

Application for Washington State Pilot Project for Entity Regulation

Preamble

The Washington Supreme Court adopted a ten year Pilot Project for Entity Regulation to test and evaluate innovative legal service models and alternative business structures. The pilot project serves as a mechanism to encourage legal professionals, entrepreneurs, law firms, corporations, and others to experiment with innovative business models for delivering legal and law-related services. The pilot project authorizes entities to provide legal and law-related services in Washington through a monitored, data-driven, and regulated experimental environment.

The goal of the pilot project is to evaluate if entity regulation combined with regulatory reform and innovative service models will increase the accessibility of quality legal assistance to Washington consumers without exposure to undue risk or harm.

Instructions and Additional Information

Please read the [Washington State Pilot Project for Entity Regulation Participant Manual](#) prior to completing this application. As an applicant to a regulatory reform project, you are expected to fully disclose all information as requested in the application and to err on the side of transparency. We may have additional questions or request additional information after reviewing your application.

All information about the Washington State Pilot Project for Entity Regulation can be found on the [entity regulation page of the WSBA website](#).

Compliance Officer/Primary Contact

Provide the name and contact information for the individual at the entity who will be the compliance officer and primary contact for this pilot project. This individual must complete and submit an Entity Regulation Pilot Project Character & Fitness Application.

Compliance Officer Name

Title

Business Email Address

Business Phone Number

Business Mailing Address

Describe your qualifications to be the compliance officer. [text box]

Provide the name and contact information for an individual to contact in the event the compliance officer is unavailable. This individual must complete and submit an Entity Regulation Pilot Project Character & Fitness Application.

Secondary Contact Name

Title

Phone Number

Email Address

Mailing Address

Entity Information

Provide the following primary or general information for your entity.

Entity Name

Email Address

Phone Number

Website URL

Business Address

Mailing Address (if different from primary contact mailing address)

Date entity formed

Federal Tax ID Number

Does your entity have any alternate names (i.e., a trade name or “doing business as” name)?

[If yes] List all alternate names of the entity (i.e., a trade name or “doing business as” name).

Business Name

+Add Another Name

What type of business structure is your entity?

- ☐ Sole Proprietorship
- ☐ LLC or PLLC
- ☐ LLP or other Partnership
- ☐ Social Purpose Corporation
- ☐ Public Benefit Corporation
- ☐ Corporation
- ☐ 501(c)(3)
- ☐ 501(c)(6)
- ☐ Incorporated Voluntary Organization, not a 501(c)
- ☐ Unincorporated Voluntary Organization, not a 501(c)

☐ Other: _____

Is your entity an umbrella or parent organization that will **not** provide the direct legal services?

[If yes] List the following for all subsidiaries providing the proposed legal services:

Subsidiary Name

Email Address

Phone Number

Website URL

Address

Mailing Address (if different from primary contact mailing address)

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Provide a brief description of the general nature of your entity's business. Include both legal and non-legal services.

[text box]

Entity Disclosures

Is your entity registered with the Washington Office of the Secretary of State?

[If yes] Upload entity formation documents, e.g., articles of incorporation, partnership agreement, etc. and most recent annual report.

Registered Agent Name

Business Title

Email Address

[If no] Explain why not.

[text box]

Is your entity licensed or otherwise authorized to practice law or participating in a regulatory reform project in any other jurisdiction?

[If yes] Jurisdiction

Date licensed/authorized

Briefly describe the scope of the license, authorization, or participation.

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+Add Another Jurisdiction

List all states and countries in which your entity operates. Upload any entity formation documents, e.g., articles of incorporation, partnership agreement, etc. and most recent annual report.

Jurisdiction

How long has your entity been operating in this jurisdiction?

Does this jurisdiction require business licensing, certification, or registration?

[If yes] Name of licensing/certification/registration office

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Is the entity using or intending to use sources of finance?

[If yes] Type of financing

Provider name

Amount of financing

+Add Another Finance Provider

Will your entity share premises, staff, or data with any other person or entity?

[If yes] Name of person or entity

Describe the nature and extent of the sharing arrangement.

[text box]

Is your entity or any affiliated entity (such as a parent company or subsidiary) currently subject to state or federal criminal investigation?

[If yes] Please describe in detail the nature of the investigation, parties involved, current status, etc.

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List all persons or entities possessing an economic interest in the entity equal to or more than 10 percent of all economic interests in the entity. ("Financing Persons"). All Financing Persons must complete and submit an Entity Regulation Pilot Project Character & Fitness Application.

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Describe the association

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If you are unsure about any of your above answers or would like to include/disclose anything not captured by the above questions, please explain here:

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Data About Your Test for Regulatory Reform and Service Model

In which legal practice area(s) do you intend to provide services under your proposed service model?

- ☐ Business/Corporate/Commercial
- ☐ Civil and Disability Rights
- ☐ Consumer

- ☐ Criminal Issues
- ☐ Expungement

- | | |
|---|---|
| <input type="checkbox"/> Domestic/Intimate Partner Violence | <input type="checkbox"/> Municipal |
| <input type="checkbox"/> Education | <input type="checkbox"/> Native American/Tribal |
| <input type="checkbox"/> Elder | <input type="checkbox"/> Personal Injury |
| <input type="checkbox"/> Employment and Unemployment | <input type="checkbox"/> Public Benefits |
| <input type="checkbox"/> Environmental and Land Use | <input type="checkbox"/> Real Estate |
| <input type="checkbox"/> Family and Marriage | <input type="checkbox"/> Taxes |
| <input type="checkbox"/> Healthcare | <input type="checkbox"/> Traffic |
| <input type="checkbox"/> Intellectual Property | <input type="checkbox"/> Wills or Estates |
| <input type="checkbox"/> Landlord and Tenant | <input type="checkbox"/> Workplace Safety |
| | <input type="checkbox"/> Other: |

Are there any secondary areas in which you may need to provide services to adequately provide the legal services under your proposed service model?

[If yes]

- | | |
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| <input type="checkbox"/> Healthcare | <input type="checkbox"/> Other: |

Which of the service models below most closely resembles the service model you are seeking to use?

- ☐ **Traditional law firms innovating** – bringing persons who are not licensed to practice (i.e., not lawyers and LLLTs) into firm ownership or using investment from persons not licensed to practice law to expand operations and reach or introduce new service delivery models.
- ☐ **Law-focused entities practicing law** – providing legal services by an entity that is already delivering law-related services to the public and is owned by individuals not licensed to practice law.
- ☐ **New entities using persons not licensed to practice law to deliver legal services**—creating entirely new legal service delivery models with persons not licensed to practice law.

- ☐ **New entities using technology to deliver legal services**—creating entirely new legal service delivery models using software or other technology with or without involvement by persons licensed to practice law.
- ☐ **Intermediary platforms** – connecting marketplaces of consumers with licensed legal professionals.
- ☐ **Non-law companies expanding into law** – new entrants in the legal market that combine law and non-law expertise, by, for example, providing a holistic “one-stop-shop” or new offshoot from their existing services.
- ☐ **Other** – please describe.

[text box]

Who or what will provide the legal services under your proposed service model? *Check all that apply.*

- ☐ Lawyers
- ☐ Limited License Legal Technicians
- ☐ Limited Practice Officers
- ☐ Paralegals
- ☐ Other Persons Not Licensed to Practice Law
- ☐ Software/Technology
- ☐ Other:

Will any lawyers or other licensed legal professionals provide legal services under your proposed service model?

Will any lawyers or other licensed legal professionals oversee software or individuals not licensed to practice law under your proposed service model?

Will any lawyer or other licensed legal professionals operate in any other capacity under your proposed service model?

[If yes] Briefly describe the capacity.

Who are your target consumers? *Check all that apply.*

- ☐ Families
- ☐ LGBTQ+
- ☐ Low Income
- ☐ Moderate Income
- ☐ Professionals
- ☐ Pro Se Litigants
- ☐ Seniors
- ☐ Small Businesses
- ☐ Young Persons
- ☐ Other:

How many full-time equivalent (“FTE”) employees will be involved in the proposed service model?

[text box]

Proposed Regulatory Reform and Service Model

Refer to the [Participant Manual](#) for guidance in responding to the below items.

Proposed Service Model

Describe your proposed service model and what the services you provide under your proposed service model will do for consumers.

[text box]

Describe how the services will be provided to consumers under your proposed service model.

[text box]

Describe who will supervise and how they will supervise licensed legal professionals, other providers of legal services, or oversee software and technology providing the legal services under your proposed service model.

[text box]

Describe how consumers will access or receive services under your proposed service model. Include a description of any particular consumer markets you intend to target and why.

[text box]

Which fee structure(s) does your entity intend to use for collecting fees from consumers for legal services provided under the proposed service model. Check all that apply.

- ☐ Client Deposit Feature/Escrow-like Deposit Feature
- ☐ Contingency Fees
- ☐ Disbursement of Settlements Funds/Client Recovery
- ☐ Flat Fees
- ☐ Hourly Rates
- ☐ Insurance
- ☐ Sliding Scale
- ☐ Subscription
- ☐ Other: [text box]

Regulatory Reform

As part of your proposal to test regulatory reform, which regulatory rules governing the practice of law does your entity seek to modify?

Note: Regulatory rules might include [lawyer Rules of Professional Conduct](#), [LLLT Rules of Professional Conduct](#), [LPO Rules of Professional Conduct](#), the [Unauthorized Practice of Law statute](#), and others.

- | | |
|--|-------------------------------------|
| <input type="checkbox"/> LLLT RPC 5.4(a) | <input type="checkbox"/> RPC 5.4(a) |
| <input type="checkbox"/> LLLT RPC 5.4(b) | <input type="checkbox"/> RPC 5.4(b) |
| <input type="checkbox"/> LLLT RPC 5.4(c) | <input type="checkbox"/> RPC 5.4(c) |
| <input type="checkbox"/> LLLT RPC 5.4(d) | <input type="checkbox"/> RPC 5.4(d) |
| <input type="checkbox"/> RCW 2.48.180(2) | <input type="checkbox"/> RPC 5.5 |
| <input type="checkbox"/> RPC 1.5 | <input type="checkbox"/> Other: |

Describe how each rule would be modified and the reason for the modification.

[text box]

Identify how your proposal to test regulatory reform and modification of the rules will allow you to operate, or better operate, your entity and provide the proposed legal services.

[text box]

Accessibility of Legal Services

Describe how your proposed service model will increase the accessibility of quality legal services for Washington consumers; specifically, how it will increase access to justice by enhancing access to affordable and reliable legal and law-related services to low- and moderate-income Washingtonians.

[text box]

What data or information will you be able to provide to the WSBA to demonstrate the impact your proposal has on accessibility to affordable and reliable legal and law-related services to low- and moderate-income Washingtonians?

[text box]

Risk Assessment and Public Protection

This section asks specific questions about risk. Risk describes the likelihood and potential impact of harm or negative consequences to consumers resulting from your proposed model of legal service delivery. Responses should be complete, candid, and concise.

Identification of Risks Created by the Proposal

Describe the risks to consumers created by waiving or modifying regulatory rules under your proposed study and service model. Include risks present at the time services are received and potential future risks.

You may want to consider potential risks associated with:

- Use of unlicensed legal professionals
- Reliance on technology, software, or automated systems
- Modification of traditional legal professional regulation and compliance

[text box]

Identification of General Risks

Even if not directly created by regulatory rule modifications, clearly identify risks associated with:

- Inappropriate or flawed legal results
- Failure of consumers to exercise legal rights due to ignorance or incorrect advice
- Purchase of unnecessary or inappropriate legal services

[text box]

Categorization of Identified Risks

For each identified risk above, please specify:

- Likelihood of Harm: (1) Very Unlikely, (2) Possible, (3) Almost Certain
 - Potential Severity of Harm: (1) Negligible, (2) Manageable, (3) Catastrophic
- Provide a brief explanation for your categorization.

[text box]

Risk Mitigation Strategies

For each identified risk, clearly describe the specific measures or controls your entity will implement to mitigate or eliminate these risks. Include details such as staff training, process oversight, monitoring mechanisms, technological safeguards, or other relevant practices.

[text box]

[+Add Another Risk]

Public Protection Measures

Describe the specific measures your entity will have in place for public protection. Include:

- Methods to identify and track consumer harms
- Contingency plans for unforeseen risks
- Methods to reduce implicit bias, such as algorithm bias

[text box]

Consumer Complaint Resolution Process

Clearly describe the process your entity will establish for receiving, reviewing, and resolving consumer complaints under your proposed service model. Include:

- How complaints will be submitted by consumers
- Timelines for review and response
- Escalation pathways for unresolved issues

[text box]

Financial Responsibility and Consumer Compensation

Describe in detail how your entity will demonstrate financial responsibility to adequately compensate consumers harmed due to negligence, errors, or malpractice. Include specifics such as:

- Professional liability or errors and omissions insurance (coverage limits)
- Audited financial statements or other financial assurances

[text box]

Data Privacy and Consumer Data Protection

Does your entity or any affiliated entity plan to share or sell consumer data in any form to third parties?

[Yes/No]

[If Yes] Fully explain the nature and purpose of the data sharing or sale, along with measures to protect consumer privacy.

[text box]

Confidentiality and Data Security

Describe your entity's policies, procedures, and technological systems for ensuring confidentiality, privacy, and security of client records and information. Specifically address:

- Data encryption and security protocols, both within your entity and for any service providers to your entity (for example cloud data storage or processing)
- Staff training and access control policies
- Procedures for data breach notification and response

[text box]

Conflicts of Interest

Clearly describe your entity's policies and procedures for identifying, managing, and avoiding conflicts of interest.

[text box]

Client-Centric Service Standards

Explain how your entity's policies and operational procedures will ensure that the entity prioritizes the best interests of the client over its own interests. Provide examples of specific policies or practices you will implement.

[text box]

Consumer Rights and Waivers

Does your entity require customers to waive certain rights as a condition of service?

[If Yes] Briefly describe which rights customers will be required to waive and any implications those waivers may have on the rules of professional conduct.

Certification

On behalf of the entity named in this application and identified below:

- ☐ I understand and acknowledge that the Washington State Pilot Project for Entity Regulation is a pilot project and experiment. As such, policies and requirements are subject to change as more information is gathered.
- ☐ I understand that (1) this application may be subject to a public records request in accordance with GR 12.4; (2) proprietary data, trade secrets, and other information that relates to unique methods of conducting business or data unique to the product or service of the entity may be redacted under applicable statutes, such as RCW 42.56.270(11); and (3) GR 12.4(d)(3) provides that if a public records request is made, the WSBA may notify the entity before disclosing the records and tell the subject they may present information opposing disclosure.
- ☐ I have read Washington Supreme Court Order No. 25700-B-721 dated Dec. 5, 2024, and the *Washington State Pilot Project for Entity Regulation Participant Manual*.
- ☐ I acknowledge knowingly or intentionally making false or materially misleading statements or omissions in this application is a basis for loss of authorization to participate in the pilot project for entity regulation and that other criminal and civil sanctions may also apply.
- ☐ I agree if there are changes to any of my answers to the application questions related to entity disclosures or the proposed regulatory reform and business model, I, or my designee at the entity, is responsible for updating the information with the Washington State Bar Association (WSBA) and that failure to promptly update information might delay or affect the decision to authorize the entity.
- ☐ I agree to respond to additional questions or requests for information during the application process and that failure to promptly update information might delay or affect the decision to authorize the entity.
- ☐ I consent to WSBA sharing my and my entity's contact information with approved researchers, whose projects are entirely independent of the work of the WSBA and the regulatory process so that the WSBA can facilitate impartial, independent studies of Washington's evidence-based regulatory experiment to promote legal services innovation and consumer protection.
- ☐ By submitting this application, I certify under penalty of perjury under the laws of the State of Washington that the foregoing information is complete, true, and correct to the best of my knowledge.

Name

Title

Entity

City where certifying

State where certifying

Date [*system submit date*]

Required Documents to Upload

Authorization & Release

WA Secretary of State registration and/or most recent annual report

Entity Formation Papers (articles of incorporation, partnership agreement, etc.) for all jurisdictions

Good standing certificate/letter for other jurisdictions (entity)

DRAFT

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Commented [BH1]: @Nina Crosby will look into if this should say civil, or criminal, or both.

[If yes] Please describe in detail the nature of the action, parties involved, laws violated, penalties or sanctions imposed, etc.

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| <input type="checkbox"/> Expungement | <input type="checkbox"/> Personal Injury |
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Violence | <input type="checkbox"/> Public Benefits |
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| <input type="checkbox"/> Family and Marriage | <input type="checkbox"/> Workplace Safety |
| <input type="checkbox"/> Healthcare | <input type="checkbox"/> Other: |

Which of the service models below most closely resembles the service model you are seeking to use?

- ☐ **Traditional law firms innovating** – bringing persons who are not licensed to practice (i.e., not lawyers and LLLTs) into firm ownership or using investment from persons not licensed to practice law to expand operations and reach or introduce new service delivery models.
- ☐ **Law-focused entities practicing law** – providing legal services by an entity that is already delivering law-related services to the public and is owned by individuals not licensed to practice law.
- ☐ **New entities using persons not licensed to practice law to deliver legal services**—creating entirely new legal service delivery models with persons not licensed to practice law.
- ☐ **New entities using technology to deliver legal services**—creating entirely new legal service delivery models using software or other technology with or without involvement by persons licensed to practice law.
- ☐ **Intermediary platforms** – connecting marketplaces of consumers with licensed legal professionals.
- ☐ **Non-law companies expanding into law** – new entrants in the legal market that combine law and non-law expertise, by, for example, providing a holistic “one-stop-shop” or new offshoot from their existing services.
- ☐ **Other** – please describe.

[text box]

Who or what will provide the legal services under your proposed service model? *Check all that apply.*

- ☐ Lawyers
- ☐ Limited License Legal Technicians
- ☐ Limited Practice Officers
- ☐ Paralegals

- ☐ Other Persons Not Licensed to Practice Law
- ☐ Software/Technology
- ☐ Other:

Will any lawyers or other licensed legal professionals provide legal services under your proposed service model?

Will any lawyers or other licensed legal professionals oversee software or individuals not licensed to practice law under your proposed service model?

Will any lawyer or other licensed legal professionals operate in any other capacity under your proposed service model?

[If yes] Briefly describe the capacity.

Who are your target consumers? *Check all that apply.*

- ☐ Families
- ☐ LGBTQ+
- ☐ Low Income
- ☐ Moderate Income
- ☐ Professionals
- ☐ Pro Se Litigants
- ☐ Seniors
- ☐ Small Businesses
- ☐ Young Persons
- ☐ Other:

How many full-time equivalent (“FTE”) employees will be involved in the proposed service model?

[text box]

Which regulatory rule(s) governing entities practicing law and, if applicable, other related rules are part of your test for regulatory reform?

Note: Regulatory rules might include [lawyer Rules of Professional Conduct](#), [LLLT Rules of Professional Conduct](#), [LPO Rules of Professional Conduct](#), the [Unauthorized Practice of Law statute](#), and others.

- | | |
|--|-------------------------------------|
| <input type="checkbox"/> LLLT RPC 5.4(a) | <input type="checkbox"/> RPC 5.4(a) |
| <input type="checkbox"/> LLLT RPC 5.4(b) | <input type="checkbox"/> RPC 5.4(b) |
| <input type="checkbox"/> LLLT RPC 5.4(c) | <input type="checkbox"/> RPC 5.4(c) |
| <input type="checkbox"/> LLLT RPC 5.4(d) | <input type="checkbox"/> RPC 5.4(d) |
| <input type="checkbox"/> RCW 2.48.180(2) | <input type="checkbox"/> RPC 5.5 |
| <input type="checkbox"/> RPC 1.5 | <input type="checkbox"/> Other: |

Proposed Regulatory Reform and Service Model

Refer to the [Participant Manual](#) for guidance in responding to the below items.

Proposed Service Model

Describe your proposed service model and what the services you provide under your proposed service model will do for consumers.

[text box]

Describe how the services will be provided to consumers under your proposed service model.

[text box]

Describe who will supervise and how they will supervise licensed legal professionals, other providers of legal services, or oversee software and technology providing the legal services under your proposed service model.

[text box]

Describe how consumers will access or receive services under your proposed service model. Include a description of any particular consumer markets you intend to target and why.

[text box]

Which fee structure(s) does your entity intend to use for collecting fees from consumers for legal services provided under the proposed service model. Check all that apply.

- ☐ Client Deposit Feature/Escrow-like Deposit Feature
- ☐ Contingency Fees
- ☐ Disbursement of Settlements Funds/Client Recovery
- ☐ Flat Fees
- ☐ Hourly Rates
- ☐ Insurance
- ☐ Sliding Scale
- ☐ Subscription
- ☐ Other: [text box]

Regulatory Reform

Provide a discussion of the regulatory rules governing the practice of law that are currently preventing or blocking your entity from providing legal services under your proposed business model.

[text box]

As part of your proposal to test regulatory reform, which regulatory rules governing the practice of law does your entity seek to modify? Describe how each rule would be modified.

[text box]

Identify how your proposal to test regulatory reform and modification of the rules will allow you to operate, or better operate, your entity and provide the proposed legal services.

[text box]

Accessibility of Legal Services

Describe how your proposed service model will increase the accessibility of quality legal services for Washington consumers; specifically, how it will increase access to justice by enhancing access to affordable and reliable legal and law-related services to low- and moderate-income Washingtonians.

[text box]

What data or information will you be able to provide to the WSBA to demonstrate the impact your proposal has on accessibility to affordable and reliable legal and law-related services to low- and moderate-income Washingtonians?

[text box]

Risk Assessment and Public Protection

Fully and candidly describe the risks to consumers created by waiving or modifying regulatory rules under your proposed study and service model. Include risks at the time of receiving the services and risks that might arise in the future.

[text box]

Even if not created by the modification of regulatory rules under your proposal, describe risks of harm associated with (1) inappropriate or otherwise flawed legal results, (2) failure to exercise legal rights through ignorance or bad advice, and (3) purchase of unnecessary or inappropriate legal services.

[text box]

For each risk, identify the likelihood of harm to the consumer: (1) very unlikely, (2) possible, or (3) almost certain; and the level of potential harm to the consumer: (1) negligible, (2) manageable, or (3) catastrophic.

[text box]

Does your entity or any affiliated entity plan to share or sell consumer data in any form to third parties?

[If yes] Please explain.

[text box]

Describe the measures you propose to have in place for public protection. Include how you will identify, track, and mitigate the risks to the consumers under your proposed service model.

[text box]

Describe the consumer complaint resolution process you intend to have in place under your proposed service model.

[text box]

Describe how your entity will provide financial responsibility to make whole persons harmed by the entity's negligence or malpractice? E.g., professional liability insurance, errors and omissions insurance, audited financial net worth, etc.

[text box]

Describe your entity's policies, procedures, and systems for protecting and ensuring confidentiality of client records and information.

[text box]

Describe your entity's policies and procedures for checking for conflicts of interests.

[text box]

Describe your entity's policies and procedures to ensure your entity does not place its interests over the best interests of the client.

[text box]

Certification

On behalf of the entity named in this application and identified below:

- ☐ I understand and acknowledge that the Washington State Pilot Project for Entity Regulation is a pilot project and experiment. As such, policies and requirements are subject to change as more information is gathered.
- ☐ I understand that (1) this application may be subject to a public records request in accordance with GR 12.4; (2) proprietary data, trade secrets, and other information that relates to unique methods of conducting business or data unique to the product or service of the entity may be redacted under applicable statutes, such as RCW 42.56.270(11); and (3) GR 12.4(d)(3) provides that if a public records request is made, the WSBA may notify the entity before disclosing the records and tell the subject they may present information opposing disclosure.
- ☐ I have read Washington Supreme Court Order No. 25700-B-721 dated Dec. 5, 2024, and the *Washington State Pilot Project for Entity Regulation Participant Manual*.
- ☐ I acknowledge knowingly or intentionally making false or materially misleading statements or omissions in this application is a basis for loss of authorization to participate in the pilot project for entity regulation and that other criminal and civil sanctions may also apply.
- ☐ I agree if there are changes to any of my answers to the application questions related to entity disclosures or the proposed regulatory reform and business model, I, or my designee at the entity, is responsible for updating the information with the Washington State Bar Association (WSBA) and that failure to promptly update information might delay or affect the decision to authorize the entity.
- ☐ I agree to respond to additional questions or requests for information during the application process and that failure to promptly update information might delay or affect the decision to authorize the entity.
- ☐ I consent to WSBA sharing my and my entity's contact information with approved researchers, whose projects are entirely independent of the work of the WSBA and the

regulatory process so that the WSBA can facilitate impartial, independent studies of Washington's evidence-based regulatory experiment to promote legal services innovation and consumer protection.

- ☐ By submitting this application, I certify under penalty of perjury under the laws of the State of Washington that the foregoing information is complete, true, and correct to the best of my knowledge.

Name

Title

Entity

City where certifying

State where certifying

Date [system submit date]

Required Documents to Upload

Authorization & Release

WA Secretary of State registration and/or most recent annual report

Entity Formation Papers (articles of incorporation, partnership agreement, etc.) for all jurisdictions

Good standing certificate/letter for other jurisdictions (entity)

Risk Assessment and Public Protection

This section asks specific questions about risk. Risk describes the likelihood and potential impact of harm or negative consequences to consumers resulting from your proposed model of legal service delivery. Responses should be complete, candid, and concise.

1. Identification of Risks to Consumers

Describe the risks to consumers created by waiving or modifying regulatory rules under your proposed study and service model. Include risks present at the time services are received and potential future risks.

Examples risks to consider include:

- Use of unlicensed or non-lawyer professionals (potential for insufficient legal judgment, misapplication of law, communication gaps)
- Reliance on technology or automated systems (potential for system failures, cybersecurity breaches, data loss)
- Modification of traditional oversight and compliance requirements

[text box]

2. Risks of Flawed Legal Outcomes

Even if not directly created by regulatory rule modifications, clearly identify risks associated with:

- Inappropriate or flawed legal results
- Failure of consumers to exercise legal rights due to ignorance or incorrect advice
- Purchase of unnecessary or inappropriate legal services

[text box]

3. Categorization of Identified Risks

For each identified risk above, please specify:

- **Likelihood of Harm:** (1) Very Unlikely, (2) Possible, (3) Almost Certain
- **Potential Severity of Harm:** (1) Negligible, (2) Manageable, (3) Catastrophic

Provide a brief explanation for your categorization.

[text box]

4. Risk Mitigation Strategies

For each identified risk, clearly describe the specific measures or controls your entity will implement to mitigate or eliminate these risks. Include details such as staff training, process oversight, monitoring mechanisms, technological safeguards, or other relevant practices.

[text box]

5. Public Protection Measures

Describe the specific measures your entity will have in place for public protection. Include:

- Methods to identify and track consumer harms
- Contingency plans for unforeseen risks

[text box]

6. Consumer Complaint Resolution Process

Clearly describe the process your entity will establish for receiving, reviewing, and resolving consumer complaints under your proposed service model. Include:

- How complaints will be submitted by consumers
- Timelines for review and response
- Escalation pathways for unresolved issues

[text box]

7. Financial Responsibility and Consumer Compensation

Describe in detail how your entity will demonstrate financial responsibility to adequately compensate consumers harmed due to negligence, errors, or malpractice. Include specifics such as:

- Professional liability or errors and omissions insurance (coverage limits)
- Audited financial statements or other financial assurances

[text box]

8. Data Privacy and Consumer Data Protection

Does your entity or any affiliated entity plan to share or sell consumer data in any form to third parties?

[Yes/No]

If Yes, please fully explain the nature and purpose of the data sharing or sale, along with measures to protect consumer privacy.

[text box]

9. Confidentiality and Data Security

Describe your entity's policies, procedures, and technological systems for ensuring confidentiality, privacy, and security of client records and information. Specifically address:

- Data encryption and security protocols, both within your entity and for any service providers to your entity (for example cloud data storage or processing)
- Staff training and access control policies
- Procedures for data breach notification and response

[text box]

10. Conflicts of Interest

Clearly describe your entity's policies and procedures for identifying, managing, and avoiding conflicts of interest.

[text box]

11. Client-Centric Service Standards

Explain how your entity's policies and operational procedures will ensure that the entity prioritizes the best interests of the client over its own interests. Provide examples of specific policies or practices you will implement.

[text box]

ISSUE SUMMARY

TO: Practice of Law Board
FROM: Bobby Henry, WSBA Staff Liaison to POLB
DATE: June 17, 2025
RE: **Recruitment Committee Recommendations for Member Nominations**

Background: GR 25 provides that the Practice of Law Board should have 13 members, with a minimum of five public members. Members serve for three-year terms and may serve up to two consecutive terms. Member terms align with the WSBA fiscal year which is October 1 – September 30. Ideally, terms should be staggered so that approximately one-third of the board changes over each year.

Board Roster: The board currently has three open positions. One position will be moved to the 2025-2028 term to even out the number of members cycling on/off each year. One position will be filled as a partial term in the 2023-2026 group. The Recruitment Committee recommends the reappointment of Ellen Reed and Craig Shank. The additional nominations recommended by the committee would, if approved, increase the number of public members on the board to six instead of the current minimum of five. The three “groups” would then be as follows and the recommended nominations are indicated accordingly:

Group 1 2022-2025 / 2025-2028

- Ellen Reed – Public
- Craig Shank – LLP
- Vacant – LLP
- Vacant – LLP

Recommended Nominations

Ellen Reed – Public
Craig Shank – LLP
Leah Snyder – LLP
Cindy Kim – Public (position switch from LLP to Public)

Group 2 2023-2026

- Rory Hardy – LLP
- Ron Satterthwaite – LLP
- Michael Terasaki – LLP
- Vacant – Public

Shaina Xi – Public

Group 3 2024-2027

- Lesli Ashley – LLP
- John Deweese – Public
- Murugeshwari Subramanian – Public
- Aaron Vanderpol – LLP
- Melissa Kover – Public

Alternates: (1) Amy Turner and (2) Scott Haddock

UPL #	Date of Complaint	Complainant Occupation	Respondent Occupation	UPL Complaint	Brief Summary	Referred
25-01	1/30/2025	Individual	Individual	Legal services	Grievant and Respondent are inmates. Grievant alleges that Respondent is providing legal assistance and misrepresenting himself as a lawyer by using his membership in the National Lawyers Guild (which is a public interest organization that does not require admission as a lawyer to be a member--like the ABA).	Yes
25-02	1/30/2025	Individual	Individual	Legal services	Respondent is an inmate who admits he assists other inmates with legal procedure and filling out documents.	Yes
25-03	2/4/2025	Attorney	Individual	Legal documents	Grievant is an attorney and is alleging that Respondent is not an attorney but is acting as one for someone appearing in criminal court. Respondent's response indicate he was acting as an investigative journalist, not as an attorney. He claims that the person appearing in court hired brief writers to assist with the case. The metadata lists Respondent as the author of some of the briefs.	No
25-04	2/21/2025	Attorney	Voluntarily Resigned Attorney	Legal documents	Grievant is alleging that voluntarily resigned lawyer Respondent is practicing law by filing motions with the court. The case was still open and the filings were regarding fees still owed to Respondent.	Yes
25-05	2/24/2025	Attorney	Individual	Legal advice	Respondent has a personal relationship with a former board member of Chelan Pride. Board member accused the Board of misappropriating funds and is trying to get those funds moved. Respondent is speaking on behalf of Board member and referring to him as a client.	No
25-06	3/7/2025	Attorney	Individual	Legal documents	Respondent was retained by the opposing party and is giving legal advice as well as filling out forms. Respondent accepted payment for services	Yes
25-07	3/12/2025	Individual	Paralegal	Legal advice, legal documents	Grievant hired Respondent's Law firm that employs Respondent. Respondent assisted Grievant in preparing legal documents and gave legal advice.	No
25-08	3/20/2025	Individual	individual	Legal documents	Respondent sent subpoenas to Grievant and his employer.	No
25-09	4/21/2025	Individual	Attorney Resigned in Lieu	Legal Documents, appeared in court, negotiated legal rights, offered to provide legal services	Respondent drafted and submitted interrogatories and appeared in court with a friend.	Yes
25-10	4/24/2025	Attorney	Paralegal	Legal advice, legal documents, appeared in court, negotiated legal rights, offered to provide legal services	Respondent filed a lawsuit and dismissed it the next day so he could use the case number to forge court documents. He claims to be an attorney with a fake ABA card	Yes

25-11	5/8/2025	Individual	Out of State Attorney	gave legal advice, legal documents	Family law. Grievant's wife is Respondent's sister. After a domestic violence situation, Respondent came to Washington from Idaho to bring her sister to Idaho. After that, Respondent's sister filed for divorce. Grievant is claiming Respondent helped with the legal documents. Respondent stated that she did not help her sister with legal documents.	No
25-12	5/31/2025	Individual	Individual	Gave legal advice, legal documents, negotiated legal rights, offered to provide legal services	Respondent was drafting documents related to real property like promissory notes	Yes
25-13	6/6/2025	Individual	Individual	gave legal advice, legal documents, negotiated legal rights	Respondent is assisting with a court proceeding and drafting documents. The proceeding is in Idaho.	Yes
25-14	6/12/2025	Attorney	Paralegal	gave legal advice, legal documents, legal services	Practicing family law without a license. Claims to be an attorney on social media. Received money for legal services.	Yes

PRACTICE OF LAW BOARD

Cost Center

PLB

FY26 FTE

FY25 REFORECAST FTE

0.50

0.35

Washington State Bar Association**Budget Comparison****FY2025
Reforecast****FY2026
Budget****FY25 vs. FY26
Comparison****% Change****FY2024
Actuals
YTD****FY2025
Actuals
YTD****REVENUE:****TOTAL REVENUE**

-

-

-

-

-

DIRECT EXPENSES:**50100**

STAFF TRAVEL/PARKING

-

200

200

-

-

55510

PRACTICE OF LAW BOARD

16,000

16,000

-

0%

1,157

-

TOTAL DIRECT EXPENSES**16,000****16,200****200****1%****1,157****-****INDIRECT EXPENSES:****51199**

SALARY EXPENSE

44,050

54,953

10,903

25%

48,544

22,526

51299

BENEFITS EXPENSE

15,037

16,775

1,738

12%

18,779

7,850

51900

OTHER INDIRECT EXPENSE

11,502

13,444

1,942

17%

14,695

6,480

TOTAL INDIRECT EXPENSES:**70,590****85,172****14,582****21%****82,019****36,855****TOTAL ALL EXPENSES:****86,590****101,372****14,782****17%****83,176****36,855****NET INCOME (LOSS):****(86,590)****(101,372)****(14,782)****17%****(83,176)****(36,855)**

FY 2026 BUDGET GUIDANCE FOR WSBA ENTITIES

PURPOSE

This document is intended to provide WSBA entities with information about the FY26 Budget process, including key deadlines and considerations that should be explored when preparing to submit budget information. Each entity should work with their WSBA staff liaison to discuss resource needs and work for the coming year to develop the budget. If you need more information or assistance with your budget, please reach out to WSBA Finance Department representatives using the email addresses under the “RESOURCES” section below.

BUDGETING BASICS

The WSBA operates on a fiscal year (FY) that begins October 1 and ends on September 30. Budgets are prepared annually and approved by the Board of Governors at the last meeting of the fiscal year (September). The budget is a tool that lays out a financial plan for the coming fiscal year and provides direction for how resources are to be used. WSBA budgets revenue and expenses as accurately as possible. Revenues should be realistic, but not overly conservative. Expenses should be estimated not on remote possibilities, but rather on historical spending patterns and actual planned expenses. There should be some flexibility in the budget to allow for contingencies and necessary adjustments. For historical budget and financial information, see the “RESOURCES” section below.

PROCESS

Each year, the budget process is initiated internally by the WSBA Finance department. All budget managers are provided with the detailed schedule, access to the budget planning software, and historical financial information. Not all staff liaisons are budget managers, so in some cases there needs to be communication between the staff liaisons and budget managers to determine what budget information is submitted. Once submitted, the budget is reviewed internally by the Finance and Executive Leadership Teams. During that time, there may be questions and follow-up required to arrive at a final budget amount. The budget is reviewed by the Budget and Audit Committee and approved by the Board of Governors, with each group seeing a first draft and final draft between June and September. Any necessary updates or changes to budget line items can be incorporated if provided within the budget timeline.

TIMELINE

DATE	FY26 BUDGET TIMELINE ITEM
March 14, 2025	1 st Round Budget submissions due
May 19, 2025	Budget & Audit Committee reviews FY26 Budget assumptions
June 6, 2025	1 st Round Budget revisions finalized Section Budget submissions due
June 9, 2025	1 st Draft FY26 Budget reviewed by Budget & Audit Committee
July 17-19, 2025	1 st Draft FY26 Budget reviewed by Board of Governors
July 29, 2025	Final Draft Budget revisions finalized
August 18, 2025	Final Draft FY26 Budget reviewed by Budget and Audit Committee
September 25-26, 2025	Final Draft FY26 Budget review & approval
October 1, 2025	Start date of Fiscal Year 2025-2026 (FY26)

CONSIDERATIONS

When planning for the upcoming fiscal year budget, consider the following questions:

- Is there any work currently underway that needs to be carried forward into the next fiscal year?
- What work would your entity like to accomplish in the next fiscal year and what resources (WSBA staff and volunteer time, direct expenses, etc.) are needed to support this work?
- Are there existing budget items in the FY25 Budget for your entity's work or do you have new budget item(s)?
- If you have a budget for FY25, will it be able to support your work for FY25? Is there anything in your budget that you have NOT used? Will it be needed in the next year?
- For entities with meeting expenses, incorporate estimates for the number of meetings held per year, the format of the meeting (virtual, in-person, hybrid), number of members to be reimbursed and average reimbursement costs.
- Keep WSBA expense reimbursement guidelines (mileage, meals, and lodging limits) in mind when budgeting (see [Expense Report](#) for current guidance).

RESOURCES

WSBA Finance Team

- Maggie Yu, Controller (maggiery@wsba.org)
- Darshita Patel, Senior Accountant & Budget Analyst (darshitap@wsba.org)

[About WSBA Finances](#)

- Information on WSBA current and historical budgets and monthly financial reports
- Fiscal Policies and Procedures
- Audited Financial Statements

[Budget and Audit Committee Meeting Information](#)

[Board of Governors Meeting Information](#)



PRESS, OUTREACH, & UPDATES:

June 18, 2025

PRESS (PDF in BOX)	
❖	2025-05-21 KPMG Law Firm Faces California Blockade with Fee Shares Bill
❖	2025-06-02 Legal Reforms Leading to Different Results in Utah, Ariz.
❖	2025-06-02 Arizona is Modernizing Law with Alternative Business Structures
❖	Regulatory Innovation at the Crossroads : Five Years of Data on Entity Regulation Reform in Arizona and Utah (report in the Entity Regulation folder in BOX)
❖	2025-06-03 Arizona Firms Blocked? California's New Legal Rule Spells Trouble
❖	2025-06-11 How Ethics Reforms in Arizona Led to LegalZoom's Law Firm (ABA podcast)
❖	2025-06-13 Wealth Management Business Sells ABS to Local Law Firm
ENTITY REGULATION PILOT PROJECT	
❖	<i>will be used for stats and info about entity regulation after implementation, e.g., number of applications received, entities authorized, etc.</i>
UPCOMING MEETINGS & EVENTS	
❖	June 26-27, 2025, 2 nd Annual WSBA Small Town and Rural (STAR) Practice Summit , Toppenish, WA
❖	July 18-19, 2025, WSBA Board of Governors Meeting, Walla Walla, WA/Zoom
❖	August 20, 2025, Practice of Law Board Meeting, Zoom
❖	September 17, 2025, Practice of Law Board Meeting, Zoom