



Office of Legal Services Innovation
An Office of the Utah Supreme Court

INNOVATION OFFICE ACTIVITY REPORT

DECEMBER 2021

DRAFTED JANUARY 20, 2022

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OVERALL METRICS

Total Applications Received	54
Applicants Recommended to Court for Authorization	33
Applicants Denied Recommendation from Innovation Office	2
Applicants Denied Authorization by Court	0
Applicants Tabled (referral fees)	8
Inactive or Withdrawn Applicants Before Recommendation	9
Currently Under Office Review	2
Recommended to Court for Authorization Decision	0
Authorized Entities	33 (including 3 withdrawn)
Entities Reporting Data (this month)	13
Entities Recommended to Exit the Sandbox	0
Key Risks and Trends	There were 2 reported consumer complaints during December 2021 but neither were harm-related



EXECUTIVE SUMMARY

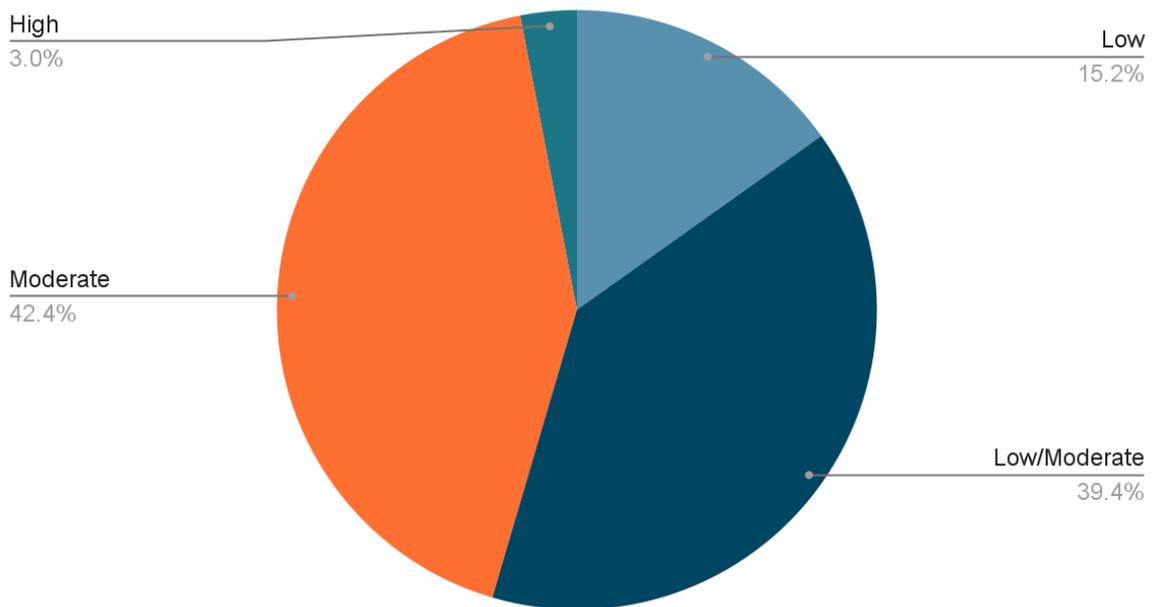
This report summarizes activities and negative risk assessment (i.e., harms) of entities approved by the Utah Supreme Court to implement legal services within the Utah Sandbox and monitored by the Office of Legal Services Innovation. This report covers the period of October 2020 through December 2021.

SANDBOX ACTIVITY (OCTOBER 2020 - DECEMBER 2021)

Entities Authorized to Offer Sandbox Legal Services

- 33 entities approved to offer services

Entities Authorized



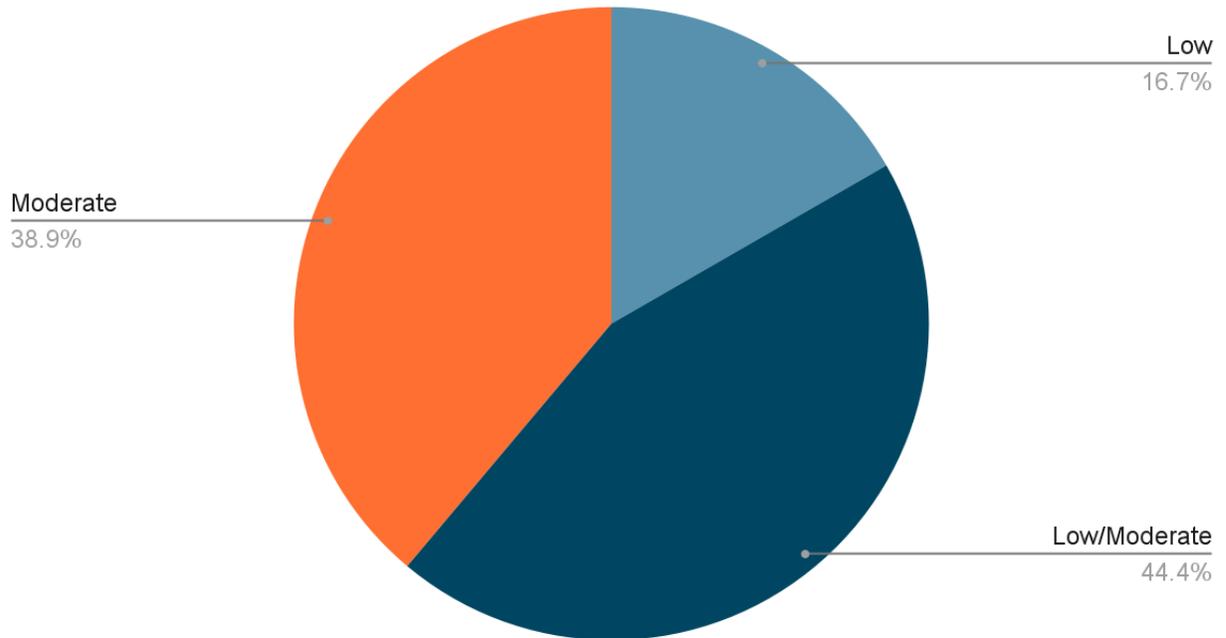
- o **Low Risk=5** (AGS Law, Blue Bee, Firmly, Hello Divorce, Rocky Mountain Justice)
- o **Low/Moderate=13** (GovAssist Legal, Davis & Sanchez, FOCL Law, LawPal, Legal Atoms, Legal Claims, Inc. [Trajector Legal], Mountain West Legal Protective, My Immigration, R&R, Robert Deby & Associates, Rocket Lawyer, Tanner, Xira)
- o **Moderate=14** (1Law, DSD Solutions, Estate Guru, Holy Cross Ministries, Jordanelle Blocks, LawGeex, Law HQ, Law on Call, Nuttall, Brown & Coutts, Off the Record, Pearson Butler, Sudbury Consulting, Timpanogos Legal Center, Utah Legal Advocates)
- o **High=1** (AAA Fair Credit)



Authorized Entities Reporting Data through December 2021

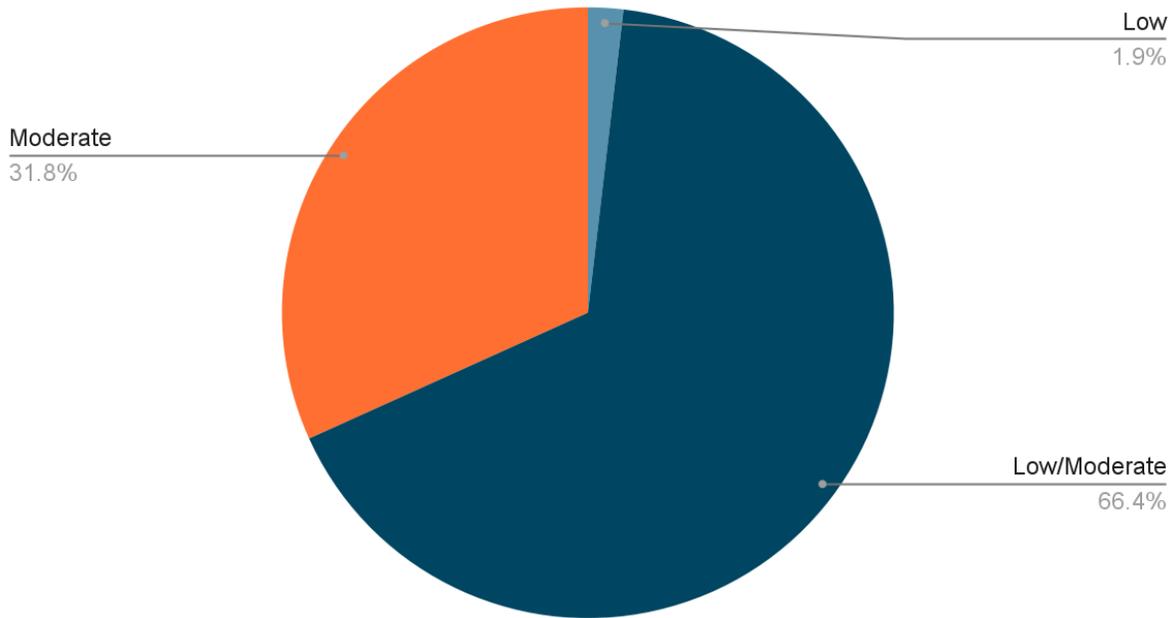
- 18 entities reporting data to date; 13 reporting this period
 - o 3 low risk entities; 8 low/moderate risk entities; 7 moderate entities

Entities Reporting Data to Date



Proportion of Services by Entity and Legal Categories Addressed

Legal Services by Entity Risk



- 12721 legal services sought from ~10000 unduplicated clients
 - Low=237 legal services sought; Low/Moderate=8444 legal services sought; Moderate=4040 legal services sought
 - 98% of legal services were produced via low/moderate or moderate risk entities
 - 11882 (93%) legal services have been delivered by a lawyer (or lawyer employee) or software for form or document completion only with lawyer involvement
 - 839 legal services have been delivered by non-lawyers (software or person) with lawyer involvement

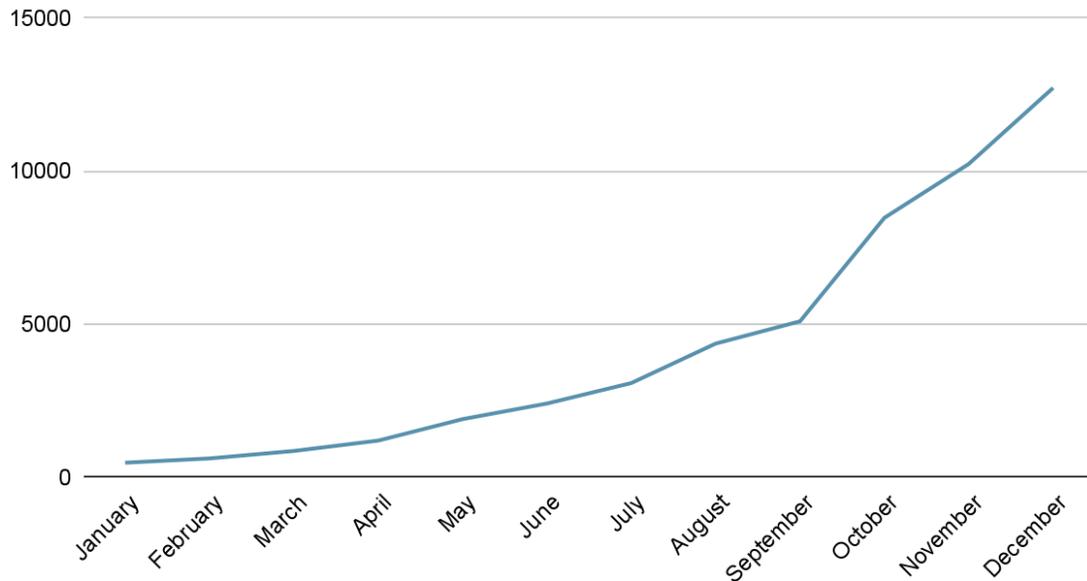
- **Legal Categories Addressed by Service**
 - The rank of legal category addressed has been:
 - 1) Military/Veterans Benefits [43.0%]
 - 2) Business [14.9%; e.g., intellectual property, contracts/warranties, and entity incorporation]
 - 3) Accident/Injury [14.7%]
 - 4) End of Planning [8.2%];
 - 5) Marriage/Family [5.0%];
 - 6) Financial [e.g., individual bankruptcy and collections practices; 3.2%];



- o Six legal categories accounted for 89% of legal services. The remaining 14 possible legal categories accounted for 11%.
- o The top four categories accounted for 73% of legal service.

Growth of Services Across Time

Cumulative Legal Services by Month (2021)



Complaints and Audits

- To date, entities have reported seven complaints to the Office, approximately 1 complaint per ~1817 services delivered. The first complaint was reported in the April report and was linked to the harm of an inappropriate/inaccurate legal result. The second complaint was reported in the May report but was not linked to any of the three harms. The third, fourth, and fifth complaints were linked to exercising legal rights and were reported during June, September, October 2021 respectively. Two complaints were reported during December 2021 but neither was harm-related. The ratio of harm-related complaints to services was approximately 1 complaint per ~3180 services. The entity response to harm-related complaints has been adequate and acceptable as related to harm mitigation and prevention.



Consumer Complaint Assessment: All Reporting Entities to Date

Complaint Harm Category	# Consumer Complaints	% Consumer Complaints
Consumer achieves an inaccurate or inappropriate legal result.	1	<0.01%
Consumer fails to exercise legal rights through ignorance or bad advice.	3	<0.03%
Consumer purchases an unnecessary or inappropriate legal service.	0	0%

- o Audit materials have been collected from three moderate risk entities, with two reviewed. The third is being prepared for external auditor review.

TABLE 1: AUTHORIZED ENTITIES

Entity Name	Risk Level	Service Models	Service Categories
10 - Blue Bee Bankruptcy	Low	Lawyers employed / managed by nonlawyers	Education
		<50% non lawyer ownership	Consumer Financial Issues
15 - AGS Law	Low	<50% non lawyer ownership	Business
			End of Life Planning
			Real Estate
19 - Firmly, LLC	Low	<50% non lawyer ownership	Business
44 - Hello Divorce	Low	Lawyers employed / managed by nonlawyers	Marriage and Family
		<50% non lawyer ownership	
51 - Rocky Mountain Justice	Low	<50% non lawyer ownership	Accident / Injury
04 - Lawpal	Low / Moderate	Lawyers employed / managed by nonlawyers	End of Life Planning
		50+% non lawyer ownership	Consumer Financial Issues



		Software provider /w lawyer - doc completion	Housing (Rental)
			Marriage and Family
05 - Rocket Lawyer	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Criminal (Other)
			Discrimination
			Domestic Violence
			Education
			Employment
			End of Life Planning
		50+% non lawyer ownership	Consumer Financial Issues
			Healthcare
			Housing (Rental)
			Immigration
			Marriage and Family
			Military
			Public Benefits
			Real Estate
07 - R & R Legal Services	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Domestic Violence
			End of Life Planning
		50+% non lawyer ownership	Consumer Financial Issues
			Healthcare



			Marriage and Family
			Public Benefits
14 - FOCL Law	Low / Moderate	Lawyers employed / managed by nonlawyers	Marriage and Family
		50+% non lawyer ownership	
		Software provider /w lawyer - doc completion	
32 - Tanner LLC (Withdrew from Sandbox)	Low / Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% non lawyer ownership	
33 - Xira Connect	Low / Moderate	50+% non lawyer ownership	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Discrimination
			Domestic Violence
		Fee Sharing	Education
			Employment
			End of Life Planning
			Consumer Financial Issues
			Healthcare
			Housing (Rental)
			Immigration
		Intermediary Platform	Marriage and Family
			Military
Native American / Tribal			
Public Benefits			
Real Estate			



			Traffic Citations
37 - Robert DeBry (Withdrawn form Sandbox)	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
		50+% non lawyer ownership	
38 - Davis & Sanchez	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
		50+% non lawyer ownership	Education
39 - Legal Claims Benefits (Trajector Legal)	Low / Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Education
		50+% non lawyer ownership	Healthcare
			Military
Public Benefits			
41 - Mountain West Legal Protective	Low / Moderate	Lawyers employed / managed by nonlawyers	Housing - Rental
		50+% non lawyer ownership	Real Estate
48 - Legal Atom	Low / Moderate	50+% non lawyer ownership	Immigration
		Software provider /w lawyer - doc completion	Marriage and Family
		Fee sharing	Domestic Violence
			Housing - Rental
50 - GovAssist Legal	Low / Moderate	Lawyers employed / managed by nonlawyers	Immigration
		50+% non lawyer ownership	
		Fee sharing	
		Software provider /w lawyer - doc completion	
52 - My Immigration	Low / Moderate	Lawyers employed / managed by nonlawyers	Immigration
		50+% non lawyer ownership	
		Lawyers sharing fees with	



		nonlawyers	
		Software provider /w lawyer - doc completion	
02 - 1Law	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Adult Care
			Business
			Criminal Expungement
			Criminal (Other)
		50+% non lawyer ownership	Discrimination
			Domestic Violence
			Education
			Employment
			End of Life Planning
		Software provider w/ lawyer involvement	Consumer Financial Issues
			Healthcare
			Housing (Rental)
			Immigration
		Non-lawyer provider w/ lawyer involvement	Marriage and Family
Public Benefits			
Real Estate			
Traffic Citations			
03 - Law HQ	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
		50+% non lawyer ownership	Business
		Software provider w/ lawyer involvement	Employment
12 - Nuttall Brown	Moderate	Lawyers employed / managed by nonlawyers	Accident Injury
		50+% non lawyer ownership	Business



		Software provider w/ lawyer involvement	Discrimination
		Non-lawyer provider w/ lawyer involvement	Employment
			Marriage and Family
13 - Estate Guru	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% non lawyer ownership	End of Life Planning
		Fee Sharing	Consumer Financial Planning
		Software provider /w lawyer - doc completion	Healthcare
		Software provider w/ lawyer involvement	Real Estate
		Non-lawyer provider w/ lawyer involvement	
23 - Off the Record	Moderate	50+% non lawyer ownership	Traffic Citations
		Fee Sharing	
		Software provider w/ lawyer involvement	
27 - Sudbury Consulting	Moderate	Software provider w/ lawyer involvement	Criminal Expungement
			Employment
28 - Pearson Butler	Moderate	50+% non lawyer ownership	Accident / Injury
			Adult Care
			Business
			Discrimination
			Education
		Fee Sharing	Employment
			End of Life Planning
			Consumer Financial Issues
			Housing (Rental)
			Immigration



		Non-lawyer provider w/ lawyer involvement	Marriage and Family
			Military
			Native American / Tribal
			Public Benefits
			Real Estate
30 - Law on Call	Moderate	Lawyers employed / managed by nonlawyers	Business
			End of Life Planning
		50+% non lawyer ownership	Consumer Financial Issues
			Housing (Rental)
		Non-lawyer provider w/ lawyer involvement	Real Estate
31 - DSD Solutions	Moderate	Lawyers employed / managed by nonlawyers	Accident / Injury
			Business
			Criminal Expungement
		50+% non lawyer ownership	Domestic Violence
			Employment
			End of Life Planning
		Software provider w/ lawyer involvement	Housing (Rental)
			Immigration
			Marriage and Family
		Non-lawyer provider w/ lawyer involvement	Public Benefits
			Real Estate
			Traffic Citations
36 - Timp. Cert. Advocates	Moderate	Nonlawyer provider w/out lawyer involvement	Domestic Violence
			Marriage and Family
40 - Utah Legal Advocates	Moderate	Nonlawyer provider w/ Lawyer Involvement	Domestic Violence
		Fee Sharing	Marriage and Family



42 - Jordanelle Blocks	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% non lawyer ownership	
		Fee Sharing	Housing - Rental
		Software provider /w lawyer - doc completion	
		Software provider w/ lawyer involvement	Real Estate
		Non-lawyer provider w/ lawyer involvement	
43 - LawGeex	Moderate	Lawyers employed / managed by nonlawyers	Business
		50+% non lawyer ownership	Healthcare
		Software provider w/ lawyer involvement	
45 - Holy Cross Ministries	Moderate	Non-lawyer provider w/ lawyer involvement	Financial Issues
			Immigration
			Health Care
			Public Benefits
47 - AAA Fair Credit	High	Non-lawyer provider w/out lawyer involvement	Financial Issues
			Healthcare
			Public Benefits



TABLE 2: AUTHORIZED ENTITIES REPORTING STATUSES

Entity Name	Risk Category	Launch Date	First Report Due	Frequency
Blue Bee Bankruptcy	Low	Oct. 1, 2020	Jan. 5, 2021	Quarterly
AGS Law	Low	Oct. 1, 2020	Jan. 5, 2021	Quarterly
Firmly LLC	Low	Jul. 1, 2021	Oct. 5, 2021	Quarterly
Hello Divorce	Low	Dec. 1, 2021	Mar. 5, 2022	Quarterly
Rocky Mountain Justice	Low	TBD	TBD	Quarterly
Rocket Lawyer	Low-Moderate	Oct. 1, 2020	Nov. 5, 2020	Monthly
R&R Legal Services	Low-Moderate	Jan. 1, 2021	Feb. 5, 2021	Monthly
LawPal	Low-Moderate	Feb. 1, 2021 Dec. 1, 2021 (relaunch)	Mar. 5, 2021	Monthly
FOCL Law	Low-Moderate	Jan. 1, 2021 Nov. 1, 2021 (relaunch)	Feb. 5, 2021	Monthly
Xira Connect	Low- Moderate	Jan. 1, 2022	Feb. 5, 2022	Monthly
Davis & Sanchez	Low-Moderate	Jul. 1, 2021	Aug. 5, 2021	Monthly
Legal Claims Benefits	Low-Moderate	Aug. 15, 2021	Sept. 5, 2021	Monthly
GovAssist Legal	Low-Moderate	TBD	TBD	Monthly
Legal Atoms	Low-Moderate	TBD	TBD	Monthly
My Immigration	Low-Moderate	Jan. 15, 2022	Feb. 5, 2022	Monthly
Mountain West Legal Protective	Low-Moderate	TBD	TBD	Monthly
1Law	Moderate	Oct. 1, 2020	Nov. 5, 2020	Monthly
LawHQ	Moderate	Dec. 1, 2021	Jan. 5, 2022	Monthly
Nuttal Brown	Moderate	Dec. 1, 2021	Jan. 5, 2022	Monthly
Estate Guru	Moderate	Dec. 1, 2020	Jan. 5, 2021	Monthly
Sudbury Consulting / Code for America	Moderate	TBD	TBD	Monthly
Off the Record	Moderate	TBD	TBD	Monthly
Law on Call	Moderate	Apr. 1, 2021	May. 5, 2021	Monthly
DSD Solutions	Moderate	Jan. 1, 2022	Feb. 5, 2022	Monthly
Pearson Butler	Moderate	Apr. 1, 2021 Jan.1 2022 (moderate launch)	May 5, 2021	Monthly
Timp Cert. Legal Advocates	Moderate	Jun. 1, 2021	Jul. 5, 2021	Monthly



Jordanelle Blocks	Moderate	TBD	TBD	Monthly
Law Geex	Moderate	Nov. 1, 2021	Dec. 5, 2021	Monthly
Holy Cross Ministries	Moderate	TBD	TBD	Monthly
Utah Legal Advocates	Moderate	Feb. 1, 2022	Mar. 5, 2022	Monthly
AAA Fair Credit	High	TBD	TBD	Monthly



DECEMBER 2021 ACTIVITY RISK REPORT - HARM ASSESSMENT

Depending on an entity’s assessed risk level (the risk level assigned at authorization), OLSI collects a range of measures from the entity designed to assess the occurrence of three harms to consumers (this can also be understood as “actualized risk”):

- Consumer achieves inaccurate or inappropriate legal results.
- Consumer fails to exercise legal rights through ignorance or bad advice.
- Consumer purchases an unnecessary or inappropriate legal service.

As service activity increases among sandbox participants, the Office will receive more kinds of information. For entities assigned higher risk levels, this will include information about legal outcomes, financial outcomes, and expert audits of a sample of work product. As these data accumulate, harm assessments will be based on a review of all applicable measures.

In these early stages of service provision and reporting, the assessment of consumer harm is based on the prevalence of consumer complaints indicating the occurrence of one or more of the three harms. Social scientific studies grounded in expert peer review of lawyers’ work product typically find that lawyers commit errors in one fifth to one quarter of the cases reviewed. Taking this finding as a baseline, the harm assessment classifies receipt of harm-related complaints from more than 25% of customers as a significant warning of harm (red), which would indicate an immediate need for the entity to work with OLSI to develop and implement quality improvement plans to prevent harms and might also lead the Office to recommend that the Court suspend the entity’s operations in the sandbox. Receipt of harm-related complaints from 11-25% of consumers would trigger a watch (yellow) to better understand and prevent potential harms and would likely include the requirement of additional information from entities so classified. Receipt of harm-related complaints from 10% or fewer of an entity’s consumers is considered reasonable risk (green) and does not trigger the need for any additional risk assessment.

