

## A.2. Public Comment Letter From Ms. Doi

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**From:** Genie Doi [<mailto:genie@immigrate.la>]  
**Sent:** Thursday, June 20, 2019 10:04 AM  
**To:** ATILS  
**Subject:** Public Comment

Hello,

I would like to comment on the ATILS Rec. B. 2. - "Add an exception to the prohibition against the unauthorized practice of law permitting State-certified/registered/ approved entities to use technology-driven delivery systems to engage in authorized practice of law activities."

Disclaimer: I was unable to read the committee's reasoning for this recommendation because there is a problem with the PDF (see attached screenshot).

I love technology and leverage it where possible in my legal practice to create efficiency, lower costs, and thereby increase access to legal representation in my community. However, speaking on behalf of the immigration bar, allowing for-profit non-lawyers to provide immigration services would absolutely result in predatory consumer practices and life-altering outcomes for foreign nationals seeking to immigrate to the United States legally.

1. Tech entrepreneurs are by nature risk takers. They will encourage clients to take risks with the promise of high reward and low cost. Lawyers, by contrast, are trained to mitigate risk and will advise accordingly. In today's political environment, filing risky immigration applications can lead to life-altering consequences like deportation.
2. Tech entrepreneurs are primarily motivated by revenue generation. As non-lawyers, they owe no legal duty to the client. Lawyers, by contrast, are bound by law to act in the best interest of their client.
3. Legaltech startups may be here today, gone tomorrow—immigration applications sometimes take years to conclude. Lawyers, by contrast, are legally required to see a client through the end of each matter.
4. Immigrants are already a vulnerable community that is being preyed upon by bad actors engaged in the unauthorized practice of law.

Case in point: <https://www.passright.com/>

- for-profit non-lawyer engaged in lots of marketing and advertising that incorporates legal advice
- the business apparently partners with lawyers, but the marketing of this service violates attorney advertising rules
- not only that, the advertising makes [dubious claims](#) about obtaining green cards in 3 weeks
- consumers are clearly [confused](#) as to whether the founder is a lawyer or not

I used to consult for this company and had to end my ties due to their refusal to abide by ethical standards.

Thank you for your consideration.

**Genie Doi**  
Attorney at Law  
424.254.7972



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**The file "5. Recommendation\_Lawyers in traditional practice and law firms perform legal and law related services under the current regulatory framework with the intention of expanding access to justice through innovation with the use of technology (1).pdf" could not be opened because it is empty.**

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