

# ALTERNATIVE BUSINESS STRUCTURES COMMITTEE



**Location:** Conference room 109 / Zoom  
**Date:** Tuesday, July 9, 2024  
**Time:** 10:00 A.M.  
 State Courts Building  
 1501 West Washington Street  
 Phoenix, Arizona 85007

*For any item listed on the agenda, the Board may vote to go into Executive Session for advice of counsel (under ACJA Sec. 1-202(C)(5)(c)) or for discussion or consideration of records or matters made confidential or privileged by statute, court rule, or the Arizona Code of Judicial Administration (under ACJA Sec. 1-202(C)(5)(b))*

Member Attendance	In Person	Zoom	Absent
Hon. Charles Harrington (Chair) (Retired)			X
Hon. Anni Hill Foster (Vice Chair)	X		
Katie Bryant		X	
Steve German			X
John Hay	X		
Andy Kvesic	X		
Lynda Shely		X	
Martin Shultz			X
Mike Widener			X
Tracy Ward		X	
Patrick Barnes	X		

Staff	Guest	Guest
Aaron Nash	Genesis Legal Group	JC Guerro
Marquita Brazil	Richard Traulsen	Jennifer Woolf
Ryan Lincoln	Sunny S. Dhillon	K. Goode
Daisy Cambron-Perez	Sophia	Katya Fisher
	MS	Lance
	Reid Potter	Louis Kachulis
	Monica	Lourdes Espinal
	Dan Mori	Lucian Pera
	Camille Bass	Brianne Wolcott
	Evan Bortz	Luke Dyas
	Patricia Sallen	Matthew Rasmussen
	Jessica W.	Michael DiMori
	Thomas Arthur	Monica Singh
	Sara Anzalone	Neil Peretz
	Dean Steffy	Read AI Meeting Notes
	Alexander S.	Sara
	Avi Goldenberg	Sara Dimmel
	Ashleigh Dowsell	SBS
	Mark Sullivan	Scott Hardy

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Carolina Johnson	Stephanie Long
Colleen Joyce	Dustin Ruge
Carson Brien	Carl Engstrand
Deborah Kogok	Cecillia Dubravec
Eiegler	Tim Keating
GS	Suzanne Porter
Helen Russell	William Gould
Holly Ayala	Jessica Kemper
Iphone	Richard Christesen
Jack Newsham	James Hansen
Jack Rives	Laura Ruhl
Mark Rubin	Wendy Culbertson

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*Call To Order.....Hon. Anni Hill Foster (Vice Chair)*

**1) Review and Approval of Meeting Minutes..... Hon. Anni Hill Foster (Vice Chair)**

*1-A: Review, discussion, and possible action regarding approval of the regular session minutes of the meeting of June 11, 2024.*

**Motion:** Approve the regular session minutes of the June 11, 2024, meeting.

**Motion Proposals:** First: Andy Kvesic  
 Second: John Hay

**Recused:**

**Pass/Fail:** Pass 7-0-4

**2) Welcome New Members.....Hon. Anni Hill Foster (Vice Chair)**

*2-A: Update on Committee Members*

**Discussion:** The Committee welcomed new members Miles Lynk and Kieth Swisher to the board of Committee. (New Committee members were not added, this was a Division oversight related to a recent ABS task force appointment and not a committee appointment)

**3) Initial License Applications .....Ryan Lincoln**

*3-A: Review, discussion, and possible action regarding application for initial licensure as an alternative business structure for the following applicants with the following conditions:*

- i. ABSs compliance lawyer shall conduct semi-annual audits to review the firm’s compliance with Arizona Supreme Court Rule 33.1, ACJA § 7-209, and its internal policies and procedures and at the completion of each audit prepare and retain a written report of the findings.*
- ii. Pursuant to Rule 33.1, upon the Committee’s determination of whether to recommend licensure, the application and the Committee’s determination shall be forwarded to the Supreme Court for review and further action.*

- 1. Trident Legal, PLLC

2. Consumer Defense Partners, LLC
3. Aracor Law, LLC
4. My Visa Source Legal Corp

1. Trident Legal, PLLC

**Discussion:** Dean Steffy and Alexander Shunnarah were present via Zoom, representing Trident Legal, PLLC, and addressed the Committee.

**Motion:** Approve the initial application for Trident Legal, PLLC with the Division’s recommended conditions.

<b>Motion Proposals:</b>	First:	John Hay
	Second:	Katie Bryant
<b>Recused:</b>		Lynda Shely
<b>Opposed:</b>		Patrick Barnes
<b>Pass/Fail:</b> Pass	5-1-5	

2. Consumer Defense Partners, LLC

**Discussion:** Wendy Culbertson was present in person, representing Consumer Defense Partners, LLC, accompanied by Sara Anzalone and Jessica Woolf via Zoom and addressed the Committee.

**Motion:** Approve the initial application for Consumer Defense Partners, LLC with the Division’s recommended conditions.

<b>Motion Proposals:</b>	First:	Patrick Barnes
	Second:	Lynda Shely
<b>Recused:</b>		Andy Kvesic
<b>Pass/Fail:</b> Pass	6-0-5	

3. Aracor Law, LLC

**Discussion:** Richard Christesen was present in person, representing Aracor Law, LLC, accompanied by Katya Fisher via Zoom and addressed the Committee.

**Motion:** Approve the initial application for Aracor Law, LLC with the Division’s recommended conditions.

<b>Motion Proposals:</b>	First:	John Hay
	Second:	Tracy Ward
<b>Recused:</b>		
<b>Pass/Fail:</b> Pass	7-0-4	

4. My Visa Source Legal Corp

**Discussion:** Sunny Dhillon and Monica Singh were present via Zoom, representing My Visa Source Legal Corp and addressed the Committee.

**Motion:** Approve the initial application for My Visa Source Legal Corp with the Division’s recommended conditions.

**Motion Proposals:** First: Andy Kvesic  
Second: Lynda Shely

**Recused:**

**Pass/Fail:** Pass 7-0-4

4) 4) **Renewal License Applications .....Daisy Cambron-Perez**

4-A: *Review, discussion, and possible action regarding application for renewal licensure as an alternative business structure for the following applicants:*

1. National Mass Tort & Class Action Law Firm PLLC Licensure period 11/6/2023-11/5/2024
2. LegalFi Law, LLC Licensure period 1/13/2024-1/12/2025
3. Novus Lex, LLC Licensure period 2/10/2024-2/9/2025
4. Vantage Law Firm, LLC Licensure period 1/13/2024-1/12/2025
5. Genesis Legal Group, LLC (name changed from HFC Legal, LLC, see agenda item 4-A) Licensure period 3/14/2024-03/13/2025.
6. Legal Help Partners, LLC Licensure period 08/25/2023-08/24/2024.

1. National Mass Tort & Class Action Law Firm PLLC Licensure period 11/6/2023-11/5/2024

**Discussion:** Laura Ruhl was present in person, representing National Mass Tort & Class Action Law Firm PLLC, and addressed the Committee.

**Motion:** Approve the renewal application for National Mass Tort & Class Action Law Firm PLLC with the Division’s recommended conditions.

**Motion Proposals:** First: John Hay  
Second: Andy Kvesic

**Recused:** Lynda Shely

**Pass/Fail:** Pass 6-0-5

2. LegalFi Law, LLC Licensure period 1/13/2024-1/12/2025

**Discussion:** Scott Hardy, Camille Bass, and Cecillia Dubravec were present via Zoom, representing LegalFi Law, LLC, and addressed the Committee.

**Motion:** Approve the renewal application for LegalFi Law, LLC with the Division's recommended conditions.

**Motion Proposals:** First: Andy Kvesic  
Second: Tracy Ward  
**Recused:** Lynda Shely  
**Pass/Fail:** Pass 6-0-5

3. Novus Lex, LLC Licensure period 2/10/2024-2/9/2025

**Discussion:** Representatives for Novus Lex, LLC were not present to address the Committee.

**Motion:** Approve the renewal application for Novus Lex, LLC with the Division's recommended conditions.

**Motion Proposals:** First: Andy Kvesic  
Second: Lynda Shely  
**Recused:**  
**Pass/Fail:** Pass 7-0-4

4. Vantage Law Firm, LLC Licensure period 1/13/2024-1/12/2025

**Discussion:** Brad Denton and Caren Dombrowski were present in person, representing RP Legal Group, LLC, accompanied by Ramin Ghaneeian and Ramtin Ghaneeian via Zoom and addressed the Committee.

**Motion:** Approve the renewal application for RP Legal Group, LLC with the Division's recommended conditions.

**Motion Proposals:** First: Andy Kvesic  
Second: Tracy Ward  
**Recused:**  
**Pass/Fail:** Pass 7-0-4

5. Genesis Legal Group, LLC (name changed from HFC Legal, LLC, see agenda item 5-A) Licensure period 3/14/2024-03/13/2025.

**Discussion:** James Hansen was present in person, representing Genesis Legal Group, LLC, and addressed the Committee.

**Motion:** Approve the renewal application for Genesis Legal Group, LLC with the Division’s recommended conditions.

**Motion Proposals:** First: John Hay  
Second: Patrick Barnes  
**Recused:** Andy Kvesic  
**Pass/Fail:** Pass 6-0-5

6. Legal Help Partners, LLC Licensure period 08/25/2023-08/24/2024.

**Discussion:** Mark Rubin was present in person, representing Legal Help Partners, LLC and addressed the Committee.

**Motion:** Approve the renewal application for Legal Help Partners, LLC with the Division’s recommended conditions provide Compliance Lawyer audit within six months.

**Motion Proposals:** First: Lynda Shely  
Second: Patrick Barnes  
**Recused:**  
**Pass/Fail:** Pass 7-0-4

**5) Licensee Updates .....Marquita Brazil**

*5-A: Review, discussion, and possible action regarding application for a change in name for:*

- 1. Genesis Legal Group, LLC (formerly HFC Legal, LLC)

**Discussion:** Genesis Legal Group, LLC representative James Hansen was present in person and addressed the Committee. Informational item.

**6) Administrative Items ..... Division Staff  
..... Marquita Brazil**

*6-A: Review, discussion, and possible action regarding recommended topics for Task Force/ Committee.*

- 1. Merger and acquisitions
- 2. Change to ten-year disciplinary action timeframes
- 3. Economic interest

1. Merger and acquisitions

**Discussion:** The Committee discussed this issue is troublesome and that maybe we don't need this because of the 10% or greater ownership which requires an application and an update. Hon. Anni Hill Foster stated we need a definition to decide what to do next. Suggestions to recommend adding this to the ACJA workgroup for redline.

**Motion:** Add this topic for the next upcoming agenda.

**Motion Proposals:** First: Andy Kvesic  
Second: Patrick Barnes

**Recused:**

**Pass/Fail:** Pass 7-0-4

2. Change to ten-year disciplinary action timeframes.

**Discussion:** The Committee discussed this could go either way. A reprimand can be considered a technical violation, and the lawyer can still practice law. For suspension or disbarment, a ten-year ban is appropriate. Perhaps a reprimand warrants less than a ten-year ban. A few members agreed that lawyers make mistakes and correct them. Others are not sure a reprimand should be disqualifying at all, depending on the circumstances. Being disbarred and later reinstated shouldn't matter – there should be a lifetime ban from being a Compliance Lawyer (CL) for an Alternative Business Structure (ABS). Technical suspensions, such as those for dues and Continuing Legal Education (CLE), should not result in a prohibition..

**Motion:** Get levels of discipline information from the State Bar. Staff to propose redline 7-209 changes.

**Motion Proposals:** First: Lynda Shely  
Second: Andy Kvesic

**Recused:**

**Pass/Fail:** Pass 7-0-4

3. Economic interest

**Discussion:** The Committee discussed the proposed redline changes from Division Staff. John Hay stated he liked the direction of the redline, however, (E)(1)(a)(3) could be drafted better to ensure that holding companies don't have to apply. Focus on obtaining the necessary information, so reconsider the wording related to "application." Lynda Shely informed that she was not opposed to obtaining information but did not like delving into the personal backgrounds of individuals who aren't directly involved in ABS decision-making. Judge Anni Hill Foster included that the terms Principal and Designated Principal are used interchangeably. And if you mean Designated Principal ("DP"), use it consistently or define DP to mean the same as Principal.

**Motion:** No motion was made. The Committee directed staff to rework the redline and bring it to the next agenda meeting.

*6- B: Division Updates*

**Discussion:** Director Aaron Nash issued a reminder to the Committee to review 7-201(I), the communication provision, which explains the role of members and how to refer external contacts to the AOC or the Division.

*6-C: Review, discussion, and possible action regarding an additional regular meeting to cover topics to be determined.*

**Discussion:** The Committee discussed to schedule an additional meeting in August and to restart work groups.

*6- D: Review, discussion, and possible action regarding the Task Force on Alternative Business Structures.*

**Discussion:** The Committee discussed having the workgroups up and running by the next meeting.

*6-E: Update on Alternative Business Structure program and Legal Paraprofessional program.*

**Discussion:** The Committee and Division staff discussed the updates for the Alternative Business Structures and Legal Paraprofessionals programs. Additionally, the Committee recommended additional information be added in the pending applications update.

**ABS:**

The Alternative Business Structures Unit reports the following as of June 27, 2024:

- 87 ABSs are currently active.
- The following are initial applications Under Review, or Not Started

ABS APPLICATION STATUS		
Age (Months)	Number of Applications	Percentage of total (%)
0-3 Months	17	42.5
4-6 Months	9	22.5
7-9 Months	12	30.0
10 months-1 year	2	5.0
<b>Total</b>	<b>40</b>	<b>100</b>
Avg Processing time (Initial) <b>6 Months</b>		

- For potential applicants that are utilizing a third party to pay applicable fees, please also include contact information for the Designated Principle. The Division has received payments-separate from the initial application- in which we lack sufficient information to determine the relevant application.
- Previous initial application Stats from June 11, 2024, committee meeting:

ABS APPLICATION STATUS		
Age (Months)	Number of Applications	Percentage of total (%)

0-3 Months	15	31.9
4-6 Months	9	19.1
7-9 Months	16	34.0
10 months-1 year	7	14.9
<b>Total</b>	<b>47</b>	<b>100</b>
Avg Processing time (Initial) <b>6 Months</b>		

**Legal Service Innovations (LSI):**

As of June 27, 2024, there are 65 licensed legal paraprofessionals holding a total of 67 licensed practice areas approved by the Board of Nonlawyer Legal Service Providers. LPs may be licensed to provide services in more than one practice area. Current practice area licenses:

- o 51 family law
- o 8 civil law
- o 8 criminal law
- o 0 administrative law
- o 0 juvenile dependency law (anticipated mid-2024)
- o 0 probate (pending)

In collaboration with Innovations for Justice (i4J), a joint venture with Denver University and the University of Arizona, LSI recently administered 14 certification exams to the first cohort of Housing Stability Legal Advocates and Domestic Violence Legal Advocates. These Community Based Justice Workers, once fully certified, will be employed with approved service agencies and under an attorney’s supervision, to provide legal aide to those who may not have easy access to justice.

*6-F: Update on Division application processing timeframes.*

**Discussion:** The Committee and Division staff discussed the updates for the Alternative Business Structures processing times. No further information was discussed.

**7) Call to the Public.....Hon. Anni Hill-Foster (Vice Chair)**

No public comments were made.

**Adjournment..... Hon. Anni Hill Foster (Vice Chair)**

The meeting adjourned at 12:07 pm.