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January 13, 2020

Florida Supreme Court  
Clerk of Court  
500 South Duvall Street  
Tallahassee, FL 32399-1927

Joshua Doyle  
Executive Director of the Florida Bar  
[jdoyle@florida-bar.org](mailto:jdoyle@florida-bar.org)

Re: Amendments to Rules Regulating the Florida Bar – Chapter 23 Registered Online Service Provider Program, Case No. SC19-2077.

Dear Mr. Doyle

I practiced in Illinois before moving to Florida. Oh, the hoops I had to go through to get licensed in Florida. Many attorneys from other states move to Florida to retire (or are snow birds). Rather than go through all the hoops I had to jump through to be able to practice here, all they have to do is sell their services as non-lawyers. I found the following article from 2012 (Washington Post) [https://www.washingtonpost.com/business/capitalbusiness/can-someone-who-is-not-a-lawyer-own-part-of-a-law-firm-in-dc-yes/2012/04/06/gIQAAnrvd4S\\_story.html](https://www.washingtonpost.com/business/capitalbusiness/can-someone-who-is-not-a-lawyer-own-part-of-a-law-firm-in-dc-yes/2012/04/06/gIQAAnrvd4S_story.html)

It appears that this is allowed in D.C. and the ABA supports it. The article states that much of the services has to do with lobbying (perhaps because it is D.C.) As with everything else, whether it is good or bad depends on the ethics of the people involved. What are the qualifications for the non-lawyers. In order to practice here, I had to go through a thorough background check including fingerprint check, 3 years of bank records, all employers since the age of 18, & recommendations. If something goes wrong, I am responsible. Who is responsible for the non-lawyer?

Where "The most recent data from the public says approximately 60% of the public think lawyers are "greedy," and only 20% think that they are either "honest or compassionate." The public has always had a basket full of nasty comments and a laundry list of jokes. The protests of the public always change but they are always present."

So, if you are disbarred e.g., Wisconsin, could you just join as a non-lawyer?

"The most recent data from the public says approximately 60% of the public think lawyers are "greedy," and only 20% think that they are either "honest or compassionate." The public has always had a basket full of nasty comments and a laundry list of jokes. The protests of the public always change, but they are always present." See: <https://www.lawcrossing.com/article/4995/Why-is-the-Legal-Profession-Given-a-Bad-Reputation/>

Cordially,

  
Caroline Zoes  
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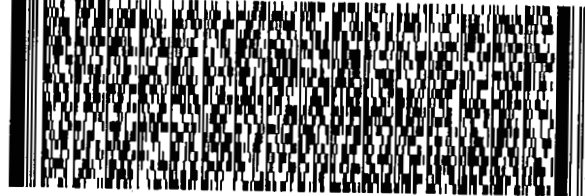
TO JUSTICE R POLSTON  
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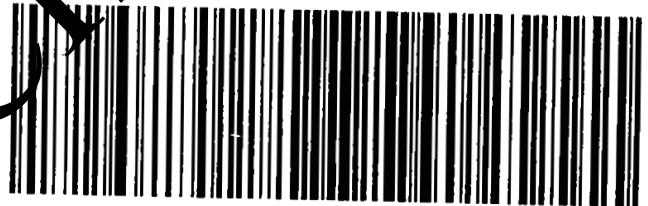
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