



OFFICE OF LEGAL SERVICES INNOVATION
An Office of the Utah Supreme Court

Amended Sandbox Authorization Packet

Elysium Holdings

September 21, 2022

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2. Innovation Office Recommendation to the Court

Document 1

In the Supreme Court of the State of Utah

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In re: Application of Elysium Holdings LLC

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 Elysium Holdings LLC and their subsidiaries Pearson Butler and Elysium Legal are authorized to practice law within the regulatory sandbox and subject to the restrictions outlined below.

The Court has reviewed the original recommendation of the Office of Legal Services Innovation ("Innovation Office") dated February 4, 2021, and the amended recommendation, dated September 21, 2022, for Elysium Holdings LLC ("Elysium Holdings") to be authorized to practice law.

Elysium Holdings, a multi-professional services entity, is owned by lawyers and nonlawyers. Its subsidiaries include Pearson Butler, a Utah-based law firm, and Elysium Legal, which will be offering legal services through Alternative Legal Providers ("ALPs"). The other subsidiaries include a financial services firm and a registered investment advisor (RIA) firm. Pearson Butler's attorneys, who work closely together with its ALP staff, will identify those staff members, including LLPs, who, in the attorneys' professional judgment, are competent to offer legal practice services through Elysium Legal.

The Innovation Office has assessed the risk of harm to Elysium Holdings' subsidiaries' targeted consumers relative to the risk of harm they currently face and has determined that the risk of harm presented by Elysium Holdings' services is Moderate.

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. Elysium Holdings and its subsidiaries are authorized to offer legal services through the following methods:
 - a. Alternative Business Structure
 - i. Lawyers employed or managed by nonlawyers
 - ii. Lawyers sharing profits with nonlawyers
 - iii. Nonlawyer ownership
 - b. ALP with lawyer involvement as follows:
 - i. ALPs offering:
 1. Legal information;
 2. Legal process assistance (e.g. providing general information about rules, procedures, and practices);
 3. Legal advice to assist consumers with form completion and in administrative hearings as permitted by the relevant forum¹ (e.g. uncontested probate document preparation; EEOC process including appearing in administrative hearings; unemployment insurance appeals before DWS; uncontested custody and child support documents, uncontested divorce mediation documents).
 - ii. Lawyer involvement including:
 1. ALPs approved and supervised by practice group heads;
 2. Training, job-shadowing, and CLE based on the specific practice area;
 3. Develop, and train ALPs on, criteria to guide identification of those situations in which an attorney must be brought into the service;
 4. Conduct random monthly audits of intakes and services performed by nonlawyer practitioners.
2. Elysium Holdings, through its subsidiaries Pearson Butler and Elysium Legal, is authorized to provide legal services across the following legal service areas:

¹ This authorization is limited in its reach by the scope of authorization for nonlawyer practice and/or representation by the relevant forum. In other words, in those administrative fora in which nonlawyer representation is permitted, Pearson Butler's nonlawyer practitioners remain governed by the rules and requirements of those fora. Nonlawyers are permitted to appear on behalf of litigants before the EEOC and before the Department of Workforce Services. Nothing in this recommendation authorizes nonlawyer practitioners to appear in venues where they are barred by that venue's rules and this authorization does not permit nonlawyer practitioners to appeal before the Utah Labor Commission.

- a. Accident / Injury
- b. Adult Care
- c. Business
- d. Consumer Financial Issues
- e. Criminal
- f. Discrimination
- g. Domestic Violence
- h. Employment
- i. End of Life Planning
- j. Healthcare
- k. Immigration
- l. Marriage and Family
- m. Native American / Tribal Issues
- n. Public Benefits
- o. Real Estate

3. Utah lawyers owning, partnering with, or employed by Pearson Butler and/or Elysium Legal remain subject to the Utah Rules of Professional Conduct. However, the Court hereby grants the following waivers:

- a. Lawyer owners of the holding company Elysium Holdings will not, by virtue of their ownership interest in the non-legal subsidiaries only, trigger application of Rules 1.7 through 1.10 of the Rules of Professional Conduct for consumers served by non-legal subsidiaries.²
- b. Payment of bonuses or compensation to lawyers owning or employed by Pearson Butler or Elysium Legal by nonlawyer owners or employees of other entities owned by Elysium Holdings will not violate Rule 1.8(f).
- c. The application of Rule 5.7 is waived as to those lawyer owners and employees of Pearson Butler and Elysium Legal with respect to the ancillary services provided by entities owned by Elysium Holdings.
- d. To the extent that Elysium Holdings' business model could be found to implicate Utah Rule of Professional Conduct 5.3, the Court waives application of that rule as to lawyers practicing as employees of Pearson Butler or Elysium Legal.

² In the event that one of Pearson's sister entities or the holding company are the subject of litigation by a current or former customer of those entities and/or Pearson, this waiver does not obviate Pearson's responsibility under Rules 1.7 through 1.10.

4. Elysium Holdings shall conform to the Moderate Innovation reporting requirements imposed by the Innovation Office. Initially, Pearson will be reporting as an ABS, while Elysium Legal will be reporting on ALP services. However, both entities are authorized to provide ALP services. Pearson will notify the Office when/if it launches ALP services.
5. Elysium Holdings and its subsidiaries will prominently display the following disclosure requirements:
 - a. Innovation Office Badge
 - b. Nonlawyer ownership disclosure
 - c. Nonlawyer provider disclosure

If Elysium Holdings 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 Elysium Holdings' 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 21st day of September, 2022.



Matthew B. Durrant
Chief Justice

Document 2



OFFICE OF LEGAL SERVICES INNOVATION
An Office of the Utah Supreme Court

Amended Recommendation to the Court

App No. 0028 - Elysium Holdings (previously Pearson Butler PLLC)

September 21, 2022

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Executive Summary

Recommendation: Authorize

Applicant: Elysium Holdings LLC

Proposed Model/Service: Elysium Holdings, a multi-professional services entity, is owned by lawyers and nonlawyers. Its subsidiaries include Pearson Butler, a Utah-based law firm, and Elysium Legal, which will be offering legal services through Alternative Legal Providers ("ALPs"). The other subsidiaries include a financial services firm and a registered investment advisor (RIA) firm. Pearson Butler's attorneys, who work closely together with its ALP staff, will identify those staff members, including LLPs, who, in the attorneys' professional judgment, are competent to offer legal practice services through Elysium Legal.

Target Consumer Market Lower to upper middle class consumers; small businesses.

Sandbox Qualifiers: This business model/service qualifies for the Sandbox because it would feature the following characteristics:

- Lawyers employed or managed by nonlawyer
- Nonlawyer ownership
- Profit sharing with nonlawyers
- ALP with lawyer involvement

Regulatory Objective Qualifier:¹ The proposed legal service model has the potential to increase efficiency and access to services through a holistic model of service, incorporating legal services alongside investment and other financial services. It also has the potential to make these services accessible to individuals and small businesses with lower capital resources through the nonlawyer service tier.

Utah Qualifier: Adapted for Utah requirements

Implementation Qualifier: Proposed model ready for implementation.

¹ Regulatory Objective: To ensure consumers have access to a well-developed, high-quality, innovative, affordable, and competitive market for legal services. (Standing Order No. 15)

Innovation Assessment

Target Market: Individuals and small businesses.

General Assessment: Moderate Innovation

Specific Risks: As with any ABS there are common risks regarding:

1. Confidentiality
2. Non-lawyer oversight of services
3. Corporate interest in protecting profit
4. ALP competency and quality assurance

Elysium has appropriately addressed these concerns

Sandbox Recommendation

We recommend the Court authorize Elysium Holdings. to practice law in the state of Utah, subject to such requirements as the Innovation Office may impose.

Term of authorization	The Innovation Office recommends that the authority be 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 Elysium Holdings' 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.
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Recommended Legal Service Models	<ol style="list-style-type: none">1. Lawyers employed or managed by nonlawyer2. Nonlawyer ownership3. Profit sharing with nonlawyer4. ALP with lawyer involvement<ol style="list-style-type: none">a. ALPs may offer:<ol style="list-style-type: none">i. Legal Informationii. Legal process assistanceiii. Legal advice with form completioniv. Preparing uncontested divorce paperworkv. Assisting consumers with small claims paperworkvi. Filling out Chapter 7 bankruptcy forms
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- vii. Wage claims
- viii. Disability
- ix. Immigration
- x. Debt settlement
- xi. Collections
- xii. Form-based estate planning;
- xiii. Uncontested probate document preparation;
- xiv. The EEOC process, including appearing in administrative hearings;²
- xv. Unemployment hearings;
- xvi. Family law document preparation including: uncontested custody and child support documents, uncontested divorce mediation documents, assisting with OCAP paperwork etc., preparing other documents for pro se litigants, including stipulations etc.

2. Lawyer involvement:

- a. ALP supervision by the head of the practice group with which they work.
- b. Training, job-shadowing, and CLE based on the specific practice area.
- c. Develop criteria to guide identification of those situations in which an attorney must be brought into the service and training based on those criteria.
- d. Conduct random monthly audits of intakes and services performed by nonlawyer practitioners.

Legal service models not recommended	None
Recommended consumer service areas	<p>The entity is authorized across the following consumer service areas:</p> <ul style="list-style-type: none"> 1. Accident / Injury 2. Adult Care 3. Business 4. Consumer Financial Issues 5. Criminal 6. Discrimination

² This authorization for nonlawyer practitioners is limited by the rules and practices applicable to the relevant venues. Nonlawyers are permitted to appear on behalf of litigants before the EEOC and in unemployment proceedings. Nothing in this Order authorizes nonlawyer practitioners to appear in venues where they are barred by that venue's rules.

- 7. Domestic Violence
- 8. Employment
- 9. End of Life Planning
- 10. Healthcare
- 11. Immigration
- 12. Marriage and Family
- 13. Native American / Tribal Issues
- 14. Public Benefits
- 15. Real Estate

ALPS are limited to the services listed in their service model recommendation.

Recommended waivers	Rules 1.7 - 1.10 (the conflicts and imputation of conflicts rules) Elysium seeks waivers as to the lawyer owners and employees of the entity to ensure that the lawyer owners are not automatically conflicted out of providing legal services to clients by virtue of the fact that the clients were served by the sister companies and to ensure that the sister companies' engagements with firm clients are not considered business transactions.
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The Innovation Office recommends the following language:

Utah lawyers owning, partnering with, or employed by Elysium Holdings and its subsidiaries remain subject to the Utah Rules of Professional Conduct. However, the Court hereby finds that for the duration of its authorization by this Order, the lawyer owners of the holding company Elysium will not, by virtue of their ownership interest in the non-legal subsidiaries only, trigger application of Rules 1.7 through 1.10 of the Rules of Professional Conduct for consumers served by non-legal subsidiaries.

Rule 1.8 (f) (forbidding a lawyer to accept compensation from one other than the client unless there is informed consent).

Elysium seeks the waiver to permit entity lawyers to accept referral fees from nonlawyers working with the other entities owned by the holding company.

The Innovation Office recommends the following waiver language:

Utah lawyers owning, partnering with, or employed by Elysium Holdings or its subsidiaries remain subject to the Utah Rules of Professional Conduct. However, the Court hereby authorizes payment of bonuses or compensation to lawyers owning or

employed by Elysium by nonlawyer owners or employees of other entities owned by Elysium LLC will not violate Rule 1.8(f).

Rule 5.7 (responsibilities regarding law-related services).

Elysium recognizes the need to develop clear processes and communications to facilitate the offering of legal, investment, and retirement services together while ensuring client confidentiality and privilege protections remain intact but seeks the flexibility to develop those processes and procedures without being subject to Rule 5.7.

The Innovation Office recommends the following waiver language:

Utah lawyers owning, partnering with, or employed by Elysium Holdings remain subject to the Utah Rules of Professional Conduct. However, the Court hereby waives application of Rule 5.7 as to those lawyer owners and employees of Elysium with respect to the ancillary services provided by other entities owned by Elysium LLC.

Rule 5.3 (responsibilities regarding nonlawyer assistance)

The Office recommends this waiver with respect to Elysium's ALPs.

The Office recommends the following language:

Utah lawyers partnering with Elysium Holdings remain otherwise subject to the Utah Rules of Professional Conduct. However, to the extent that Elysium's business model could be found to implicate Utah Rule of Professional Conduct 5.3, the Court waives application of that rule as to lawyers practicing as employees of Elysium Holdings and its subsidiaries.

Recommended qualitative compliance requirements	Standardized disclosure statements on website and in mobile applications (see Manual): 1. Badge 2. Nonlawyer Ownership Disclosure Statement 3. Nonlawyer service provider disclosure statement 4. Rule 5.4 fee sharing disclosures
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Recommended data reporting requirements	Moderate Innovation data reporting requirements (see Manual)
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Sandbox Application

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 consumers.

Pearson Butler, PLLC is a Law Firm located in South Jordan, Utah that primarily serves consumers, individuals, and small businesses. Pearson Butler is owned by its Equity Members: Carson Pearson, Jeff Butler, Jenna Hatch, [REDACTED] Kyle Adams, Daniel Witte, Elliot Smith, Jason Haymore, Jason Webb, Rachel Sykes, Angilee Dakic, and David Williams. Pearson Butler employs close to [REDACTED] employees.

Pearson Butler, PLLC (“we”, “Pearson Butler”, or “the Law Firm”) proposes to enter the Sandbox with a variance that will allow the Law Firm to provide a diverse range of integrated law-related professional services — not only for its existing clients, but for prospective clients who would greatly benefit from an integrated approach to these professional services. The goal of this integration and ownership model is to reduce costs for our consumers and to increase access to professional services — including and primarily legal services [REDACTED]

[REDACTED] Additionally, this model would allow for the consumer to experience a full range of related integrated services, akin to a multi-disciplinary treatment team in the medical community. Many consumers would benefit from an integrated team of highly qualified professionals who can identify for the consumer the range of services needed and then effectively provide those services in a cost-effective manner, without requiring the consumer to self-generate this team of professionals. Many of our existing clients are unable to assemble this team of professionals either due to costs or lack of knowledge regarding the benefits of doing so.

To effectuate integrated management of professional services, as well as reduce the cost of those professional services most needed by consumers, the Law Firm proposes to incorporate a professional services entity which would own the Pearson Butler Law Firm, as well as other professional services entities, [REDACTED]

[REDACTED] The holding entity would be owned by attorneys and non-attorneys alike. The attorney and non-attorney owners would be permitted to profit-share [REDACTED]

[REDACTED]. This joint ownership would allow for multiple benefits to the consumers, including: 1) reduction in client acquisition costs incurred by the service providers across the entities and disciplines which may be passed on to the client; 2) reduction in cost of legal services; 3) easier access to legal services needed by consumers as they engage with other professional services in the community; and 4) easier access to integrated professional services where historically the line between legal and non-legal professional services have overlapped, thereby creating better and more comprehensive results for the consumer.

The Law Firm proposes to allow the acquisition [REDACTED] of the Law Firm by a holding company, Elysium Holdings, LLC; ("Elysium" or the "Company") [REDACTED]

[REDACTED] The creation of Elysium Holdings, LLC, will permit [REDACTED] non-attorney ownership of Pearson Butler. Please see response 1.2 for further information regarding the management structure.

Upon approval, Elysium would provide the following services through its subsidiaries:

- Legal services within the range of what Pearson Butler already offers, through the current Law Firm. The only change would be that the ownership of Pearson Butler would be subsumed into the holding entity Elysium Holdings, LLC.

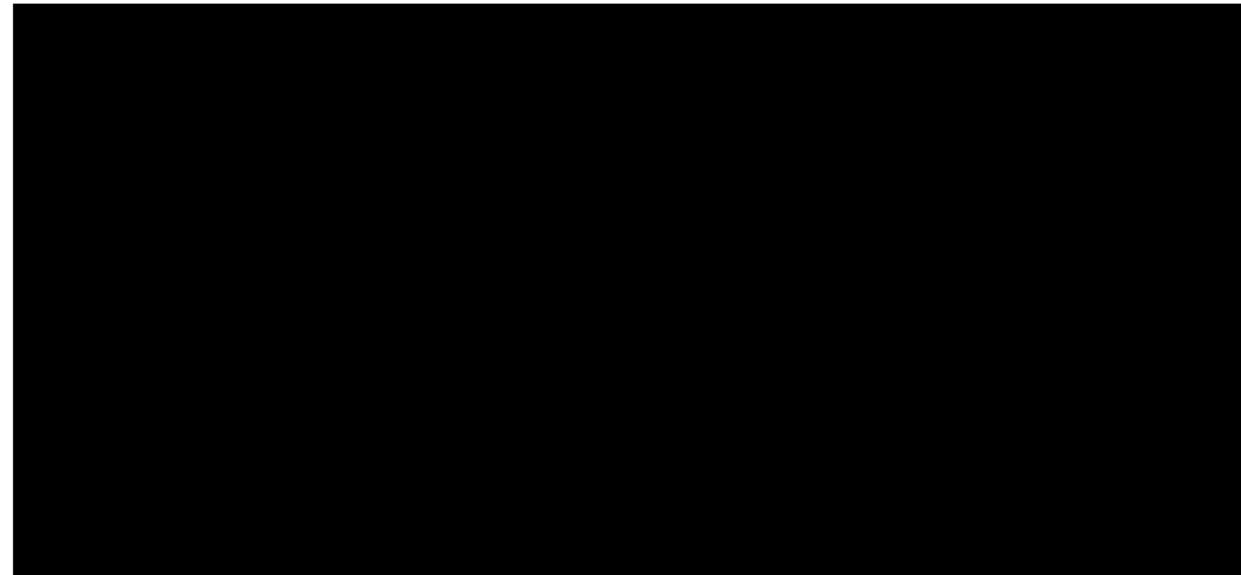
[REDACTED]

In order to provide these services, the following variances to the Utah Rules of Professional Conduct should be permitted through the Sandbox:

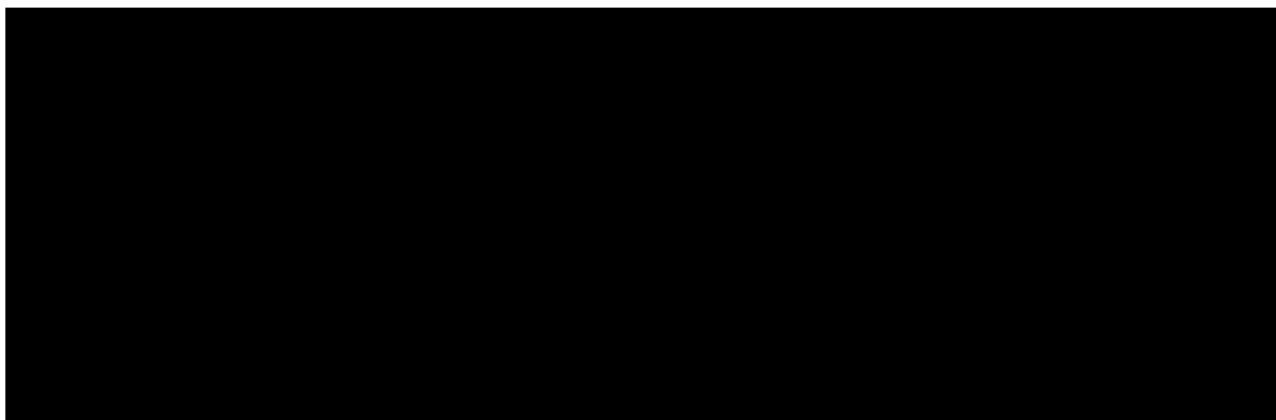
- 1) Allowing non-attorney ownership. Elysium Holdings, LLC will be owned initially by at least two non-attorneys and the current equity partners of Pearson Butler. We seek confirmation that the ownership proposal outlined in this application complies with the provisions of Rule 5.4.
- 2) Fee-Sharing. We seek a variance from the requirements of Rule 5.4, or confirmation that the following proposed practices are approved under Rule 5.4:
 - a) *Fee sharing between businesses held by Elysium.* The companies owned by Elysium should be allowed to share legal fees between themselves. [REDACTED]

[REDACTED]

- d) *Fee sharing with other attorneys.* Elysium or its subsidiary companies should be permitted to share fees both by paying or receiving fees to acquire cases. For instance, California



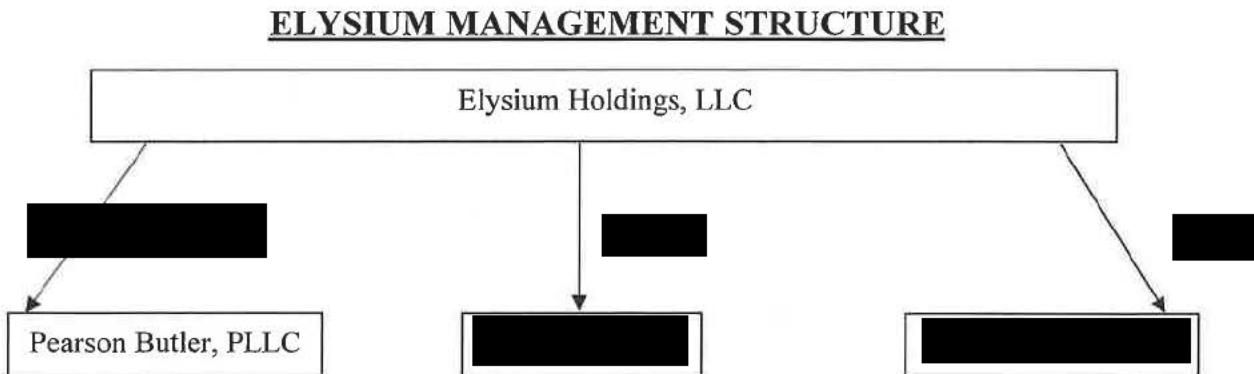
- 4) Conflicts of Interest. We wish to clarify Rules 5.7 and 1.7-1.10 and seek variance and/or verification that clients of the holding Company will not have conflicts of interest imputed to the Law Firm merely because professional services have been provided by an affiliated company. We also seek clarification or a variance that agreements between Law Firm clients and other Elysium subsidiaries are not transactions with clients or are exempt from the requirements of Rule 1.8(a). Our business model also anticipates sharing fees and referral fees among the Elysium subsidiaries. We therefore also seek a variance from the requirements of Rule 1.8(f).



[REDACTED]

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

Upon approval, Elysium Holdings, LLC will hold [REDACTED] of Pearson Butler, PLLC, [REDACTED] Elysium Holdings, LLC is depicted visually below:



Initially, Elysium Holdings, LLC will be owned [REDACTED]

[REDACTED] Pearson Butler, PLLC, the only entity providing legal services, will be directly managed by attorneys who will have independent control to run the Law Firm subsidiary. No non-attorney will be permitted to serve in a capacity supervising the attorneys. In order to ensure that attorneys remain in a position to exercise independent judgment in providing legal services Elysium and Pearson Butler, PLLC will enter into a written agreement to ensure that Elysium and its other subsidiaries will not be able to influence or control the independent judgment of attorneys who work for Pearson Butler.

Elysium's ownership of non-Law Firm entities does implicate the Rules of Professional Conduct. This application seeks approval to have Elysium, which is partially owned by non-lawyers, own the Law Firm.

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.

See supra 1.1 and 1.2

We desire to provide a range professional services including legal and non-legal professional services in a truly multi-disciplinary practice. In order to accomplish this, we are seeking approval for the following: 1) non-attorney ownership of a holding Company that would own a Law Firm;

2) fee-sharing as outlined in 1.1 above; and 3) to empower Law Firm staff to provide supervised legal services to clientele.

This application spells out our plan to benefit consumers of legal and other professional services, while protecting them against the harms the Rules of Professional Conduct are intended to address.

1.4 Describe your target consumer

We anticipate primarily serving the general population who most often struggle being caught between obtaining access to justice and affording quality legal services. This tends to be lower middle-class to upper middle-class consumers and small businesses. The middle class is a widely underserved because they cannot afford quality legal services. A 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, (December 3, 2017),

<https://www.americanbar.org/groups/litigation/committees/minority-trial-lawyer/practice/2017/access-to-justice-mitigating-justice-gap/>.

Yet these consumers can more actively participate in the community and economy if they have access to such services.

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

- Lawyers employed or managed by a nonlawyer
- Less than 50% nonlawyer ownership
- More than 50% nonlawyer ownership
- Lawyers sharing legal fees or paying referral fees to nonlawyers
- Nonlawyer provider with lawyer involvement
- Nonlawyer provider without lawyer involvement
- Software provider with lawyer involvement
- Software provider without lawyer involvement
- Other:

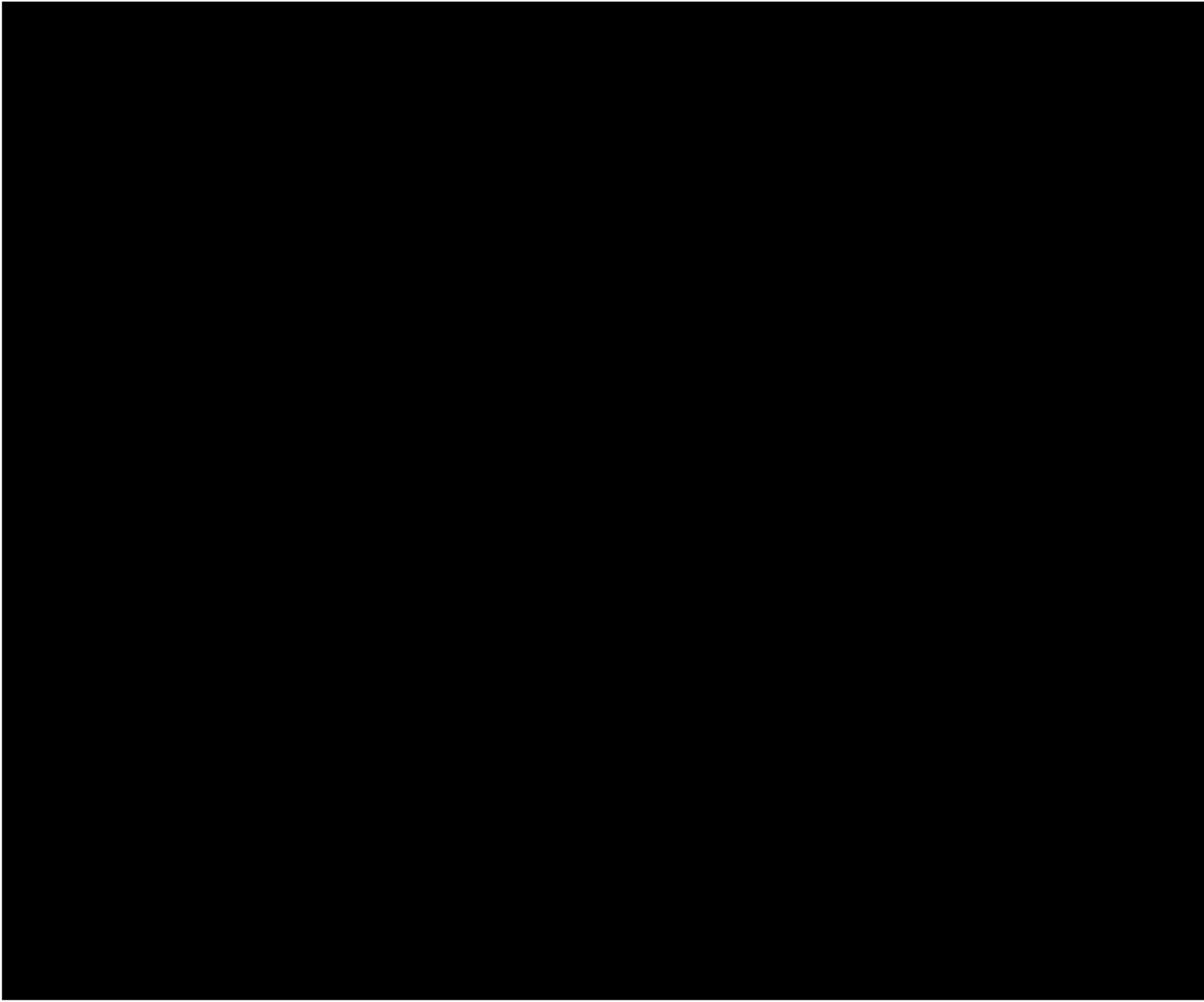
1.6 Which legal services categories are you seeking to offer?

- Accident/Injury
- Adult Care
- Business
- Criminal - Expungement ONLY
- Discrimination
- Domestic Violence
- Education
- Employment
- End of Life Planning
- Financial Issues
- Immigration
- Healthcare

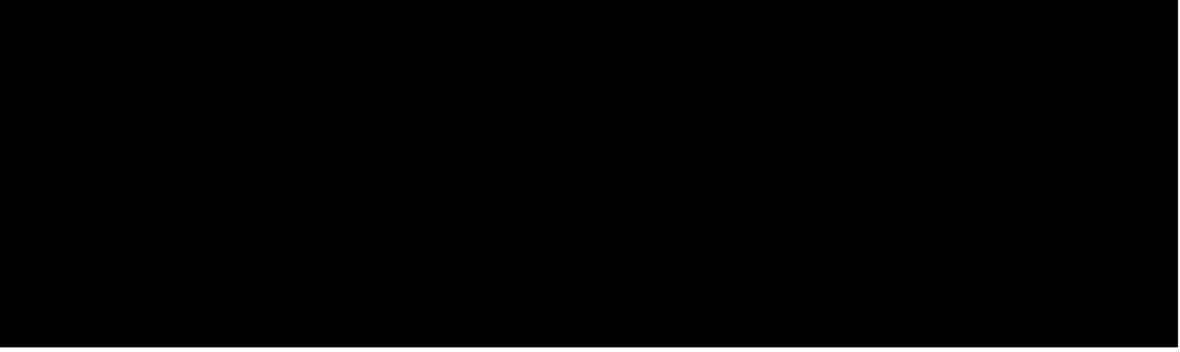
- Housing - Rental
- Marriage and Family
- Military
- Native American + Tribal Issues
- Public Benefits
- Real Estate
- Traffic - civil actions / citations

* Please note these are services Pearson Butler already provides and will continue to provide under Elysium ownership. Further, Pearson Butler offers and will continue to offer legal services in categories not listed in this section that are currently underserved, including but not limited to Criminal, Startups, Personal and Business Tax, Securities, and Business Transactions. These services will promote increased income for Utah families and job growth that will inherently increase the ability for Utah families to access legal services.

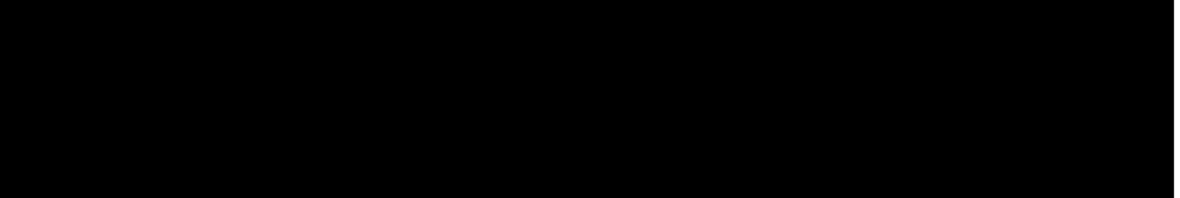
2.1 Fully and candidly discuss the risks your consumers might face if they use your proposed model, including each of the risks described above.



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



2.3 Please describe your consumer complaint process.



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

Partnering with other professionals will allow Pearson Butler, PLLC to provide legal and professional services in a more cost-efficient manner. As an example, Pearson Butler often encounters consumers who recently lost a job but were provided retirement benefits before their termination. Many of these clients seek representation at unemployment hearings but ultimately cannot afford the services because they have no income. Under the proposed model, Pearson Butler would be able to economically provide representation at the unemployment hearing if they are able to provide both the legal representation and bundled financial services to the client. It is the ability to provide both services which makes it economical feasible for Pearson Butler to provide greater access to legal services. A similar scenario exists among many disciplines.

Elysium and its subsidiary companies will identify professional services that a client may need and offer to provide those services. Bundled services will not only save consumers money, but it will assist them in identifying services they were unable to access previously. The Law Firm has already sought out like-minded, high-end professionals who are looking to reduce the cost of client acquisition and scale their services in a way that cannot be done without integration. Consumer

practices are - by nature - high volume and lower-case value. This means that one of the greatest costs to a client is the Law Firm's cost to acquire the client.

In the past, the Rules of Professional Conduct have restricted professional-service providers ability to cross-refer clients and build functional networks for the clients. This has left consumers with the heavy task of finding and vetting various professionals for the various services they need. This is costly to the client because the client pays for the marketing costs, and it takes significant time for the client to find, vet, and engage different professionals. This can also build customer frustration and a general distrust of the entire system. And, in many cases, consumers simply do not get the professional help they need.

Pearson Butler aims to reduce the expense of both the consumer's costs of both time and money to locate professional service providers, and to build trust and confidence in those providers. The integration of these services - while not mandatory for the client - will allow the client to have one place where they can fill many of their professional needs with high quality professionals, all at a lower cost than seeking piecemeal services.

The client acquisition costs incurred by a Law Firm, [REDACTED] are significant. Because many of the clients have overlapping needs, an integrated professional services firm can significantly reduce costs. This allows for more competitive pricing models, which will increase access to the specific customers affected and will also act to drive down market prices across the board, putting pressure on similar service providers to optimize their practices whether they participate in the Sandbox or not.

3.2 Does your proposal comply with applicable Utah requirements?

Yes.

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

[REDACTED]

4.1. 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").

The Equity Partnership of Pearson Butler as listed in question 1.1. John Bergquist and Brady Tanner will also participate in the ownership and management of Elysium.

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

The business is 100% self-financed by the Equity Partners and the two non-attorney owners.

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.

No disbarred lawyers will have any managerial role nor will any disbarred lawyers provide any legal services or be affiliated with us in any way.

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.

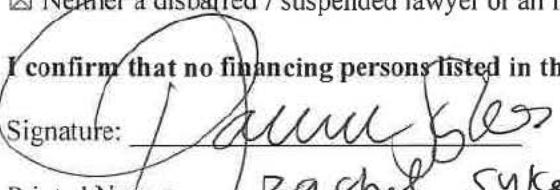
None.

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

None

- 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: Rachel Sykes

Title: PARTNER

Date: OCT 7 2020

ls carson pearson
managing partner
(signed with permission)