

THE SUPREME COURT OF WASHINGTON

IN THE MATTER OF THE RECOMMENDATION OF
THE PRACTICE OF LAW BOARD OF WRK LEGAL
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 Wrk Legal to participate in the Pilot Project for Entity Regulation and be authorized to practice law subject to the limitations and conditions outlined below;

WHEREAS, this Court has inherent and plenary authority to regulate the practice of law in Washington (GR 12) and the exclusive responsibility and the inherent power to establish the qualifications for admission to practice law (APR 1);

WHEREAS, Wrk Legal is a subsidiary law firm of Worklution Inc. which is not a law firm;

WHEREAS, Wrk Legal proposes modifications or exceptions to the regulatory rules 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 Wrk Legal'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 and plenary authority to regulate the practice of law and consistent with Order 25700-B-721, it is hereby ORDERED:

Wrk Legal is authorized to 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:** Wrk Legal'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 Wrk Legal 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:** Wrk Legal provides legal services through licensed lawyers on a contingency fee basis. Other than the exceptions granted in Section 4, Wrk Legal 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 Wrk Legal 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. This order does not prohibit Wrk Legal from providing lawyer referrals to lawyers in other jurisdictions, provided Wrk Legal complies with all applicable rules and regulations governing lawyer referrals.
4. **Limited Regulatory Reform:** The following rules governing the practice of law are modified for Wrk Legal and such modifications apply only to the legal services provided under the authority of this order:
 - An exception to RPC 5.4(a) to permit the sharing of legal fees with nonlawyers.
 - An exception to 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 exception to RPC 5.4(d)(1) to permit nonlawyer ownership of an entity providing legal services.

- An exception to 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.

Based on (1) the Court's inherent and plenary authority to regulate the practice law, (2) the authorization for Wrk Legal to practice law under this order, and (3) the above exceptions to RPC 5.4 authorized by this order, Wrk Legal, its personnel and officers, and its nonlawyer investors, owners, or recipients of legal fees are not engaged in the unlawful practice of law when engaged in activities authorized under the terms and conditions of this order. RCW 2.48.180(7).

Wrk Legal is not exempted from, nor granted a modification to, any other rule governing the practice of law not explicitly identified in this section.

5. Consumer Protection Measures: Wrk Legal's compliance officer shall take the following measures for protection of the public:

- provide supervision for all legal services delivered through Wrk Legal;
- afford all clients the right to decide how best to resolve disputes regarding legal services by ensuring Wrk Legal's terms of service do not include mandatory arbitration clauses {, mandatory mediation clauses (even if non-binding),} or other restrictions on a client's right to choose how to resolve claims about legal services.
- ensure confidential client information is not accessible to, disclosed to, or shared with employees of Worklution Inc. except as necessary for Worklution Inc. to perform its business operations related to Wrk Legal. All employees of Worklution Inc. must sign confidentiality agreements regarding any and all information related to the clients of Wrk Legal;
- 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: Wrk Legal 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.

The WSBA shall display a substantially similar disclosure on the entity's profile page on the WSBA's online Legal Directory.

7. Handling of Client Funds and Property: Wrk Legal 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 Wrk Legal 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: Wrk Legal 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 Domonique Price who is licensed to practice law as a lawyer in Washington (License No. 47552). Domonique Price, or

a successor compliance officer approved by the WSBA, shall ensure Wrk Legal'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: Wrk Legal shall comply with the periodic reporting and monitoring requirements to be established by the WSBA.

10. Applicability of Existing Rules and Laws: Wrk Legal 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 Wrk Legal 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: Wrk Legal 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. Wrk Legal must comply with reporting requirements and cooperate with the WSBA's review and investigation of complaints and any compliance reviews conducted by the WSBA. Wrk Legal 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. Wrk Legal 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 Wrk Legal'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 Wrk Legal'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

To: Regulatory Services Department
Washington State Bar Association Committee
From: Domonique Price, Compliance Attorney Wrk Legal
Date: May 12, 2026
Re: Wrk Legal – Supplemental Clarifications for Entity Regulation Pilot Program

I. Introduction

Wrk Legal respectfully submits this supplemental memo in response to the Committee's request for additional clarification regarding its application to participate in the Washington State Bar Association Entity Regulation Pilot Program.

Wrk Legal's model is designed to expand access to legal services through a structured, compliance-forward framework that preserves attorney independence while leveraging technology to improve client accessibility and preparedness. The following provides clarification regarding (1) requested rule modifications, (2) compliance with RPC 1.5(e), and (3) the business flow from both the client and attorney perspectives.

II. Specific Rules Requested for Modification

Wrk Legal requests limited modification of the following Rules of Professional Conduct solely to the extent necessary to support its operational model within the pilot program:

A. RPC 5.4(a)

Wrk Legal seeks modification to permit fee-sharing at the entity level between Wrk Legal and its nonlawyer parent entity, Worklution Inc., solely for the purpose of funding operational infrastructure and technology services.

Such arrangements:

- Are not tied to, contingent upon, or influenced by the outcome of any individual client matter;
- Do not affect individual attorney compensation structures; and
- Exist exclusively to support operational delivery of services.

Under no circumstances will any nonlawyer owner, officer, or affiliated entity direct, control, or influence an attorney's professional judgment, case strategy, settlement decisions, or client representation.

B. RPC 5.4(b)

Wrk Legal seeks modification to permit nonlawyer ownership and investment in an entity employing licensed attorneys, provided that attorney independence is preserved through:

- Governance documents;
- Written independence policies; and
- Oversight by a designated Compliance Officer.

Nonlawyer stakeholders will not have authority over legal decision-making or attorney judgment.

C. RPC 5.4(d)

Wrk Legal seeks modification to permit nonlawyer ownership and executive leadership, including Cierra Gross serving as CEO, while ensuring that all legal services and client representation remain under the exclusive authority of licensed attorneys.

Wrk Legal anticipates engaging attorneys licensed in Washington for matters arising within the state and may engage attorneys licensed in other jurisdictions where permitted by applicable law.

At all times, attorney independence is preserved and nonlawyer leadership will not influence or override legal judgment.

III. Compliance with RPC 1.5(e)

Wrk Legal confirms that it does not require modification of RPC 1.5(e) and will comply fully with the rule as written.

In connection with referrals to attorneys outside Wrk Legal:

- All fees will be reasonable;
- Clients will receive written disclosure and provide informed consent to any fee-sharing arrangement;
- Fee division will either reflect proportional work performed or include joint responsibility by the referring attorney.

Wrk Legal will not engage in referral arrangements that compromise attorney independence or client interests. All referrals are based solely on client need and appropriate legal expertise.

IV. Narrative Business Flow

A. Client Perspective

A prospective client—such as a healthcare worker experiencing potential workplace discrimination—seeks guidance but may lack clarity on whether their situation constitutes a legal claim.

The client discovers Wrk Receipts through digital channels and begins documenting incidents within the platform. This includes uploading communications, logging events, and organizing relevant details chronologically.

Wrk Receipts is available as a free tool. Users may elect to subscribe to optional premium features designed to enhance documentation and organization capabilities.

Any subscription is voluntary and relates solely to technology features. Clients are not charged for access to legal representation or for the opportunity to connect with an attorney.

At any point, the client may request a consultation with a licensed attorney. This action is user-initiated and requires affirmative consent before any data is shared.

Following consent:

- The client's intake is submitted;
- An attorney is assigned through a neutral rotation system; and
- The attorney reviews the structured documentation in advance.

During consultation:

- The attorney evaluates the legal merits of the matter;
- Advises the client on available options; and
- Presents a written fee agreement where appropriate.

All legal fees are disclosed directly between the client and attorney prior to engagement.

Throughout representation:

- The client communicates directly with the attorney;
- Retains full control over decision-making; and
- May terminate or disconnect at any time.

Participation in Wrk Legal does not restrict the client's right to seek independent counsel.

B. Attorney Perspective

An attorney is assigned through a neutral rotation system and initially receives limited information sufficient to conduct a conflict check.

Upon clearance:

- The attorney accesses the full intake file;
- Conducts a second conflict check; and
- Prepares for consultation using organized client-provided data.

If representation proceeds:

- The attorney independently manages all aspects of the matter;
- Exercises sole authority over legal strategy and decisions; and
- Advises the client, who retains final decision-making authority.

Neither Wrk Legal, Worklution Inc., nor any nonlawyer entity has authority to influence legal judgment or case outcomes.

Attorneys are not evaluated based on case value, settlement outcomes, or platform performance metrics.

The Compliance Officer:

- Operates independently of business leadership;
- Monitors adherence to regulatory requirements; and
- Has authority to escalate or halt operations where necessary to protect clients and attorney independence.

Attorney compensation is governed solely by their individual agreements with Wrk Legal and is not tied to entity-level financial arrangements.

V. Conclusion

Wrk Legal is committed to advancing the mission of the WSBA Entity Regulation Pilot Program by expanding access to legal services while maintaining rigorous safeguards for client protection and attorney independence.

We appreciate the Committee's consideration and welcome any further questions or requests for clarification.

Respectfully submitted,

Domonique Price

Compliance Attorney, Wrk Legal

Entity Regulation Pilot Project Application - Entity Regulation Pilot Project Application

Amendment Submitted on 03.09.2026

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	Wrk Legal LLC
Email Address	support@wrklegal.com
Phone Number	877-361-6247
Website URL	wrklegal.com
Entity Physical Address 1	600 1st Ave Ste 330
Entity Physical Address 2	PMB 855766
City	seattle
State	WA
ZIP Code	98104
Entity Mailing Address 1	600 1st Ave Ste 330

Entity Mailing Address 2	PMB 855766
City	Seattle
State	WA
ZIP Code	98104
Date entity formed	2-24-2026
Federal Tax ID Number	41-4525914

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	Domonique Price
Title	Compliance Officer
Business Email Address	dprice@domoniqueprice.com
Business Phone Number	877-361-6247
Compliance Officer Mailing Address 1	600 1st Ave Ste 330
Compliance Officer Mailing Address 2	PMB 855766
City	seattle
State	Washington
ZIP Code	98104

Describe your qualifications to be the compliance officer.

I have been practicing law since April 2014 (11 years, 10 months). Focusing on business and intellectual property law, Through my service I have aided in helping individuals in the compliance space.

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	Cierra Gross
Title	CEO
Phone Number	877-361-6247
Email Address	support@wrklegal.com
Mailing Address 1	600 1st Ave Ste 330
Mailing Address 2	PMB 855766
City	seattle
State	WA
ZIP Code	98104

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.

Wrk Legal currently operates as a lead generation service, but upon approval will be a Washington-based employment law firm providing contingency-based legal representation to workers facing workplace violations, including discrimination, harassment, retaliation, wage- and-hour violations, wrongful termination, and failure-to-accommodate claims. Wrk Legal will operate as a legally and structurally separate entity from Worklution Inc., its technology partner and parent ecosystem.

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 United States Corporation Agents, Inc.

Business Title Registered Agent

Email Address Clientsupport@usregisteredagents.com

Is your entity licensed or otherwise authorized to practice law or participating in a regulatory reform project in any other jurisdiction? No

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 Worklution's Inc.

Describe the nature and extent of the sharing arrangement

Yes. Wrk Legal will share data with Worklution Inc. pursuant to a software licensing agreement with Wrk Receipts, Worklution's workplace documentation platform. Any transfer of client data from Wrk Receipts to Wrk Legal will occur solely at the user's request and with the user's informed consent. No client data will be shared with Worklution Inc. or any affiliated platform without explicit authorization from the client. Shared data will be logged for audit purposes and reviewed annually by the Compliance Officer

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? No

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) Cierra Gross

Title CEO

Email Address Cierra@worklution.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



Substantive Legal Areas

Substantive Legal Areas

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

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. No

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. Yes

Intermediary platforms – connecting marketplaces of consumers with licensed legal professionals. Yes

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. No

Other – please describe. No

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

Will any lawyers or other licensed legal professionals provide legal services under your proposed service model? No

Will any lawyers or other licensed legal professionals oversee software or individuals not licensed to practice law under your proposed service model? No

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

Briefly describe the capacity

→ Lawyers and other licensed professionals may supervise other lawyers as well as serve in other business development roles.

Who are your target consumers? Check all that apply LGBTQ+, Low Income, Moderate Income, Professionals, Seniors, Young Persons

How many full-time equivalent (“FTE”) employees will be involved in the proposed service model? 5

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

Wrk Legal is currently a lead generating service that will be a Washington-based employment law firm that provides contingency-based representation to workers facing workplace violations. The firm focuses on discrimination, retaliation, wage-and-hour violations, harassment, wrongful termination, and failure-to-accommodate claims. Clients pay no upfront fees. Legal fees are earned only if a recovery is obtained, removing the primary financial barrier that prevents many workers from pursuing valid claims. Under the proposed service model, legal services are provided exclusively by licensed Washington attorneys. Wrk Legal integrates structured legal technology through a software licensing agreement with Wrk Receipts, a documentation platform developed by Worklution. Wrk Receipts enables workers to document workplace incidents chronologically, upload supporting materials, preserve communications, and organize evidence in a structured format. Employment claims often depend on detailed timelines and contemporaneous documentation. Many workers struggle to reconstruct events after the fact or feel overwhelmed by repeatedly explaining their experience to different attorneys. By listing Wrk Legal as a legal resource within the Wrk Receipts platform, users who have documented workplace concerns can choose to seek representation through a direct referral pathway. This model allows workers to move from documentation to legal evaluation without needing to retell traumatic experiences multiple times. Additionally, instead of contacting several law firms, repeating their story, and wondering whether a lawyer can help them, users can present organized documentation for attorney review with the click of a button, when they need it most. This approach meets workers where they are. Some individuals are not yet ready to hire a lawyer but want to begin preserving records. Others are unsure whether their situation rises to the level of a legal claim. By separating documentation from legal advice, Wrk Receipts enables workers to take an initial step toward protecting themselves without financial commitment or immediate litigation.

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

Workers will be able to contact Wrk Legal through Wrk Receipts, the Wrk Legal Website, or any other Worklution Inc. brand. Workers in Washington will be supported by lawyers licensed in Washington. For matters arising outside Washington, Wrk Legal will refer to local counsel licensed in the relevant jurisdiction through formal co-counsel agreements or referral fee agreements. Legal advice in those matters is provided by attorneys licensed in the relevant jurisdiction, and clients are clearly informed of the representation and fee structure.

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

All legal services delivered through Wrk legal will be supervised by the Compliance Officer, who will ensure adherence to applicable rules, WSBA pilot requirements, and consumer protection standards. The Compliance Officer will review and approve workflows involving attorney participation, oversee escalation of complex cases, review client feedback forms, and oversee the Co-Counsel Network Program. The technology Partner, Wrk Receipts, is a separate legal entity developed under the supervision of attorneys but is not a law firm and does not provide legal services.

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

[REDACTED]

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

Contingency Fees

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

LLLT RPC 5.4(a), LLLT RPC 5.4(b), LLLT RPC 5.4(c), LLLT 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

To permit non-lawyer ownership of an entity providing legal services. -To permit lawyers to be employed by and practice law in a for-profit entity owned by non-lawyers -To enable Wrk Legal to collect reasonable referral fees from third-party lawyers, or to which Wrk Legal refers clients, in the absence of a reciprocal referral agreement.

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

Wrk Legal's proposal seeks reforms to and RPCs 5.4 to allow the company to operate as a regulated, technology-enabled law firm for employment law services. The requested changes would authorize nonlawyers to own a law firm to provide low-cost, accessible legal services to underserved communities, permit nonlawyer investment and participation to support growth and innovation, and allow reasonable referral fees for connecting consumers with licensed attorneys. These adjustments would enable Wrk Legal to integrate technology, legal expertise, and complementary professional services within a clear regulatory framework that expands access to affordable employment law services not only for Washington residents but also for workers nationwide.

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

Likelihood of Harm

Possible

Potential Severity of Harm

Manageable

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

Wrk Legal's service model is fundamentally dependent on technology including the Wrk Receipts documentation platform, case management systems, attorney assignment workflows, and any AI-assisted features that support the referral pathway from documentation to legal representation. This reliance creates risk that system failures, software errors, or automated processes operating incorrectly could delay, disrupt, or compromise legal services delivered to clients.

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

Wrk Legal will maintain redundant backup systems for all client data ensuring that a failure of any single system does not result in permanent loss of client records. All critical deadlines, including statutes of limitations, filing deadlines, and response windows, will be tracked independently by the assigned attorney in a separate calendar and docketing system, so that no deadline is solely dependent on an automated platform alert. The software licensing agreement between Wrk Legal and Wrk Receipts will include uptime and data integrity, breach notification requirements, and defined remediation timelines in the event of a system failure. obligations, breach notification requirements, and defined remediation timelines in the event of a system failure. The Compliance Officer will monitor system performance and flag any outages or errors to the supervising attorney and affected clients promptly.

Risk (short descriptor)

Nonlawyer issues

Likelihood of Harm

Possible

Potential Severity of Harm

Catastrophic

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

→ Attorney independence compromised by nonlawyer ownership

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

Governance documents reserve case evaluation and settlement authority exclusively to licensed attorneys; written independence policies; → contingency model aligns incentives with client recovery.

Risk (short descriptor)

Conflict of interest

Likelihood of Harm

Very Unlikely

Potential Severity of Harm

Manageable

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

→ Conflict of interest in attorney assignment

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

→ Two-stage conflict check process; all certifications logged for audit.

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

Manageable

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

This risk is categorized as Very Unlikely because structural safeguards licensed attorney oversight, professional responsibility obligations, and outcome-aligned compensation collectively minimize the probability of flawed results reaching clients.

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 risk of inappropriate or flawed legal results is mitigated by the fact that all legal services provided through Wrk Legal will be delivered exclusively by licensed Washington attorneys who are individually bound by the Washington Rules of Professional Conduct, including the competence requirements of RPC 1.1. Wrk Legal's contingency-only fee model further reduces this risk by aligning the firm's financial incentives directly with client outcomes attorneys are motivated to pursue only meritorious claims and to handle them competently. The Compliance Officer will oversee case workflows and escalate concerns as needed. Professional liability insurance will be maintained.

Risk Assessment - WSBA Required 2

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

Likelihood of Harm

Possible

Potential Severity of Harm

Manageable

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

Workers facing workplace violations frequently do not know their legal rights, do not recognize that their situation may constitute a legal claim, or receive informal advice from non-attorney sources that discourages them from seeking representation. This risk is compounded for Wrk Legal's target population, which includes workers in industries and demographics historically underserved by the legal system including Black and African American workers, workers with disabilities, and workers in low-wage roles who may distrust or feel intimidated by the legal process.

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

To mitigate this risk, Wrk Legal will be embedded as a legal resource directly within the Wrk Receipts documentation platform, presenting workers with a clear pathway to legal evaluation at the moment they are actively documenting workplace concerns. This proactive integration reduces the likelihood that workers will fail to act on valid claims due to lack of awareness or access. All legal guidance will be provided by licensed attorneys, not by AI or non-attorney staff. The platform will clearly distinguish between documentation tools and legal advice to prevent workers from mistaking general information for counsel. Intake communications will include plain-language explanations of workers' rights and what to expect from the representation process.

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

Workers who are unfamiliar with the legal process may be vulnerable to agreeing to representation that is not in their best interest, particularly in a model where a technology platform facilitates the connection between users and attorneys. There is a risk that workers could be funneled toward legal services they do not need, do not fully understand, or that are not well-suited to their situation, especially if the referral pathway creates any perception of pressure or obligation.

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

To mitigate this risk, Wrk Legal will operate exclusively on a contingency fee basis, meaning workers pay nothing unless a recovery is obtained. This structure removes the primary financial harm associated with unnecessary legal services. Case acceptance decisions are reserved exclusively to licensed attorneys who are ethically obligated under RPC 1.1 and 1.4 to assess case merit and communicate honestly with prospective clients before undertaking representation. Attorneys have no financial incentive to accept non-meritorious cases under a contingency model. The referral pathway from Wrk Receipts to Wrk Legal will include clear disclosures that workers are not obligated to proceed with legal representation and that consulting with Wrk Legal does not create an attorney-client relationship until a formal agreement is signed. Workers will retain full authority to decline or discontinue representation at any time without penalty.

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

Wrk Legal will track and identify consumer harms through a structured case management system, a direct complaint pathway accessible via wrklegal.com, support email, and toll-free phone number, with all complaints reviewed within three business days and resolved within 14, escalated to the Compliance Officer as needed, and reported to the WSBA quarterly. For unforeseen risks, Wrk Legal will activate a written incident response plan authorizing the Compliance Officer to pause intake, reassign matters, or suspend workflows pending resolution, with co-counsel network capacity available to absorb disruptions and prompt self-reporting to the WSBA. To reduce implicit bias, attorney assignments will be made through a structured rotation system, case acceptance criteria will be merit-based and documented in writing. AI-assisted referral pathway features will be periodically reviewed for algorithmic bias, and de-identified demographic outcome data will be analyzed quarterly with intake and assignment practices adjusted where disparities are identified.

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

Consumers will be able to submit complaints directly to an online case management system, which will also be accessible via Wrklegal.com, support email, or toll-free phone number. Upon submission, each complaint will generate an acknowledgment. Within three business days, staff will review the complaint and provide an estimated timeline for resolution. Staff will aim to resolve complaints within 14 business days. Unresolved or complex issues, such as those involving potential legal or ethical concerns, will be escalated to the Compliance Officer for further review. All submissions, communications, and outcomes will be logged within the case management system for audit purposes, allowing quarterly reporting of complaint trends and resolutions to the WSBA as part of the Entity Regulation Pilot Program.

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

Wrk Legal will maintain professional liability insurance at minimum coverage limits of \$100,000 per occurrence and \$300,000 for all claims, consistent with WSBA Pilot Project requirements, and will inform all clients of the firm's insurance status in writing prior to representation commencing, consistent with RPC 1.4(c). All client funds will be held in a dedicated trust account in full compliance with → RPC 1.15A and 1.15B, with no commingling of client and operating funds at any time, and the Compliance Officer will submit the annual trust account declaration to the WSBA as required. Wrk Legal will make financial records available to the WSBA upon request and will evaluate increasing coverage limits commensurate with caseload growth throughout the pilot period.

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

Yes

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

Yes. Wrk Legal will share data with Worklution Inc. pursuant to a software licensing agreement with Wrk Receipts, Worklution's workplace documentation platform. Any transfer of client data from Wrk Receipts to Wrk Legal will occur solely at the user's request and with the → user's informed consent. No client data will be shared with Worklution Inc. or any affiliated platform without explicit authorization from the client. Shared data will be logged for audit purposes and reviewed annually by the Compliance Officer

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

When a consumer requests a referral to complementary services, such as insurance or legal assistance for a complex situation, Wrk Legal will share the necessary client data with the referral partner, with the consumer's knowledge and consent. Any data sharing will require user consent, be logged for reporting and audit purposes, and be clearly disclosed to the customer, and will be facilitated at the customer's → request. Any referral partners will be required to agree to industry-standard confidentiality, restricted use, and data-handling practices prior to accessing shared data or receiving referrals. Shared data and related practices will be reviewed at least annually by the Compliance Officer. [REDACTED]

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

[REDACTED]

→ [REDACTED] Access to client information is further protected through role-based access controls and strict data permissions. Only attorneys and authorized personnel involved in the matter may access client information, and access is limited to what is necessary for representation. For matters involving co-counsel or affiliated third-party attorneys in other jurisdictions, Wrk Legal requires those attorneys to conduct independent conflict checks consistent with their applicable Rules of Professional Conduct. Written co-counsel agreements require confirmation of conflict clearance and compliance with all jurisdictional ethical requirements before engagement. Client consent to any fee division or co-counsel arrangement is obtained in writing where required. These layered procedures are designed to protect client confidentiality, preserve impartiality, and ensure full compliance with professional responsibility obligations.

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.

Wrk Legal is structured separately from its technology partner so that all legal judgment and client representation decisions are controlled exclusively by licensed Washington attorneys who are bound by the Rules of Professional Conduct. The firm operates on a contingency-only model, aligning its financial incentives with client recovery rather than volume or upfront billing. Governance documents expressly reserve authority over case evaluation, litigation strategy, and settlement recommendations to attorneys, and clients retain ultimate authority over whether to accept or reject settlement offers. Nonlawyer owners or affiliated technology partners have no authority to direct legal strategy, influence settlement decisions, or control case selection based on financial considerations. Written independence policies prohibit interference with professional judgment, and any fee-sharing arrangements occur at the entity level without affecting attorney control over individual matters.

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

Domonique Price

Title

Compliance Officer

Entity

Wrk Legal LLC

City where certifying

Seattle

State where certifying

WA

Today's Date

3-6-2026