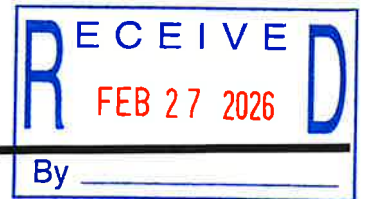


Kim Meador



From: Law Office of Joshua Pearce <joshua@pearce-legal.com>
Sent: Friday, February 27, 2026 7:30 AM
To: appellatecourtclerk
Subject: Supreme Court's nonlawyer ownership question

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To Appellate Court Clerk:

In response to the Supreme Court's September 16, 2025, order soliciting public comment on potential regulatory reforms, I respectfully oppose any measure that would permit non-lawyers to own law firms or share in legal fees.

Though the goal of expanding access to justice is important, there is no evidence that non-lawyer ownership or outside investment expands access to legal services for underserved populations. Indeed, since Arizona permitted non-lawyer ownership, personal injury and mass-tort litigation has become the predominant practice area among Alternative Business Structure firms, with more than seven times as many such firms as in any other field of law. Tennesseans needing assistance with personal injury and mass-tort claims are not underserved as a class, and their ability to pay for representation is generally not a barrier because of contingency-fee structures. There is no empirical evidence showing that the introduction of Alternative Business Structures has improved access to justice in Arizona, and no reason to believe that for-profit investment would meaningfully assist the underprivileged or residents of so-called "legal deserts" in obtaining representation.

If anything, there is a tremendous risk of reducing access to justice among the most affected populations. Private-equity investment has led to widespread closures of rural hospitals in favor of consolidation in metropolitan areas. The same economic incentives would predict similar outcomes in the legal profession, as investors seek scale, efficiency, and higher margins, often at the expense of rural and low-profit communities. The poor would find it even more challenging to obtain cost-effective legal representation as investors chase the most profitable cases, not the least profitable ones. Moreover, non-lawyer investors could restrict or discourage lawyers' ability to devote time and firm resources to pro bono representation, further reducing access to justice for those most in need.

There are other dangers to inviting non-lawyers to control law firms. Clients' confidential data could be exploited by corporate owners for marketing or cross-industry analytics, particularly where firm data is integrated into broader corporate or artificial-intelligence systems. Advertising controlled by non-lawyers could push ethical boundaries – or disregard them altogether. Investigating and enforcing ethical violations by non-lawyer owners would place significant additional strain on an already limited disciplinary and regulatory system.

As an attorney that provides services to underserved rural communities I applaud the Court's thoughtful consideration of innovative ways to improve access to justice, non-lawyer ownership or fee sharing is not the answer and would undermine core principles of the profession.

Best regards,

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