

Meeting Minutes
Utah Supreme Court's Ad Hoc Committee on Regulatory Reform
AI/Legal Tech Meeting Minutes
Friday, December 19, 2025
12:00 – 1:00
Virtual & In-person

The Committee accepted the minutes from the previous meeting with minor revisions.

The meeting agenda identified Zach Boyd and Brady Young from the Governor's Office of AI Policy as guests for this meeting, but it was clarified that they will attend the next AI/Legal Tech meeting.

The group briefly discussed the December 11, 2025 Executive Order and its relevance to Utah's AI and legal technology initiatives.

- The Executive Order will be discussed in greater detail in the next meeting with Zach and Brady.
- Not a significant concern at this time where the focus is on regulating the practice of law, perhaps using safe harbor provisions, not regulating AI. Some discussion of whether state regulation adds value within UT with non-Utah-specific technologies and whether UT-specific AI tools warrant differentiated regulation.

Connor reported his research on how other states regulate/carve out AI/tech tools related to the practice of law.

- Entity-Based Authorizations
 - Arizona's ABS program affirmatively authorizes entities with nonlawyer ownership or decision-making authority to provide legal services.
- Programmatic/Pilot Carve-Outs
 - Washington and Utah both have pilot programs (e.g., the Sandbox).
- Limited scope non-lawyer authorizations, like CJA regulation (Minnesota and Oregon)
- Disclosure-based authorizations - California
- Colorado doesn't necessarily make any carve-outs. Colorado's approach is enforcement discretion, not authorization. Nevertheless, it is an important state to watch. IAALS is

supporting CO's non-prosecution approach. Discussion of non-prosecution policy is a half-step towards regulation, for a slow transition towards a rule change.

The group discussed other AI/Legal Tech-related issues in preparation for the preliminary presentation for the Court.

Alex shared the Open Source Law Project with the group. This is a project that Alex developed and has been working on that includes a chatbot, Minerva, which is specifically and exclusively trained on Utah law. Terms of use and disclosures, with instructions not to enter confidential information, were discussed. Entered test examples of non-confidential information and confidential information to compare results. Discussion of accuracy of information compared to first year attorney, but simplicity of changing the validity of results with simple code changes. The project was useful for discussing disclaimers, the practice of law, and other concerns. Also discussed click-through disclaimers, knowing and voluntary waiver issues, civil consumer harm protections (civil actions) compared to legal malpractice.

Discussion of back-end control/disciplinary mechanisms like OPC. The Sandbox complaint mechanism was different from the OPC process, provided limited data about the services provided, and is not a parallel comparison. The audit process was also complicated and labor intensive, but had aimed to have a peer-reviewed process. OPC option raises resources concerns and whether a licensing fee would be collected to contribute to those costs. Some discussion of whether the OPC process would deter innovation, particularly for free tools. Some discussion of requirements for moderate-innovation entities subject to OPC to use compliance attorneys.

Action Items

- The group will need to begin preparing a preliminary report/recommendation for the Court.
- Connor, Nick, and Maryt will have a draft of the preliminary report available for workshopping by the next meeting.