



# The State Bar of California

CLOSING

II.D. Proactive Regulation  
12-01-21 CTJG Meeting  
Open Session

WORKING GROUP

**DATE:** November 24, 2021

**TO:** Closing the Justice Gap Working Group

**FROM:** Bridget Gramme, Deputy Chief of Programs

**SUBJECT:** II.D. Recommendation re Proactive Regulation and Monitoring of Sandbox Providers, including Reporting, Monitoring, and Audits

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## INTRODUCTION

CTJG's recommendations for proactive regulation are intended to serve as the pillars of a robust regulatory system that ensures public protection by actively monitoring sandbox providers as they test new models of legal services delivery.

At the SAGE subcommittee's November 3, 2021 meeting, the group reflected on the full working group's October 18, 2021 discussion of specific methods and tools the regulator should use to monitor sandbox providers under the risk-based regulatory approach. The subcommittee concluded that a set of recommended minimum requirements for the regulator, combined with illustrative appendices containing more detail as to the proposed methods and tools, would enhance the recommendation and – if approved – the final report.

Accordingly, staff has prepared a recommendation for minimum requirements of proactive regulation in the sandbox, which includes a description of specific methods and tools, as well as the proposed appendices, for the full working group approval.

Working group members are asked to review the proposed recommendation, as well as the appendices, and submit written comments by **Tuesday November 30 at 10:00 am.** so that staff can circulate them in advance of the meeting.

## PROACTIVE REGULATION TOOLS: REPORTING, MONITORING, AND AUDITING

As a reminder, traditional regulation uses primarily reactive tools to regulate licensees: the regulator receives a complaint about potential harm, investigates the complaint, and then after a hearing process imposes some form of discipline on the licensee.

The tools used for proactive regulation are different. In a sandbox environment where the legal services might be provided under modified rules or by an entity that is not a law firm, proactive tools are implemented according to the level of risk to maximize consumer protection. These

methods are designed to prevent harm from occurring in the first instance. While the regulator will still receive and investigate consumer complaints, and discipline or other corrective action will be imposed, the regulator will not wait for a complaint before investigating.

At its October 18, 2021 meeting, the full working group identified the following risks of harm to consumers that will form the basis of the proactive regulatory approach in the sandbox:

1. The consumer receives inaccurate or inappropriate legal services.
2. The consumer fails to exercise legal rights through bad advice or incomplete information within the scope of the agreed-upon services.
3. The consumer receives an unnecessary legal service or pays an inappropriate amount for legal services.
4. The consumer experiences fraud, theft, loss of privacy, or abuse of trust by the service provider.

The SAGE subcommittee discussed the importance of designing the recommended proactive tools in a way that balances the proportional risk of harm to consumers with the burden that the proactive regulation (such as data reporting requirements) may impose on potential sandbox applicants – particularly nonprofits and small businesses.

Keeping this in mind, the following recommendation contains several components, which will be the minimum requirements for proactive regulation in the sandbox. The attached appendices are designed to provide illustrative examples of how the minimum requirements might be implemented, recognizing that the regulator will ultimately operate to ensure public protection.

## RECOMMENDATION

**Proposed Recommendation:** Recommend that the regulator implement any or all of the following proactive tools to minimize the risk to consumers:

### 1. RISK ASSESSMENT

The regulator must establish a uniform approach for assessing and measuring consumer risk relative to the risk of harm to determine eligibility to enter the sandbox.<sup>1</sup> The regulator will screen each applicant and assign a level of risk according to established criteria. The assigned risk level will determine the level at which the other regulatory tools below (such as data collection and reporting requirements) will be utilized, subject to modification based on ongoing risk assessment. The general principle for the risk assessment is that the further the

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<sup>1</sup> On October 18, the working group approved the following recommendation: “For the purpose of admission to the sandbox, the risk of harm to consumers should be measured relative to the experience the consumer would have had absent the legal services provided. In addition, the applicant must demonstrate the capacity to provide competent legal service.” Note this is a standard for assessing the level of risk for purposes of entry into the sandbox; it is not a standard of care for which providers will be held for purposes of discipline, malpractice liability, etc.

applicant's proposed service model is from traditional, existing legal service models, and the more complex the nature of the service provided becomes, the higher the level of assigned risk.

**Appendix I** provides detail as to how the risk assessment will operate, and also provides illustrative examples of how the risk assessment would apply to potential applicants.

## **2. DETAILED AUTHORIZATION ORDERS**

After the regulator screens an application and assigns a risk level to the applicant, it will compile a detailed summary document for the Supreme Court, including the proposed model and service; the specific rules and/or statutes for which it seeks an exemption; the proposed method of training/ supervision for employees; consumer service area; target consumer market; the reason the applicant cannot otherwise operate under existing rules; and the risk assessment. This document will also include a specific recommendation from the regulator which includes, at a minimum, the scope of permitted practice, quality assurance mechanisms, the term of the authorization, the recommended service model, and the recommended data reporting requirements.

If the Supreme Court approves the recommendation of the regulator, or a modified version thereof, the Court will, issue a detailed Authorization Order, which will be prominently posted on the regulator's website alongside the authorization order for every other authorized entity operating in the sandbox. The Order will enumerate the authorized practice for each applicant, including the specific practice areas, the specific rules and laws that are waived, methods for supervising nonlawyer providers, the specific disclosures the entity must make to consumers, the assigned level of risk, and the data reporting and other requirements for each. It will be important that the order be precise and easily understandable to the consumer.

**Appendix II** provides an illustrative example of a detailed Authorization Order demonstrating the level of detail that should be provided for each approved entity.

## **3. REGULAR REPORTING AND MONITORING**

An applicant's authorization to enter the sandbox must be conditioned on compliance with mandatory reporting requirements so that the regulator may assess the data and evaluate that the sandbox goals are being accomplished and the consumer is not being harmed. The frequency (quarterly vs. monthly) would depend on the assigned risk. Data reported may also vary by risk but may include number and content of consumer complaints, number of people served, geographic information, revenue, and financial and substantive outcomes for clients. Annual reporting may also be required to confirm ownership and controlling financial interests in the entity as applicable.

The regulator must regularly communicate with the sandbox participants to discuss the reported data, including trends, concerning spikes, etc. There should also be a discussion about any complaints received, and efforts made to address them. The regulator must develop a standardized method of data collection so that data may be regularly and accurately analyzed. The aggregate, de-identified data will be publicly available and included in regular reports from

the regulator to the Supreme Court and the Legislature to keep them apprised of sandbox activity, including number of consumers served, consumer complaints, demographics, practice areas, outcomes, etc.

In addition to data collection and analysis, the regulator must also conduct regular audits to test for legal quality and accuracy of the services provided by nonlawyers or software. The frequency and detail of the audits may be adjusted based on level of risk.<sup>2</sup> The regulator may appoint a panel to review and consider the audits, including expert review of redacted case files to ensure continued consumer protection. The regulator shall develop a standardized form for the auditors to use to ensure the needed data is consistently audited and available for analysis.

**Appendix III** provides an illustrative example of the type and frequency of data to collect, information provided to applicants pertaining to the collection of data, and a sample standardized audit form. The regulator would adopt the final document based on all the parameters approved by the Board of Trustees, the Legislature and the Court.

#### **4. REQUIRED CONSUMER DISCLOSURES**

Consumers of legal services must be notified that they are receiving services from a sandbox provider in two ways:

- **Digital Badges:** All approved sandbox providers will receive a digital “badge” from the regulator which must be prominently displayed on all advertisements, social media, websites, service platforms, and physical locations to signify authorization to operate. The badge must contain information about how to file a consumer complaint and a link to the regulator’s website.
- **Disclosure Requirements:** All approved sandbox providers must provide specified disclosures to consumers in accordance with their service model. For example, they must advise consumers that the entity is not a law firm, is owned by nonlawyers, or is not a lawyer, as applicable. Additionally, sandbox providers may be required to include a disclosure advising clients that a free attorney through local legal services organizations may be available to those who qualify.<sup>3</sup> They must advise the consumer of the parameters of their authorized model. Such disclosures would be posted on the entity website, advertising, and service platform, and incorporated into terms of service or engagement letters.

**Appendix IV** provides an illustrative example of a digital badge and disclosure language.

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<sup>2</sup> Quality audits are another example of the way in which proactive regulation differs from the existing complaint-based model of regulation for individual attorneys; currently the State Bar does not conduct random quality audits of attorney work product.

<sup>3</sup> Note that a similar disclosure requirement is included in the recommendations for the California Paraprofessional Program, as developed by the California Paraprofessionals Program Working Group.

## 5. ADDITIONAL SECURITY MEASURES

In addition to the mechanisms described above, the regulator should also implement additional security measures to ensure consumer protection as follows:

- **Security for Claims Requirements:** The regulator should establish a mechanism for reimbursing clients who may be harmed by an entity operating the sandbox. This might include bonding, insurance, or a common restitution fund, similar to the Client Security Fund.
- **Secret Shopper Programs:** The regulator should be authorized to conduct secret shopper studies on sandbox entities as needed to evaluate the quality of the service received. The regulator should establish a clear policy defining the process and setting forth the circumstances in which this program might be utilized.
- **Robust Consumer Complaint Mechanisms:** The regulator must maintain a robust and timely system for accepting and processing consumer complaints, including potentially an ombudsperson who would be assigned to walk complainants through the process, and identify areas for the regulator to proactively investigate to ensure consumer protection. Additionally, each sandbox participant should be required to maintain its own mechanism for tracking and resolving consumer complaints, and report complaints received to the regulator on a regular basis.
- **Customer Satisfaction Surveys:** In addition to the regular data reporting requirements described above, the regulator should develop a mechanism for assessing customer satisfaction. For example, it might require approved entities to include a customer satisfaction survey at the end of each engagement (or if a high volume entity, a specified percentage of their engagements) and include responses in regular reports to the regulator.





## APPENDIX I. RISK ASSESSMENT

The risk assessment by the sandbox regulator considers how different a provider's service will be from the "traditional" model of the provision of legal services. Both the nature of the service and the stakes of the case to the client are a part of this evaluation. Thus, a lawyer-owned firm that provides legal services by lawyers or nonlawyers who are supervised by lawyers would be the lowest risk service model. The risk level would rise as lawyer involvement in the provision of legal services decreased. Conceptually a firm in which a lawyer shared ownership with a non-lawyer but in which the lawyer still held a majority interest in the firm would be a higher risk but still relatively lower than if a non-lawyer had a controlling interest. In classifying the risk inherent in the nature of a proposed service, the sandbox regulator's assessment would include an evaluation of the specificity of the legal advice to be offered. The lowest risk would be basic legal information, which in theory applies to all potential clients (e.g., a client's general inquiry on how to incorporate a family business in California). As the issues become more complex and the specific facts of the client's situation become more relevant to the analysis, the risk level rises. Thus, in-court representation in litigation, in which particular facts of the case dictate very different legal strategies, would be a much higher risk than a basic transactional matter. Finally, the stakes of the service could increase the risk level. For example, a firm providing no contest divorces would be lower risk compared to a firm dealing with child custody disputes.

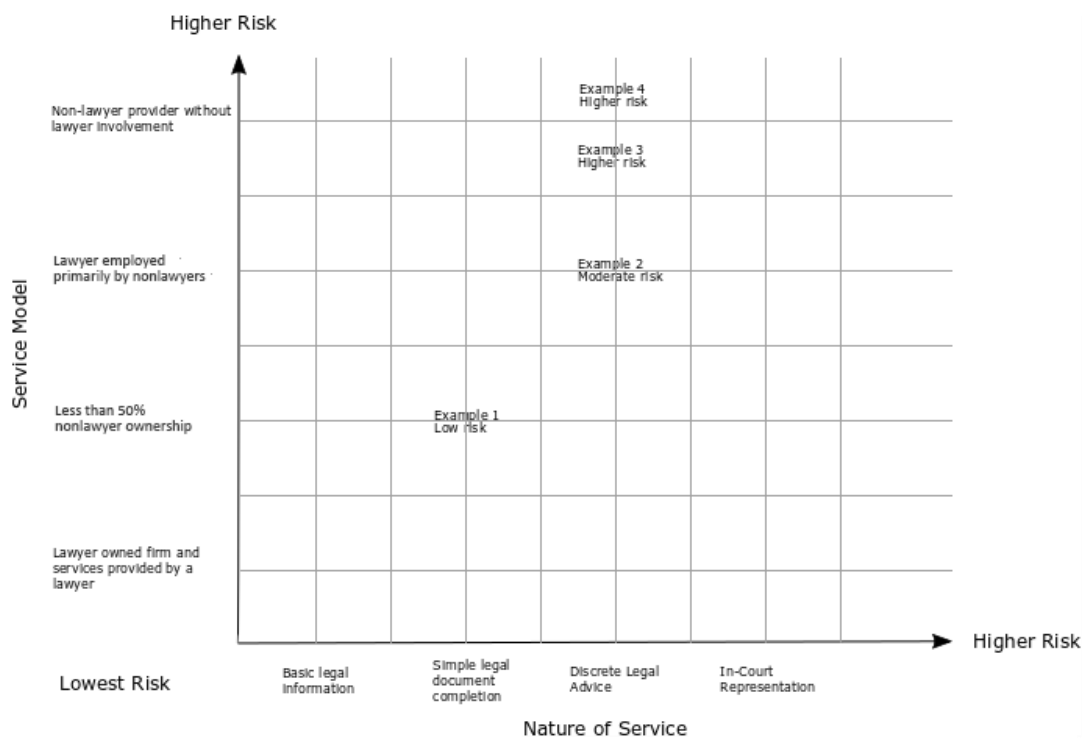
### Consider four hypothetical applicants to the sandbox:

**Example 1:** A traditional law firm in which the lawyer owns 51% but shares ownership with his paralegal (49%), and the paralegal handles only simple tasks, such as basic document completion. This applicant would be considered low risk since the lawyer still holds a controlling interest in the firm and the lawyer must supervise the paralegal as in any traditional law firm.

**Example 2:** A non-profit business in which social workers provide basic legal information and limited scope legal advice on dealing with debt collection, but a lawyer provides extensive training to the social workers. This would be categorized as a moderate risk on the service model and a low-risk on the nature of the service.

**Example 3:** A nonlawyer provides information and advice on immigration laws and prepares immigration documents for filing in court by self-represented parties. This applicant would likely be high risk due to the significant stakes of these matters (e.g., potential deportation) and the nature of service (i.e., marshalling law and facts to prepare court documents).

**Example 4:** A company provides self-represented parties assistance in uncontested divorce cases through a technology-driven online form completion service that uses an interface which asks a series of questions similar to income tax completion applications that are commonly used by consumers. If this software-based model does not involve lawyers directly providing its service, it would be classified as high risk even though the stakes for an uncontested divorce would be moderate risk, but the company could reduce its risk profile by having an in-house lawyer review the advice given to clients.







# The State Bar of California

## APPENDIX II. SAMPLE DETAILED AUTHORIZATION ORDER

### COURT ORDER

In the Supreme Court of California

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In re: Application of Legal Help for Californians

### ORDER FOR AUTHORIZATION TO PRACTICE LAW

*Based upon the California Supreme Court's plenary and constitutionally granted authority to regulate the practice of law in California, and the tenets of Standing Order XX, the California Supreme Court orders that Legal Help for Californians is authorized to practice law within the regulatory sandbox and subject to the restrictions outlined below.*

The Court has reviewed the recommendation of the Regulator dated November 29, 2021 for Legal Help for Californians to be authorized to practice law.

Legal Help for Californians is a 501(c)(3) nonprofit organization serving families in the San Francisco Bay Area and Los Angeles area. Legal Help for Californians proposes offering legal services alongside the health services it already offers. The legal services will be provided by nonlawyer Community Health Workers ("CHWs"), an established role within Legal Help for Californians. Specifically, Legal Help for Californians proposes training CHWs to become bilingual medical debt legal advocates ("MDLAs") to provide limited-scope legal assistance related to medical debt and its collateral issues.

CHWs within Legal Help for Californians already provide holistic services related to the variety of issues arising within and related to health problems. Their role is to serve as a bridge between patients, health care providers, and social service providers. CHWs in the proposed program will be able to offer limited-scope legal assistance as part of that holistic service offering and address medical debt legal issues immediately and comprehensively. The legal assistance offered by MDLAs includes legal advice on addressing medical debt, assistance in identifying, completing and filing relevant paperwork, and assistance in negotiation with creditors.

The Regulator has assessed the risk of harm to Legal Help for Californians' targeted consumers relative to the risk of harm they currently face and has determined that the risk of harm presented by Legal Help for Californians' services is MODERATE.

In light of the Court's responsibility to the public to effectively regulate the practice of law in California and in keeping with the tenets of Standing Order XX, the Court now orders as follows:

1. Legal Help for Californians is authorized to offer legal services through the following models:
  - a. Nonlawyer provider with lawyer involvement
    - i. Nonlawyer providers may only offer the following services:
      1. Legal information;
      2. Legal process assistance;
      3. Form completion assistance;
      4. Legal advice related to resolution of medical debt; and
      5. Negotiation on behalf of the consumer.
    - ii. Lawyers must be involved with the nonlawyers providing the above-mentioned legal services in the following ways:
      1. Assessing nonlawyer providers' knowledge and skills before and after they have received training;
      2. Developing substantive and procedural curriculum for nonlawyer provider training;
      3. Conducting training for nonlawyer providers;
      4. Developing checklists for nonlawyer providers to use while delivering services;
      5. Conducting regular quality checks of services provided; and
      6. Providing ongoing availability for assistance to nonlawyers.
2. Legal Help for Californians is only authorized to provide legal services for medical debt legal issues including: legal advice and assistance with medical insurance issues; medical services bills or debt; and legal issues involving Medicaid, Medicare, and financial services available to people experiencing medical debt.

3. To the extent that Legal Help for Californians' service model could be found to implicate California Rule of Professional Conduct 5.3, the Court waives application of that rule as to lawyers overseeing MDLAs for Legal Help for Californians.
4. Legal Help for Californians shall conform to the MODERATE risk reporting requirements imposed by the Regulator.
5. Legal Help for Californians will prominently display the following disclosure requirements as set forth in the attached manual:
  - a. Regulator Badge
  - b. Nonlawyer provider disclosure

If Legal Help for Californians wishes to alter these conditions or requirements, it must submit any such change to the Regulator for further assessment. The Regulator will assess the proposed change and may permit the change if it deems the change does not materially increase the risks to consumers. If the Regulator finds a material increase in risk then it will present the issue to the Court for further consideration.

This authority is granted for an initial period of XX months from the date of service launch as confirmed by the Regulator with the possibility of extension or permanent authorization. This authority and any such extension or permanent authorization is subject to Legal Help for Californians' compliance with the conditions and requirements set forth in the Regulator Manual and the Regulator Recommendation to the Court and also to a verification by the Regulator that Legal Help for Californians has a record of compliance with all requirements and the company's services are not causing harm to consumers.

DATED this 1st day of December, 2021.

A handwritten signature in black ink, appearing to read 'John B. Smith', written over a horizontal line.

John B. Smith, Chief Justice





## APPENDIX III. REPORTING AND MONITORING<sup>1</sup>

### A. PROVIDER REPORTING

#### 1. ANNUAL ENTITY REPORTING

Sandbox authorized entities will have certain annual reporting / certification requirements, confirming the identity and ownership share of those with controlling interests in the entity, and the identity of those individuals responsible for certifying the accuracy of the services delivered and compliance with the rules of the Sandbox.

#### 2. DATA REPORTING REQUIREMENTS

Entities authorized to offer services in the Sandbox are subject to regular data reporting requirements. **Continued authorization to offer services in the Sandbox is contingent upon compliance with the applicable data reporting requirements prescribed by the Regulator.** Any false or misleading statements made by entities or their members in interactions with the Regulator, including reporting of data, whether discovered at the time or at any time afterward, will be independent grounds for regulatory enforcement, including termination of authorization, and an aggravating factor in any enforcement proceeding based on other conduct.

This reporting includes the following fields (subject to updating). Where applicable, the requirement includes reporting on all matters pending? during the reporting period:

- ☐ Sandbox Participant Code
- ☐ Customer Number
- ☐ Service Provider
- ☐ Consumer Service Category
- ☐ Legal Problem / Matter
- ☐ Service Status (in progress, completed, etc.)
- ☐ Start Date
- ☐ Scope of Service Sought
- ☐ Scope of Service Received
- ☐ End Date
- ☐ Elapsed Time to Complete Transaction/Service
- ☐ Legal Process Outcome(s)

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<sup>1</sup> This provides an illustrative example of the type and frequency of data to collect, information provided to applicants pertaining to the collection of data, and a sample standardized audit form. The regulator would adopt the final document based on all the parameters approved by the Board of Trustees, the Legislature and the Supreme Court.

- ☐ Financial Outcome(s)
- ☐ Amount Customer Paid/Cost to Customer
- ☐ Customer Complaint/Service Feedback
- ☐ Customer Complaint Resolution Outcome
- ☐ Time to Resolve Complaint
- ☐ Customer Demographic Data

The Regulator will share the reported data regularly with the Regulatory Board and the Supreme Court to keep these decisionmakers apprised of the Sandbox activity. The Regulator may also share reported data with external research teams which enter into research agreements with the Court. Any data shared will be anonymized (i.e. the entity's name and any other identifying information will be removed). The Regulator will also report annually to the Legislature on the data collected.

The specific data each entity will be required to produce will be initially determined according to the assigned risk assessment level (low/moderate/high) upon entry to the sandbox. Staff of the Regulator has developed a continued threshold-based framework for rating the actualized risk (evidence of consumer harm) of each entity based on the analysis of the relevant reported data. Data collected such as time to complete service, unfinished or abandoned transactions, failed transactions, legal process outcomes, financial outcomes, and client satisfaction surveys will be used to measure the risk of harm to consumers. In addition, data collected will also be analyzed to show whether the access to justice gap was reduced and whether authorized entities managed risks to consumers. The data requirements may change depending on the continued assessment of the risk of harm while operating in the sandbox.

### **3. DATA REPORTING FORMAT**

The Regulator will assign a risk categorization for each sandbox entity according to the framework described above. For each approved service area, the entity will submit case level data as follows. The Regulator will provide the entity with a template with specific data fields and corresponding operational and technical definitions (see Excel template as an example).

The Regulator has developed detailed data reporting templates and protocols to facilitate entity reporting (see Excel template). There is one template/protocol for LOW and LOW / MODERATE risk entities and one template/protocol for MODERATE and HIGH risk entities. Those templates include required codes for data entry across the above-listed fields. Entities must use the codes supplied by the Regulator to describe the legal services provided. Entities will report data at the case level. Entities are not permitted to provide their own descriptions of the services provided. Failure to comply with the coding requirements is considered an indicator of increased risk of consumer harm and could result in suspension or termination of authorization.

### **4. DATA REPORTING PERIODS**

All Sandbox authorized entities are required to collect and report the number of people served, geographic information of people served, revenue/receipt information, and all consumer

complaints. Low risk Sandbox authorized entities will report on a quarterly basis. Low/moderate risk Sandbox authorized entities will report on a monthly basis. Moderate and high risk Sandbox authorized entities will report on a monthly basis. (See, Figure 1. Data Reporting Periods Based on Entity Risk Categorization.) Data reports must be submitted by the 5th of each applicable reporting month as an Excel file (.xlsx or .xls) via email.

*Figure 1. Data Reporting Periods Based on Entity Risk Categorization*

RISK	NUMBER OF PEOPLE SERVED	GEOGRAPHIC INFORMATION	REVENUE/ RECEIPT INFO	ALL CONSUMER COMPLAINTS
LOW RISK	Quarterly	Quarterly	Quarterly	Quarterly
LOW TO MODERATE	Monthly	Monthly	Monthly	Monthly
MODERATE	Monthly	Monthly	Monthly	Monthly
HIGH	Monthly	Monthly	Monthly	Monthly

## B. COMPLIANCE AUDITTING

Moderate and high risk entities are required to submit to auditing by the Regulator. The purpose of the audits is to test for the legal quality and accuracy of services provided by nonlawyer humans or software. The audit data will be incorporated into the overall actualized risk assessment conducted by the Regulator. Audits will be conducted as follows:

- Moderate
  - First 20 completed services in each authorized service area
  - The Regulator may require additional service audits to better understand potential harms, if original audits findings indicate a possible harm.
- High
  - First 40 completed services in each authorized service area
  - The Regulator may require additional service audits to better understand potential harms, if original audits findings indicate a possible harm.

The Regulator has developed a standardized audit template to facilitate accurate reporting (see Figure 2. Sample Audit Form). Auditors must select from the options provided by the Regulator to answer each question. Respondents are only permitted to provide their own responses where indicated. The Regulator may review the audit template and the information provided with sufficient notice to the regulated entities.

The Regulator will create an Audit Panel of California lawyers who are trained in using the audit protocol developed by the Regulator. Lawyer members of the Audit Panel will be compensated for the audit services. Each service file will be reviewed by two independent members of the Audit Panel. Auditors will not be informed of the identity of the entity for which they are conducting the audit and are required to maintain confidentiality of the audit protocol and data.

Figure 2. Sample Audit Form

<b>Audit Form</b>
<b>Entity ID</b>
<b>Customer ID</b>
<b>Service ID</b>
<b>1) Overall, how would you rate the result(s) of the legal service?</b>
<Select from drop-down list>
<b>2) Overall how would you rate the identification of consumer legal right(s)?</b>
<Select from drop-down list>
<b>3) Overall how would you rate the exercising of consumer legal right(s)?</b>
<Select from drop-down list>
<b>4) Overall how would you rate the necessity of the purchased legal service?</b>
<Select from drop-down list>
<b>5) Overall how would you rate the appropriateness of the purchased legal service?</b>
<Select from drop-down list>
<b>6) Comments on the quality of service provided.</b>
<b>7) Comments regarding poor or very poor service ratings (results, rights, or purchase), if applicable.</b>

**Note: For questions 1–5, responses are limited to the options listed in the drop-down which include the following: Excellent, Good, Adequate, Poor, Very Poor, and Not Applicable.**





## APPENDIX IV. CONSUMER DISCLOSURES

### A. BADGES

All authorized entities are required to use the digital “badge” provided by the Regulator on all advertisements, social media, websites, service platforms, and at physical locations to signify authorization to operate. The badge must also contain information on how to access the limits of the services authorized, how to file a consumer complaint and a link to the regulator’s website. Failure to display the badge will be considered evidence of noncompliance and consumer harm.

This will facilitate consumer knowledge and confidence and will provide question / complaint information. Regulators in Utah and the UK have developed a similar “badge” for regulated legal service entities. See examples below.



Figure 1. Utah Office of Legal Services Innovation



Figure 2. UK Solicitors Regulation Authority

### B. DISCLOSURE REQUIREMENTS

The following disclosures are required depending on the category of service model authorized. These disclosures must be made available at all physical locations, posted on the entity website, advertising, and service platform, incorporated into terms of service or engagement letters, and provided to potential clients. Failure to provide these disclosures will be considered noncompliance and considered evidence of consumer harm.

- **This is not a law firm. / This law firm is owned by nonlawyers.** Some of the people who own / manage this company are not lawyers. This means that some services / protections, like the attorney-client privilege, may be different from those you could get from a law firm.
  - If you have questions, please contact us at \_\_\_\_\_.

- **This service is not a lawyer. The product / service you have selected is not being provided by a lawyer.** This means:
  - Someone involved with you or with your legal issue, including people on the other side of this case, could be using this service as well.
  - We could be required to disclose your communications (such as questions and information submissions), for example in response to a subpoena.  
If you have questions, please contact us at \_\_\_\_\_.
- **Alternative services may be available to you.** Free legal services from a local legal aid organization may be available to you if you qualify for their services.
- **This service is regulated by the [California Legal Regulatory Sandbox Regulator], and is only authorized to deliver specific services.** For more information or to file a complaint go to [website].