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December 23, 2019

Re: Chapter 23, Registered On-Line Service Provider Program, SC2019-2077

To whom it may concern:

Please accept this letter in opposition to the above-referenced proposed new Rule that would permit tech companies, hedge funds, and other non-lawyers to sell legal services in Florida. Please consider the following in opposition to this rule:

- Ads from "online service providers" will ***not be reviewed*** by The Florida Bar, resulting in ***false and misleading advertising*** that injures consumers and provides an unfair competitive advantage over regulated law firms.
- Online service providers" are ***less likely*** to "face sanctions for the unlicensed practice of law," which will harm Florida consumers and lawyers.
- "Online service providers" will be able to advertise that they have registered with The Florida Bar, but The Bar ***won't actually handle or resolve consumer complaints***.

Thank you for your time and attention to this very important matter.

Sincerely,

Adam D. Harmelin, Esquire

RECEIVED, 12/23/2019 11:55:33 AM, Clerk, Supreme Court