

**IN THE SUPREME COURT OF FLORIDA**

IN RE: AMENDMENTS TO THE  
RULES REGULATING THE  
FLORIDA BAR – CHAPTER 23  
REGISTERED ONLINE SERVICE  
PROVIDER PROGRAM

CASE NO. SC19-2077

**COMMENTS ON THE FLORIDA BAR'S PETITION TO AMEND THE  
RULES REGULATING THE FLORIDA BAR**

As a member of the Florida Bar, I am writing to comment on and oppose the Florida Bar's Petition to Amend the Rules Regulating the Florida Bar.

The Petition should be rejected for a variety of reasons. The key reasons are set forth below.

First, the Petition would amend the Rules Regulating the Florida Bar in such a way that "Registered Online Service Providers" would be permitted to advertise legal services in Florida without having those advertisements reviewed by The Florida Bar. This will lead to false and misleading advertising, which will injure clients.

Second, because Registered Online Service Providers do not have to have their advertisements reviewed, they gain an unfair competitive advantage over Florida lawyers. Florida lawyers must have their advertisements reviewed by The Bar, must change their advertisements if required by The Bar, and face increased

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costs and delays as a result of this process. These delays, costs, and advertising limitations will make it more difficult for Florida lawyers to compete with Registered Online Service Providers.

And third, The Bar will not undertake any serious vetting of Registered Online Service Providers, which means that those with criminal backgrounds and other potentially disqualifying characteristics will be permitted to sell legal services to Florida clients. This will likely result in injury to such clients.

WHEREFORE, I respectfully request that the Court deny the Petition to Amend the Rules Regulating the Florida Bar.

Dated: December 20, 2019.

Respectfully submitted,

s/ Joel Mumford

Joel Mumford

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been filed on this 20th day of December, 2019, via the statewide e-portal and true and correct copies were furnished via email using the statewide e-portal to

Joshua E. Doyle, Executive Director  
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*s/ Joel Mumford*  
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