

In the Supreme Court of the State of Utah

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In re: Application of WayLit Legal Legal 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 WayLit Legal Inc. is 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 March 23, 2022, for WayLit Legal Inc. to be authorized to practice law.

WayLit Legal is a nonlawyer-owned legal tech company offering an intermediary software platform for attorneys offering employer sponsored immigration services.

The Innovation Office has assessed the risk of harm to WayLit Legal targeted consumers relative to the risk of harm they currently face and has determined that the risk of harm presented by WayLit Legal'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. WayLit Legal is authorized to offer legal services through the following methods:
 - a. Lawyer employed or managed by a nonlawyer
 - b. Lawyers sharing fees with nonlawyers
 - c. Intermediary platform¹
 - d. Nonlawyer ownership

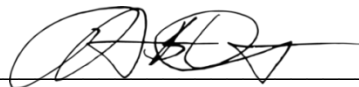
¹ "Intermediary platform" means an entity offering a software- or online-based platform to connect Utah lawyers with interested consumers. The platform may also offer other legal practice support services such as timekeeping, billing, video-conferencing, etc.

2. WayLit Legal is authorized to provide legal services across the following legal service areas, subject to the restrictions outlined below:
 - a. Business
 - b. Employment
 - c. Immigration
3. WayLit Legal shall conform to the Low innovation reporting requirements imposed by the Innovation Office.
4. WayLit Legal will prominently display the following disclosure requirements:
 - a. Innovation Office Badge
 - b. Nonlawyer ownership disclosure

If WayLit Legal 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 WayLit Legal'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: 00001-0000000099

Office of Legal Services Innovation

Summary

ID: 00001-0000000099

Last submitted: Jan 31 2022 08:10 PM (MST)

Labels: Lawyers employed or managed by a nonlawyer, More than 50% nonlawyer ownership, Lawyers sharing legal fees or paying referral fees to nonlawyers, Software provider with lawyer involvement, Software provider without lawyer involvement, Business, Employment, Immigration

Personal Information

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Personal Information

Entity Name

WayLit, Inc.

Business Email Address

Business Phone Number

Business Website

<https://www.waylit.com/>

Business Address

Address Line 1	
Address Line 2	
City	
State	

Mailing Address

Address Line 1	
Address Line 2	
City	
State	

Contact Name

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Contact Title

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Contact Phone Number

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Contact Email

Second Contact Name

Second Contact Title

Second Contact Phone Number

Second Contact Email

Bar License No. and State (if applicable)

1. Proposed Services

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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.

I. The lawyer/attorney provides the legal services to the client via the WayLit platform. The WayLit platform interfaces the legal process for the beneficiary (employee needing immigration work for himself/herself) and for the employer-sponsor (typically the Human Resources Department and Corporate Counsel). This offering will not diminish the need for competent legal advice which is why all portions of this software are overseen and reviewed by multiple attorneys. We have a wide network of attorneys to assist those clients whose situations fall outside the realm of what our software can assist with. In the long term, this will act as a way of ensuring more attorneys use technology, providing them with more clients that they can serve in a more effective timeline and increasing consumer access to licensed attorneys.

II. Consumers can directly access these services via a personal login to the platform to view their progress and the outstanding documents/tasks they need to complete for the visa application. They can also access these services through their employer-sponsors who use the WayLit platform. Employer has the direct account and initiates the process on behalf of the employee-beneficiary. For U.S. Based employer-sponsors: employer finalizes a candidate that they want to hire. The employer-sponsor then invites the candidate to the platform to gather facts needed for the visa application - immigration history, biographical history, employment history, educational history and documented proof to support all the above. The case management module inside of the WayLit platform shows where the beneficiary is in the process. This is not dissimilar to case management that an attorney uses in their private practice - except the WayLit platform is significantly more automated and access oriented with tools that the attorney, employer-sponsor, and the employee-beneficiary can use across systems, time zones, document sets and circumstances.

III. WayLit's platform will streamline the entire employment-based visa application process across several required immigration application document sets: H-1B, H-2A, H-2B, L-1A, L-1B, TN, H-1B1, E-3, O-1, Employment Based Green Cards (EB1, EB2, EB3) and dependent visas (H-4, L-2, TD). The platform works as an extension of the HR team of the employer-sponsor to resolve the continuing year-round needs of their foreign national employees. Examples of this separate from those listed above include connecting them to a network of highly qualified immigration attorneys for higher tiered/complicated services, filing visa work and tracking visa renewals, verifying immigration history, creating a collaboration framework where employees can submit the required documentation and employers can check prevailing wage bands, automating LCA compliance, employee travel documents support, pre and post-travel interviews

and giving managerial tools to manage this entire process for the attorney and the HR officer. The WayLit platform provides for seamless compliance with the USCIS and the Department of Labor standards detailed below:

A. Immigration Status Expiration - Employers and foreign national employees may lose their ability for the worker to work and live in the U.S. because the employer failed to act on time to file a renewal or start an application or an immigration benefit. WayLit automatically tracks the expiration dates on all important immigration status documents for the employee and works with the attorney and the employer to start the next immigration milestone to keep the employer compliant and the employee in legal immigration status in the U.S.

B. Worksite Location (Metropolitan Statistical Area) - A foreign national employee's work visa is bound to a work location. The Department of Labor (DOL) dictates minimum Prevailing Wage based on the metropolitan statistical area where the employer is located or where the employee will be working. The Prevailing Wage determination (through the Labor Certification Application) by the DOL is to ensure that employers are not undercutting U.S. domestic workers in the same positions and the same locations by paying foreign workers lower wages. WayLit monitors changes in worksite locations and automatically alerts the employers if a new LCA or a new work visa needs to be filed. This keeps the employer and the employee compliant with the rules of the Department of Labor.

C. Electronic LCA Management - The Department of Labor (DOL) requires employers to publicly post the Labor Certification Application Notice (that is filed for a foreign national worker). Earlier the DOL mandated that the LCA be posted physically but recently the rule has been extended to include the posting of the LCA electronically. Given the pandemic and most employees working from home, the task of physically posting the LCA has become difficult for the employers and with no employees at the offices, the effectiveness of the posting has been rendered useless. WayLit has helped employers by automating the LCA posting and removal electronically. By adhering to all the DOL rules, the electronic posting on a publicly available web page has helped employers save time and maintain compliance during the pandemic and beyond.

D. I-9 Alerts - I-9 compliance is required by the Department of Labor not just for the domestic employees but also for the foreign national employees. The employers are required to check the I-9 documents whenever a foreign national employee's status changes. WayLit automatically tracks the changes in the status or the expiration dates of visa statuses and alerts the HR department to conduct I-9 checks to maintain compliance.

E. Document Expiration alerts - A foreign national may lose their ability to stay and work in the U.S. if their legal document issued by the home country (i.e., Passport or any other Travel Document) expires. WayLit automatically tracks the expiration of these documents for the employees to make sure the employees are in legal status throughout their stay in the U.S.

F. Compliance violations - Most are accidental and cost the employer and beneficiary the talent at their firm and the end beneficiary must exit the US. The ramifications are far reaching at scale - millions of dollars spent on re-entry to the US, end employees run the risk of being blacklisted for overstaying their visa. Employers pay higher legal fees to rehire those employees and higher HR costs (1.5 times the salary of the lost employee) to find new employees. Reputational damage across the firm's brand and damage to the livelihood of those seeking a better opportunity and access to immigration justice in the US. WayLit safeguards reputational damage in the hiring and immigration process by verifying documents and tracking their expiration. Further, WayLit prevents these violations from occurring through automated alerts, follow-ups and reminders.

G. Year-Round Support - Immigration support does not end with case completion; foreign national employees have to deal with immigration implications beyond getting a visa approval. Therefore, WayLit supports the employees year-round with documentation preparation for trips outside the U.S., visa interview preparation and providing support documents for opening a bank account, applying for a lease or a driver's license.

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

We want to be a majority non-lawyer owned law firm.

The entity will have attorneys - Managing Attorneys, Junior Attorney and Contract Attorneys to oversee the immigration case load.

We'll have support reps to support onboarding employers and employees, collect and verify documents, run cases with the attorney and answer support questions that don't require legal opinion from the attorneys. For example -

- How long will it take for the case to finish?
- When will my case start?

- What does “consular processing” mean?
- When can I schedule my visa appointment?
- Does this document scan look ok?
- Do I need to provide all the I-20s from my master’s degree?
- I am traveling to visit my family. What documents should I take with me?
- Should we have an immigration policy?
- How soon can an employee start with us?
- What steps do I need to take when the H-1B lottery registration opens?
- How do different application processes work?
- What is the best path to take as an employer? Which immigration status offers us and our employees the best options legally for employment given our time and talent horizons?
- What are the advantages to the different applications and which would be best in my circumstances as an employer-sponsor/employee-beneficiary?

The process questions are UNBUNDLED from the legal advice and so the attorney has to spend less time directly interfacing with clients and more time practicing intellectual capacity over the legal implications of client decisions/needs. We anticipate using analytics in concert with the attorneys in our firm to provide the best legal advice and scale that across our clients without needing to onboard a 1:1 ratio of attorneys to manage the case/client load. Predictive questioning and analytics empowered by internal attorneys and non-attorneys will help WayLit scale access to advice to thousands of foreign nationals and their employer-sponsors in the immigration process.

According to the Utah Supreme Court Standing Order 15 these are our options:

3.3.2 Within the Innovation Office’s Regulatory Scope

Individuals and entities that carry out the following activities are within the scope of the Innovation Office’s regulatory authority and are subject to this Standing Order’s requirements:

(a) Partnerships, corporations, and companies entirely owned and controlled by lawyers; individual lawyers with an active Utah Bar license; and legal services nonprofits partnering with a nonlawyer-owned entity to offer legal services as contemplated by Rule 5.4B;

(b) Nonlawyer owned entities, or legal entities in which nonlawyers are partial owners (for profit or nonprofit):

(i) offering legal practice options whether directly or by partnership, joint venture, subsidiary, franchise,

or other corporate structure or business arrangement, not authorized under the Rules of Professional Conduct in effect prior to [Month] [Date], 2020, or under Utah Supreme Court Rule of Professional Practice 14-802; or

(ii) practicing law through technology platforms, or lawyer or nonlawyer staff, or through an acquired law firm.

We are option: 3.3.2 (b) (i) and (ii)

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.

Nonlawyer owned law firm entities, or legal entities in which nonlawyers are partial owners (for profit or nonprofit):

Within the Utah Legal Sandbox, we seek to be a distributed law firm with a wide range of legal offerings, beginning with immigration and business services. By operating within the sandbox, we will be able to expand to become more consumer-focused and adapt our currently designed model, which focuses on working with employer-sponsors and other licensed professionals. Many of the people who most need our services are currently bound by pricing and delivery models buttressed by industry insiders and immigration attorney professional-oriented legislation. WayLit analytics check information provided by the employer-sponsor and employee-beneficiary against predefined standards to identify and prepare the documents each case needs. Our analytics will consistently monitor the proposed documents and send the employer-sponsors, their employees-beneficiary, their dependents and attorneys action items required to keep the case on track and up-to-date. The technology analytics check employer and employee data and documents to identify when fact patterns, applications and documentation conflict with the way the USCIS requires them to be.

A. Fee Splitting and referral fees with other attorneys and non-attorneys: By being classified as a law firm, we will be able to legally split fees, and provide referral fees which will enable us to increase access to the following:

a. Distribution channel partners in the rendering of legal services, i.e., employer-sponsors, immigration referral networks through outsourced talent acquisition firms, headhunters, payroll automation

companies and many more. By unbundling legal services in this way, these attorneys, employer-sponsors, and employee-beneficiaries are able to execute documents, draft and complete data and documentation requirements and streamline workflows across differently incentivized partners across the talent acquisition and retention chains. This will also decrease the cost and time associated with rendering the service. It will also allow consumers to directly register, monitor, complete, review, update and inform the necessary parties to the cases, and provide transparency to the regulatory authorities overseeing the compliance and legality of these parties directly through the use of the WayLit platform. Our model depends on well incentivized channel partners to increase the scope and reach of our offering to employers, individuals and families (access to justice).

b. Specifically, we would charge a price for our platform, collecting and maintaining data and documents, generating immigration case documents, data and workflows – channel partners would be able to charge/split a modest fee on top of our fee for their execution, introduction and help in the process where necessary.

c. When we can split legal fees with attorneys, the attorneys are properly incentivized to assist in making sure these cases are set up correctly through the technology questionnaire/triggers instead of being scared that this technology will take clients away from their practice. Many of the companies and people who need access to these services at a reasonable fee cannot afford attorneys, advisors/advice and their HR professionals are ill-equipped or would overcharge them for minor services that make the end consumer's employment and contribution to the American economy and society costly, time consuming, unfair and highly uncertain.

B. Marketing Rules:

a. We need to market the benefits of our platform in order to increase adoption and use, especially for the direct-to-consumer model to work. We need to be able to make use of Google ads, Facebook ads, LinkedIn ads, co-marketing agreements, technology integrations using application programming interfacing capabilities (API), live and chatbot communications on platform, partnerships and other diverse forms of marketing in order to accomplish an impact in creating access to justice and meaningful revenues for growth.

b. Many times, the best way to discover if such advertising is working is to change small portions of the ads or run two ads at once to see which one conveys the message more appropriately.

c. We will need to do this without the need to have every ad approved by the Bar Association ahead of

time. Current marketing rules may also prohibit the scope and reach of our distribution efforts.

C. Unlicensed Practice of Law:

a. While the use of technology platforms utilizing legal technology hasn't been definitively adjudicated as the unlicensed practice of law, there is the potential for this to be a barrier to entry. We want to do things the right way and have the support of the Utah Bar Association in working together to increase the accessibility of legal services to all instead of fighting against the Bar to determine if what we are doing is within the realm of unauthorized practice of law.

b. In a tech model at scale, it is not practical for all direct client service/assistance to be done by attorneys and/or paralegals. There simply are not enough professionals practicing who are willing to switch to a non-traditional law firm. Our company will have customer service agents who will have scripts, answers and knowledgebase articles written and/or approved by attorneys or licensed paralegal practitioners to guide conversations and assist consumers in most questions. If a question or problem arises that they cannot assist, as determined by attorneys or paralegal practitioners, it will then be escalated to the person most qualified to handle such issues.

D. Conflict Checks:

a. The general nature of immigration application and maintenance work does not require the use of many conflicts of interest checks as differing parties rarely request the same attorney to represent both employer-sponsor and employee-beneficiary in disputes that may arise.

b. Due to volumes at scale and the predefined logic rules approved by the attorneys in the platform, all accounts that go through the system with the automated logic do not perform a conflict check for the attorney of record.

c. For all accounts that are flagged to be referred out of the WayLit platform for custom drafting by the attorney, the conflict check is the responsibility of the attorney that has taken the referral.

E. Rules of Law Firm Ownership:

a. Non-lawyers owning a quasi-law firm structure/new law firm structure of WayLit. This allows for new subsets of skills, tech development, access to justice at scale and with broader adoption and distribution.

b. It allows for partnerships with other entities such as law firms, talent acquisition groups, benefits brokers, corporate planners, banks and multi-national institutions.

c. It also allows raising capital that will allow for creating something new and innovative, in an approach that beforehand was unable to be executed due to lack of aligned incentives and a regulatory burden.

d. Many lawyers and firms are leery of partnering or assisting technology companies as they see it as assisting in the unauthorized practice of law. By being qualified as a law firm, this eliminates this fear and allows for more collaboration within the legal community and all other participants in the immigration process.

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.

WayLit works with:

- Fast growing companies where the science and/or engineering teams are growing fast and the HR department either (1) has a hard time understanding the immigration requirements or (2) don't have the bandwidth to deal with immigration operations (managing work requirements for foreign national employees takes 3 times the effort as is requirement to manage domestic employees). WayLit adds value by working as an appendant to the HR department for the employer.

- Entrepreneurs, outside the U.S., to help them migrate to the U.S. on O-1 or entrepreneurial visas and help create jobs in the U.S. market.

- Companies that are hiring their first foreign national employee and don't understand the process or steps that they need to take for a stress-free onboarding.

WayLit streamlines the data and document collection, case management and keeping employers and employees compliant through year-round support and automated checks.

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

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
Software provider with lawyer involvement
Software provider without lawyer involvement

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

Select all that apply.

Responses Selected:

Business
Employment
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

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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.

1. Risks for inaccurate or inappropriate legal results:
 - a. While WayLit and our partner employees do our best to make sure that we are getting authentic and up-to-date information from the employee-beneficiary and employer-sponsor, this information used by the attorney for a petition may be flawed or false. Our failure to catch misinformation has the potential to cause a rejection of the immigration benefit petition filed with USCIS or the Department of Labor.
 - b. In very rare cases, typically after an update to the system's code, there may be instances when errors in immigration documents occur that cannot always be caught in the moment due to the volume coming through the platform.
 - c. Attorneys we work with may recommend the wrong type of visa through our platform which could lead to suboptimal outcomes for employer-sponsor and employee-beneficiary.
 - d. While our profile evaluation is built on robust reasoning from the attorneys, our platform in some rare cases may evaluate an employee's profile and may fail to raise appropriate red-flags to alert the attorney or the employer about issues with the employee's immigration history.
 - e. While the WayLit team checks all uploaded documents for accuracy, an attorney may upload an employer or employee sensitive documents to some other employer or employee's immigration case.
 - f. While the attorneys make sure to have updated rules for sending petitions to particular USCIS service centers, an attorney may send the immigration petition to a wrong USCIS service center and get a denial of service.
 - g. WayLit automatically suggests to start work on the immigration petition 60 - 90 days before current status expiration, but in some rare cases (software update, downtime, code bugs etc.) the platform may miss the deadline of filing a petition, rendering the employee-beneficiary out of status.
 - h. Breach of security protocols within system code may lead to an inaccurate rendering of our services/products and can create exposure to employees' sensitive information and damaging financial outcomes for individuals.
 - i. We require employee-beneficiaries to have paper copies of the approval notices and downloaded electronic copies of their petition. Code issues with the platform in rare cases may delete the current status proof of an employee requiring the attorney to file for duplicate copies.
 - j. We monitor case fees very closely but in some cases we may write checks in wrong amounts, causing a denial of service from USCIS.

2. Risks of failing to exercise legal rights through ignorance or bad advice:

- a. Understanding different visa types and the needs of foreign national employees burdens employers-sponsors and thus curtails their intent to hire the best available talent.
- b. Lack of awareness of how to engage traditional legal services puts consumers at risk of non-existent, incomplete or improper immigration services.
- c. Lack of ability to afford traditional immigration legal services puts consumers at risk of non-existent, incomplete or improper immigration services.
- d. Many clients do not receive comprehensive legal advice even with their attorneys. Many attorneys specialize (tax, immigration, labor, employment) and refer to others creating a dislocation of advice and an increase in cost. This also makes it harder to get comprehensive legal advice that pertains to their complete needs - labor laws for domestic employees, immigration laws for foreign national employees, tax laws for their international employees and corporate laws for their company.

3. Risk of purchasing unnecessary or inappropriate legal service without our service model:

- a. With the proliferation of technology, consumers have come to expect better service, support and experience. Traditionally, attorneys have had a narrow focus on simply starting and completing the cases, resulting in employers-sponsors and employees-beneficiaries to be burdened with ineffective or incomplete legal documents, services or support. Additionally, this was the only path available for consumers due to the regulatory burdens that the Utah Sandbox seeks to overcome.
- b. Lack of planning and visibility into immigration processes often results in delays in filing cases. Consumers unnecessarily need to pay extra for fast-track case processing. Technological logic and computer platforms that are available 24/7 and easily accessible are less subject to human error, oversight, or prejudices, can enable early decision making for employers-sponsors and employees-beneficiaries to avoid long waits and unnecessary fees.
- c. Many applications (35.8% for H-1B in FY2020) are returned by the USCIS with “Request for Further Evidence (RFE)”. Most of these are due to technical errors (such as incorrect fee, missing document, incorrect address). Traditional processes are largely manual, making these errors common. Getting an RFE causes delays in acquiring immigration benefits as well as extra costs in staff time and attorney fees.

4. Risk of purchasing unnecessary or inappropriate legal service with our service model:

- a. WayLit’s platform offers visa type recommendation and immigration documents based on the attorney-managed artificial intelligence (AI). Unless the employer-sponsor or the employee-beneficiary provide flawed data or documentation, the system will recommend and complete immigration forms

correctly.

b. The visa assessment and required supporting documents are dependent on the consumer's responses and coded legal logic, not human judgment at the time. This could be a risk if the wrong risk triggers are made by the network attorneys in the first place, which is why we do multiple reviews of the triggers.

c. The platform is based on computer logic, AI and machine learning, and may not understand the emotional or human nuances (eagerness to move quickly, anxiety to get a decision) involved in an immigration petition that could be uncovered through in-person consultation with legal counsel.

d. The platform provides optional services (such as to fast-track the case decision) that may not be necessary, but the consumer may decide to purchase based on the emotional factors rather than on the tool's determination or recommendation that the document or service is not needed at such time.

e. The platform may recommend a visa type (assuming the employee-beneficiary qualifies for multiple options) that is more profitable for WayLit. The final decision in such a case will be made between the consumer and the legal counsel.

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.

1. Mitigation for inaccurate or inappropriate legal results:

a. Improper generation of documents:

i. Every document is reviewed by the attorney + employee + employer. If any errors are found, they are tracked and the computer logic is modified to ensure prevention.

ii. We can track both versioning timestamps and document creation dates thereby identifying date ranges when errors in doc generation occurred so that we can thoroughly address and correct specific affected immigration petitions, if any.

b. Out of date Immigration Forms and Fees:

i. Managing attorneys review legal logic annually to keep immigration forms current with new immigration laws and make changes throughout the year as we are made aware of updates by the State Department, the DOL and the USCIS.

ii. The platform subscribes to USCIS form updates, and automatically alerts all users of the platform, as well as updating the forms on the platform.

iii. Similarly, WayLit tracks changes in fees and USCIS service locations to correctly file petitions at the right service center.

c. Out of date Immigration Support Documents:

- i. WayLit's platform monitors the expiration of time sensitive documents (passports, travel documents, visa status, etc.) and alerts the employer and the employee. The platform automatically sends a monthly email to the employee for their personal documents starting 12 months from expiration date and a daily email 3 months from the expiration date.
- ii. Monthly emails for immigration documents are also sent to the employer and WayLit Support Desk at 6 months from the expiration date and a daily email is sent 60 days from the expiration date.
- iii. The consumer is given a link to go in and update their data, upload the appropriate document, which generates new document versions or sends an update to the attorney on file to have them reach out to the client if necessary.

d. Failure analysis and control points:

- i. We track errors that may happen at every stage of the case and modify the computer logic on the platform to mitigate against them.
- ii. In addition, we have manual review by trained staff and attorneys at critical control points.
- iii. We use product analytics to find points where the client may have a harder time accomplishing their goals. We use the analytics to make continuous improvement in the user experience on the platform
- iv. We also conduct regular review with our users to obtain qualitative feedback on their experience and incorporate the findings into improvements on the platform

e. Checks to ensure correct visa recommendations:

- i. While the attorney's decision is final, we review cases with discrepancies between system generated decision and attorney decision.
- ii. An added check is to review the recommendation if the employer-sponsor or the employee-beneficiary has a conflicted opinion about the recommendation.

f. Software updates, testing and version control:

- i. Our development process follows best practices for software quality. All computer code is maintained under version control.
- ii. All new computer code is reviewed before integration.
- iii. All integrated code must pass automated tests using continuous integration (CI).
- iv. All new releases go through manual review on non-production systems, and only after satisfactory performance, are rolled out in a phased manner to production.
- v. We subscribe to software security and update notices for our dependencies and update our software dependencies within appropriate timelines.

- vi. We use a bug reporting system to detect software bugs in production
 - vii. We maintain a bug tracking system to document, rectify, and track bugs
- g. Application security and reliability
- i. Our application server architecture follows industry best practices for security and reliability with web application firewalls, segmented networks, and principles of least privilege.
 - ii. All data is encrypted in transit to our application and at rest using the latest standards (AES-256, TLS1.2).
 - iii. We log all accesses to our application and network, and have monitoring services and intrusion detection services to notify us of unauthorized access.
 - iv. All administrator level access requires multi-factor authentication
 - v. Information security policy maintained, reviewed and communicated to constituents
 - vi. Background checks performed on employees and contractors before hiring
 - vii. Physical security program in place
 - viii. Incident management program maintained, reviewed, and communicated to constituents
 - ix. Servers used for transmitting, processing and storing Scoped Data with unnecessary/unused services uninstalled and disabled
 - x. Security and hardening standards for network devices including Firewalls, Switches, Routers and Wireless Access points
 - xi. Default passwords changed or disabled prior to placing new devices or accounts in place
 - xii. Individual IDs required for user authentication to applications, operating systems, databases and network devices
 - xiii. Zero-trust architecture for all access
 - xiv. All available high-risk security patches applied and verified quarterly
 - xv. Intrusion Detection/Prevention systems employed in all sensitive network zones and wherever firewalls are enabled
 - xvi. Vulnerability scans performed against internal networks and systems
 - xvii. Data segmentation by client, advisor or service provider
 - xviii. Obsolete data is stored in inactive archival state according to lifecycle policy and automatically purged at the end of expiration period
 - xix. Sensitive documents are seldom in physical form, but when in physical form they are disposed of by shredding; physical media is wiped.
- h. Information security policies
- i. POL01 - Data Storage & Management Policy
 - ii. POL02 - Information Security Roles & Responsibilities

- iii. POL03 - Information Handling Policy
- iv. POL04 - Acceptable Usage Policy
- v. POL05 - Password Protection Policy
- vi. POL06 - Mobile Device & Teleworking Policy
- vii. POL07 - Server Maintenance Policy
- viii. POL08 - Privacy Policy
- ix. POL09 - Malware Policy
- x. POL10 - User Access Management
- xi. POL11 - Backup Policy
- xii. POL12 - Event Logging & Monitoring Policy
- xiii. POL13 - Control of Operational Software Policy
- xiv. POL14 - Cryptographic Controls Policy

2. Mitigation for failure to exercise legal rights through ignorance or bad advice:

a. Improve hiring and filing of immigration petitions:

- i. WayLit's platform provides an easy way for the employers to simply invite the foreign national employee onto the platform and the system automatically walks them through the questionnaire to determine the visa type.
- ii. Once the visa type is determined and approved by the immigration attorney, WayLit's paralegal and support team verifies the documents provided by the employee and employer and the case is started.
- iii. The case is further managed by the WayLit support team to make sure that the case is completed and filed on time and that the employer and the employee is kept updated besides getting automated alerts and reminders for assigned and completed tasks.

b. Advisors or Clients giving incorrect information or making incorrect choices:

- i. Ongoing system training to advisors and users.
- ii. Audits of client documents and advisor accounts.
- iii. WayLit will conduct thorough background checks for the attorneys that we hire and give referral work to and ensure that the hired attorneys maintain proper credentials, training, and continuing education for the immigration services provided through the platform.
- iv. Our platform will provide support via WayLit's HelpDesk, where the consumers can send questions to be answered by attorneys or paralegal practitioners and other support staff. WayLit's SLA is to provide answers under 4 business hours for active cases and under 24 business hours for questions unrelated to active cases.

c. Network Attorneys giving wrong recommendations:

- i. We review network attorneys yearly to make sure they are still active and in good standing in their licensed jurisdiction.
- ii. We occasionally have outside, independent council review documents and clients for us to ensure things are being done correctly.

d. Integrated services:

- i. While we may streamline immigration and labor laws, our platform can integrate with attorneys that provide other specialized services and does not preclude clients working with other attorneys across other disciplines.

3. Mitigation for purchasing unnecessary or inappropriate legal service without our service model:

a. Provide effective planning and improve process transparency:

- i. WayLit's platform shows upcoming immigration status expirations, forecast of upcoming cases and associated costs to assist consumers in planning proactively rather than in a reactive manner.
- ii. WayLit's support team will work with the employer every month to plan cases on a monthly, quarterly, and yearly basis. This will provide better visibility to the HR department and improve decision making for the management.
- iii. WayLit collects and stores all documents and information needed to file cases so that cases can be filed expeditiously once a decision has been made.

b. Better document management - before and after case completion:

- i. WayLit's platform collects relevant documents and data based on the employee's-beneficiary's immigration history and the next immigration milestone. Instead of collecting the documents at the time of starting the case, the employee-beneficiary is provided an account for them to work towards completing their profile by answering relevant questions and uploading supporting documents. This allows WayLit to start and process a case without delays.
- ii. Besides automatically reminding the employees to complete their profiles, WayLit also monitors the expiration of time sensitive documents and send alerts and reminders to the employee and the employer is copied on the emails.
- iii. Whenever (during or after the case) a document is updated by the employee, the system alerts the attorney, employer and the WayLit staff. This ensures that the employee profiles are always up-to-date.
- iv. To avoid mistakes through manual interventions, the relevant immigration forms are filled out based on the information provided by the employee-beneficiary and the employer-sponsor. This information is finally reviewed by WayLit's paralegal team and the attorney to ensure correct information.

v. WayLit has added an extra check to ensure information correctness by allowing the employee-beneficiary to check the draft petition before the package is sent to the USCIS.

4. Mitigation for purchasing unnecessary or inappropriate legal service with our service model

a. Ensure correct profile evaluation and data accuracy

i. As our machine learning and artificial intelligence algorithms improve, our platform will recognize immigration laws, limitations and trends based on the employees' and employers' answers and their immigration history to provide better evaluations so that the consumer can take advantage of all the availability of the law.

b. Ensure wrong visas are not recommended

i. After the primary system evaluation is done, our platform directly involves the attorney who is empowered with analytics to make correct judgments enhancing the legal advice given.

ii. We will also mitigate risk through our use of network attorneys to review and approve the process that our platform uses to enhance the practice of law. Our platform creates "fail-safes" or triggers that stop clients from filing immigration petitions and other legal documents until the petition is checked by the attorney, WayLit's staff, paralegal followed by the employer and employee. These triggers are set by our network of attorneys.

iii. Evaluation algorithms are purely based on the logic provided by the network attorneys and do not take into account WayLit's financial motivations to recommend a particular kind of visa. That correct recommendations are being made is ensured by a third-party attorney who audits the processes annually.

2.3. Please describe your consumer complaint process.

1. Consumer complaints generate a service ticket in our CRM in the Complaints queue.
2. Service Level Agreement (SLA) for complaint tickets is as follows:
 - a. Two-business day initial response to consumer
 - b. Internal escalation procedures to assign tickets to the department who can resolve the issue, i.e., tech problem, legal question, outside attorney inquiry/subpoena for documents, product dissatisfaction, etc.
 - c. Internal escalation SLA action is two business-days.
 - d. Resolution response to consumer is due within one business-day of internal escalation resolution.
 - e. If our process doesn't result in restored consumer satisfaction, or if legal proceedings result, the case is transferred to our managing attorney for strategy with counsel.
 - f. If the complaint is not resolved with the managing attorney, the consumer may request confidential ADR through the Utah State Bar.

3. Benefits To Utah Consumers

Completed - Jan 31 2022

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.

Our services are based and rooted in extending the scope and reach of competent attorney representation for Utah citizens regardless of income, economic strata, family history, geographic region, technological competency, sexual orientation, race, ethnicity, and gender. This is a large feat that will require partnerships across the separate stakeholders in the immigration/employment industry. We anticipate these will include payroll service providers, headhunters, staffing companies benefits brokers/associations, group legal plans, distributed legal service providers, government entities (USCIS), HR service providers (in house and outsourced platforms) among several others. This will enable Utah consumers to be able to access our legal solutions at scale. Without our model, Utah consumers would not have access to services like ours nor would our partner law firms be able to handle the volume of clients. Businesses that operate out of rural Utah areas and individuals that live in these areas, who do not have access to highly qualified legal services will now have much easier access to our platform and to legal advice through our law firm. Small towns have mostly general practitioners, or individuals have

to travel to major cities to receive competent representation. We will be able to scale access to justice anywhere in the state of Utah end to end. Our service increases the effectiveness of immigration documents because we receive input from attorneys from different law firms and areas of the State of Utah to create and update the documents we offer. Traditionally, you get whatever the individual or firm's knowledge is with their documents. With WayLit, clients will get the best from every firm state-wide. We will be able to help Utahns at a price point that works for them and their employers. Also, through the use of our platform we enable competent legal services and sound immigration strategies to be employed for Utahns of all backgrounds, ethnicities and genders with no fear of discrimination. It being a central tenet of our platform that attorney to client interaction is made through technology rather than in person, Utahns who find themselves or believe themselves to be the subject of racial, ethnic, cultural, gender or economic discrimination will be able to access justice through scalable, sound, complete and competent technology-based representation. For many employers and employees, access to immigration services is the determining factor of their safety, their well-being, their standard of living, their healthcare and the opportunities that their children and grandchildren will be able to take advantage of. Our services, our team and our strategy follow the same tenets of access to justice that were best termed as they are written on the statue of liberty: "Give me your tired, your poor, your huddled masses yearning to breathe free, the wretched refuse of your teeming shore. Send these, the homeless, tempest-tossed to me, I lift my lamp beside the golden door!" Access to this dream for those wishing to obtain it in Utah is the objective of our entry to the sandbox in serving Utahns of every background.

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, we are staffed by Utah-licensed attorneys, partner with attorneys on all legal documents, transactions, etc., and are built to state regulations and standards of quality. Our attorneys and those under their supervision are in good standing with the BAR association (rules and ethics).

Additionally, our proposal seeks to engage attorneys in the benefit of consumers at scale while maintaining complete standards of care and integrity as mandated by each regulatory authority (both state and federal) involved in a case performed with our platform.

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.

Our legal service offering spans the areas of law, forms, products and services (transactional, litigation, and ADR) that pertain to Immigration and employment. WayLit is a technology-based, attorney-managed immigration and employment company/platform designed to innovate, streamline, and scale immigration legal services i.e., visas, travel documents, compliance, and various other immigration and employment services/transactions. While some of these services will need more development, we can begin offering immigration (employer-sponsor and employee-beneficiary) services across the spectrum of USCIS mandated forms and compliance, immediately. We believe that we can scale quickly with our other services within short order as investment and team growth occur.

4. Confirmation Of Eligibility

Completed - Jan 31 2022

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”).

WayLit, Inc. (Delaware C-Corp)

Raj K Singh, CEO

Satya N Mishra, CTO

Hector Chichoni, Advisor (Utah Licensed Attorney)

Tony Gao, Advisor (Missouri Licensed Attorney)

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

WayLit, Inc. (Delaware C-Corp)
Raj K Singh, CEO
Satya N Mishra, CTO
TinySeed (Fund 1 + Fund 2), Accelerator + Investor

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.

N/A

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

N/A

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.

N/A

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.

N/A

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.

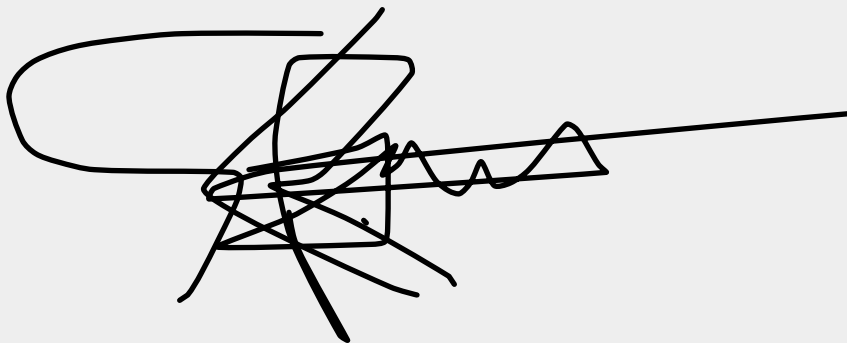
N/A

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.

N/A

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

Signature

A handwritten signature in black ink, consisting of a large, stylized initial 'S' followed by a long horizontal line and a series of smaller, overlapping strokes.

Printed Name

Raj Singh

Title

CEO

Date

Jan 31 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

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 cursive, starting with a large loop on the left and ending with a long horizontal stroke extending to the right.

Printed Name

Raj Singh

Title

CEO

Date

Jan 31 2022

GRAMA

Completed - Jan 31 2022

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, WayLit, Inc. (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.

Responses Selected:

non-public financial statements

specific employee name and contact information

specific customer information, client lists, or subscription lists

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

Responses Selected:

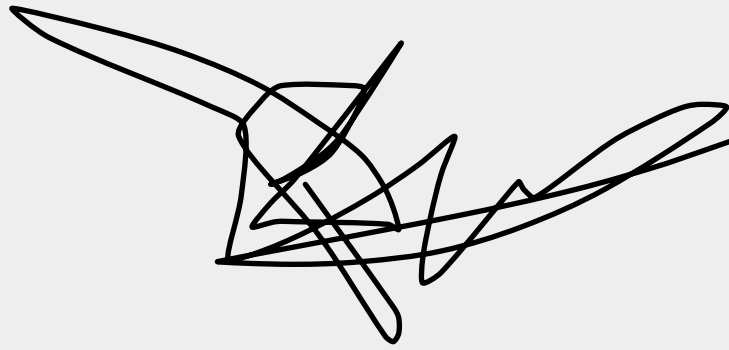
trade secrets as defined in Utah Code Section 13-24-2 ("Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that: (a) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.)

commercial information or non-individual financial information obtained from a person if: (a) disclosure of the information could reasonably be expected to result in unfair competitive injury to the person submitting the information or would impair the ability of the governmental entity to obtain necessary information in the future; [and (b) the person submitting the information has a greater interest in prohibiting access than the public in obtaining access.

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

In our efforts to be transparent to the Sandbox committee we have disclosed the nature of how our platform interacts with clients, attorneys and end users on a granular level. In addition, we have laboriously detailed the potential risks of our model and our delivery mechanisms to consumers and this information would make it very easy for our competitors to take advantage of our intellectual property. Beyond the aforementioned, we have also laid out our projected course in strategy for distribution, integrations, and partnerships which are not commonly known nor detailed in the public sphere.

Signed

A handwritten signature in black ink on a light gray background. The signature is stylized and somewhat abstract, with several overlapping loops and lines. It appears to be a cursive or semi-cursive signature.

On behalf of (company): WayLit, Inc.

Date

Jan 31 2022