

Entity Regulation Pilot Project Application - Entity Regulation Pilot Project Application

Application Submitted on 10.22.2025

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	Legata, Inc.
Email Address	legal@legata.com
Phone Number	(425) 800-4346
Website URL	www.legata.com
Entity Physical Address 1	8435 SE 87th St
Entity Physical Address 2	
City	Mercer Island
State	WA

ZIP Code	98040
Entity Mailing Address 1	1100 Bellevue Way NE
Entity Mailing Address 2	Suite 8A, #565
City	Bellevue
State	WA
ZIP Code	98004
Date entity formed	7-2-2024
Federal Tax ID Number	[REDACTED]

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	Ann Parker-Way
Title	VP, Product and General Counsel, Compliance Officer
Business Email Address	complianceofficer@legata.com
Business Phone Number	4258004346
Compliance Officer Mailing Address 1	8435 SE 87th St
Compliance Officer Mailing Address 2	
City	Mercer Island
State	Washington
ZIP Code	98040

Describe your qualifications to be the compliance officer.

I am a corporate attorney with over 27 years of experience, both in law firms and as in-house counsel, and as part of my role I frequently handle compliance matters.

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	Henry Frantz
Title	Co-Founder, Treasurer
Phone Number	(425) 800-4346
Email Address	[REDACTED]
Mailing Address 1	1100 Bellevue Way NE
Mailing Address 2	Suite 8A, #565

City	Bellevue
State	WA
ZIP Code	98004

Entity Structure**Entity Structure**

Does your entity have any alternate names (i.e., a trade name or "doing business as" name)? No

Entity Disclosures**Entity Disclosures**

Is your entity registered with the Washington Office of the Secretary of State? Yes

Upload entity formation documents, e.g., articles of incorporation, partnership agreement, etc. and most recent annual report.

Registered Agent Name Cogency Global

Business Title Registered Agent

Email Address [REDACTED]

Is your entity licensed or otherwise authorized to practice law or participating in a regulatory reform project in any other jurisdiction? No

Are there any shareholder agreements, voting agreements or restrictions, or other agreements that restrict or affect decision making? No

Is the entity using or intending to use sources of finance? Yes

Type of financing [REDACTED]

Provider name [REDACTED]

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? Yes 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 No

Name (first name, last name)

Title

Email Address

Are there controlling parties for this entity? Yes No

Name (first name, last name)

Title

Email Address

Are there controlling parties for this entity? Yes No

Name (first name, last name)

Title

Email Address

Are there controlling parties for this entity? Yes No

Name (first name, last name)

Title

Email Address

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 No

Name (first name, last name)

Title

Email Address

Are there financing parties for this entity?

Yes

Name (first name, last name)

[REDACTED]

Title

[REDACTED]

Email Address

[REDACTED]

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?

Wills or Estates

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.

Yes

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.

No

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

Paralegals,
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? Yes

Will any lawyer or other licensed legal professionals operate in any other capacity under your proposed service model? Yes

Briefly describe the capacity

Lawyers and paralegals will assist clients with using and understanding the software/technology, including through interaction with clients using the technology, and through preparing educational materials. Lawyers and paralegals will also serve as supervisors and advisors for the technology-enabled delivery of legal services. When a client requests a referral or their situation is complex and needs a lawyer referral, paralegals will assist in gathering the information necessary to do an effective and efficient hand-off to a third-party lawyer.

Who are your target consumers? Check all that apply Families, LGBTQ+, Low Income, Moderate Income, Professionals, Seniors, Young Persons

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

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

Legata will provide technology-enabled estate planning services to underserved individuals with small and mid-size estates, providing comprehensive planning at a fraction of the cost of bespoke attorney services. Legata also serves individuals who have fewer assets but still need an estate plan, including for the provision of custody of minor children in the event of an unexpected death. It also will serve people with special needs, including disabilities and complex family dynamics. Legata reduces cost barriers and increases access by: - Reducing costs of estate plan preparation by up to 70% (as compared to traditional attorney resources in the greater Seattle metro area offering equivalent services). - Providing plain-language estate summaries and educational resources. - Offering proactive, dynamic estate plan monitoring. - Targeting the millions of Washingtonians currently without estate plans. - Providing integrated access to complementary services (e.g., insurance) that can assist users in optimizing their estates in a cost-effective manner. - Providing tools and services to assist in the timely and transparent management of estates.

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

Legata will be delivered as a secure, cloud-based SaaS platform, giving customers 24/7 access to estate planning tools through a web portal. The system generates customized documents based on user inputs, while ensuring that clients with complex cases or who request lawyer involvement are escalated to licensed attorneys for professional oversight. In addition to core planning, the platform will integrate with a network of lawyers, insurance providers, and other professionals to optimize estate outcomes and provide holistic support. This model combines the efficiency and accessibility of technology with the expertise of knowledgeable professionals to ensure both affordability and reliability.

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

All legal services delivered through Legata will be supervised by the Compliance Officer, who will ensure adherence to applicable rules, WSBA pilot requirements, and consumer protection standards. The Compliance Officer will review and approve workflows involving attorney participation, oversee escalation of complex cases or client-requested assistance to licensed lawyers, and conduct periodic audits of system-generated outputs for accuracy and compliance. Licensed attorneys engaged

through the platform will operate under defined oversight protocols, with clear accountability for review, sign-off, and quality assurance in client interactions.

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

Consumers will access Legata's services through a secure, cloud-based platform available on web and mobile devices, where they can complete a guided intake, generate personalized estate planning documents, and manage their plans online. The platform serves underserved individuals with small and mid-size estates as well as individuals with modest assets who need affordable planning tools (such as guardianship designations for minor children). Legata reduces costs of estate planning, offers plain-language summaries, educational resources, and dynamic monitoring, and integrates complementary services like insurance referrals and trustee and executor support. By targeting the millions of Washingtonians who currently lack estate plans, Legata expands access to affordable, reliable, and professionally supported estate planning services.

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

Flat Fees,
Subscription

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

RCW 2.48.180(2), RPC 5.4(a), RPC 5.4(b), RPC 5.4(d), Other

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.

Other

Describe how each rule would be modified and the reason for the modification

RCW 2.48.180(2) -To permit technology-assisted delivery of estate planning services, allowing AI tools and trained non-lawyer professionals to operate under attorney and Compliance Officer oversight. -To allow non-lawyers to provide legal services through technology, including automated document generation, estate management tools, and related services. -To allow non-lawyer ownership/investment in a business that engages in the practice of law. RPC 5.4 (a), (b), (d) -To permit non-lawyer ownership of an entity providing legal services. -To permit lawyers to be employed by and practice law (as advisors for the technology-enabled delivery of legal services) in a for-profit entity owned by non-lawyers -To enable Legata to collect reasonable referral fees from third-party lawyers to which Legata refers clients, in the absence of a reciprocal referral agreement. RPC 7.3 -To provide proactive prompts and engagement with clients for legal services that are contextually relevant to the client.

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

Legata's proposal seeks targeted reforms to RCW 2.48.180(2) and RPCs 5.4 and 7.3 to allow the company to operate as a regulated, technology-enabled platform for estate planning legal services. The requested changes would authorize the use by nonlawyers of lawyer-designed, automated document generation and related digital tools, permit nonlawyer investment and participation to support growth and innovation, and allow reasonable referral fees when connecting consumers with licensed attorneys. These adjustments would enable Legata to integrate technology, legal expertise, and complementary professional services within a clear regulatory framework that expands access to affordable and accessible estate planning services for Washington residents.

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

Legata's proposal to test targeted reforms of RCW 2.48.180(2) and RPCs 5.4 and 7.3 is designed to remove structural barriers that prevent technology-driven innovation, allowing legal services to be provided by non-lawyers at a much lower cost, while preserving the regulatory safeguards that protect consumers. These reforms would enable Legata to operate as a SaaS platform for legal services, combining automated tools with professional oversight to expand access to affordable estate planning and

administration. Specifically, the requested modifications would:

- Allow estate planning legal services to be provided at a fraction of the cost of traditional attorney services tailored to individuals.
- Allow non-lawyers to invest in and help operate Legata, providing the capital and expertise needed to scale the platform and continuously enhance the quality and capability of its technology and services.
- Permit lawyers to work within a non-lawyer-owned business, ensuring consumers benefit from direct attorney oversight and advice while still accessing affordable, technology-enabled planning solutions.
- Authorize Legata to collect reasonable referral fees from attorneys, creating a sustainable pathway for connecting consumers with trusted lawyers for specialized or complex matters without requiring restrictive reciprocal agreements.
- Enable proactive consumer engagement under RPC 7.3, allowing the platform to send context-specific prompts and alerts that help users keep their estate plans up to date as laws or personal circumstances change.

Together, these reforms will allow Legata to operate more effectively as an integrated legal services platform, combining technology, professional expertise, and complementary referrals to deliver affordable, accessible, and comprehensive estate planning services to Washington residents.

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?

Legata will provide the WSBA with comprehensive quarterly reporting designed to clearly demonstrate the platform's impact on accessibility, affordability, and reliability of estate planning services for low- and moderate-income Washingtonians. Data will include the total number of clients served, broken down by demographic factors such as income levels, geographic location, and whether the individual is a first-time estate planner. Cost savings benchmarks will be tracked by comparing the average cost of estate planning through Legata against traditional attorney-driven services, highlighting measurable reductions in financial barriers. In addition, Legata will report the number of referrals made to licensed third-party attorneys for complex matters, ensuring visibility into how consumers are escalated into appropriate professional channels. Finally, Legata will report consumer satisfaction survey results, along with the number and resolution rate of complaints, to demonstrate both the quality of service delivery and Legata's commitment to strong consumer protections. Together, this reporting will provide the WSBA with transparent, data-driven evidence of how Legata advances access to affordable and reliable legal services.

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)	Influence of Nonlawyer Ownership on Professional Judgment
Likelihood of Harm	Very Unlikely
Potential Severity of Harm	Manageable

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

Some people may see a risk that allowing nonlawyer ownership or investment could create pressure to prioritize business objectives over consumer protection or attorney independence. For example, referrals could be directed toward partners offering greater financial incentives rather than those best suited to client needs, or in the promotion of services and resources that are

more complex or costly than necessary for a clients situation. The risk is rated as "Very Unlikely" for several reasons. First, the Legata platform is designed by lawyers to provide affordable, high-quality legal services, and its investors will understand that the platform's long-term value depends both on adhering to its value proposition and on public perception that Legata stands for professional integrity and adherence to legal ethics. Moreover, the controlling shareholder and CEO of Legata and several of its shareholders are attorneys with decades of experience helping to navigate the natural tension between business goals and legal concerns, without compromising their professional judgment. They are adept at helping business leaders understand that legal issues are business issues. Finally, the platform offers documents that are, for the most part, standard estate planning documents, and they are currently offered as a complete package. The potential severity is "Manageable," since strong compliance oversight and reporting requirements can prevent or correct such conflicts (if any arise) before they impact consumers.

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

To mitigate these risks, Legata's Compliance Officer will review referral relationships, marketing materials, and pricing models on a quarterly basis to ensure alignment with ethical standards and consumer interests. The Compliance Officer will have authority over all legal and professional matters relating to the program, and quarterly compliance reports to the WSBA will document that professional judgment remains independent and consumer interests are prioritized.

Risk (short descriptor)	Over-Solicitation or Unwanted Client Contact
Likelihood of Harm	Very Unlikely
Potential Severity of Harm	Negligible

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

Modifying RPC 7.3 to allow proactive, context-based prompts may lead to excessive or unwanted client communications, potentially perceived as solicitation. The risk is "Very unlikely," because although automated outreach could unintentionally exceed consumer expectations, the communication scope is, in great part, chosen by the client. The severity is "Negligible" because, in any event, communications will be carefully limited and monitored.

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

Part of the challenge with traditional estate planning is that lawyers do not have a great way to interact with clients after an estate plan has been completed. Traditionally, lawyers have instructed the client to check back with them regularly and when life circumstances change (either in a document provided with the estate planning documents, or in an annual form letter). Legata's platform enables it to provide more timely and appropriately tailored communications to facilitate estate planning that evolves with the client's life circumstances and changes in the law. Notifications suggesting review of the documents (or the preparation of additional documents that may be appropriate for the client's circumstances) will likely be appreciated by clients, especially because Legata will not charge subscribers to recreate or update existing estate planning documents. Nevertheless, Legata will implement consent-based communication settings. Every outreach message will include clear opt-out options, and communication logs will be reviewed quarterly to ensure compliance with privacy and solicitation standards.

Risk (short descriptor)	Data Misuse by Third-Party Partners or Referrals
Likelihood of Harm	Possible
Potential Severity of Harm	Manageable

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

Permitting integrated services and referral relationships could expose consumer data to misuse or unauthorized sharing. The risk is rated as "Possible" because multiple parties may be provided with consumer data and each new party carries risks. The severity is "Manageable," since data-sharing agreements and controls will mitigate exposure.

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

Any referral partners will be required to agree to industry-standard confidentiality, restricted use and data-handling obligations

➡ prior to accessing shared data or receiving referrals. Shared data and related practices will be reviewed at least annually by the Compliance Officer.

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

Like attorneys working manually from their database of forms, the Legata platform generates estate planning documents using templates that have been carefully curated by attorneys and are then tailored using information provided by the consumer. And, just like attorneys working manually from a database of forms, Legata faces the risk that consumers may receive documents that contain incorrect provisions or omissions due to consumer data entry errors or failure to provide relevant information. This could result in estate plans that do not accurately reflect the consumer's intent or comply with current law. This risk is considered to be

➡ "Very Unlikely" because, even though automated drafting systems and human review processes can occasionally produce drafting errors and consumers sometimes do not fully understand which information is relevant, Legata will be taking measures to help consumers understand what is relevant. This risk is considered "Negligible" as Legata's comprehensive intake procedures, education, attorney oversight and review, and optional paralegal support, will minimize the possibility and impact of this occurring.

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

Legata will use attorney-designed document templates and a comprehensive intake process and enforce mandatory attorney referrals for complex cases that fall outside the scope of Legata's ability to handle electronically or where the client requests attorney involvement. The Compliance Officer will conduct quarterly audits of a sampling of completed documents to ensure accuracy of the system outputs. Legata has designed its intake logic to maximize the likelihood of receiving from the consumer

➡ all relevant information for the documents being prepared. Legata will provide plain-language explanations of estate planning documents written by attorneys, interactive guidance, and referral pathways to licensed attorneys that are built into the platform, as well as notifications of certain important circumstances (e.g., changes in estate tax law). Staff will receive guidance to identify and escalate consumer inquiries that may require attorney intervention. These will help make sure that clients understand their documents and their implementation.

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	Manageable

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

Although Consumers may misunderstand their estate planning documents, it is unlikely that consumers will lose rights because they failed to act on important rights and obligations because they misunderstood information or failed to seek attorney guidance when needed because Legata's forms are created to be flexible to allow for future revisions. For example, the Will provides that any estate asset that wasn't considered in the Will shall be poured over and managed according to the Revocable Trust. The Revocable Trust has built-in flexibility for the Trustee to make revisions should it be necessary to optimize outcomes, such as → transferring assets in the case of a need for a disability trust. The Trustee can seek legal guidance when the need arises and the documents are flexible enough to allow treatments that are specific to the need. Thus the Likelihood of Harm is "Very Unlikely," and the severity is considered "Manageable" because Legata has drafted forms that enable the input and adjustment of lawyers later. In addition, Legata provides ongoing monitoring and notification, no charge to recreate documents for subscribers, and opportunities for attorney consultation and clear paths to obtain support.

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

Legata will provide plain-language explanations of estate planning documents, interactive guidance, and referral pathways to → licensed attorneys that are built into the platform, as well as notifications of certain important circumstances (e.g., changes in estate tax law). Staff will receive guidance to identify and escalate consumer inquiries that may require attorney intervention.

Risk Assessment - WSBA Required 3

Risk: Purchase of unnecessary or inappropriate legal services

Likelihood of Harm	Very Unlikely
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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

Some people may see a risk that, when buying services online, consumers could purchase services that are not needed for their situation or are more complex than necessary, potentially increasing costs or confusion. The likelihood is rated as "Very Unlikely" because we believe that everyone should have an estate plan and Legata's service offers a standard selection of documents that → provide the greatest flexibility for the majority of consumers. However, as more products and services are offered in the future, consumer self-selection in an online platform may occasionally lead to over-purchasing or misunderstanding of services. The severity is "Negligible" because all of the documents offered through the platform are considered standard for many consumers and Legata's disclosures, intake logic, and educational materials mitigate any potential harm.

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

At the present time, the Legata estate planning documents are offered as a very reasonably priced bundle. In the future, if and as additional estate planning tools are offered on an a-la-carte basis, Legata's comprehensive intake questionnaires will help assess each consumer's particular needs. All optional or add-on services will be presented with clear cost and scope disclosures, and the Compliance Officer will periodically review transaction data to ensure recommendations and purchasing decisions align with consumer needs and ethical standards. Additionally, Legata will enable users to update their existing estate plan documents → without additional cost (other than notary costs for signing), ensuring that they do not purchase unnecessary services simply to make routine updates or corrections. We believe the Legata platform is no more risky than traditional legal service providers in this respect; we help clients understand estate planning tools in an accessible, plain-language manner, so they can make informed decisions. We designed our intake process and educational materials to give clients the same information that they would get in a one-on-one meeting with an attorney.

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

Legata will maintain consumer protection throughout the delivery of legal services. Consumer harms will be identified and tracked through an integrated customer support system that will log issues, assign case numbers, and record actions taken. The Compliance Officer will review these records quarterly to identify trends, risks, or recurring concerns, which will be reported to the WSBA. Contingency plans include established protocols for data breaches, service interruptions, and compliance issues, supported by redundant data storage, real-time monitoring, and escalation procedures to ensure timely resolution. To address algorithmic bias, Legata will conduct regular audits of its automated systems and decision logic, which will use diverse data sets and test cases to identify bias, and include human oversight by the Compliance Officer in the review process.

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

Consumers will be able to submit complaints directly to an online ticketing system [REDACTED] which will also be accessible via the Legata system, support email, or toll-free phone number. Upon submission, each complaint will generate a unique case number and acknowledgment. Within two business days, staff will review the complaint and provide an estimated timeline for resolution. Staff will aim to resolve complaints within 14 business days. Unresolved or complex issues, such as those involving potential legal or ethical concerns, will be escalated to the Compliance Officer for further review. All tickets, communications, and outcomes will be logged within the ticketing system for audit purposes, allowing quarterly reporting of complaint trends and resolutions to the WSBA as part of the Entity Regulation Pilot Program.

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

Legata will maintain at least the following type and level of insurance policies and minimum corresponding limits: [REDACTED]

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

Fully explain the nature and purpose of the data sharing or sale, along with measures to protect consumer privacy.

Legata will not sell consumer data. When a referral is requested by the consumer to provide access to complementary services, such as insurance or lawyer assistance with a complex situation, Legata will share the necessary client data with the referral partner with the consumer's knowledge and consent. Any data sharing will be clearly disclosed to the customer and will be facilitated at the customer's request. Any referral partners will be required to agree to industry-standard confidentiality, restricted use and data-handling practices prior to accessing shared data or receiving referrals. Shared data and related practices will be reviewed at least annually by the Compliance Officer.

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

Legata employs robust security, privacy, and confidentiality protocols to safeguard all client information.

[REDACTED] These combined measures protect confidentiality, ensure integrity of client data, and uphold public trust in the secure, compliant operation of the Legata platform.

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

While Legata provides technology-enabled services and is not a law firm, we recognize that our platform facilitates interactions involving sensitive legal information and professional relationships, and we apply conflict management principles consistent with ethical and regulatory expectations for the legal services environment. We will identify potential conflicts of interest through both automated and manual processes: -Our system architecture is designed to segregate estates to prevent the sharing or co-comingling of information among clients with potentially adverse interests (unless our client expressly permits an individual to have access to their estate information, no access is given). In addition, the Legata platform employs role-based access controls and strict data permissions to ensure that confidential client information cannot be accessed by unauthorized personnel of Legata or for unauthorized uses that may compromise impartiality or professional integrity. -For any professional services provided via affiliated attorneys or third-party legal partners, we will require those providers to disclose any existing or potential conflicts prior to engagement. They are required to comply with applicable professional conduct rules, including independent conflict checks and client consent procedures.

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.

-Legata and the Compliance Officer will conduct periodic reviews of platform activities and referral relationships to identify areas where commercial, operational, or ethical conflicts may arise. -Legata prohibits its personnel from having personal, financial, or business relationships that may compromise their impartiality or professional integrity. -Legata will provide regular training to staff on ethical standards, data handling obligations, and conflict-of-interest recognition.

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 customary for SaaS providers of technology-based services, the Legata terms of service currently require arbitration to resolve disputes or claims. They also have a limitation of liability provision that excludes consequential, indirect, punitive, special or incidental damages and that cap Legatas aggregate liability. Since RPC 1.8(h) prohibits lawyers from making an agreement prospectively limiting the lawyer's liability to a client for malpractice permitted by law and the client is independently represented by a lawyer in making the agreement, we would need to understand whether technology-facilitated legal services provided by non-lawyers but supervised by lawyers are covered by RPC 1.8(h). In any event, we would revise the Legata service terms to make clear that any limitations of liability do not apply to the extent that they are prohibited under the RPCs or

applicable law, and we would distinguish between platform operational failures (e.g., uptime, bugs), where caps/exclusions are appropriate, and legal service quality (e.g., negligent advice), where caps/exclusions may violate the RPCs.

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

Ann Parker-Way

Title

VP, Product and General Counsel, Compliance Officer

Entity

Legata, Inc.

City where certifying

[REDACTED]

State where certifying

[REDACTED]

Today's Date

10-22-2025