



Meeting Minutes Supreme Court's Office of Legal Services Innovation Committee

Held via Zoom and in person

Tuesday, May 20, 2025

1:00 pm to 2:30 pm

COMMITTEE MEMBERS

Alyson Carter McAllister – <i>Chair</i>	Present	Megan Connelly	Present
Nick Hafen – <i>Vice Chair</i>	Present	Ciriac Alvarez Valle	Present
Lindsey Brandt	Present	Barclay Burns	Present
Christopher Martinez	Present	Elizabeth Wright – <i>Ex Officio</i>	Excused
J. Brett Chambers	Excused	Andrea Donahue – <i>Staff</i>	Present
Janine Liebert	Present	Tanya Rosado – <i>Staff</i>	Present
Megan Glasmann	Present	Nick Stiles – <i>Staff</i>	Present
Gretchen Lee	Excused		

GUEST(S)

Kim W.	Hayley Cousin	Jason Velez – <i>1Law</i>
Ryan Hogan – <i>Johnson Hogan</i>	Gabriela Elizondo-Craig – <i>i4J</i>	Aaron Velez
Pace Johnson – <i>Johnson Hogan</i>	Jessica Bednarz – <i>IAALS</i>	Staci Spencer

1. Discussion:

Alyson McAllister

Welcome and Public Comment

Ms. McAllister welcomed all attendees and opened the floor for public comments.

Jason Velez spoke on behalf of his entity, 1Law, in response to the notice of termination recommendation and asked for more guidance and feedback in order to decide whether to submit a request for reconsideration. Mr. Velez explained that his entity was one of the first entities in the Sandbox, that he has been a big supporter of the Sandbox, and that he had wanted his entity to be considered for Exit. 1Law is based in Utah; while it has offices in other states, it has a disproportionate focus on Utah considering Utah's population size. Three of 1Law's six offices are in Utah. Additionally, sacrifices have been made to be more involved in the Utah legal market.

Ms. McAllister encouraged Mr. Velez to submit a Request for Reconsideration so that the Committee could review and deliberate on the information provided. Ms. McAllister explained that the process is triggered by the receipt of the request for reconsideration, which allows for meaningful discussion. Ms. McAllister also explained that the jurisdiction of Sandbox authorizations, which are through the Utah Supreme Court, are limited to the practice of law in Utah. If an entity is able to provide services in other jurisdictions, then it is unclear why authorization would be needed.

2. Vote:

Alyson McAllister

Approval of April Meeting Minutes

Ms. McAllister invited a motion for approval of the April 2025 Meeting minutes.

Mr. Hafen moved to approve the minutes. Ms. Connelly seconded the motion, and it passed unanimously.

3. Discussion and Vote:

Andrea Donahue

Requests to Withdraw

Ms. Donahue presented the requests to withdraw received from Holy Cross Ministries and Timpanogos Legal Center ("TLC"). Holy Cross Ministries will be continuing its community health worker program under the umbrella of Community Justice Advocates of Utah ("CJAU"). TLC is also entering into an agreement with CJAU to administer its Certified Advocate Partners Program ("CAPP"). Hayley Cousin offered a clarification that TLC will be transferring CAPP to CJAU rather than operating as a community partner.

Mr. Hafen moved to approve the requests to withdraw for both entities. Ms. Glasmann seconded the motion, and it passed unanimously.

4. Discussion and Vote:

Andrea Donahue

Amendment Request

Ms. Donahue presented the amendment request received from CJAU in connection with the requests to withdraw. The requested amendment would revise CJAU's authorization order to (1) provide it with the ability to train and certify individuals in CAPP, currently operated by TLC, and (2) provide it with the ability to set eligibility requirements for participation in the program.

CJAU provided proposed language for the amendment, including two options for modification of the first paragraph of the order. The first option was to insert a new statement incorporating TLC's authorization order by reference, and the second option was to make edits within the current paragraph. The Committee deliberated on the proposed language, finding the second option to be more clear; Mr. Hafen noted that finding that the second option would allow for the information to be in one place.

Mr. Hafen moved to approve the amendment request from CJAU, with the second option for the introductory paragraph. Ms. Connelly seconded the motion, and it passed unanimously.

5. Discussion and Vote:

Nick Hafen

Applications

Mr. Hafen informed the Committee that the Applications Working Group recommends denials for 9 entities that do not appear to have a Utah-specific model. Sandbox authorization orders are limited to Utah; it is unclear why entities operating in other states or nationally would require authorization in Utah unless they can explain why their Sandbox model is unique. Ms. Glasmann noted that some of the applicants had Utah attorneys while others did not. Ms. Donahue explained that the involvement of Utah attorneys can provide context.

Mr. Burns asked if these applicants had lawyers or legal structures operating in Utah. Ms. McAllister responded that the Supreme Court wants to make it clear that they are not authorizing entities or attorneys to operate outside of Utah. If they haven't made it clear how their model is specific to Utah, they haven't shown the need for authorization. Mr. Barclay raised that he has seen requirements for incorporation in Utah in his other work; Ms. Donahue explained that the Supreme Court instituted a requirement for registration with the Utah Department of Commerce in its 2023 Letter to the Bar.

Ms. Brandt motioned to deny the list of entities who appeared to lack a Utah-specific model. Mr. Hafen seconded the motion, and it passed unanimously.

(The list included: Aracor UT, Inc.; Cimphony AI; Holding GC OP Services; Holistic Law; LegalSifter Law; Massive Blue; Rosefelt Tax Laws; Salus Law; and NAFA Law Abogados Attorneys LLC.)

Mr. Hafen presented My Visa Source, a for-profit entity seeking to offer immigration services. The Committee had voted to deny applications from for-profit immigration entities pursuant to the Supreme Court's order in the April meeting, but this entity had not been included in that list as the applications working group had been discussing whether further clarification was needed from the Supreme Court regarding Low Innovation entities.

Mr. Hafen motioned to deny My Visa Source because it is a for-profit entity solely or primarily focused on immigration. Ms. Glasmann seconded the motion, and it passed unanimously.

Ms. Donahue presented proposed updates to the Innovation Office Manual to reflect the new Utah innovation requirement from the Supreme Court as well as to highlight the need for a Utah-specific model as an eligibility requirement. She explained that language had been pulled from the Supreme Court's September 2024 letter to the Committee regarding the Utah innovation requirement.

The proposed updates would apply to Section II (Applying for the Sandbox), adding to the list under “other entities not eligible for the Sandbox.” After “entities that cannot ensure that lawyers comply with their rules of professional conduct and other applicable rules or statutes,” an additional sentence stating, “*This includes national and international entities that do not demonstrate Utah-specific models*” would be added.

The addition of the following paragraphs, to incorporate the guidance from the Supreme Court, were also proposed:

- *Entities that do not demonstrate that a Sandbox authorization will allow them to reach Utah consumers currently underserved by the legal market (the “**Utah innovation requirement**”). The Utah innovation requirement is intended to act as a fairly high bar for participation in the Sandbox. Only applications that present an innovative service model with the potential to expand access to legal services in Utah will be submitted for Court approval.*
 - *The impact on Utah consumers must be substantial relative to the entity’s overall reach. National and international companies that expect to serve only an incidental number of Utah clients will not qualify. A small entity that principally serves Utah consumers will satisfy the Utah nexus even if it reaches a modest number of clients.*
 - *Low Innovation entities will not meet the Utah innovation requirement unless the non-lawyer ownership structure is designed to facilitate an innovative service model with a substantial impact on the Utah market, such as providing a one-stop-shop or intermediary platform for Utah consumers.*
 - *Moderate and High Innovation entities will generally meet the Utah innovation requirement, so long as the entity’s service model is designed to reach a substantial number of Utah consumers.*

The Committee discussed the proposed updates and expressed the desire to ensure clarity. Mr. Hafen noted that the first sub-bullet makes it appear that an applicant that is a big national company with a Utah-specific model would still be ineligible. He expressed that he didn’t think that was the intention. Ms. Donahue explained that this bullet point was taken from the Court’s letter. Ms. McAllister expressed that the focus has to be on the Utah-specific model. Mr. Hafen stated that it might be worth it to clarify. He suggested adding the term “generally.” Ms. Glasmann proposed adding “unless they demonstrate a Utah-specific model” to that sentence to ensure that national entities are not discouraged. Mr. Barclay expressed that clarifying boundaries is helpful. Jessica Bednarz provided a comment through the chat function that she agreed with Mr. Hafen that clarity was key for potential applicants.

Ms. Glasmann motioned to approve the proposed updates to the Innovation Office Manual with the addition of “unless they demonstrate a Utah-specific model” after the line: “National and international companies that expect to serve only an incidental number of Utah clients will not qualify.” Mr. Hafen seconded the motion, and it passed unanimously.

**6. Discussion and Vote:
Felony Histories Policy**

Alyson McAllister

Ms. McAllister updated the Committee that the Court approved the updated felony history policy with one revision. The Court changed the word “expressly,” when describing individuals prohibited from participation in the Sandbox, to “categorically.”

Ms. Glasmann motioned to approve updating the Innovation Office Manual to include the felony histories policy, including the Court’s revision. Mr. Hafen seconded the motion, and it passed unanimously.

**7. Discussion and Vote:
Request for Reconsideration**

Alyson McAllister

Ms. McAllister gave the floor to Ryan Hogan, a representative from the applicant Johnson Hogan. Johnson Hogan applied prior to Phase 2 and submitted a request for reconsideration in response to the Committee’s initial denial. Mr. Hogan thanked the Committee for their time and went over some of his accolades. He went on to give a personal account of his experience with the judicial system and expressed the hard work he has done to help others navigate the system and transform their lives.

**8. Discussion and Vote:
Fee Policy**

Andrea Donahue

Ms. Donahue opened up discussion on the fee policy agenda item, noting that it had been inadvertently skipped over. She described the Committee’s previous recommended revision to the fee policy for the new members, following feedback from entities regarding the revenue-based fee. Heading into Phase 2, the Court instituted a revised fee policy of a \$5,000 annual flat fee, which replaced the previous revenue-based licensing fee along with the audit and pre-launch assessment fees. The revised fee policy does not include a hardship waiver process, but the Utah Bar Foundation is a potential resource for nonprofit organizations. At the close of Phase 1 at the end of January, the revised fee policy was communicated to the remaining entities. 2025 is the first year that a fee policy has been implemented.

Michelle Turpin PC, a tax law firm, has requested a waiver, which would require a revision to the policy. Staci Spencer, from Michelle Turpin PC, explained their waiver request. Ms. Spencer explained that the fee is prohibitive as her entity is a smaller tax law firm, and she does not have equity ownership yet. She wanted to know if there is room for a “more reasonable” annual fee.

The Committee discussed the previous process of revising the fee policy, and new members raised questions. Ms. Donahue described that the Committee previously considered operating costs, the Court’s expressed goal for the project to become self-funded, and Arizona’s ABS fee structure. The Court also took into consideration that community partners, such as the Utah Bar Foundation, are potential resources to nonprofit entities. Mr. Burns expressed that the general process is that operating costs

would be divided by the number of entities. Ms. Donahue noted that at the current number of entities and fee amount, the projected revenue is a fraction of the operating costs, even with the decreased operating budget. Ms. Connelly asked about the potential to have categorized fees. Mr. Hafen expressed concern that the fee is high if the goal is to encourage innovation and suggested the possibility of waiving the first 12 months for entities. Ms. Spencer raised that Moderate Innovation entities won't undergo pre-launch assessments.

Ms. Glasmann motioned for the Committee to go into closed session. Ms. Connelly seconded the motion, and the Committee closed the meeting.

The Committee invited Mr. Hogan and Mr. Johnson to enter closed session to answer questions.

9. Post-Closed Session

No remaining items

Ms. Connelly motioned to adjourn the meeting. Ms. Glasmann seconded the motion, and the meeting was adjourned.