

ALTERNATIVE BUSINESS STRUCTURES COMMITTEE



Location: Conference room 109 / Zoom
Date: Tuesday, August 13, 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	Constantine Venizelos	Fire Files. AI Notes
Marquita Brazil	Benjamin Pierce	Gary Gorman
Ryan Lincoln	Anna Grozdanov	IPhone 15
Daisy Cambron-Perez	Kevin Miller	Jack rives
	Michael Markos	Jeff Mosokowitz
	Raj Abhyanker	Jessica Kemper
	Andy Halaby	Louis Kachulis
	Bill Gould	Mark Rinechart
	Sergio De La Canal	Mark Sullivan
	Whitney Cunningham	N. Preston
	Tom Carse	SBS
	Paloma Neria	Teda
	Ryan Cavanaugh	Todd Richeimer
	Brad Denton	VU
	Casey	Jonathan Allred
	Catherine Kemnitz	Anudeep Sethee
	Colleen Joyce	Samuel Lake- Laubach
	Dustin Ruge	Stephanie Long
	Thomas Arthur	Mark R.
	LKB	Alex Chucri

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 July 9, 2024.

Motion: Approve the regular session minutes of the July 9, 2024, meeting.

Motion Proposals: First: John Hay
Second: Andy Kvesic
Recused: None.
Pass/Fail: Pass 7-0-4

2) Initial License ApplicationsDivision Staff

2-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. Trademarkia Venture Partners
- 2. LegalSifter Law, LLC
- 3. Constant Legal Group, LLC
- 4. GFO Law, LLC
- 5. LevelUp Law, LLC

.....**Ryan Lincoln**

- 1. Trademarkia Venture Partners

Discussion: Raj Abhyanker and Michel Markos were present in person, representing Trademarkia Venture Partners, and addressed the Committee.

Motion: Approve the initial application for Trademarkia Venture Partners with the Division’s recommended conditions.

Motion Proposals: First: John Hay
Second: Patrick Barnes
Recused: None.
Andy Kvesic,
Steve German
Opposed: German

Pass/Fail: Pass 5-2-4

Members explained their no votes by acknowledging that corrections to meeting materials were made on the record, but there were inaccuracies in the meeting materials.

.....**Marquita Brazil**

2. LegalSifter Law, LLC

Discussion: Kevin Miller and Anna Grozdanov were present in person, representing LegalSifter Law, LLC, and addressed the Committee.

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

Motion Proposals: First: John Hay
Second: Andy Kvesic
Recused: None.

Pass/Fail: Pass 7-0-4

Note: The Committee began discussing the application, then considered other applications to allow time for further review of the applicant’s materials before returning to the application for discussion and a vote.

.....**Ryan Lincoln**

3. Constant Legal Group., LLC

Discussion: Dean Benazelas was present in person, representing Constant Legal Group, LLC, accompanied by Ryan Cavanaugh via Zoom and addressed the Committee.

Motion: Approve the initial application for Constant Legal Group, LLC with the Division’s recommended conditions.

Motion Proposals: First: Steve German
Second: Andy Kvesic
Recused: Lynda Shely

Pass/Fail: Pass 6-0-5

.....**Marquita Brazil**

4. GFO Law, LLC

Discussion: Whitney Cunningham was present in person, representing GFO Law, LLC accompanied by Casey Gard via Zoom and addressed the Committee.

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

Motion Proposals: First: Andy Kvesic
Second: John Hay
Recused: None.

Pass/Fail: Pass 7-0-4

.....**Marquita Brazil**

5. Level Up Law, LLC

Discussion: Sergio De La Canal and William Gould were present in person representing Level Up Law, LLC and addressed the Committee.

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

Motion Proposals: First: Andy Kvesic
Second: Patrick Barnes
Recused: Lynda Shely

Pass/Fail: Pass 6-0-5

3) Renewal License ApplicationsDaisy Cambron-Perez

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

1. Eos Law, LLC - Licensure period 11/16/2023-11/15/2024
2. Arizona Immigration & Legal Services- Licensure period 06/30/2024-06/29/2025
3. Radix Professional Services, LLC- Licensure period 08/25/2023-08/24/2024
4. Legal Help Partners, LLC- Licensure period 08/25/2024-08/24/2025
5. First Law, LLC- Licensure period 03/15/2024-03/14/2025
6. Lawfty Legal PLLC- Licensure period 06/30/2024-06/29/2025
7. Wilkie Puchi, LLC - Licensure period 12/13/2023-12/12/2024
8. Axiom Advice & Counsel, LLC- Licensure period 05/19/2024-05/18/2025
9. McCormick Law Car Wreck Attorneys, PLLC – Licensure Period 03/14/2024-03/13/2025

.....**Ryan Lincoln**

Motion: Approve the renewal applications for Legal Help Partners, licensure period 08/25/2024-08/24/2025; First Law, LLC, for licensure period 03/15/2024-03/14/2025; Wilkie Puchi, LLC, licensure period 12/13/2023-12/12/2024; and McCormick Law Car Wreck Attorneys, PLLC, licensure period 03/14/2024-03/13/2025

Motion Proposals: First: Lynda Shely
Second: John Hay
Recused: None.

Pass/Fail: Pass 7-0-4

.....**Ryan Lincoln**

Motion: Approve the renewal applications for Eos Law, LLC, licensure period 11/16/2023-11/15/2024; Lawfty Legal, PLLC, for licensure period 06/30/2024-06/29/2025; Axiom Advice & Counsel, licensure period 05/19/2024-05/18/2025.

Motion Proposals: First: Andy Kvesic
Second: Patrick Barnes
Recused: Lynda Shely

Pass/Fail: Pass 6-0-5

.....**Ryan Lincoln**

Motion: Approve the renewal application for Arizona Immigration & Legal Services licensure period 06/30/2024-06/29/2025.

Motion Proposals: First: John Hay
Second: Patrick Barnes
Recused: Andy Kvesic

Pass/Fail: Pass 6-0-5

.....**Ryan Lincoln**

Motion: Approve the renewal application for Radix Professional Services, LLC licensure period 08/25/2023-08/24/2024.

Motion Proposals: First: Patrick Barnes
Second: Steve German
Recused: Lynda Shely
Andy Kvesic

Pass/Fail: Pass 5-0-6

.....**Ryan Lincoln**

4) Licensee UpdatesMarquita Brazil

4-A: Review, discussion, and possible action regarding a Change in Compliance Lawyer for:

- 1. 1787 Legal Group, LLC – Compliance Lawyer Change

Discussion: Benjamin Pierce was present in person representing 1787 Legal Group, LLC and addressed the Committee.

5) Administrative Items Division Staff

5-A: Update on Alternative Business Structures Program and Legal Service Innovations Program:

Discussion: The Committee requested additional details on pending applications. Division Staff, Marquita Brazil, provided an overview of the applications submitted for approval. Vice Chair, Hon. Anni Hill Foster, inquired about the status of twenty-nine applications that have been pending for nine months without apparent progress. Marquita Brazil responded that all applications are actively being processed and are in various stages of triage. She emphasized that none of the applications have been sitting idle for nine months without review. Marquita Brazil also noted that the Division is set to approve its one-hundredth ABS application during the September 10, 2024, meeting.

ABS:

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

- 90 ABSs are currently active.
- The following are initial applications Under Review, Not Started, Pending Information from the applicant or awaiting approval.

ABS APPLICATION Aging Report (August)		
Age (Months)	Number of Applications	Percentage of total (%)
0-3 Months	12	31.6
4-6 Months	9	23.7
7-9 Months	14	36.8
10 months-1 year	3	7.9
Total	38	100

Not Started **29** | Pending more information from applicant **4** | Presented for Approval **5**

- Previous initial application Stats from June 11, 2024, committee meeting:

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
Total	40	100
Avg Processing time (Initial) 6 Months		

Legal Service Innovations (LSI):

As of July 15, 2024, there are 68 licensed legal paraprofessionals holding a total of 72 licensed practice areas approved by the Board of Nonlawyer Legal Service Providers (64 are currently active).

LPs may be licensed to provide services in more than one practice area. Current practice area licenses:

- o 55 family law
- o 9 civil law
- o 8 criminal law
- o 0 administrative law
- o 0 juvenile dependency law
- o 0 probate (pending)

5-B: Review, discussion, and possible action regarding Taskforce Updates:

Discussion: Division staff was not present at the Task Force meeting. The Committee indicated there was nothing further to add and is awaiting recommendations from the Task Force. Member Patrick Barnes mentioned that he plans to present a draft recommendation at the next Task Force meeting.

5-C: Review, discussion, and possible action regarding working groups to address regulatory tasks, including:

Discussion: Division staff Marquita Brazil noted that resuming the working group meetings is pending and requested information on how the Committee can facilitate the reactivation of these groups, as well as details on who is leading each working group. Member Lynda Shely raised a concern about potential changes to the Authorized Person Entity application online, questioning when these changes occurred and why the Committee did not vote on them. Marquita Brazil responded that the Division would review the matter and report back at the next meeting. Hon. Anni Hill Foster (Vice Chair) suggested holding off on any workgroup activities until the Task Force draft is released.

Audits;

Data gathering;

ACJA changes;

Application changes; and

Training for nonlawyers and other applicants;

6) Division Updates.....Division Staff

6-A: Update on the allowable number of ABSs per Compliance Lawyer.

Discussion: The Division plans to include a modification to ACJA 7-209 that will authorize Compliance Lawyers to manage up to three Alternative Business Structures (ABSs) simultaneously. Until this proposal completes the ACJA modification process, the Division will inform applicants of this guideline and recommend the denial of licensure for applications where a Compliance Lawyer is listed with more than three ABSs. As a result of this approach, the Division anticipates that pending and future applications will include Compliance Lawyers who manage practices with three or fewer ABSs.

6-B: Division updates:

Discussion: Director Aaron Nash stated “I want to extend my gratitude to Marquita, Ryan, and Daisy for their efforts in organizing an additional meeting and preparing today’s agenda. Marquita managed to balance learning to run the bar exam’s non-standard testing site while also coordinating the agenda—her dedication is greatly appreciated. The amount of time spent preparing and reviewing documents, only to encounter technology issues, has been disruptive and time-consuming. We will work on improving this in the short term until the technology is functioning smoothly. Regarding the online application portal, it is currently in the testing phase, including process mapping and payment processing. The latest projection for its completion is by the end of September this year.”

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

Raj Abhyanker addressed the Committee with a question regarding obtaining a list of approved ABSs and the total number of applications. Division staff member Marquita Brazil informed Mr. Abhyanker that he would need to submit a Public Records Request to obtain the list and noted that there are currently ninety-five approved ABS applications.

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

The meeting adjourned at 12:02 pm.

Motion Proposals:	First:	John Hay
	Second:	Steve German
Recused:	None.	
Pass/Fail: Pass	7-0-4	