

**IN THE SUPREME COURT OF  
FLORIDA**

CASE NO. SC19-2077

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

**COMMENT OPPOSING THE FLORIDA BAR'S PETITION TO  
AMEND THE RULES REGULATING THE FLORIDA BAR**

This comment is submitted by **José Mauricio Bello**, a member of The Florida Bar in good standing. I have read and oppose the Florida Bar's Petition to Amend the Rules Regulating the Florida Bar (Chapter 23 -Registered Online Service Provider Program). In support of this Comment, I adopt and incorporate by reference the Comment of James J. McGuire Opposing The Florida Bar's Petition To Amend The Rules Regulating The Florida Bar, as well as the “Comment On The Florida Bar’s Dangerous And Reckless Proposal (Chapter 23)” by the Hon. Eric M. Beller, previously filed with this Court.

As a practicality, the proposed rule will transform the legal profession, in a commodity. Further, it will be a mediocre (if at all) commodity, where the strict ethical standards applicable to us, licensed lawyers, will succumb upon companies (located either in the U.S. or overseas) offering legal services or intermediation services.

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Consumers will have some sort of legal “anesthesia” by having the belief that their legal matters are effectively provided. Soon we will have a myriad invalid prenuptial agreements, defective trusts and wills, usurious promissory notes, broken partnerships, and so on. For those able to pay, litigation will increase. For those unable to pay a litigator (or where litigation is not cost-effective) impunity will reign. Trust in the legal system will vanish.

The legal profession shall indeed be prepared for new times, but that will not be accomplished by opening the gates to unlicensed, unregulated and faceless corporate actors, immune to discipline and scrutiny. The legal profession, and the very close relationship between lawyers and clients, cannot be replaced by a technology company and we cannot compare the legal profession to Kodak, Blockbuster Video, or a Taxicab company, when demanding ways to adapt the same to the new times. We do not “sell documents.” Rather, we analyze, we advise, we counsel. Only after that, we draft. And we draft thoroughly to protect our client’s interest. And we strive to protect our reputation, as professionals, as members of the community.

If anything, we should be concerned with the litany of ways of unlicensed practice of law rampant now in the State, particularly in South Florida.

Respectfully submitted,

/S/ José Mauricio Bello

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been filed on this 10<sup>th</sup> day of January, 2020, 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, The Florida Bar

John M. Stewart President, The Florida Bar

Dori Foster-Morales / President-Elect, The Florida Bar

Lori S. Holcomb / Ethics and Consumer Protection, The Florida Bar

Elizabeth Clark Tarbert / Ethics Counsel, The Florida Bar

### **CERTIFICATE OF COMPLIANCE WITH FLA. R. APP. P. 9.210**

Undersigned counsel hereby certifies that this comment is typed in 14-point (proportionately spaced) Times New Roman and otherwise meets the requirements of Florida Rule of Appellate Procedure 9.210.

/S/ José Mauricio Bello

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