

In the Supreme Court of the State of Utah

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In re: Application of Boundless Immigration Inc.

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 Boundless Immigration Inc ("Boundless Immigration") and its subsidiaries, Boundless Legal LLC and RapidVisa Legal LLC, are authorized to practice law 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 27, 2022 for Boundless Immigration Inc. and its subsidiaries Boundless Legal LLC and RapidVisa Legal LLC to be authorized to practice law.

Boundless Immigration and its subsidiaries are non-lawyer entities seeking to hire attorneys as employees to expand existing services provided by a software platform and through non-lawyer customer success team members.

The Innovation Office has assessed the risk of harm to Boundless Immigration targeted consumers relative to the risk of harm they currently face and has determined that the risk of harm presented by Boundless 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. Boundless Immigration and its subsidiaries are authorized to offer legal services through the following methods

- a. Lawyer employed or managed by a nonlawyer
- b. Nonlawyer ownership
- c. Lawyers sharing profits with nonlawyers
- d. Software with lawyer involvement- legal document completion

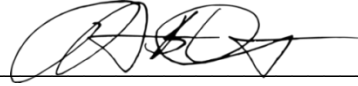
The Supreme Court of Utah does not have the jurisdiction to determine what constitutes the practice of law in immigration court and does not take a position on whether or not the software, as currently used by Boundless Immigration, constitutes the “practice of law” as defined in 8 CFR 1.2. Boundless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

2. Boundless Immigration and its subsidiaries are authorized to provide legal services across the following legal service areas, subject to the restrictions outlined below:
 - a. Immigration
3. Boundless Immigration shall conform to the Low Innovation reporting requirements imposed by the Innovation Office and includes data reporting for its subsidiaries.
4. Boundless Immigration and its subsidiaries will prominently display the following disclosure requirements:
 - a. Innovation Office Badge
 - b. Nonlawyer ownership disclosure

If Boundless 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 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.

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 Boundless Immigration and its subsidiaries’ 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.

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

Matthew B. Durrant
Chief Justice

BOUNDLESS

Boundless Immigration, Inc. Sandbox Application

1. APPLICANT INFO

- 1.1. Entity Name – Boundless Immigration, Inc.
- 1.2. Proposed Entity Website – www.boundless.com
- 1.3. Business Email – be@boundless.com
- 1.4. Business Phone Number – 855-268-6353
- 1.5. Business Address – 300 Lenora Street, #251, Seattle, WA 98121
- 1.6. Mailing Address – 300 Lenora Street, #251, Seattle, WA 98121
- 1.7. Sandbox Application Contact Name – [REDACTED]
- 1.8. Contact Title – Counsel for Boundless
- 1.9. Contact Phone Number [REDACTED]
- 1.10. Additional Application Contact Name: [REDACTED]
- 1.11. Additional Contact Title: X [REDACTED]
- 1.12. Additional Contact Phone Number: [REDACTED]
- 1.13. Additional Contact Email Address: [REDACTED]
- 1.14. Bar License No. (if applicable): TBD

2. PROPOSED SERVICES

2.1 Describe your proposed legal services offering in detail.

Please include (i) who provides the legal services, (ii) how consumers will access/receive these services, and (iii) what your service will do for your consumers.

Boundless Immigration, Inc. (“Boundless”) empowers families to navigate the U.S. immigration system more confidently, rapidly, and affordably. The US immigration system is complex and difficult to navigate by a layperson. Historically, millions of immigrants and their families have been forced to choose between either paying thousands of dollars in legal fees, or spending months trying to self-navigate the immigration system and apply for status on their own. In the latter instance, this substantially increases the chance of an application denial or the government returning for an RFE (request for evidence), prolonging the process. Boundless uses technology to bridge the gap between these two options. Our platform and services help customers understand their eligibility for specific visa and green card types and streamlines the form-filling and application assembly processes. To complement our technology, our Customer Success team (“CS team”) partners with our customers to guide them through their immigration journey, from

understanding and finding the required supporting personal documents, to ensuring consistency in information provided across forms and documents, to assembling final application packages for submission to the United States Citizenship & Immigration Office (USCIS). Our CS team members are not lawyers and thus currently do not provide legal services to our customers. They carefully explain USCIS and National Visa Center (NVC) recommendations to customers without providing any personalized legal advice.

Currently, Boundless owns and operates two brands: [Boundless](#) and [RapidVisa](#) (collectively referred to in this application as “Boundless”).¹ These brands offer varying service levels at different price points:

- Services offered through the Boundless brand include a legal review of a customer’s draft application by an independent immigration attorney. The independent attorney provides legal advice to customers via a limited scope agreement. The customer communicates with the attorney through our custom technology platform. Virtual legal consultations (video call, phone, or email) are also offered.
- Services offered through the RapidVisa brand do not, by default, include legal services through independent immigration attorneys. Customers can obtain legal support through an add-on service, utilizing independent immigration attorneys (see “Ask My Attorney” overview below).

Our core services are available for purchase on our website(s) for customers who pass our petition eligibility check, and who can provide a valid form of payment. We provide our customers with payment plan options that allow them to pay their petition preparation fees and USCIS fees in up to 12 monthly installments. This payment plan offering increases access to justice for lower-income families who may not have alternative financing options.

In addition to core immigration service offerings, Boundless sells an adjacent legal service fulfilled via a network of independent immigration attorneys: [“Ask My Attorney”](#) is a monthly, subscription-based model allowing customers to schedule an unlimited number of 15-minute calls with an independent immigration attorney for legal advice. For example, a customer might subscribe to our Ask My Attorney service for one-off questions around moving or changing jobs through their marriage-based green card process.

Through the opportunities offered by the Utah Sandbox, Boundless proposes to provide additional legal services to our customers as follows:

We propose that 1) our software platform; and 2) our trained and competent non-attorney staff will deliver legal advice and assistance to our customers. Boundless will employ/contract Utah-licensed attorneys who will be managed by nonlawyers. These attorneys will 1) provide legal services directly to our Boundless customers via application reviews and individual consultations; and 2) create language, advice, and provide responses to customer questions. The latter will also be delivered to our customers by our software platform and our CS team.² The approval of

¹ In the future, Boundless may acquire other entities that provide immigration-related services.

² This will be primarily our CS team. Our sales team may be involved in helping customers select the appropriate product for them under the supervision of a Utah-licensed attorney.

language and “canned responses” will be prepared/approved by a Utah-licensed attorney and may constitute legal advice.

Our proposed services will provide extensive benefits to the Utah customer including:

- High quality legal services provided at a lower cost compared to traditional attorney services;
- Increased confidence in the process;
- Reduced stress of customer;
- Faster application preparation and submission;
- Reduced likelihood of receiving an RFE;
- Higher probability of application success;
- Providing a “representative of record” for USCIS;
- Better customer understanding of the process, timeline, evidence required etc;

2.2 Describe the entity business model you want authorized in the Sandbox, including the management structure which will oversee direct legal services providers.

Boundless seeks to offer legal services through the following models:

- 50% or more nonlawyer ownership;
- Lawyers employed or managed by a nonlawyer;
- Nonlawyer provider with lawyer involvement;
- Software provider with lawyer involvement - legal document completion

We currently anticipate that our Head of Legal Operations³ will manage our team of immigration attorneys as we build the team and deploy our new service models. This role will report directly to our Senior Director, Global Customer Success.

See also 2.3.

2.3 Why is your proposal eligible to enter the Sandbox?

Identify the specific model, service or product innovations that are not permitted under the traditional rules governing the practice of law.

- Non-attorney ownership/management. Boundless is owned exclusively by non-attorneys. Non-attorneys supervise attorneys who provide immigration services. Boundless seeks confirmation that the ownership and management proposal outlined in this application complies with the provisions of Rule 5.4 of the Utah Rules of Professional Conduct.
- Non-attorney staff. Non-attorney staff (the CS team) with sufficient experience, training, and oversight should be allowed to provide limited legal advice under the supervision of a Utah licensed attorney without violating the rules of unauthorized practice of law. This reduces the cost of legal services to consumers and allows consumers with more modest means to access legal services. Due to existing rules, immigration is a practice area where competently trained staff cannot be maximized in a way that may be more cost-efficient

³ This role is in the process of being filled

for the client. A variance should be granted to allow more consumers to be served by competently trained and supervised staff.

- Software provider with lawyer involvement – Boundless seeks a variance to allow the software platform to deliver “canned legal responses” to consumers that have been prepared/approved by attorneys.

2.4 Describe your target consumer

Boundless anticipates serving (through both the Boundless and RapidVisa products) consumers living in the U.S. or abroad who are seeking a more affordable and streamlined option to obtain either (1) a new immigration status; or (2) a visa for the right to live and work in the United States.

Boundless anticipates primarily serving consumers who wish to reunite their families here in the United States. Currently, 88% of our customers use our services to obtain status for their immediate family members. These individuals are generally lower-middle class to upper middle-class consumers. These individuals are widely underserved because they cannot often afford quality legal services. 2017 ABA report states that 40%-60% of the middle class’s legal needs go unmet. Leonard Will, [Access to Justice, Mitigating the Justice Gap](https://www.americanbar.org/groups/litigation/committees/minority-trial-lawyer/practice/2017/access-to-justice-mitigating-justice-gap/), (December 3, 2017), <https://www.americanbar.org/groups/litigation/committees/minority-trial-lawyer/practice/2017/access-to-justice-mitigating-justice-gap/>.⁴ Yet these consumers are in a position to more actively participate in the community and economy if they have access to such services.

Boundless provides services for consumers who either cannot afford, or who do not wish to pay for traditional immigration attorney services. Boundless’s services are far more affordable than traditional immigration attorney services. In the year 2020, Boundless had a 99.96 application approval rate.

2.5 What service models are you seeking to use? Select all that apply.

- Lawyers employed or managed by a nonlawyer
- More than 50% nonlawyer ownership
- Nonlawyer provider with lawyer involvement
- Software provider with lawyer involvement – legal document completion

2.6 Which legal services categories are you seeking to offer?

- Immigration

3. RISK ASSESSMENT

3.1 Fully and candidly discuss the risks your consumers might face if they use your proposed model, including each of the risks described above.

⁴ See also, e.g. Rebecca Buckwalter-Poza, [Making Justice Equal](https://www.americanprogress.org/article/making-justice-equal/) (December 8, 2016), <https://www.americanprogress.org/article/making-justice-equal/>

A consumer may potentially receive inappropriate legal advice (either through the platform, CS team, an in-house attorney, or one of our independent network attorneys).⁵ Likewise, a customer could fail to exercise a legal right by ignorance or flawed legal advice.⁶ This could lead to an application being denied or delayed.

These risks are mitigated/remedied by Boundless's multi-faceted approach to ensuring outstanding results and customer success. These include:

- In-house attorney and independent network attorney oversight of the delivery of all services provided by the platform and CS team;
- Extensive training for the CS team and all independent network attorneys;
- Regular audits of the CS team and independent network attorneys;
- Quality assurance procedures;
- Following the complaint process described in 3.3;
- Refund and satisfaction guarantee policy;
- Customer disclosures;
- Where an application is denied, Boundless would provide assistance to mitigate customer impact which may include filing a new application or a motion to reopen. Further, a full refund of Boundless fees would be provided.

It is also possible that the software platform or sales team suggests a service to a consumer for which they are not deemed eligible by the US Government. To mitigate this risk, Boundless will conduct regular audits of the "eligibility assessment tool" on the platform, as well as conduct regular training with the sales staff. In the event that a consumer purchases a service where they are not eligible, a full refund will be provided.

There is a risk, or at least a perceived risk, that a software platform, and non-attorney staff may not provide services at the same standard as a private immigration attorney. Boundless already has a professional reputation for providing high quality consumer immigration services and enjoys an extremely high success rate.⁷ Boundless's commitment to success and customer satisfaction will guide attorneys and non-attorneys alike to carefully select and train non-attorneys who would be authorized to provide those services. Boundless currently employs a highly trained CS team overseen by our Senior Director of Customer Success. This team can provide streamlined immigration services at a much lower cost to consumers. Boundless will seek to ensure that the CS team will provide services on par with the services provided by attorneys. The current rules for unauthorized practice of law prohibit more services from being delegated to non-attorneys, which can result in higher costs to consumers.

3.2 Describe the specific ways you will identify, track, and mitigate the risks of consumers in your proposed model.

⁵ An equivalent risk may also occur with services provided by a traditional immigration attorney. In any legal matter, there is always a risk of a bad outcome.

⁶ For example, not being advised of a right to appeal or not being advised of a right to seek a waiver etc.


⁷ In 2020, Boundless had a 99.96 success rate in application approval.

- Client satisfaction reviews and surveys;
- A comprehensive complaint and customer service policy (*See* 3.3);
- Regular quality assurance and audits of work performed by the CS team and independent network attorneys;
- Extensive disclosures will be provided to the consumer;
- Regular training of the CS team and independent network attorneys;

See also, supra, 3.1, and *infra*, 3.3.

3.3 Please describe your consumer complaint process.

Boundless provides a variety of channels for how consumers can submit complaints:

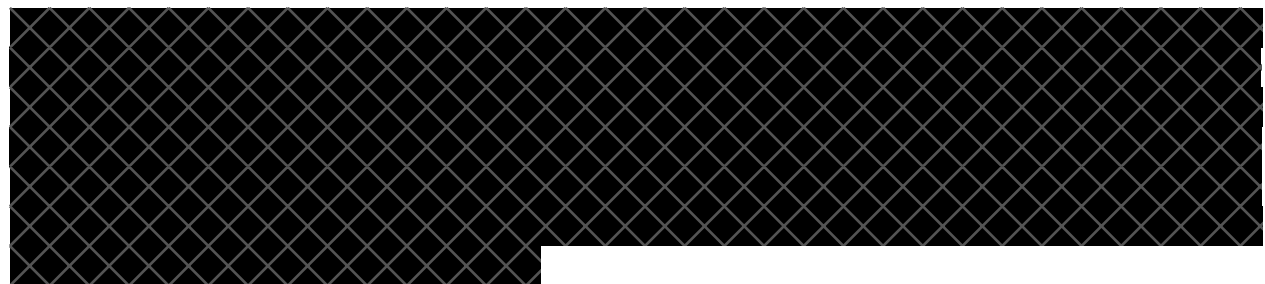
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4. BENEFITS TO UTAH CONSUMERS

4.1 Describe how your model will provide higher quality, more cost-effective, and more accessible legal services for your target consumers.

The high cost of attorney-provided immigration legal services coupled with both the needless complexity of the US immigration system and the difficulty that lower to middle class consumers

have in accessing justice, creates a barrier to entry for many consumers to obtain quality and affordable legal services.

Boundless (through both brands) will increase the ability of Utah consumers to obtain more affordable immigration services through our various models. Our base services average between \$149 and \$995 compared to the thousands of dollars it costs to engage traditional immigration attorney services. Unlike most independent attorneys, Boundless reduces the financial risk to our customers with a 100% money-back guarantee in instances where 1) An application is denied by the government due to our error; 2) a customer receives an RFE due to our error; 3) or upon customer dissatisfaction within 30 days of initiating services. We provide additional services to the customer to respond to an RFE at no additional cost upon our error. Our customers increase their chance of application approval in working with us. Our success rate (blended across both brands) is 99.96%, compared to USCIS' approval rate of ~82% (blended across customers applying with and without legal support).

Our innovative approach of blending technology with legal services will provide countless Utah families with affordable, high-quality legal services.

4.2 Does your proposal comply with applicable Utah requirements?

Yes.

4.3 Identify which of your services are ready to immediately implement.

One of our in house attorneys is currently working on reciprocal licensing in Utah and will be licensed in Utah within a few months. She is eligible for Utah admission based on UBE score.

Upon approval, we will be contracting with Utah attorneys in the very near future and expect to begin delivering services shortly thereafter.

5. CONFIRMATION OF ELIGIBILITY

5.1. List all persons who wholly or partially direct the management or policies of your proposed entity and/or the direct provision of legal services to consumers, whether through ownership of securities, by contract, or otherwise (“controlling persons”).

Entities

- Boundless Immigration, Inc. (Delaware corporation; parent company)
- RapidVisa, Inc. (Nevada Corporation)
- RapidVisa, Philippines, Inc. (Philippines Corporation)

Controlling Persons:

- Xiao Wang (Co-founder, Chief Executive Officer)
- Erik Finch (Interim Director Vice President of Customer Success)⁸
- Melissa Blume (Vice President of Product)

⁸ This position will be filled shortly.

5.2 List all persons or entities who will wholly or partially (greater than 10%) finance the business of your proposed entity (“financing persons”).

As a venture-capital-funded technology company that consumes cash, Boundless periodically raises equity cash funds to fund the company’s operations over the following 18-24 months.

[REDACTED]

[REDACTED]

Shareholders who own [REDACTED] shares in Boundless are:

- Foundry Venture Capital 2016, L.P. [REDACTED]
- Pioneer Square Labs [REDACTED]
- Trilogy Equity Partners, LLC [REDACTED]
- Xiao Wang [REDACTED]

5.3 Please note that no financing person may be a disbarred or suspended lawyer. List all controlling persons who are disbarred or suspended lawyers.

None

5.4 List all controlling persons or financing persons of your proposed entity who have a felony criminal history.

None

5.5 List all persons who will be in a managerial role over the direct provision of legal services to consumers who are disbarred lawyers.

None

5.6 List all persons who will be in a managerial role over the direct provision of legal services to consumers who have a felony criminal history.

None

5.7 Please select the most accurate description: my proposed entity has a material corporate relationship and/or business partnership with:

A disbarred or suspended lawyer

An individual with a felony criminal history

Neither a disbarred / suspended lawyer or an individual with a felony criminal history

I confirm that no financing persons listed in this application are disbarred or suspended lawyers.

Signature: 

Printed Name: Xiao Wang

Title: CEO

Date: March 15, 2022

SELLING OF CONSUMER DATA DISCLOSURE

Please indicate whether your business model includes the sharing or selling of consumer data in any form to third parties.

Yes

No

PUBLIC APPLICATION

Your application could be made publicly available. You will have the opportunity to make a claim of business confidentiality for specific information that would qualify for protection under GRAMA Section 63G-2-305. Making false or materially misleading statements in this application is a basis for loss of authorization to practice within the Sandbox. Other criminal and civil sanctions may also apply.

I understand.

Signature: 

Printed Name: Xiao Wang

Title: CEO

Date: March 15, 2022