

In the Supreme Court of the State of Utah

----oo0oo----

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

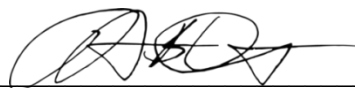
The Supreme Court of Utah does not have the jurisdiction to determine what constitutes the practice of law in immigration court and does not take a position on whether or not the software, as currently used by My Immigration, constitutes the practice of law as defined in 8 CFR 1.2. My Immigration is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

Application: 00001-0000000050

Office of Legal Services Innovation

Application Custom Fields

None present

Summary

ID: 00001-0000000050

Last submitted: Oct 14 2021 04:35 PM (MDT)

Labels: Lawyers employed or managed by a nonlawyer, More than 50% nonlawyer ownership, Lawyers sharing legal fees or paying referral fees to nonlawyers, Other, Immigration

Personal Information

Completed - Oct 14 2021

Personal Information

Entity Name

My Immigration, LLC

Business Email Address

Business Phone Number

TBD

Business Website

TBD

Business Address

Address Line 1	TBD
Address Line 2	TBD
City	TBD
State	Utah

Mailing Address

Address Line 1	TBD
Address Line 2	TBD
City	TBD
State	Utah

Contact Name**Contact Title**

Contact Phone Number

Contact Email

Second Contact Name

(No response)

Second Contact Title

(No response)

Second Contact Phone Number

(No response)

Second Contact Email

(No response)

Bar License No. and State (if applicable)

(No response)

1. Proposed Services

Completed - Oct 14 2021

1. Proposed Services

1.1. 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 customers.

My Immigration, LLC (“My Immigration”) will provide technology-enabled immigration legal services through a website located at www.myimmigration.com, which is currently under construction. The website will provide consumers general information regarding immigration, online access to immigration form creation software, and consultations with immigration attorneys. Currently, consumers seeking immigration services must choose between do-it-yourself websites that cannot offer attorney services or retaining an immigration lawyer at considerable expense. My Immigration will take advantage of the Utah sandbox to combine the efficiency and cost-reduction of legal form software with individualized attorney consultation, all in one location.

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

My Immigration, LLC, will be organized as a Utah limited liability company owned ninety-five percent (95%) by File Right, Inc. (“File Right”), a Nevada corporation, and five percent (5%) by attorney(s) licensed in the State of Utah. File Right will license its existing immigration legal form creation software to My Immigration for use on www.myimmigration.com and will provide other back-office support services. My Immigration’s customers will be able to use this web-based immigration form completion technology and consult with My Immigration attorneys about their cases. All legal services will be controlled and provided by licensed attorneys employed by My Immigration. File Right will not direct or control the lawyers’ provision of legal services and advice to My Immigration customers. My Immigration intends to employ the same business model of attorney-assisted, technology-enhanced, legal services that Rocket Lawyer is now providing under the Utah sandbox.

1.3. 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.

The proposed business model involves lawyers providing legal services to customers while employed by a for-profit entity that is not wholly owned by attorneys. Because non-lawyers would own an equity interest in My Immigration, the model is inconsistent with Utah's prohibition against non-lawyer ownership of law firm, the ethical prohibition against attorneys practicing law while employed by a non-lawyer owned entity, and fee-sharing between attorneys and non-attorneys.

1.4. Describe your target consumer(s).

For example: single parents making <\$50,000 in a custody dispute, first generation college students in a landlord-tenant dispute; renters 40+ years planning for retirement; college educated entrepreneurs seeking legal advice in starting a business.

My Immigration's target consumers is a person over the age of 18 who is seeking U.S. citizenship, permanent residence or a visa for residence, work or educational purposes or in need of other immigration services for themselves or their family. When construction of the website, www.myimmigration.com, is complete, it will offer online immigration application form creation as well as attorney-enhanced services for Green Card Renewal (Form I-90), US Citizenship (Form N-400), Deferred Action (DACA) (Form I-821D), Employment Authorization (Form I 765), Certificate of Citizenship (Form N-600), Replacement of Citizenship Certificate (Form N-565), Petition for Alien Relative (Form I-130), Removal of Conditions (Form I-751), Adjustment of Status (Form I-485) and Petition for Alien Finance (Form I-129f) . My Immigration LLC anticipates offering those immigrations services initially, and then adding others over time.

Please attach any supporting materials you'd like to include with your application.

Application Cover Letter

Filename: 2021-10-14 Sanbox Application Cover Letter (signed).pdf **Size:** 89.5 kB

Summary of the business documents and agreements to be used in My Immigration's business

Filename: Summary of Business Documents and Agreements.pdf **Size:** 62.0 kB

Exhibits to the application, including a business structure chart and copies of the business documents and agreements to be used in My Immigration's business

Filename: Exhibits to Sandbox Application.pdf **Size:** 1.0 MB

1.5. Which service models are you seeking to use?

Select all that apply.

Responses Selected:

Lawyers employed or managed by a nonlawyer

More than 50% nonlawyer ownership

Lawyers sharing legal fees or paying referral fees to nonlawyers

Other:: Attached is a summary of the structure of the transaction and the agreements between the parties.

1.6. Which legal service categories are you seeking to offer?

Select all that apply.

Responses Selected:

Immigration

¹ Provider means legal practitioner: a provider who or which is practicing law, including offering legal advice.

² Involvement denotes a range of activities, including guidance on initial development of forms, scripts, processes, software. It could mean a lawyer does sample reviews of product/service performance. It could mean a lawyer is available to advise the nonlawyer provider as needed - including via red flag trap doors in software.

2. Risk Assessment

Completed - Oct 14 2021

2. Risk Assessment

The Innovation Office must assess whether new legal service models cause consumers to get inappropriate or otherwise flawed legal results, fail to exercise legal rights through ignorance or bad advice, or purchase an unnecessary or inappropriate legal service.

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

Because a non-lawyer owned entity will own a majority interest in My Immigration, there is a hypothetical risk that it may try to manage the delivery of legal services by the Company to maximize profits to the detriment of clients.

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

These efforts could include quality control measures, training, provider testing.

The risk described above will be mitigated by prohibiting any non-lawyer from directing the provision of legal services or the exercise of any My Immigration attorney's independent legal judgment, and by requiring all retained attorneys to guarantee that they will comply with all applicable attorney professional responsibility and ethics rules. These prohibitions and requirements will be contained in the Company's Operating Agreement, Business Support Agreement, and Attorney Employment Agreement.

2.3. Please describe your consumer complaint process.

All complaints will be forwarded and reviewed by the Chief Legal Officer. The Chief Legal Officer will implement policies and procedures to not only remedy the complaint (assuming it is a valid complaint) but to insure that the matter complained of does not happen again.

The Chief Legal Officer will also be responsible for following up on all complaints in order to insure that the matter complained of has been resolved.

3. Benefits To Utah Consumers

Completed - Oct 14 2021

3. Benefits To Utah Consumers

The Innovation Office is assessing potential benefits of proposed offerings to the Utah legal market.

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

My Immigration will provide higher quality, more cost effective, and more accessible legal services to consumers by combining the efficiency and accuracy of existing immigration form creation technology with simple and affordable direct access to attorneys, all in one place. Immigration form creation software provides customers an easy-to-use and easy-to-follow process for completing standard US immigration documents. Using software reduces errors and saves time for both the customer and My Immigration, reducing costs. Providing direct access to attorneys for those customers who have questions or who would like their forms reviewed by a lawyer saves customers time and effort locating attorneys. My Immigration will provide customers "unbundled" immigration legal services that are difficult, if not impossible, for most customers to find. And, because My Immigration attorneys will have direct access to the forms created by the customers, they and their clients will share a technology platform allowing them to efficiently review the client's information documents and provide individualized legal advice based on their specific situation, something non-lawyer attorney document services are not permitted to provide.

3.2. Does your proposal comply with applicable Utah legal requirements?

For example: staffed by UT licensed attorneys, built to complete state legal forms.

Yes, the proposed structure complies with applicable Utah legal requirements, as the company will be staffed with attorneys licensed to practice law in the State of Utah and as all professional legal services will be provided and directed solely by such licensed attorneys.

3.3. Identify which of your service models are ready to immediately implement.

The Office of Innovation is only authorized to consider proposals which are ready to begin offering legal services not currently authorized in Utah at the time of authorization.

The Company is ready to launch its business model. The Company will license its software and upon approval of the Office of Innovation, Lawyers are lined up and ready to be employed to provide the legal services.

4. Confirmation Of Eligibility

Completed - Oct 14 2021

4. Confirmation Of Eligibility

4.1. List all persons and entities 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”).

1. File Right, Inc., a Nevada corporation, will license its immigration form completion software and provide back-office services.

2. A licensed Utah attorney will provide the legal services and manage any other lawyers providing legal services.

The specific structure of the company and the agreements between the parties are attached.

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

File Right, Inc., a Nevada corporation

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

None.

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

None.

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

None.

4.6. 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.

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

Neither a disbarred / suspended lawyer nor an individual with a felony criminal history

4.8. Disclose any history of state or federal criminal (misdemeanor or felony) conviction, state or federal consent decree, or state or federal enforcement action resulting in sanctions (disgorgement, civil penalties, and/or injunction) for the entity and, if applicable, its parent and other affiliated companies.

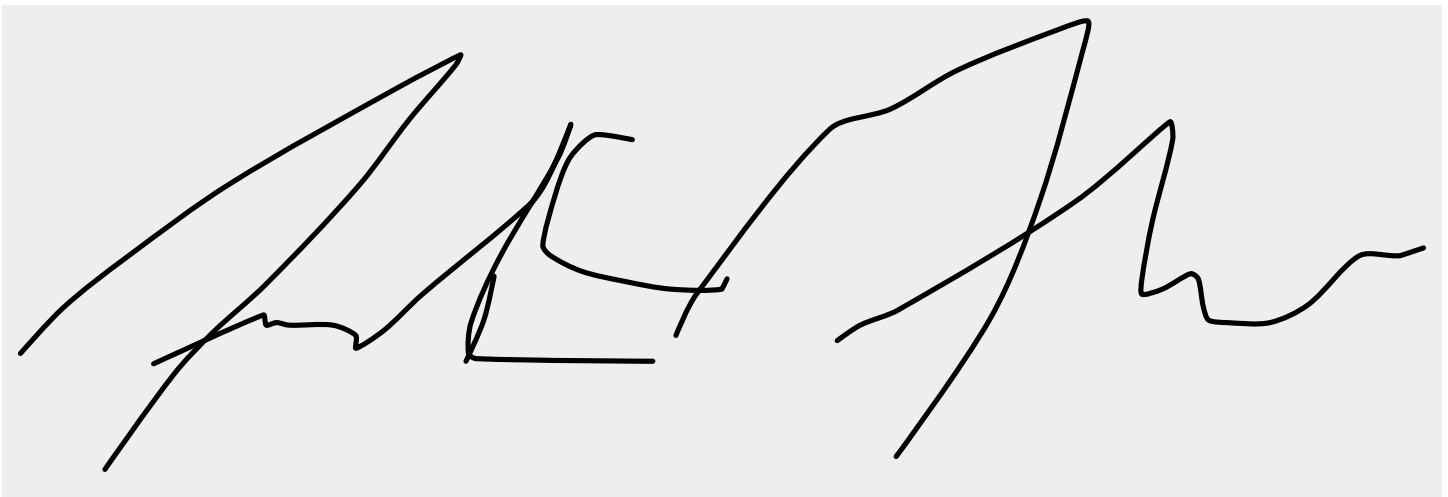
None.

4.9. Disclose whether the entity, parent, and other affiliated companies are, to their knowledge, currently subject to a state or federal criminal investigation or state or federal enforcement action.

None

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

Signature

A handwritten signature in black ink on a light gray background. The signature is stylized and appears to read "Justin T Blair". It consists of several overlapping loops and lines, with a prominent "J" at the beginning and a "B" in the middle.

Printed Name

Justin T Blair

Title

Outside Counsel

Date

Oct 14 2021

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.

No

Public Application

Your application will 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.

Responses Selected:

I understand.

Signature

A handwritten signature in black ink on a light gray background. The signature is stylized and appears to be a name with several overlapping loops and a long horizontal stroke.

Printed Name

[Redacted printed name]

Title

[Redacted title]

Date

Oct 14 2021

GRAMA

Incomplete

GRAMA

SANDBOX PARTICIPANT GRAMA CLAIM OF BUSINESS CONFIDENTIALITY

Pursuant to Utah Code Section 63G-2-305(1) and (2), and in accordance with Section 63G-2-309, My Immigration, LLC (company name) asserts a claim of business confidentiality to protect the following information submitted as part of an Application for authorization to offer legal services in the Sandbox.

No Responses Selected

This claim is asserted because this information requires protection as it includes:

No Responses Selected

Following is a concise statement of reasons supporting the claim of business confidentiality:

(No response)

Signed



On behalf of (company): My Immigration, LLC

Date

(No response)