthcare	
			Military	



			Public Benefits
41 - Mountain West Legal Protective	Low	Lawyers employed / managed by nonlawyers	Housing - Rental
		50+% non lawyer ownership	Real Estate
44 - Hello Divorce	Low	Lawyers employed / managed by nonlawyers	Marriage and Family
		<50% non lawyer ownership	
48 - Legal Atoms	Low	50+% non lawyer ownership	Immigration
		Software provider /w lawyer - doc completion	Marriage and Family
		Fee sharing	Domestic Violence
			Housing - Rental
50 - GovAssist Legal	Low	Lawyers employed / managed by nonlawyers	Immigration
		50+% non lawyer ownership	
		Fee sharing	
		Software provider /w lawyer - doc completion	
51 - Rocky Mountain Justice	Low	<50% non lawyer ownership	Accident / Injury
52 - My Immigration	Low	Lawyers employed / managed by nonlawyers	Immigration
		50+% non lawyer ownership	
		Lawyers sharing fees with nonlawyers	
		Software provider /w lawyer - doc completion	
53 - Savvi Technologies, Inc.	Low	Lawyers employed / managed by nonlawyers	Business
		Non lawyer ownership	
		Lawyers sharing fees with nonlawyers	
56 - Blue Ridge Law Group	Low	Lawyers employed / managed by nonlawyers	Accident / Injury
		Non lawyer ownership	
		Lawyers sharing fees with nonlawyers	



57 - Believe First	Low	Lawyers employed / managed by nonlawyers	Adult Care
			Business
			Discrimination
			Domestic Violence
		Non lawyer ownership	Education
			Employment
			End of Life Planning
			Financial
			Healthcare
		Lawyers sharing profits with nonlawyers	Housing (Rental)
			Marriage and Family
			Public Benefits
			Real Estate
			Other
		58 - Herbert Greenwald Law Group	Low
Less than 50% nonlawyer ownership			
Lawyers sharing profits with nonlawyers			
59 - Waylit	Low	Lawyers employed / managed by nonlawyers	Business
		Non lawyer ownership	Employment
		Intermediary platform	
60 - Trajan Estate	Low	Lawyers employed / managed by nonlawyers	End of Life Planning
		Non lawyer ownership	
		Lawyers sharing profits with nonlawyers	Business



61 - PD Digital Logistics Design	Low	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Discrimination
			Domestic_Violence
		Non lawyer ownership	Education
			Employment
			End of Life Planning
			Financial
			Healthcare
			Housing (Rental)
		Intermediary platform	Immigration
			Marriage and Family
			Military
			Native American and Tribal Law
			Public Benefits
			Real Estate
			Traffic Citation
62 - Fair Credit, LLC (formerly Credit Cop)	Low	Lawyers employed / managed by nonlawyers	Financial
		Non lawyer ownership	
		Lawyers sharing profits with nonlawyers	
63 - Immigration Office Solutions	Low	Lawyer employed / managed by nonlawyers	Immigration
		Nonlawyer ownership	
		Lawyers sharing profits with nonlawyers	



		Software with lawyer involvement- legal document completion	
64 - Boundless Immigration	Low	Lawyer employed / managed by nonlawyers	Immigration
		Nonlawyer ownership	
		Lawyers sharing profits with nonlawyers	
		Software with lawyer involvement- legal document completion	
66 - Bike Legal	Low	Lawyers employed / managed by nonlawyers	Accident / Injury
		Non lawyer ownership	
		Lawyers sharing fees with nonlawyers	
67 - Esquire Law	Low	Lawyer employed / managed by nonlawyers	Accident / Injury
		Nonlawyer ownership	
		Lawyers sharing profits with nonlawyers	
70 - Mina Legal Service	Low	Lawyer employed / managed by nonlawyers	Immigration
		Nonlawyer ownership	
		Lawyers sharing profits with nonlawyers	
71 - D4U Immigration	Low	Lawyer employed / managed by nonlawyers	Immigration
		Nonlawyer ownership	
		Lawyers sharing profits with nonlawyers	
		Software with lawyer involvement - legal document completion	
75 - Lindenberg Law Group	Low	Lawyer employed / managed by nonlawyers	Business
		Nonlawyer ownership	Consumer Financial Issues
		Lawyers sharing profits with nonlawyers	Healthcare
76 - Standout Legal	Low	Lawyer employed / managed by nonlawyers	Business
		Nonlawyer ownership	End of Life Planning
			Housing (Rental)



		Lawyers sharing profits with nonlawyers	Marriage and Family
77 - Olson & Partners	Low	Lawyer employed / managed by nonlawyers	Business
		Nonlawyer ownership	Consumer Financial Issues
		Lawyers sharing profits with nonlawyers	
79 - HW Human Capital	Low	Lawyer employed / managed by nonlawyers	Business
		Nonlawyer ownership	
		Lawyers sharing profits with nonlawyers	Immigration
80 - Truinta	Low	Lawyer employed / managed by nonlawyers	Business
			Employment
		Nonlawyer ownership	Consumer Finance
			Discrimination
		Lawyers sharing profits with nonlawyers	Real Estate
82 - Angel Advocates	Low	Lawyer employed / managed by nonlawyers	Accident/Injury
			Adult Care
			Education
			Employment
		Nonlawyer ownership	End of Life Planning
			Financial Issues
			Healthcare
			Housing - Rental
		Lawyers sharing profits with nonlawyers	Marriage and Family
			Military
Public Benefits			



02 - 1Law	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Criminal (Other)
		50+% non lawyer 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+% non lawyer ownership	Business
		Software provider w/ lawyer involvement	Employment
12 - Nuttall Brown	Moderate	Lawyers employed / managed by nonlawyers	Accident Injury
		50+% non lawyer 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+% non lawyer 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	
27 - Rasa (Sudbury Consulting)	Moderate	Software provider w/ lawyer involvement	Criminal Expungement
		Lawyers sharing fees with nonlawyers	Employment
		Non-lawyer provider w/ lawyer involvement	
28 - Pearson & Butler	Moderate	50+% non lawyer 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+% non lawyer 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+% non lawyer 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
40 - Utah Legal Advocates	Moderate	Nonlawyer provider w/ Lawyer Involvement	Domestic Violence
		Fee Sharing	Marriage and Family
42 - Jordanelle Blocks	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% non lawyer ownership	
		Fee Sharing	Housing - Rental



		Software provider /w lawyer - doc completion	Real Estate
		Software provider w/ lawyer involvement	
		Non-lawyer provider w/ lawyer involvement	
43 - LawGeex	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% non lawyer 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
47 - AAA Fair Credit	High	Non-lawyer provider w/out lawyer involvement	Financial Issues
			Healthcare
			Public Benefits

¹Robert DeBry and Tanner LLC were authorized at Low-Moderate before withdrawing.

TABLE 2: AUTHORIZED ENTITIES REPORTING STATUSES

Entity Name	Risk Category	Launch Date	First Report Due	Frequency
AGS Law	Low	Oct. 1, 2020	Jan. 5, 2021	Quarterly
Rocket Lawyer	Low	Oct. 1, 2020	Nov. 5, 2020	Quarterly
The Fiduciary Law Firm (R&R Legal)	Low	Jan. 1, 2021	Feb. 5, 2021	Quarterly
FOCL Law	Low	Jan. 1, 2021 (relaunch TBD)	Feb. 5, 2021 (relaunch TBD)	Quarterly
LawPal	Low	Feb. 1, 2021 (relaunch Dec. 15, 2022)	Mar. 5, 2021 (relaunch Jan. 5, 2023)	Quarterly
Davis and Sanchez	Low	Jul. 1, 2021	Aug. 5, 2021	Quarterly
Firmly LLC	Low	Jul. 1, 2021	Oct. 5, 2021	Quarterly
Legal Claims Benefits (Trajector)	Low	Aug. 15, 2021	Sept. 5, 2021	Quarterly
GovAssist Legal	Low	Feb. 1, 2022	Mar. 5, 2022	Quarterly
My Immigration	Low	Mar. 1, 2022	Apr. 5, 2022	Quarterly



Off the Record	Low	Apr. 1, 2022	May 5, 2022	Quarterly
Trajan Estate	Low	Apr. 1, 2022	Jul. 5, 2022	Quarterly
Believe First	Low	May 1, 2022	Aug. 5, 2022	Quarterly
Fair Credit, LLC (Credit Cop)	Low	Jul. 1, 2022	Oct. 5, 2022	Quarterly
Sarvi Technologies, Inc.	Low	Aug. 15, 2022	Nov. 5, 2022	Quarterly
Boundless Immigration	Low	Aug. 15, 2022	Nov. 5, 2022	Quarterly
Bike Legal	Low	Sep. 1, 2022	Dec. 5, 2022	Quarterly
Mountain West Legal Protective	Low	Sep. 1, 2022	Dec. 5, 2022	Quarterly
Herbert-Greenwald	Low	Nov. 1, 2022	Feb. 5, 2023	Quarterly
D4U Immigration	Low	Nov. 1, 2022	Feb. 5, 2023	Quarterly
Esquire Law	Low	Nov. 1, 2022	Feb. 5, 2023	Quarterly
Mina Legal Services	Low	Nov. 1, 2022	Feb. 5, 2023	Quarterly
Hello Divorce	Low	Dec. 1, 2022	Mar. 5, 2023	Quarterly
HW Human Capital	Low	Jan. 1, 2023	Apr. 5, 2023	Quarterly
Rocky Mountain Justice	Low	TBD	TBD	Quarterly
Immigration Office Solutions	Low	TBD	TBD	Quarterly
Blue Ridge Law Group	Low	TBD	TBD	Quarterly
Lindenberg Law Group	Low	TBD	TBD	Quarterly
Olson & Partners	Low	TBD	TBD	Quarterly
Standout Legal	Low	TBD	TBD	Quarterly
Legal Atoms	Low	TBD	TBD	Quarterly
Xira Connect	Low	TBD	TBD	Quarterly
Waylit	Low	TBD	TBD	Quarterly
PD Digital Logistics Design	Low	TBD	TBD	Quarterly
Truinta	Low	TBD	TBD	Quarterly
Angel Advocates	Low	TBD	TBD	Quarterly
1Law	Moderate	Oct. 1, 2020	Nov. 5, 2020	Monthly
Estate Guru	Moderate	Dec. 1, 2020	Jan. 5, 2021	Monthly
Law on Call	Moderate	Apr. 1, 2021	May 5, 2021	Monthly
Pearson & Butler (Elysium Holdings) (Elysium Legal)	Moderate	Apr. 1, 2021 (moderate launch TBD Pearson & Butler;	May 5, 2021 (moderate launch TBD Pearson &	Quarterly (Elysium Holdings)



		moderate launch Elysium Legal Nov. 15, 2022)	Butler; Elysium Legal Dec. 5, 2022)	Monthly (Pearson & Butler moderate and Elysium Legal moderate)
Timp Cert. Legal Advocates	Moderate	Jun. 1, 2021	Jul. 5, 2021	Monthly
Law Geex	Moderate	Nov. 1, 2021	Dec. 5, 2021	Monthly
Nuttal Brown	Moderate	Dec. 1, 2021	Jan. 5, 2022	Monthly
Utah Legal Advocates	Moderate	Mar. 1. 2022	Apr. 5, 2022	Monthly
Rasa (Sudbury Consulting)	Moderate	May 1, 2022	Jun. 5, 2022	Monthly
DSD Solutions	Moderate	TBD	TBD	Monthly
Jordanelle Blocks	Moderate	TBD	TBD	Monthly
Holy Cross Ministries	Moderate	TBD	TBD	Monthly
AAA Fair Credit	High	TBD	TBD	Monthly



DECEMBER 2022 ACTIVITY RISK REPORT - HARM ASSESSMENT

Depending on an entity's assessed risk level (the risk level assigned at authorization), OLSI collects a range of measures from the entity designed to assess the occurrence of three harms to consumers (this can also be understood as "actualized risk"):

- Consumer achieves inaccurate or inappropriate legal results.
- Consumer fails to exercise legal rights through ignorance or bad advice.
- Consumer purchases an unnecessary or inappropriate legal service.

As service activity increases among sandbox participants, the Office will receive more kinds of information. For entities assigned higher risk levels, this will include information about legal outcomes, financial outcomes, and expert audits of a sample of work product. As these data accumulate, harm assessments will be based on a review of all applicable measures.

In these early stages of service provision and reporting, the assessment of consumer harm is based on the prevalence of consumer complaints indicating the occurrence of one or more of the three harms. Social scientific studies grounded in expert peer review of lawyers' work product typically find that lawyers commit errors in one fifth to one quarter of the cases reviewed. Taking this finding as a baseline, the harm assessment classifies receipt of harm-related complaints from more than 25% of consumers as a significant warning of harm (red), which would indicate an immediate need for the entity to work with OLSI to develop and implement quality improvement plans to prevent harms and might also lead the Office to recommend that the Court suspend the entity's operations in the sandbox. Receipt of harm-related complaints from 11-25% of consumers would trigger a watch (yellow) to better understand and prevent potential harms and would likely include the requirement of additional information from entities so classified. Receipt of harm-related complaints from 10% or fewer of an entity's consumers is considered reasonable risk (green) and does not trigger the need for any additional risk assessment.

