

Entity Regulation Pilot Project Application - Entity Regulation Pilot Project Application

Application Submitted on 01.28.2026

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	Confido Inc
Email Address	ewager@confidolegal.com
Phone Number	866-569-9725
Website URL	https://confidolegal.com
Entity Physical Address 1	6905 Preston-Fall City Road SE
Entity Physical Address 2	
City	Issaquah
State	WA
ZIP Code	98027
Entity Mailing Address 1	6905 Preston-Fall City Road SE

Entity Mailing Address 2

City	Issaquah
State	WA
ZIP Code	98027
Date entity formed	3-23-2023
Federal Tax ID Number	92-316746

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	William Robert Pierznik
Title	Compliance Officer
Business Email Address	bill@macrolg.com
Business Phone Number	5035020748
Compliance Officer Mailing Address 1	500 SW 116th Ave
Compliance Officer Mailing Address 2	Suite 133
City	Portland
State	Oregon
ZIP Code	97225

Describe your qualifications to be the compliance officer.

Mr. Pierznik has 30 years of experience practicing law as outside counsel and as in-house counsel. He has founded and been the managing partner of two (2) boutique law firms. Much of his work has been with technology companies where his role has been to ensure that fast growing companies remain compliant with legal and regulatory obligations (including those related to IOLTAs).

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	Emery Wager
Title	CEO
Phone Number	206-390-3293
Email Address	ewager@confidolegal.com
Mailing Address 1	1257 30th St
Mailing Address 2	
City	Hood River
State	OR
ZIP Code	97031

Type of financing	Preferred Stock
Provider name	The LegalTech Opportunities Fund I, LP
Amount of financing	[REDACTED]
Type of financing	Preferred Stock
Provider name	Aquiline Technology Growth Fund II, LP
Amount of financing	[REDACTED]
Type of financing	Preferred Stock
Provider name	Dogtown LP
Amount of financing	[REDACTED]
Type of financing	Preferred Stock
Provider name	William Dabbs Cavin
Amount of financing	[REDACTED]
Type of financing	Preferred Stock
Provider name	Gus A Blass
Amount of financing	[REDACTED]
Type of financing	Preferred Stock
Provider name	CPP Holdings LLC
Amount of financing	[REDACTED]
Type of financing	Preferred Stock
Provider name	Charlie Carter
Amount of financing	[REDACTED]
Will your entity share premises, staff, or data with any other person or entity?	No
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? Yes

Name (first name, last name) Emery Wager

Title CEO

Email Address ewager@confidolegal.com

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) Emery Wager

Title CEO

Email Address ewager@confidolegal.com

Are there financing parties for this entity? Yes

Name (first name, last name) Gravity Payments Inc.

Title Investor

Email Address edutton@graitypayments.com

Are there financing parties for this entity? Yes

Name (first name, last name) Trevor Hanus

Title CTO

Email Address mailto:thanus@confidolegal.com

Are there financing parties for this entity? Yes

Name (first name, last name) Aquiline Technology Growth Fund

Title Investor

Email Address zglosser@aquiline.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

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Substantive Legal Areas

Substantive Legal Areas

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

Other Confido provides legal payment services to law firms of all types

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. No

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. No

Intermediary platforms – connecting marketplaces of consumers with licensed legal professionals. No

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. Yes

Description Legal technology payments company

Who or what will provide the legal services under your proposed service model? Check all that apply Software/Technology

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? No

Who are your target consumers? Check all that apply Other

Other

Law Firms

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

12

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

Confido Legal is a legal-specific digital payments application that helps more than [REDACTED] law firms across the United States and Canada deposit funds into and disburse money from trust and operating accounts in ways that make it easy for firms to comply with the Rules of Professional Conduct. Confido Legal's law firm customers deposit [REDACTED] a year into IOLTA accounts. The proposed pilot is an added feature of Confido Legal's existing platform, designed specifically to enhance IOLTA compliance for Washington law firms. It builds on the same trusted infrastructure that already processes client deposits and disbursements for more than [REDACTED] law firms nationwide. Client funds will be deposited in FDIC-insured accounts at partner financial institutions. Confido Legal will operate the trust-account layer, maintaining complete sub-accounting for each client and performing real-time reconciliation directly within the Confido Legal app. Confido Legal will not manage all IOLTA-related functions, including interest calculation and remittance to the Legal Foundation of Washington, overdraft notifications, and compliance reporting to the WSBA. . By enabling continuous reconciliation and centralized oversight, Confido Legal makes trust-account management safer, simpler, and more transparent for Washington law firms. The increased participation and compliance this system enables will grow IOLTA revenue, providing more funding for the Legal Foundation of Washington to expand access to justice statewide. As a compliant digital payments platform, Confido Legal also reduces complexity and administrative burden on law firms trying to manage their accounts receivable or disburse funds to clients from IOLTA accounts.

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

IOLTA payments management services are provided to law firms via Confido's technology platform. Confido Legal primarily generates revenue today through transaction fees when clients deposit funds into or disburse money from trust and operating accounts. Note that these fees are never debited from IOLTA accounts today. They are always deducted from the firms operating account. Transaction fees will continue to be Confido's primary source of revenue. Confido Legal also expects to offer a tiered subscription model for the IOLTA feature, including a free tier for solo attorneys with a small number of matters and paid monthly tiers for firms managing more matters and seeking additional reconciliation features targeted at higher-volume trust accounting workflows.

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

The CEO and Chief Compliance Officer will oversee the deployment of this pilot project. The CEO will manage day to day operations and the Chief Compliance Officer will be responsible for regulatory and legal compliance.

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

This pilot directly supports the Washington Supreme Court's goal of increasing the accessibility of quality legal services to all persons, including low- and moderate-income Washingtonians, and others who experience barriers in accessing legal services. a. Direct Impact on Legal Foundation of Washington Funding: The LFW distributes IOLTA revenue to legal aid organizations annually. Based on Confido Legal's hypothesis that this pilot will increase IOLTA participation by [REDACTED]%. Confido Legal projects meaningful additional annual IOLTA revenue that would enable LFW grantees to provide additional hours of legal aid services, serving more low-income Washingtonians. b. How the Pilot Addresses Barriers to IOLTA Participation: Current barriers to IOLTA participation disproportionately affect solo practitioners and small firms—the very attorneys most likely to serve moderate-income clients who cannot afford large-firm rates but do not qualify for free legal aid. How it helps: a. Expands participation: Many Washington lawyers avoid IOLTA accounts due to reconciliation complexity and compliance risk. Confido Legal provides real-time reconciliation, eliminating that barrier and making participation easier and safer. b. Already expanding participation: Confido Legal already helps expand the IOLTA deposit base by making it easier for law firms to deposit payments into IOLTA accounts. For many new Confido Legal customers, this is the first time they have used their IOLTA accounts to accept payments and in many cases, the first time they have accepted digital payments into their IOLTA accounts. c. Increases IOLTA funding: More compliant firms mean more IOLTA deposits and greater interest payments to the Legal Foundation of Washington. d. Improves transparency: Confido Legal will show each firm exactly how much interest their accounts generate and how those funds are used to support legal aid across the state. This creates a more meaningful connection between law firms and the Legal Foundation of Washington and fosters a sense of pride among firms in how much they have contributed to expanding access to justice. e. Enhances compliance confidence: Real-time reconciliation and automated monitoring protect client funds and minimize the potential for error or misuse.

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

Other

Other

Transaction Fees

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

Other

Other

WA RPC 1.15A/B

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

Confido Legal proposes to test the following regulatory reform hypothesis: Permitting qualified fintech platforms to provide trust accounting services and IOLTA compliance infrastructure while maintaining full FDIC insurance and regulatory oversight will increase law firm participation in IOLTA programs by ██████% and generate correspondingly higher interest revenue for the Legal Foundation of Washington, compared to the current system requiring direct bank management of trust accounting functions. This hypothesis directly implicates Washington RPC 1.15A(c), which requires client funds to be deposited in accounts at financial institutions approved by the WSBA, and any related interpretive guidance that may require banks themselves to perform the IOLTA compliance functions. Confido Legal seeks regulatory clarity that a fintech platform may lawfully provide the IOLTA compliance infrastructure, provided that: (1) all client funds remain in FDIC-insured accounts; (2) the platform maintains real-time sub-accounting and reconciliation for each client; (3) interest calculations and remittances to the Legal Foundation of Washington are automated and transparent; (4) the platform enables required overdraft reporting; and (5) the platform operates under enhanced oversight including an independent compliance officer with direct WSBA reporting authority. Modification of RPC 1.15A would clarify that law firms may utilize Confido Legal's platform to manage IOLTA accounts while remaining in compliance with their trust account obligations, and that Confido Legal's role in facilitating such management does not violate the rule's requirements.

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

The need for this regulatory reform is demonstrated by the current barriers to IOLTA participation. Many Washington lawyers and smaller firms avoid depositing funds into IOLTA accounts due to reconciliation complexity, compliance uncertainty, and administrative burden. Traditional bank-managed trust accounts provide monthly statements and basic safeguards, but lack the real-time visibility and automated compliance tools that modern law practices require. This results in lower IOLTA participation rates and reduced funding for access-to-justice programs. By contrast, Confido Legal's technology-enhanced approach eliminates reconciliation complexity while providing superior transparency, real-time monitoring, and automated regulatory reporting making IOLTA participation both safer and simpler for law firms.

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

The pilot will demonstrate that fintech-managed trust accounting delivers measurably superior outcomes for both consumer protection and access to justice. Participating firms will benefit from continuous reconciliation, real-time balance monitoring, automated interest calculations, and immediate notification of any irregularities. The Legal Foundation of Washington (LFW) will receive increased funding through higher IOLTA participation and more efficient interest collection, resulting in more support to the dozens of legal aid organizations supported by LFW. Most importantly, the enhanced transparency and simplified compliance will enable more Washington lawyers to confidently use IOLTA accounts, expanding the programs reach and impact. This reform represents an evolution in how trust accounting services are delivered, not a departure from the protective purposes underlying RPC 1.15A and 1.15B. This pilot directly supports the Washington Supreme Courts goal of increasing the accessibility of quality legal services to all persons, including low- and moderate-income Washingtonians, and others who experience barriers in accessing legal services.

a. Direct Impact on Legal Foundation of Washington Funding: The LFW distributes IOLTA revenue to legal aid organizations annually. Based on Confido Legals hypothesis that this pilot will increase IOLTA participation by 15-25%. Confido Legal projects meaningful additional annual IOLTA revenue that would enable LFW grantees to provide additional hours of legal aid services, serving more low-income Washingtonians.

b. How the Pilot Addresses Barriers to IOLTA Participation: Current barriers to IOLTA participation disproportionately affect solo practitioners and small firmsthe very attorneys most likely to serve moderate-income clients who cannot afford large-firm rates but do not qualify for free legal aid. How it helps: a. Expands participation: Many Washington lawyers avoid IOLTA accounts due to reconciliation complexity and compliance risk. Confido Legal provides real-time reconciliation, eliminating that barrier and making participation easier and safer. b. Already expanding participation: Confido Legal already helps expand the IOLTA deposit base by making it easier for law firms to deposit payments into IOLTA accounts. For many new Confido Legal customers, this is the first time they have used their IOLTA accounts to accept paymentsand in many cases, the first time they have accepted digital payments into their IOLTA accounts. c. Increases IOLTA funding: More compliant firms mean more IOLTA deposits and greater interest payments to the Legal Foundation of Washington. d. Improves transparency: Confido Legal will show each firm exactly how much interest their accounts generate and how those funds are used to support legal aid across the state. This creates a more meaningful connection between law firms and the Legal Foundation of Washington and fosters a sense of pride among firms in how much they have contributed to expanding access to justice. e. Enhances compliance confidence: Real-time reconciliation and automated monitoring protect client funds and minimize the potential for error or misuse.

What data or information will you be able to provide to the WSBA to demonstrate the impact your proposal has on accessibility to affordable and reliable legal and law-related services to low- and moderate-income Washingtonians?

Confido Legal will evaluate the impact of the pilot using quantitative measures tied directly to IOLTA participation and revenue growth. As part of its existing underwriting process, Confido Legal already collects and reviews current bank statements from law firms and calculates the average daily balance in each firms IOLTA account. This baseline data will be used to measure growth once firms are onboarded and begin using Confido Legal as their full trust-account solution. To establish an objective baseline for measuring impact, Confido Legal will calculate the average interest rate currently offered by IOLTA-certified banks in Washington and combine that with each firms baseline average daily deposit balance. This will provide a clear, data-driven benchmark for measuring increased IOLTA interest revenue over time.

Key Metrics: Total IOLTA interest remitted Based on WA bank interest rate baseline, target ██████% increase; Average IOLTA account balance Based on underwriting baseline, target ██████% increase; Reconciliation frequency Monthly (manual) to Real-time (automated); Lawyer awareness of IOLTA impact Low baseline to ██████% awareness post-pilot. Confido Legal will track and report results through its reconciliation and reporting platform, validated by interest rate and deposit data from participating law firms and partner banks.

Risk Assessment

Risk Assessment - Entity Identified

This section asks specific questions about risk. Risk describes the likelihood and potential impact of harm or negative consequences to consumers resulting from your proposed model of legal service delivery. Responses should be complete, candid, and concise.

Describe the risks to consumers created by waiving or modifying regulatory rules under your proposed study and service model. Include risks present at the time services are received and potential future risks.

You may want to consider potential risks associated with:

- Use of unlicensed legal professionals
- Reliance on technology, software, or automated systems
- Modification of traditional legal professional regulation and compliance

Risk (short descriptor)	Confusion about Confido Legals role vs. banks
Likelihood of Harm	Possible
Potential Severity of Harm	Negligible

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

Participating law firms or their clients may not fully understand the division of responsibilities between Confido Legal and its partner financial institutions. This could lead to misdirected inquiries, delayed issue resolution, or uncertainty about where client funds are held and who is responsible for IOLTA compliance functions. Confido Legal rates the likelihood as "Possible" because the neobanking model where a fintech platform manages the user experience while a regulated bank holds the funds is relatively new in the legal industry, even though it is well-established in consumer finance. However, the potential harm is "Negligible" because any confusion would be administrative in nature and would not affect the safety or availability of client funds, which remain fully protected in FDIC-insured accounts regardless of any misunderstanding about roles.

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

- Produce and provide plain-language disclosures explaining the custodial structure to all participating law firms during onboarding.
- Include co-branded agreements that clearly delineate Confido Legal's responsibilities (trust accounting, reconciliation, interest calculation, compliance reporting) versus the partner bank's responsibilities (fund custody, FDIC insurance).
- Provide educational materials and FAQs addressing common questions about the neobanking model.
- Ensure customer support staff are trained to clarify roles when inquiries arise.

Risk (short descriptor)	Privacy and data security incidents (e.g., breaches, misuse of personal and financial data).
Likelihood of Harm	Very Unlikely
Potential Severity of Harm	Catastrophic

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

Confido Legal rates the likelihood as "Very Unlikely" due to its robust security infrastructure and compliance with industry-leading standards. However, the potential harm is rated "Catastrophic" because any significant data breach involving client financial information could cause serious reputational, financial, and legal consequences for affected law firms and their 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

Maintain compliance with PCI-DSS security standards, which require annual audits and encryption of all data. Protect all accounts with multi-factor authentication and tiered access roles. Avoid storing raw credit card numbers or full bank account credentials on servers; instead, use tokenization through secure payment partners (e.g., Stripe), where actual payment data is stored in secure vaults and Confido Legal retains only randomized tokens. Host all infrastructure on Amazon Web Services (AWS) utilizing Virtual Private Cloud (VPC) to isolate data from the public internet. Conduct monthly penetration testing to identify and remediate vulnerabilities. Maintain a dedicated Chief Security Officer role responsible for ongoing security oversight. Comply with all partner bank security and oversight requirements. Maintain cyber liability insurance with coverage of \$1,000,000 per occurrence and \$1,000,000 aggregate.

Risk (short descriptor)	Interest calculation or reconciliation errors.
Likelihood of Harm	Very Unlikely
Potential Severity of Harm	Manageable

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

Confido Legal rates the likelihood as "Very Unlikely" because the platform performs automated, real-time reconciliation with multiple validation layers, significantly reducing the potential for human error that exists in manual reconciliation processes. The potential harm is rated "Manageable" because any calculation errors would be financial in nature and correctable, and Confido Legal maintains insurance and reserves to make affected parties whole.

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

Maintain a real-time audit trail for all transactions and calculations. Implement exception monitoring that automatically flags anomalies or discrepancies for review. Require dual validation for interest calculations before remittance. Backstop all calculations through daily
 → reconciliation with partner banks at the firm level. Maintain professional liability (E&O) insurance to cover any financial losses resulting from calculation errors. Implement an error correction protocol that includes immediate notification to affected firms, correction within 24 hours, and making affected parties whole from operating funds or insurance proceeds.

Risk (short descriptor)	Limited adoption of the Confido Legal platform as part of the Pilot.
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Likelihood of Harm	Possible
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Potential Severity of Harm	Negligible
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Provide a full description of the risk with an explanation for your categorization

If Washington law firms do not adopt the Confido Legal IOLTA platform in sufficient numbers, the pilot may fail to generate meaningful data to test the regulatory reform hypothesis, and the anticipated benefits to the Legal Foundation of Washington may not materialize. Confido Legal rates the likelihood as "Possible" because adoption of any new technology platform depends on market acceptance and
 → competing priorities among law firms. However, the potential harm is "Negligible" because limited adoption would primarily affect the pilot's ability to generate data rather than causing harm to consumers or client funds. Existing Confido Legal customers would continue to receive the same level of service regardless of pilot participation rates.

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

Leverage existing relationships with more than forty (40) Washington law firms currently using Confido Legal's payment infrastructure. Utilize Confido Legal's well-established go-to-market process for customer acquisition. Collaborate with WSBA and the Legal Foundation
 → of Washington on education and outreach to potential participants. Provide early adopter support including dedicated onboarding assistance and training. Begin with a pilot cohort of 3-5 firms already using Confido Legal to demonstrate proof of concept before broader expansion.

Risk (short descriptor)	Pilot is terminated or Confido exits the Pilot and placing management of law firms' IOTLA accounts in question.
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Likelihood of Harm	Very Unlikely
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Potential Severity of Harm	Manageable
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Provide a full description of the risk with an explanation for your categorization

If the pilot program is terminated by the WSBA or Washington Supreme Court, or if Confido Legal voluntarily or involuntarily exits the Washington market, participating law firms would need to transition their IOLTA accounts to alternative providers, potentially causing disruption to their trust accounting operations. Confido Legal rates the likelihood as "Very Unlikely" because Confido Legal is committed to
 → the pilot program and has a strong track record of operational stability. The potential harm is rated "Manageable" because client funds would remain protected in FDIC-insured accounts throughout any transition, and Confido Legal has developed a comprehensive exit plan to ensure orderly transitions.

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

Provide a minimum of 90 days' written notice to all participating law firms, the WSBA, and the Legal Foundation of Washington before any voluntary withdrawal from the pilot program. Ensure all client funds remain in FDIC-insured accounts at partner financial institutions throughout any transition period; no client funds will be at risk during the transition, as Confido Legal does not commingle client funds with its own operating capital. Export complete transaction histories, reconciliation records, and client ledgers in standard formats (CSV, PDF, and integration-ready formats for common legal practice management software) to each participating firm at no additional cost. Assist each firm in establishing or re-establishing a traditional IOLTA account at a WSBA-approved financial institution, including coordination with the firm's new bank to ensure uninterrupted IOLTA compliance. Calculate and remit all accrued interest to the Legal Foundation of Washington through the final day of operations, with a final reconciliation report provided to LFW and WSBA within 30 days of transition completion. In the event of involuntary removal from the pilot by the WSBA or Washington Supreme Court, cooperate fully with WSBA-directed transition procedures and accelerate the timeline as required by the authorizing order. Maintain business continuity insurance and reserve funds sufficient to operate the transition process even in the event of financial distress.

Risk (short descriptor) Financial safeguards for law firms if there is a technical issue with the Confido Legal solution that results in loss of funds.

Likelihood of Harm Very Unlikely

Potential Severity of Harm Manageable

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

A technical failure, software bug, or processing error could theoretically result in incorrect fund transfers, lost transactions, or temporary unavailability of client funds, causing financial harm to law firms or their clients. Confido Legal rates the likelihood as "Very Unlikely" because the platform incorporates multiple layers of validation, automated monitoring, and fail-safes designed to prevent erroneous transactions. The potential harm is rated "Manageable" because Confido Legal maintains comprehensive insurance coverage and financial reserves to make affected parties whole in the event of any technical failure.

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

Maintain professional liability (E&O) insurance with coverage of \$1,000,000 per occurrence and \$1,000,000 aggregate, specifically covering technology errors, data processing failures, and financial calculation mistakes. Maintain cyber liability insurance with coverage of \$1,000,000 per occurrence and \$1,000,000 aggregate, covering data breaches, system failures, and related remediation costs. Maintain crime insurance with coverage of \$1,000,000 per occurrence and \$1,000,000 aggregate, covering employee dishonesty, theft, and fraudulent acts. Hold all client funds in FDIC-insured accounts at regulated financial institutions, providing up to \$250,000 in deposit insurance per depositor (client), per institution. Never commingle client funds with Confido Legal's operating capital; in the event of Confido Legal's insolvency, client funds would not be available to Confido Legal's creditors. Implement automated anomaly detection and money transfer limits that immediately flag unusual transactions, balance discrepancies, or potential errors for human review before funds are disbursed. Follow an error correction protocol that includes: (i) immediate notification to affected firms; (ii) correction of the error within 24 hours; (iii) making affected parties whole from Confido Legal's operating funds or insurance proceeds; and (iv) reporting the incident to the Compliance Officer and WSBA.

Risk (short descriptor) Federal or state regulatory changes could affect the neobanking model or impose new requirements on fintech platforms managing trust accounts.

Likelihood of Harm Possible

Potential Severity of Harm Manageable

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

Changes to federal banking regulations, state fintech licensing requirements, or legal industry rules could impose new compliance obligations on Confido Legal's operating model, potentially requiring significant platform modifications or affecting the viability of the neobanking approach for trust accounts. Confido Legal rates the likelihood as "Possible" because the regulatory environment for fintech platforms continues to evolve, and new requirements could emerge during the pilot period. However, the potential harm is "Manageable" because Confido Legal's platform architecture is designed to adapt to new compliance requirements, and any regulatory changes would likely include implementation periods allowing time for adjustment.

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

Actively monitor regulatory developments through industry associations, partner banks, and legal counsel. Design platform architecture to adapt to new compliance requirements without major structural changes. Notify WSBA and participating firms within 30 days of any material regulatory changes that could affect the pilot program. Propose necessary modifications to the pilot program in response to regulatory changes, subject to WSBA and Court approval.

Risk (short descriptor) Confido Legal's partner financial institutions could terminate their relationship, affecting the custody of client funds.

Likelihood of Harm Very Unlikely

Potential Severity of Harm Manageable

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

If a partner bank terminates its relationship with Confido Legal, client funds would need to be migrated to an alternative financial institution, potentially causing temporary disruption to platform operations. Confido Legal rates the likelihood as "Very Unlikely" because Confido Legal maintains strong relationships with its partner banks and all agreements include minimum notice periods for termination. The potential harm is rated "Manageable" because Confido Legal maintains relationships with multiple FDIC-insured partner banks and can migrate funds to alternative institutions if necessary.

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

Maintain relationships with multiple FDIC-insured partner banks to ensure redundancy. Ensure all partner bank agreements include minimum notice periods for termination, providing adequate time for migration planning. Develop and maintain migration procedures for transferring funds between partner institutions. Notify WSBA immediately upon receiving any termination notice from a partner bank. Ensure client funds remain fully protected and accessible throughout any migration process.

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 Negligible

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

As the Confido platform is a payments platform and does not interact with the substantive delivery of legal services, we do not see these as risks.

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

N/A

Risk Assessment - WSBA Required 2

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

Likelihood of Harm Very Unlikely

Potential Severity of Harm Negligible

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

As the Confido platform is a payments platform and does not interact with the substantive delivery of legal services, we do not see these as risks.

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

N/A

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

As the Confido platform is a payments platform and does not interact with the substantive delivery of legal services, we do not see these as risks.

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

N/A

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

Confido Legal will implement a comprehensive public protection framework designed to safeguard client funds, ensure data security, and maintain fair access to services. Our measures include:

1. Methods to Identify and Track Consumer Harms Real-Time Transaction Monitoring: Our platform utilizes automated anomaly detection to flag unusual transaction patterns, balance discrepancies, or potential errors immediately. Compliance Officer Oversight: Our independent Compliance Officer, William R. Pierznik, has direct access to all systems and records to audit processes, review flagged transactions, and identify potential compliance issues before they result in harm. Consumer Complaint Tracking: We will maintain a centralized log of all complaints received from law firms or their clients. This log will track the nature of the complaint, investigation findings, and resolution status. Client Surveys: We will distribute the WSBA-mandated client survey after services are provided to gather direct feedback on user experience and identify any unreported issues or barriers to access. Regular Reporting: We will report all complaints, survey data, and significant operational metrics to the WSBA in our periodic operational reports, including immediate reporting of any serious consumer harm.
2. Contingency Plans for Unforeseen Risks Financial Backstops: To protect against financial loss due to errors or technical failures, we maintain: Professional Liability (E&O) Insurance: \$1,000,000 coverage for technology errors and financial calculation mistakes. Cyber Liability Insurance: \$1,000,000 coverage for data breaches and system failures. Crime Insurance: \$1,000,000 coverage for employee dishonesty or theft. Fund Safety & Segregation: All client funds are held in FDIC-insured accounts at regulated partner banks and are strictly segregated from Confido Legals operating capital. In the event of our insolvency, client funds remain protected and accessible. Exit & Transition Plan: If the pilot is terminated or Confido Legal exits the market, we have a detailed transition plan that includes: 90 days' advance notice to all stakeholders. Data portability to allow firms to export all records. Assistance with transitioning funds to traditional IOLTA accounts without disruption.
3. Methods to Reduce Implicit Bias Objective, Technology-Driven Processes: Our platform relies on standardized, algorithmic processes for transaction handling and reconciliation, minimizing opportunities for human bias in day-to-day operations. Standardized Onboarding Criteria: We apply uniform, objective criteria for onboarding law firms (e.g., valid bar license, KYC/AML verification) to ensure fair access to our platform regardless of the firm's size, location, or the demographic characteristics of its leadership. Bias Monitoring in Algorithms: We will regularly review our automated monitoring and fraud detection algorithms to ensure they do not disproportionately flag transactions based on factors correlated with protected characteristics. Diverse Pilot Cohort: We have selected an initial pilot cohort that represents diverse firm characteristics to test our hypothesis across different practice contexts and identify any potential disparities in service delivery. Target Market: We do not sell our services directly to consumers.

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

i. Acknowledgment. Confido Legal will acknowledge receipt of all complaints within 2 business days. ii. Investigation. The Compliance Officer will investigate all complaints and provide a substantive response within 14 business days. Complex complaints requiring additional investigation will receive a status update within 14 days and a final response within 30 days. iii. Resolution. Confido Legal will work in good faith to resolve all complaints promptly. Resolutions may include correction of errors, refund of fees, platform modifications, or other appropriate remedies. iv. Escalation. Complainants who are not satisfied with Confido Legals response may escalate their complaint to the WSBA using the complaint form available at www.wsba.org/entityreg. c. Complaint Tracking and Reporting

i. Record Keeping. Confido Legal will maintain records of all complaints, including the nature of the complaint, investigation findings, and resolution, for a minimum of seven years. ii. WSBA Reporting. Confido Legal will report all complaints received, and their resolution status, to the WSBA as part of its periodic operational reports. Complaints alleging serious consumer harm or potential violations of the authorizing order will be reported to the WSBA within 5 business days of receipt. iii. Self-Reporting. Confido Legal will self-report to the WSBA any incidents that may constitute actionable violations under the Enforcement Procedures, regardless of whether a formal complaint has been filed.

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

Confido Legal maintains comprehensive financial safeguards to ensure it can adequately compensate consumers in the event of negligence, errors, or malpractice. These safeguards include insurance coverage, corporate governance structures, and financial transparency measures.

1. Insurance Coverage Confido Legal maintains the following insurance policies specifically designed to protect consumers and participating law firms:

- Professional Liability (Errors and Omissions) Insurance. Confido Legal maintains E&O insurance with coverage of \$1,000,000 per occurrence and \$1,000,000 aggregate, specifically covering technology errors, data processing failures, and financial calculation mistakes that could result in harm to participating law firms or their clients.
- Cyber Liability Insurance. Confido Legal maintains cyber liability insurance with coverage of \$1,000,000 per occurrence and \$1,000,000 aggregate, covering data breaches, system failures, and related remediation costs.
- Crime Insurance. Confido Legal maintains crime insurance with coverage of \$1,000,000 per occurrence and \$1,000,000 aggregate, covering employee dishonesty, theft, and fraudulent acts. These insurance policies provide a combined \$3,000,000 in aggregate coverage across the primary risk categories relevant to Confido Legal's IOLTA management services.

2. Financial Stability and Capitalization Confido Legal has recently completed a \$5,000,000 funding round, providing substantial operating capital and reserves to support the pilot program and respond to any unforeseen issues. The company is revenue-generating, with an established customer base of more than 1,300 law firms nationwide, demonstrating a sustainable business model.

3. Corporate Governance and Financial Oversight Confido Legal maintains robust corporate governance structures that provide independent oversight of the company's financial health:

- Board of Directors. Confido Legal's Board of Directors includes two professional investors who are not employed by the company. These independent board members provide external oversight of the company's financial management, risk exposure, and operational decisions.
- Quarterly Board Reporting. Confido Legal is required to provide quarterly financial and operational reports to its Board of Directors, ensuring regular independent review of the company's financial position, cash reserves, and ability to meet its obligations.

4. Structural Protections In addition to insurance and governance safeguards, Confido Legal's operational structure provides inherent consumer protection:

- Segregation of Funds. Client funds are never commingled with Confido Legal's operating capital. In the event of Confido Legal's insolvency, client funds would not be available to Confido Legal's creditors.
- FDIC Insurance. All client funds are held in FDIC-insured accounts at regulated financial institutions, providing up to \$250,000 in deposit insurance per depositor (client), per institution.
- Error Correction Protocol. In the event of a calculation or processing error, Confido Legal will: (i) immediately notify affected firms; (ii) correct the error within 24 hours; (iii) make affected parties whole from Confido Legal's operating funds or insurance proceeds; and (iv) report the incident to the Compliance Officer and WSBA.

5. Financial Reporting to WSBA Confido Legal commits to providing the WSBA with evidence of current insurance coverage upon request and will notify the WSBA within 30 days of any material change to its insurance coverage or financial condition that could affect its ability to compensate consumers for harm.

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

No

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

Confido Legal maintains a comprehensive information security and risk-management program designed to protect the confidentiality, integrity, and availability of client information, supporting PCI-DSS Level 1 and SOC-2 compliance. The program is governed by formal policies covering data classification, acceptable use, access control, secure development, third-party risk management, and business continuity. Legal-specific safeguards address attorney-client privilege, careful handling of client and payer identities, and restrictions on information disclosure. Technical controls include encryption of data in transit and at rest, full-disk encryption for endpoints, hardened cloud configurations with restrictive network segmentation, and default-deny access controls. Confido does not store cardholder data; payment card information is transmitted directly to PCI-compliant third-party processors. All vendors handling confidential data undergo structured due diligence, including review of SOC 2 reports, PCI documentation, and incident response practices. Access to client information is restricted based on role and least-privilege principles, with unique user identifiers, strong authentication, and multi-factor authentication for privileged access. All personnel complete security awareness training and sign confidentiality agreements, with role-specific training for those handling payment processing, incident response, or AML compliance. Security incidents are managed through a documented and regularly tested incident response framework that includes detection, containment, eradication, recovery, and post-incident review. The framework includes documented procedures for notifying affected customers, partners, and processors when required, and is aligned with business continuity and disaster recovery planning. Training - Confido Legal operates under a rigorous governance framework designed to ensure full regulatory compliance and the highest standards of data integrity. This commitment is operationalized through a mandatory, multi-tiered training and oversight program: - Comprehensive Regulatory Training: Every employee, regardless of role or seniority, must complete annual certification in the Bank Secrecy Act (BSA) and Anti-Money Laundering (AML) protocols. This curriculum ensures that all staff are equipped to identify, flag, and prevent illicit financial activities, maintaining our standing with federal and international regulatory bodies. - Proactive Cybersecurity Defense: To mitigate the evolving landscape of digital threats, all personnel undergo specialized Cybersecurity training. This program focuses on data hygiene, threat detection (including sophisticated phishing and social engineering), and strict adherence to internal security controls, effectively turning our workforce into a primary line of defense.

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

Confido Legal is a financial technology platform that provides payment processing and trust account management infrastructure to law firms. We do not provide legal advice, represent clients in legal matters, or establish attorney-client relationships with the consumers whose funds are processed through our system. As a result, our exposure to traditional legal conflicts of interest (e.g., representing adverse parties) is minimal. However, we maintain strict policies to identify and manage potential business or operational conflicts: 1. Nature of Relationship & Non-Representation Our primary conflict avoidance strategy is structural: Confido Legal acts solely as a technology service provider and payment processor. We explicitly disclaim any attorney-client relationship with the end consumers (the clients of the law firms using our platform). This distinction is clearly communicated in our Terms of Service and user agreements, ensuring no reasonable expectation of legal representation or advocacy exists that could give rise to a conflict. 2. Neutral Platform Operation Our platform operates on a neutral, objective basis, processing transactions according to standardized rules and the specific instructions of the authorized law firm users. We do not exercise discretion over legal strategy or the merits of any underlying legal matter. This neutrality prevents conflicts that might otherwise arise from favoring one party's interests over another's in a legal dispute. 3. Data Segregation & Privacy To prevent data conflicts or improper information sharing: Strict Data Segregation: Our system architecture logically separates data for each law firm. One firm cannot access the financial data, client lists, or transaction history of another firm. Confidentiality Protocols: Our staff are trained on strict confidentiality protocols and are prohibited from accessing client data unless necessary for technical support, compliance monitoring, or fraud prevention. 4. Financial Conflict Management We manage potential financial conflicts through transparency and segregation: No Commingling: Client funds are strictly segregated from Confido Legals operating capital. We never use client funds for our own business operations or investments. Transparent Fee Structure: Our transaction fees are deducted solely from a law firms operating account, never from IOLTA principal. This ensures our financial interest in collecting fees never conflicts with the duty to safeguard client trust funds. 5. Compliance Officer Oversight Our independent Compliance Officer, William R. Pierznik, is responsible for reviewing any potential conflicts that may arise. If a unique situation emerges where Confido Legals business interests might appear to conflict with a users interest or a regulatory obligation, the Compliance Officer has the authority to investigate and implement necessary remedies, including recusal of specific staff or termination of a specific service relationship.

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.

Confido Legal's business model is structurally aligned with the best interests of law firms and their clients. As a technology platform that facilitates IOLTA management rather than a provider of legal advice or representation, Confido Legal succeeds only when participating law firms and their clients are well-served. The following policies and operational procedures ensure that client interests are prioritized:

1. Structural Alignment of Interests Confido Legal's revenue model creates natural alignment with client protection: Confido Legal charges law firms per-transaction fees and subscription fees for platform services. These fees are always deducted from the law firm's operating account never from IOLTA principal or client funds. This ensures Confido Legal has no financial incentive to delay disbursements or manipulate client balances. Confido Legal does not sell, share, or monetize client financial data. Data is used solely to provide the contracted services and maintain regulatory compliance. All IOLTA interest is calculated and remitted directly to the Legal Foundation of Washington.
2. Fund Segregation and Protection Client funds are protected through strict segregation policies: Client funds are kept completely segregated from both the law firm's operating capital and Confido Legal's own operating capital. In the event of Confido Legal's insolvency, client funds would not be available to Confido Legal's creditors. All client funds are held in FDIC-insured accounts at regulated financial institutions, providing deposit insurance protection regardless of Confido Legal's financial condition.
3. Transparency and Disclosure Confido Legal clearly discloses to all participating law firms and their clients that Confido Legal is not the partner banks manages IOLTA compliance, interest calculations, and regulatory reporting. The identity of the partner financial institution(s) holding client funds is disclosed to all users. Participating firms have real-time access to reconciliation status, client balances, and transaction histories, enabling them to verify that Confido Legal is acting in their clients' interests.
4. Operational Safeguards The Confido platform does not allow funds attached to a client to be disbursed unless those funds have fully cleared into the Confido Legal IOLTA. Funds will not be allowed to be disbursed if the client balance is insufficient for that disbursement. Automated anomaly detection and money transfer limits immediately flag unusual transactions, balance discrepancies, or potential errors for human review before funds are disbursed. In the event of any error, Confido Legal will make affected parties whole from its own operating funds or insurance proceeds not from other client funds.
5. Complaint Process Prioritizing Client Resolution The complaint process is designed to favor client resolution. Confido Legal will acknowledge receipt of all complaints within 2 business days and provide substantive responses within 14 business days. Confido Legal will work in good faith to resolve all complaints promptly, including correction of errors, refund of fees, or other appropriate remedies. 16 Complainants who are not satisfied with Confido Legal's response may escalate directly to the WSBA, ensuring an independent avenue for redress.

Does your entity require customers to waive certain rights as a condition of service? Yes

Briefly describe which rights customers will be required to waive and any implications those waivers may have on the rules of professional conduct.

As is standard in B2B technology agreements, Confido's terms of service limits certain types of liability (e.g. consequential damages). We do not see that this would have any impact on how our law firm customers would be impacted in terms of compliance with the rules of professional conduct.

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	William Robert Pierznik
Title	Compliance Officer
Entity	Confido Inc.
City where certifying	Portland
State where certifying	OR
Today's Date	1-27-2026