



PRESS, OUTREACH, & UPDATES: April 22, 2026

PRESS (PDF in BOX)

- ❖ 2026-04-14 ClaimsHero Launches Partner Portal
- ❖ 2026-04-06 New California Law Prohibits Fee Sharing with ABS
- ❖ 2026-04-01 Law Firm Seeks Arizona License
- ❖ 2026-04-01 International wealth management firm to launch ABS
- ❖ 2026-03-31 Law Bear Pursues Arizona ABS Licensure
- ❖ 2026-03-30 New California Law Prohibits Fee Sharing with ABS
- ❖ 2026-03-26 Ethics Divide Deepens Over Interacting with Non-Atty Owners
- ❖ 2026-03-25 Private Equity Investment in U.S. Law Firms (Part II)
- ❖ 2026-03-24 S.C. Ethics Opinion 25-02 Signals Growing Opposition to ABS
- ❖ 2026-03-23 AI-Native Firms, Built by Private Equity, Will Strain Legacy Model
- ❖ 2026-03-20 English legal firms encroaching on Scotland as rule overhaul demanded
- ❖ 2026-03-19 Lawhive: AI-Native Law Firm Opens New York Office to Lead US Acquisition Strategy
- ❖ 2026-03-13 Republicans Split Over LitFi Regulation
- ❖ 2026-03-10 KPMG Law Wants 'Unglamorous' Work, New Legal Chief Says

ENTITY REGULATION PILOT PROJECT

- ❖ Applications Received: 4
 - Applications available online at: www.wsba.org/entityreg
- ❖ Authorized Entities: 0

UPCOMING MEETINGS & EVENTS

- ❖ May 1 & 2, 2026, WSBA Board of Governors Meeting, Wenatchee/Zoom
- ❖ May 11, 2026, 9:00 a.m. to 12:00 p.m., Supreme Court Boards Meeting with Supreme Court, In-Person/Zoom
- ❖ May 22, 2026, Practice of Law Board Meeting, Zoom

Entity Regulation Pilot Project Application - Entity Regulation Pilot Project Application

Application Submitted on 01.19.2026

Application Information

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.

Entity Information

Entity Information

Provide the following primary or general information for your entity.

Name of Entity Applying	Law on Call LLC
Email Address	support@lawoncall.com
Phone Number	(801) 889-1980
Website URL	https://www.lawoncall.com
Entity Physical Address 1	522 W Riverside Ave.
Entity Physical Address 2	Ste. N
City	Spokane
State	WA
ZIP Code	99201-0581
Entity Mailing Address 1	7533 Center View Ct.
Entity Mailing Address 2	Ste. 210-L

City West Jordan

State UT

ZIP Code 84084

Date entity formed 12-3-2025

Federal Tax ID Number [REDACTED]

Compliance Officer Information

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

Compliance Officer Name Daren J Harris

Title Lawyer

Business Email Address support@lawoncall.com

Business Phone Number 801-889-1980

Compliance Officer Mailing Address 1 522 W Riverside Ave

Compliance Officer Mailing Address 2 Ste N

City Spokane

State Washington

ZIP Code 99201-0581

Describe your qualifications to be the compliance officer.

I was first licensed as an attorney by the Oregon Bar in May 2012. In May 2014, I was admitted to the Utah Bar. In December 2020, Law on Call was approved to operate in the Utah Sandbox, which suspended Rule 5.4, making it possible for non-attorneys to own a law firm. In March 2021, I began working for Law on Call. I, along with a colleague, were responsible for communicating with the Sandbox regarding all compliance related issues. In January 2022, I was admitted to the Arizona Bar. In September 2022, Law on Call was approved to operate within the Arizona Alternative Business Structure (ABS). I assisted in the preparation of the application to become a member of the Arizona ABS. Around November 2022, I became the point of contact for Law on Call with the Office of Legal Service Innovation in Utah. Effectively, without any official designation, this made me Law on Calls compliance officer. At this same time, I also took over internal compliance responsibilities with the Arizona ABS. As part of Law on Calls renewal with the Arizona ABS in September of 2023, I officially replaced my predecessor as the Compliance Attorney for Law on Call with the Arizona ABS. I have been acting in that capacity since.

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 Karen Barrett

Title Attorney

Phone Number 256-376-4617

Email Address karenbarrett@lawoncall.com

Mailing Address 1 522 W. Riverside Ave.

Mailing Address 2 Ste. N

City	Spokane
State	WA
ZIP Code	99201

Entity Structure**Entity Structure**

Does your entity have any alternate names (i.e., a trade name or "doing business as" name)? No

What type of business structure is your entity? LLC or PLLC

Other

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

Clients can sign up for a \$9/month subscription. With this subscription, they can call any time during business hours for assistance with their legal questions. Additionally, they can hire us for projects including: Document Review (Estate Planning, Operating Agreements, Bylaws, Contracts, Real Estate Contracts, Deeds) and Document Drafting (Estate Planning Documents, Bylaws, Contracts, Rental Agreements, Real Estate Contracts, Deeds, Employment Agreements, Loan Agreements, etc.)

Entity Disclosures**Entity Disclosures**

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

Upload a certificate of existence and entity formation documents, e.g., articles of incorporation, partnership agreement, etc.

Registered Agent Name	Northwest Registered Agent, LLC
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Business Title	Registered Agent
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Email Address	legal@northwestregisteredagent.com
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Is your entity licensed or otherwise authorized to practice law or participating in a regulatory reform project in any other jurisdiction? Yes

Jurisdiction	AZ
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Date licensed/authorized	9-20-2022
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Briefly describe the scope of the license, authorization, or participation

→ We are licensed to operate as an Alternative Business Structure in Arizona.

Jurisdiction	UT
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Date licensed/authorized	12-7-2020
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Briefly describe the scope of the license, authorization, or participation

→ We were authorized to operate as part of the Utah Sandbox on December 7, 2020 and are authorized to operate until August 14, 2027.

List all states and countries in which your entity operates

Jurisdiction	AZ
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How long has your entity been operating in this jurisdiction?	4-1-2025
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Does this jurisdiction require business licensing, certification, or registration? No

Jurisdiction	UT
How long has your entity been operating in this jurisdiction?	5-1-2021
Does this jurisdiction require business licensing, certification, or registration?	Yes
Name of licensing/certification/registration office	West Jordan City
Mailing Address 1	8000 S Redwood Rd
Mailing Address 2	
City	West Jordan
State	UT
ZIP Code	84088
Phone number	801-569-5000
Website URL	https://www.westjordan.utah.gov/business-licensing/
Are there any shareholder agreements, voting agreements or restrictions, or other agreements that restrict or affect decision making?	No
Is the entity using or intending to use sources of finance?	No
Will your entity share premises, staff, or data with any other person or entity?	Yes
Name of person or entity	Northwest Registered Agent, LLC
Describe the nature and extent of the sharing arrangement	
<p>For staffing, we use Northwest Registered Agents employees for IT. The registered agents' customer service representatives may be used to answer questions regarding billing or other account questions. We also use Northwest Registered Agents' accounting department, billing department and software developers. While we may share a building with other employees of Northwest Registered Agents, they do not work on Law on Call projects nor do they have access to any client data.</p>	
Is your entity or any affiliated entity (such as a parent company or subsidiary) currently subject to state or federal criminal investigation?	No
Is your entity or any affiliated entity (such as a parent company or subsidiary) currently subject to state or federal civil, criminal, or administrative enforcement action?	No
Does your entity or any affiliated entity (including, but not limited to, any parent companies or subsidiaries) have any history of a state or federal criminal (misdemeanor or felony) conviction?	No
Does your entity or any affiliated entity (including, but not limited to, any parent companies or subsidiaries) have any history of state or federal enforcement action resulting in sanctions (disgorgement, civil penalties, injunction, and/or a consent decree)?	No
Does your entity or any affiliated entity (including, but not limited to, any parent companies or subsidiaries) have any history of filing for bankruptcy?	No
Has your entity or any affiliated entity been (currently or in the past) subject to investigation or enforcement by any other legal regulatory body not already disclosed above?	No

Controlling and Financing Parties

Controlling Parties

List all persons possessing the legal right to exercise decision-making authority on behalf of the entity. Examples may include: a sole proprietor of a sole proprietorship, a manager of a limited liability company, an officer of a corporation, a general partner of a general or limited partnership, individuals listed as "governors" with the Secretary of State, or a person possessing comparable rights by operation of law or by agreement. ("Controlling Persons"). All Controlling Persons must complete and submit an Entity Regulation Pilot Project Character & Fitness Application.

Are there controlling parties for this entity? Yes

Name (first name, last name) Jon Spear

Title COO of Northwest Registered Agent LLC

Email Address [Redacted]

Financing Parties

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 and Companies must complete and submit an Entity Regulation Pilot Project Character & Fitness Application.

Are there financing parties for this entity? Yes

Name (first name, last name) Northwest Registered Agent, LLC

Title Financing Party

Email Address legal@northwestregisteredagent.com

Affiliated

Has any person listed in your application been affiliated (i.e. employed or as a controlling or financing person) with any other entity that has applied to the Washington State Pilot Project for Entity Regulation? No

Material

Has any person not listed in your application but who will have material involvement with the proposed model or services been officially associated (i.e. employed or held a position of control/influence) with any other entity that has applied to the Washington State Pilot Project for Entity Regulation? No

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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Substantive Legal Areas

Substantive Legal Areas

In which legal practice area(s) do you intend to provide services under your proposed service model? Business/Corporate/Commercial, Intellectual Property, Landlord and Tenant, Real Estate, Wills or Estates, Other

Other The legal services provided include subscription-based access to telephonic and email-based legal advice in the areas of contracts, business law, employment, real estate, intellectual property and estate planning. We also intend to expand into other areas as we grow. We will not, however, practice any litigation, personal injury or criminal work.

Are there any secondary areas in which you may need to provide services to adequately provide the legal services under your proposed service model? No

Proposed Services

Proposed Services

Which of the service models below most closely resembles the service model you are seeking to use? Check all that apply.

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. Yes

Law-focused entities expanding into legal services – adding legal services to an entity that is already delivering law-related services to the public and is owned by individuals not licensed to practice law. Yes

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. No

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. No

Intermediary platforms – connecting marketplaces of consumers with licensed legal professionals. No

Non-law entities 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. Yes

Other – please describe. No

Who or what will provide the legal services under your proposed service model? Check all that apply Lawyers, Paralegals, Other

Other Paraprofessionals

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

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

Will any lawyer or other licensed legal professionals operate in any other capacity under your proposed service model? No

Who are your target consumers? Check all that apply Families, Low Income, Moderate Income, Professionals, Small Businesses, Other

Other Businesses, mainly small businesses and start ups. Individuals with transactional needs.

How many full-time equivalent (“FTE”) employees will be involved in the proposed service model? 10-15

Refer to the Participant Manual for guidance in responding to the below items.

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

Law on Call employs licensed Washington lawyers and paraprofessionals to provide direct, instant legal advice to its preexisting client base and to the general public. The legal services provided include subscription-based access to telephonic and email-based legal advice in the areas of → contracts, business law, employment, real estate, intellectual property and estate planning, with plans to expand into other areas. Additionally, Law on Call utilizes a tiered pricing system for legal services. The client chooses an attorney with the experience level that the client desires and the price per hour associated with that experience level.

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


→ For our subscription service, clients can call our phone number to connect with a licensed attorney. For a client to place an order, they can log into their client account and select which services they would like to be provided. The attorney assigned to the case will then reach out to provide legal services. Legal work is completed prior to any billing, and we have a generous refund policy if any client is unsatisfied with the work performed.

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

→ The compliance attorney supervises staff and other attorneys. They will hold trainings for the staff regarding compliance, confidentiality, legal competence and other ethical areas. They conduct quality assurance checks by reviewing communication between staff and clients.

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

Consumers will be able to sign up for a monthly subscription through their client account through Northwest Registered Agent and its Washington sister companies. They can also sign up at Law on Calls website directly. Once they do that, they are able to call in and ask their legal questions. Should they need legal services, they will log into their account and they can place an order there. They will input the necessary information (i.e. → what work needs to be done, the hourly rate, and the amount of time they would like the attorney to take). Once the order is submitted, the attorney will contact the client and can begin working on the project. Once the attorney has finished, they will upload the finished project to the clients portal. The client can log on and will pay the fee to download the finished product. If the client is not satisfied completely, we will re-do any work and/or apply our generous refund policy.

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

Other



As part of your proposal to test regulatory reform, which regulatory rules governing the practice of law does your entity seek to modify? RPC 5.4(a), RPC 5.4(b), RPC 5.4(d)

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.

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

ER 5.4(a) - A lawyer or law firm may share legal fees with a nonlawyer, except that: an agreement by a lawyer with the lawyer's firm, partner, or associate may provide for the payment of money, over a reasonable period of time after the lawyer's death, to the lawyer's estate or to one or more specified persons, or the nonlawyer holds ownership interest in the law firm; RPC 5.4(b) - A lawyer may form a partnership with a nonlawyer, → so long as the nonlawyer does not exercise influence over the practice of law. RPC 5.4(d) (1) and (2) - A lawyer shall not practice with or in the form of a professional corporation or association authorized to practice law for a profit, if: (2) a nonlawyer is a corporate director or officer thereof or occupies the position of similar responsibility in any form of association other than a corporation, if the corporate director exercises influence and decision making power over the practice of law;

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

→ The rules we would seek to modify would make it so nonlawyers may own law firms, so long as the practice of law is left to lawyers. This enables a company, like our parent company, to offer legal services to their client base through a subsidiary law firm. By leveraging the power of a successful company, we can keep costs down, offer the client a better experience, focus on the client and practicing law, and expand access to justice.

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

Often, people know they need legal help, but are unsure or intimidated by the hurdles they need to jump through just to get an answer to a question or have a document reviewed. More often than not, people that need help just go without. This is true of both individuals, and businesses. Entrepreneurs attempting to start a business are typically on a very tight budget, and as such, often forego consulting a lawyer to save money. Law on Call eliminates those hurdles and gives customers quick access to legal professionals. By providing direct access to attorneys, a cost effective subscription service, and cost effective legal services, Law on Call removes much, or even most of what makes getting legal help so difficult. Law on Call provides instant legal assistance. Essentially, Law on Call is an entity that employs trained attorneys and paraprofessionals that are available for immediate access to clients and their legal needs during normal business hours. Then, for those that need additional legal work, Law on Call provides access to legal services by licensed attorneys, at significantly reduced rates over the rates charged by traditional law firms. By eliminating the financial motivation that burdens most attorneys, Law on Call is able to provide faster, higher quality legal solutions for its clients at a significantly reduced rate. Further, the immediate access to lawyers and paraprofessionals for [REDACTED] overcomes financial hurdles that also hinder people from obtaining legal assistance. Law on Call's business model helps eliminate traditionally negative views of attorneys, increases public interaction with the legal world, and increases public confidence in legal professionals. Client satisfaction is the main objective of Law on Call, as well as providing quicker, cost effective access to lawyers and paraprofessionals.

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?

We can provide information from our Utah and Arizona operations on how many clients subscribe to our services, the types of services for which subscribers hire Law on Call, the amount charged for typical services, the typical time to fulfill an order form a client, and the volume of client complaints we have received.

Risk Assessment

Risk Assessment - Entity Identified

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.

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

Risk (short descriptor)	Modification of traditional legal professional regulation and compliance
Likelihood of Harm	Very Unlikely
Potential Severity of Harm	Negligible

Provide a full description of the risk with an explanation for your categorization

The only alteration we are looking to apply to Law on Call is fee sharing with non-attorneys and non-attorney ownership interests in the law firm. Potential risks of non-lawyer ownership could include misappropriation of client funds or undue influence on representational decisions.

Clearly describe the specific measures or controls your entity will implement to mitigate or eliminate this risk. Include details such as staff training, process oversight, monitoring mechanisms, technological safeguards, or other relevant practices

The aforementioned risks are unlikely and potential severity of harm is negligible because Law on Call takes payment after services have been rendered. There is no need to use IOLTA, so the ability to potentially misappropriate or misuse client funds is significantly minimized. Law on Call applies a generous refund policy to ensure satisfaction of all clients. Additionally, lawyers will maintain complete control over representational decision-making, minimizing the opportunity for undue influence from other non-lawyer professionals.

Risk Assessment - WSBA Required 1

Even if not directly created by your proposed study, address the following risks or 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

Risk: Inappropriate or flawed legal results

Likelihood of Harm

Very Unlikely

Potential Severity of Harm

Negligible

Provide a full description of the risk with an explanation for your categorization

We help individuals and businesses in transactional work. These areas of law are typically lower risk than other types of practice areas.
 → Furthermore, we offer services through licensed attorneys. Our parent company doesn't participate in offering legal advice and/or services.

Clearly describe the specific measures or controls your entity will implement to mitigate or eliminate this risk. Include details such as staff training, process oversight, monitoring mechanisms, technological safeguards, or other relevant practices

Our attorneys collaborate on issues together. We review each others work before it goes out to the client. Having multiple attorneys review work product minimizes the risk of inappropriate or flawed legal results. Additionally, we train our staff on a regular, recurring basis to ensure that non-lawyer staff understand the unauthorized practice of law, confidentiality, compliance and other necessary aspects of working at a law firm. We
 → conduct regular meetings and trainings to improve the quality of work we provide clients. The compliance lawyer frequently reviews communication between staff and clients for quality assurance checks and to ensure non-lawyer staff is in compliance with ethical rules. The software we use is permission based, and only Law on Call staff can access client information.

Risk Assessment - WSBA Required 2

Risk: Failure of consumers to exercise legal rights due to ignorance or incorrect advice

Likelihood of Harm

Very Unlikely

Potential Severity of Harm

Negligible

Provide a full description of the risk with an explanation for your categorization

Due to who our clients are, (businesses and individuals) and the areas of law in which we practice, we only work with clients regarding transactional work. Within the realm of transactional advice, should an attorney receive a call from a subscriber asking a legal question that we do not know the answer to, then we will let them know we need to conduct research on the issue and schedule a follow up call or meeting.
 → Sometimes we receive calls for questions that are not considered legal advice (like a question about their taxes). In situations like these, we always remind the subscribers that we are licensed attorneys, not licensed professionals in whatever field (like a CPA). We advise that they contact a licensed professional in that field to advise them.

Clearly describe the specific measures or controls your entity will implement to mitigate or eliminate this risk. Include details such as staff training, process oversight, monitoring mechanisms, technological safeguards, or other relevant practices

We train staff on areas we are and are not able to help advise in. We ensure that attorneys have adequate time to research different legal issues for
 → subscribers. We monitor communications between staff and subscribers to ensure that clients are not being given a false sense of security that we can advise on a specific issue when we cannot.

Risk Assessment - WSBA Required 3

Risk: Purchase of unnecessary or inappropriate legal services

Likelihood of Harm

Very Unlikely

Potential Severity of Harm

Negligible

Provide a full description of the risk with an explanation for your categorization

Sometimes subscribers will subscribe to Law on Call because they need advise for a particular issue that we are unable to advise on (they need help in litigation, for example). When these problems arise, a lawyer calls the subscriber and explains why we are unable to help them. We direct the subscriber to the state bar website where they can look for a lawyer in that area. Additionally, if someone calls in for advise or help that we are unable to provide, we will cancel their monthly subscription (if that is what they wish) and refund them that months subscription.

Clearly describe the specific measures or controls your entity will implement to mitigate or eliminate this risk. Include details such as staff training, process oversight, monitoring mechanisms, technological safeguards, or other relevant practices

We train our staff on what services we provide and on the process for canceling and refunding subscribers for services that we do not provide. This training if recurring. We also review communication between staff and subscribers to ensure that the subscribers are being appropriately informed.

Consumer Protection

Consumer Protection

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

We institute the same checks for public protection that traditional law firms have. Our lawyers are the ones doing the work; they are bound by the rules of professional conduct. We carry malpractice insurance. We also offer a 100% money back guarantee for our clients. Our price point reduces bias.

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

Clients can submit a complaint to any member of Law on Call on the phone or in writing. They can also submit a complaint to the parent company if they have services with them. All complaints are reviewed by the compliance attorney. The compliance attorney will call the client, get an understanding of the issue and investigate the complaint. We have a 100% money back guarantee, so any complaint will automatically have the legal service for which they are complaining about refunded to them, no questions asked. At Law on Call, we respond to clients within one business day. If there is need for an investigation, we will conduct this within three business days.

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



[Redacted] The parent company has the financial resources to offer a 100% money back guarantee for any reason. We also have legal malpractice insurance coverage and every attorney working at Law on Call is on the policy.

Does your entity or any affiliated entity plan to share or sell consumer data in any form to third parties? No

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

Confidentiality Policy: Law on Call employees may not reveal information relating to the representation of a client. An employee at Law on Call may disclose client information only if the client gives informed consent or the disclosure is impliedly authorized to carry out the representation. Staff undergoes training on a regular and routine basis where the policy is reviewed and they are trained on specific examples on how staff members at the firm could be faced with confidentiality concerns and how to protect our clients confidential information. The software we use is permission based. Only Law on Call employees can see the confidential information. Law on Call has its own staff (called Customer Service Representatives) to answer phones and handle any client questions regarding our service. We encrypt all data and limit access to all software where client data is stored. In the extremely rare case on a breach, the affected clients would be notified immediately and we take immediate action to assess the damage, fix the issue, and make required restitution.

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

Conflict of Interest Policy: Law on Call primarily engages in transactional and advisory legal services, and conflicts of interest may arise in connection with existing or former clients, or the personal, financial, or business interests of attorneys, staff, or Northwest Registered Agents, LLC. Before accepting any new matter, the responsible attorney must submit the names of all relevant parties for a conflict check using the firms internal database of existing and former clients. Additionally, conflicts must be monitored on an ongoing basis. If new parties or issues arise during representation, an updated conflict check must be conducted promptly. Each attorney is responsible for ensuring that conflict information is accurate and complete. Should a conflict check be conducted and a conflict found, an attorney at Law on Call will promptly contact the client and inform them that a conflict exists and inform the client that the firm is unable to represent them in the matter. Our policy ensures that clients can work with Law on Call confidently, knowing that we truly represent their best interest, without conflict.

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.

Law on Call offers a much needed service to the customers of the parent company. This service adds value to the client. The main goal of Law on Call is not financial gain, but rather providing another valuable service as part of our parent company's offering. Lawyers of Law on Call are free to practice law without any pressure to bring in money. Policy and procedures include always putting the client first, never billing more than agreed, offering a 100% money guarantee, regular training on putting the client first, and having a self audit process to ensure all staff is putting the client first.

Does your entity require customers to waive certain rights as a condition of service? No

Certification

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.
- I acknowledge, by virtue of participating in the pilot project, I, my entity, and my entity's staff are subject to the WSBA's enforcement procedures for the pilot project.

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. Yes

Name	Daren J Harris
Title	Lawyer
Entity	Law on Call, LLC
City where certifying	West Jordan
State where certifying	UT
Today's Date	1-8-2026

THE SUPREME COURT OF WASHINGTON

IN THE MATTER OF THE RECOMMENDATION OF
THE PRACTICE OF LAW BOARD OF LAW ON
CALL, LLC FOR PARTICIPATION IN THE PILOT
PROJECT FOR ENTITY REGULATION

PROPOSED

ORDER FOR AUTHORIZATION TO
PRACTICE LAW

No.

WHEREAS, pursuant to this Court's Order No. 25700-B-721, the Washington State Bar Association (WSBA) and the Practice of Law Board (Board) have filed a recommendation for Law on Call, LLC to participate in the Pilot Project for Entity Regulation and be authorized to practice law subject to the limitations and conditions outlined below;

WHEREAS, Law on Call, LLC is a subsidiary law firm of Northwest Registered Agent, LLC which is not a law firm;

WHEREAS, Law on Call, LLC proposes modifications or exemptions to the regulatory rules and statutes governing the practice of law that would otherwise prevent the delivery of legal services under the proposed service model; and

WHEREAS, the WSBA and the Board have assessed the risk of harm to Washington consumers, the general public, and the legal profession presented by Law on Call, LLC's proposed service model and have determined that the public protection measures set forth below are sufficient to mitigate the risk of harm.

NOW, THEREFORE, pursuant to this Court's inherent power to regulate the practice of law and consistent with Order 25700-B-721, it is hereby ORDERED:

Law on Call, LLC is authorized to temporarily practice law within the pilot project for entity regulation (hereinafter "pilot project") subject to the limitations and conditions outlined below:

1. **Permitted Legal Service Areas:** Law on Call, LLC's authorization under this order is not limited to a particular practice area. This order does not limit the ability of licensed legal professionals employed by Law on Call, LLC to provide legal services in any area of the law they are competent to do so in compliance with RPC 1.1.
2. **Method for Delivery of Legal Services:** Law on Call, LLC provides on-demand legal services through licensed lawyers, offering subscribers access for a flat monthly fee. Other than the exemptions granted in Section 4, Law on Call, LLC must abide by the Rules of Professional Conduct.
3. **Jurisdiction:** The authorization to practice law under this order is limited to the practice of law in the State of Washington for the benefit of Washington State residents. Nothing in this Order shall be construed as authorizing Law on Call, LLC to practice law in any jurisdiction other than the State of Washington, act as a referral network or intermediary for legal services in other jurisdictions, or solicit or facilitate legal matters (i.e., matters involving the practice of law) outside of Washington.
4. **Limited Regulatory Reform:** The following rules and laws governing the practice of law are modified for Law on Call, LLC and such modifications apply only to the legal services provided under the authority of this order:
 - An exemption from RPC 5.4(a) to permit the sharing of legal fees with nonlawyers.
 - An exemption from RPC 5.4(b) to permit lawyers to be employed by and practice law in a law firm owned in whole or in part by a for-profit entity owned by nonlawyers.
 - An exemption from RPC 5.4(d)(1) to permit nonlawyer ownership of an entity providing legal services.

- An exemption from RPC 5.4(d)(2) to permit nonlawyers to hold corporate office or similar positions of responsibility in a business that engages in the practice of law.

Law on Call, LLC is not exempted from, nor granted a modification to, any other statute, rule, or other law not explicitly identified in this section.

5. Consumer Protection Measures: Law on Call, LLC's compliance officer shall take the following measures for protection of the public:

- provide supervision for all legal services delivered through Law on Call, LLC;
- ensure confidential client information is not accessible to, disclosed to, or shared with employees of Northwest Registered Agent, LLC, except as necessary for Northwest Registered Agent, LLLC to perform its business operations related to Law on Call, LLC. All employees of Northwest Registered Agent, LLC must sign confidentiality agreements regarding any and all information related to the clients of Law on Call, LLC;
- ensure end-user license agreements comply with the RPC;
- maintain professional liability insurance; and
- retain client created documents for the duration of the pilot project.

6. Consumer Disclosures: Law on Call, LLC shall prominently display the following disclosure in all public-facing materials and platforms:

The legal services we offer in Washington State are provided under the authorization of the Washington Supreme Court as a participant in the Washington Pilot Project for Entity Regulation, and may include legal services that are either (1) not provided by a lawyer, (2) not able to be provided by a lawyer without participation in the Pilot Project, or (3) provided by a business that is owned in whole or in part by persons not

licensed to practice law. For additional information about the Pilot Project for Entity Regulation or to file a complaint, please visit www.wsba.org/entityreg.

- 7. Handling of Client Funds and Property:** Law on Call, LLC shall safeguard and handle funds and property of clients or third persons, and maintain trust account records, in the same manner and under the same conditions as a lawyer would under Rules 1.15A & B of the Washington Rules of Professional Conduct for lawyers regardless of how or by whom the legal services are provided. Individual licensed legal professionals employed by Law on Call, LLC shall continue to comply with client trust account requirements under existing rules of professional conduct and disciplinary rules applicable to the licensed legal professional.
- 8. Compliance Officer:** Law on Call, LLC shall have a WSBA-approved compliance officer and primary contact for its participation in the Pilot Project for Entity Regulation. The initial WSBA-approved compliance officer is Daren J. Harris who is licensed to practice law as a lawyer in Oregon, Utah, and Arizona. Daren J. Harris, or a successor compliance officer approved by the WSBA, shall ensure Law on Call, LLC's compliance with this Order, Order No. 25700-B-721, the WSBA Pilot Project for Entity Regulation Participant Manual, the WSBA's Enforcement Procedures and all ethical rules that apply to the entity, and the WSBA's reporting requirements.
- 9. Reporting Requirements:** Law on Call, LLC shall comply with the periodic reporting and monitoring requirements to be established by the WSBA.
- 10. Applicability of Existing Rules and Laws:** Law on Call, LLC shall comply with all existing laws and rules governing the practice of law in Washington except as provided in Section 4 above. Washington lawyers, limited practice officers, or limited license legal technicians employed by Law on Call, LLC remain individually subject to and shall comply with the applicable Washington rules of professional conduct

and disciplinary rules except as provided in number 4 above.

11. Enforcement Procedures: Law on Call, LLC and its staff are subject to the WSBA's enforcement procedures for the pilot project and the WSBA Pilot Project for Entity Regulation Participant Manual. Law on Call, LLC must comply with reporting requirements and cooperate with the WSBA's review and investigation of complaints and any compliance reviews conducted by the WSBA. Law on Call, LLC may not use the status of information as confidential client information or trade secret as a basis for not providing it to the WSBA or otherwise complying with requests for information and documents under the Entity Regulation Pilot Project Enforcement Procedures. The WSBA will report to the Board any findings of failure to comply, noncooperation, or violation of an authorizing order or applicable rule of ethics by a participating entity or its staff, and may make recommendations to the Board regarding any additional public protection measures that may be necessary, up to and including removal from the pilot project. The Board may request further inquiry by the WSBA or may make a recommendation to the Court as appropriate. Law on Call, LLC may be responsible for the costs of such an investigation as ordered by the Court upon recommendation of the Board.

12. Duration of Authorization: This authorization is granted for an initial term of seven years from the date of this Order. This authority is subject to Law on Call, LLC's compliance with the limitations and conditions set forth in this Order, Order No. 25700-B-721, the WSBA Pilot Project for Entity Regulation Participant Manual, and the Entity Regulation Pilot Project Enforcement Procedures.

13. Removal of Authorization: This Court may remove Law on Call, LLC's authorization upon a finding of non-compliance with the limitations and conditions outlined in this order, consumer harm as defined in the Entity Regulation Pilot Project Enforcement Procedures, or for any other reasonable cause the Court deems appropriate in its discretion.

DATED at Olympia, Washington this _____ day of _____, 20_____.

CHIEF JUSTICE

DRAFT

2026 UPL Complaints

Received: 32

Referred: 19

UPL #	Date of Complaint	Complainant Occupation	Respondent Occupation	UPL Complaint	Brief Summary	Referred
25-27	10/2/2025	Attorney	Out-of-state attorney	Legal advice, legal documents, legal services	Respondent sent legal documents to Complainant's client but is not authorized to practice law in Washington	Yes
25-28	10/10/2025	Individual	Individual	legal advice, legal documents	The Complainant alleges that the Respondent, who is the Complainant's husband's girlfriend, has been completing legal paperwork and attending court proceedings related to a Domestic Violence Protection Order (DVPO), as well as preparing dissolution of marriage documents. The complainant further states that a judge has previously warned the respondent not to assist with legal documentation.	No
25-29	10/13/2025	Individual	Individual	legal documents, legal services	Complainant's client paid Respondent \$2600 to assist with immigration paperwork. Respondent is not an attorney, and the forms that were filed were incorrect. The money was never returned.	Yes
25-30	10/17/2025	Individual	Individual	legal advice, legal documents, legal rights, legal services	Respondent is not a licensed attorney and Complainant alleges that Respondent is filing documents with the court and even attempted to appear in court.	Yes
25-31	10/20/2025	Individual	Paralegal	Legal advice, legal documents, legal rights	Complainant worked with Respondent at a law firm. Complainant alleges that Respondent was given duties and responsibilities that constituted the practice of law with no attorney oversight. Respondent was in charge of a team of attorneys.	Yes
25-32	10/22/2025	Individual	Individual	legal advice, legal documents	Complainant alleges that Respondent claimed to be a licensed attorney from New York and offered legal assistance during two court cases. Complainant paid Respondent \$1,000. Respondent allegedly drafted and filed legal documents. Respondent is not licensed in WA	Yes
25-33	10/31/2025	Individual	Attorney	legal advice, legal documents	Complainant alleges that Respondent was not authorized to practice law but was doing so anyway. Respondent was a Rule 9 Legal Intern and is now a licensed attorney.	No
25-35	11/12/2025	Attorney	Paralegal	legal advice, legal documents, negotiated legal rights, provided legal services	Complainant alleges Respondent is a paralegal and is representing individuals for their UM claims. Respondent has signed the letter of representation and is not working with an attorney	Yes
25-36	11/15/2025	Individual	Out-of-state attorney	legal advice, legal documents, appeared in court, legal rights, legal services	Respondent is Complainant's ex-husband's girlfriend. Complainant alleges Respondent is giving the ex-husband legal advice, as well as assisting with and filing paperwork on his behalf.	No
25-37	11/27/2025	Individual	Individual	legal documents, appeared in court, legal rights	Complainant was living with a friend and was asked to move out but refused. Respondent has Power of Attorney over the friend and is assisting with removing Complainant.	No
25-38	11/30/2025	Individual	Individual	legal advice, legal documents, legal rights, legal services	This complaint is related to 25-38. Complainant is alleging that Respondent sued Bank of America on behalf of Complainant's roommate/Respondent's client and pocketed the money. Complainant is also alleging that Respondent is acting against Complainant's roommates best interests.	No
25-39	12/2/2025	Individual	Individual	legal advice, legal documents, legal rights	Complainant is involved in a lawsuit and acting pro se. Respondent works for the court and issues documents to the Complainant.	No

2026 UPL Complaints

Received: 32

Referred: 19

UPL #	Date of Complaint	Complainant Occupation	Respondent Occupation	UPL Complaint	Brief Summary	Referred
25-40	12/15/2025	Individual	Out-of-state attorney	Legal advice, legal documents, legal services	Complainant's attorney sent a cease and desist to Respondent's wife. Respondent responded to the cease and desist but made it clear he was acting as a husband and not an attorney.	No
25-41	12/15/2025	Attorney	Corporation	legal advice, legal services	The Respondent is a corporation with "legal" in the title. Respondent claims to help people exit timeshare agreements. Complainant's client had to take out a \$16,561.00 loan with a \$5,592.68 finance charge at an APR of 19.99% just to work with Respondent. Respondent took the money but did not take any action.	Yes
25-42	12/15/2025	Individual	Out-of-state attorney	legal advice, legal documents, negotiated legal rights, offered to provide legal services	Complainant alleges that the respondent provided legal advice and direction that materially affected Washington-based legal rights and proceedings, including matters occurring while a Washington Domestic Violence Protection Order (DVPO) was in effect and involving Washington parties. No clear evidence was provided.	No
25-43	12/18/2025	Attorney	Paralegal	legal advice, legal documents	Complainant is an attorney that interviewed Respondent for a job. Respondent claimed to be a "freelance paralegal" and admitted to giving legal advice and preparing forms for pro se litigants.	Yes
26-01	1/2/2026	Attorney	Notario	legal advice, legal documents, legal services	Complainant alleges that Respondent claims to be an attorney and offered to assist a non-english speaker with an immigration case. Respondent allegedly took money and ruined an immigration case that Complainant is now trying to fix. The money paid to Respondent was never returned.	Yes
26-02	1/9/2026	Individual	Attorney - voluntarily resigned	legal advice, legal documents, legal services	Complainant is a homeowner and Respondent is an HOA Board member and on the "Legal & Rules Committee". Complainant alleges that Respondent is giving legal advice and direction regarding ongoing litigation against the Board.	Yes
26-03	1/29/2026	Individual	Individual	legal advice, legal services	Complainant and Respondent are involved in a contractual dispute. Respondent identified themselves as an attorney but is not licensed to practice law in WA. When the Complainant pointed out that Respondent is not listed in the WSBA directory, Respondent created a fake email with a fake name stating to be an attorney for Respondent. The name used was also not someone licensed to practice in WA.	Yes
26-04	1/30/2026	Individual	Unknown	legal documents, appeared in court	An attorney passed away and someone at the law firm is filing documents with the court that have the deceased attorney's signature and are dated after the attorney passed.	Yes
26-05	2/5/2026	Out-of-state Attorney	Unknown	legal advice, legal services	Complainant is an out-of-state attorney and Respondent is using Complainant's name and picture to pose as an immigration attorney in WA.	Yes
26-06	2/6/2026	Individual	Out-of-state attorney	legal advice, legal services	Respondent was working as an attorney at a law firm in WA but is not licensed to practice law in WA.	Yes
26-07	2/13/2026	Individual	Individual	legal advice, legal documents, legal services	Respondent claimed to be an immigration attorney and Complainant paid Respondent \$2,800 to assist with an immigration case. Respondent is not licensed to practice law in WA.	Yes

2026 UPL Complaints

Received: 32

Referred: 19

UPL #	Date of Complaint	Complainant Occupation	Respondent Occupation	UPL Complaint	Brief Summary	Referred
26-08	2/20/2026	Individual	Paralegal	legal advice, legal documents, appeared in court, legal rights, legal services	Respondent allegedly drafted and filed legal documents, advised witnesses, and acted in a representative capacity for a pro se litigant in a parenting case, including serving papers and providing false information to the GAL, actions the Complainant claims constitute the unlawful practice of law. The complaint further alleges Respondent continued using paralegal position and law firm email to conduct legal service and communications without attorney supervision as recently as February 2026.	Yes
26-09	2/21/2026	Individual	Individual	legal advice, negotiated legal rights, provide legal services	Respondent was terminated from a company but continued issuing invoices, legal threats, and legal analyses, including interpreting contracts, citing RCW violations, and threatening to file mechanics liens for herself and others. The complaint alleges Respondent is acting as a legal advocate for third parties and doing so through a business entity that has been administratively dissolved for about a year.	No
26-10	3/4/2026	Individual	Individual	legal advice, legal documents, provide legal services	Respondent offered to handle an asylum case, has filed it, and controls sole access to Complainant's USCIS account, but is refusing to release interview details or account access unless Complainant pays the remaining \$1,000 of a \$6,000 fee—despite already paying \$5,000. Respondent has not provided a written contract, invoice, or receipts, and requested payment through Cash App instead of providing formal documentation.	Yes
26-11	3/19/2026	Individual	Out of state attorney	legal advice, legal documents, appeared in court, legal rights	Respondent is an out of state attorney that is filing documents and appearing in court in Washington. The Complainant has already filed police reports and complaints with the bar of that state.	No
26-12	3/19/2026	Individual	Out of state attorney	legal advice, legal documents, appeared in court, legal rights	This complaint is related to 26-11. Respondent is an out of state attorney that is filing documents and appearing in court in Washington. The Complainant has already filed police reports and complaints with the bar of that state.	No
26-13	3/23/2026	Attorney	Individual	legal advice, legal documents, legal rights, legal services	Respondent worked as a legal assistant for the Complainant. Respondent was investigated for using their position to offer legal advice, and in some cases used their title as well as company resources to engage in the unauthorized practice of law.	Yes
26-14	3/25/2026	Individual	Disbarred attorney	legal advice, legal documents, legal rights	Respondent works in the legal department at a debt collection agency. Complainant is plaintiff in a case against the agency. Respondent has been communicating with Complainant, trying to settle the case. Respondent is acting in the capacity of a paralegal.	No
26-15	4/6/2026	Attorney	Individual	legal advice, legal documents, legal rights, legal services	Complainant is filing on behalf of their client. Respondent claimed to be an immigration attorney and took \$3500 to show up for court but never appeared.	Yes
26-16	4/9/2026	Individual	Individual	legal documents, negotiated legal rights	Complainant is alleging that Respondent claims to be an attorney but is not licensed to practice. Respondent has been attempting to serve paperwork on the Complainant and making threats.	Yes