



The North Carolina State Bar
Authorized Practice Committee

217 E. Edenton Street (27601)
Post Office Box 25908
Raleigh, North Carolina 27611
Telephone (919) 828-4620
Web: www.ncbar.gov

February 5, 2015

Mr. Nathaniel Coleman
Attorney at Law
211 S. Wright Street
PO Box 340
Burgaw, NC 28425

Re: Unauthorized Practice of Law of Ammon McNeff dba Legally Mine, LLC
File number: 15AP0008

Dear Mr. Coleman:

We have opened a file concerning the above-referenced matter. After the Committee has made a decision, I will notify you of the results. Please be advised that authorized practice files are considered public and, upon request, individuals are allowed to review the files.

Thank you for bringing this matter to our attention. Please contact me if you have any questions.

Sincerely,

David R. Johnson
Deputy Counsel

DRJ/lb



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Raleigh, North Carolina 27611
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February 5, 2015

Ammon McNeff
Legally Mine, LLC
225 W. 520 N.
Orem, Utah 84057

LETTER OF NOTICE

Re: Allegation of Unauthorized Practice of Law
File number: 15AP0008

Dear Mr. McNeff:

This is to advise you that the Authorized Practice Committee of the North Carolina State Bar has received information that you are engaged in activities that may constitute the unauthorized practice of law in North Carolina. The North Carolina State Bar, through its Authorized Practice Committee, is conducting an inquiry into your activities pursuant to the statutory authority granted by North Carolina General Statute Section 84-37 and Chapter One, Subchapter D, Section .0205 of the Rules and Regulations of the North Carolina State Bar. You are requested to respond to this Letter of Notice in writing within fifteen (15) days of its receipt. If you fail to respond within fifteen (15) days after receipt, the Chairman of the Committee may instruct the Counsel of the North Carolina State Bar to proceed with appropriate action in accordance with Section .0207 of the Rules, including seeking injunctive relief.

The information received by the Committee may be summarized as follows:

You are the president of a Utah corporation entitled "Legally Mine, LLC." Neither you nor your company is registered to do business or provide legal services in North Carolina. Yet, at a recent continuing education seminar in North Carolina, you held out as able to provide legal services to those in attendance, which included several North Carolina residents. Some of these residents retained you to provide them with legal services relating to asset protection and lawsuit representation. You indicated that you could provide these services to them and charged them for the same. You provided these residents with no beneficial assistance and yet you did not refund any of their money.

The North Carolina General Statutes prohibit individuals or entities other than North Carolina licensed attorneys at law from providing or offering to provide legal services in North Carolina to other persons, firms, or corporations. Under the statutes, legal services include giving legal advice or counsel and aiding or assisting in representation of the party before the courts. The statutes also

C. Colon Willoughby, Jr., Chair
Rebecca Eggers-Gryder, Vice-Chair

prohibit a nonlawyer from holding out to others as a lawyer or as able to provide legal services for others. A business may not offer legal services or the services of a lawyer to its customers even if those services are provided by a licensed North Carolina attorney.

The Committee asks that you respond in writing by describing your version of the events, the services you provided, and any other response to this letter of notice that you deem appropriate. Please be advised that Authorized Practice files are considered public and, upon request, individuals are allowed to review the files.

The Committee has not made any assumptions regarding the validity of the complaint against you. In those cases where a violation of the unauthorized practice statutes is found to be inadvertent or without knowledge of the statutes, the Committee generally concludes its investigation upon assurance that the prohibited act will not be repeated.

I am enclosing copies of pertinent statutes regarding the unauthorized practice of law. It may be advisable for you to consult an attorney before responding to this Letter of Notice because the unauthorized practice of law can be prosecuted as a misdemeanor criminal offense in North Carolina.

Please give this matter your immediate attention. You may contact me with any questions.

Sincerely,

A handwritten signature in black ink that reads "David R. Johnson". The signature is fluid and cursive, with a horizontal line extending from the end of the name. A faint, large watermark of the North Carolina State Bar logo is visible in the background behind the signature.

David R. Johnson
Deputy Counsel

/drj

Enclosure

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

91 7199 9991 7034 7931 4257

From: Nathaniel T. Coleman [REDACTED]
Sent: Friday, January 16, 2015 6:32 PM
To: David R. Johnson
Subject: potential unauthorized practice

Mr. Johnson,

I have a client who utilized services that I believe to be the unauthorized practice of law. If I thought that something was merely an isolated incident or a grey area, I would probably not bother you with it. However, this particular situation could potentially be an ongoing problem for other individuals. My clients run a veterinary clinic. While at a continuing education conference, they attended a seminar, for which they received continuing education credit, led by a company named Legally Mine, LLC. My particular concern for potential future harm stems from the fact that the company is apparently able to position itself in a setting which lends significant credibility, such as in this instance. My clients ultimately hired Legally Mine, LLC and paid for various services to be performed. Luckily, not all of the services had been performed because they would have needed to be undone. My clients have indicated to me that there is no indication that the company employs a North Carolina licensed attorney. I have attached a letter that I sent to Legally Mine, LLC that states the types of services and advice that they were supposedly providing my clients. My clients previously signed an agreement with them and authorized the company to make transfers that my clients needed to revoke. Anyway, this is just an FYI. If you have any questions or concerns, please do not hesitate to contact me.

sincerely,

Nathaniel T. Coleman, Esq.
Attorney at Law

211 S. Wright St.
P.O. Box 340
Burgaw, NC 28425

phone: [REDACTED]
Fax (toll free): [REDACTED]
[REDACTED]

This e-mail may be privileged and/or confidential, and the sender does not waive any related rights and obligations. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately.

This message may have been sent for the purpose of collecting a debt. Any information communicated will be used to collect that debt.

"IRS CIRCULAR 230 NOTICE: To ensure compliance with requirements imposed by the IRS, we inform you that any tax



225 W 520 N
Orem, UT 84057
Telephone: (800) 375-2453
Web: legallymineusa.com

February 24, 2015

David R. Johnson
The North Carolina State Bar
Authorized Practice Committee
217 E. Edenton Street (27601)
Raleigh, North Carolina 27611

RECEIVED
NC STATE BAR
2015 MAR -5 PM 3:31

Re: Allegation of Unauthorized Practice of Law
File number: 15AP0008

Dear Mr. Johnson,

I received your letter dated February 5, 2015. As requested, I have included a brief summary of our services. Your letter specifically asked for our "version of events," but your letter did not mention any specific names of people who purchased our services or attended one of our events, so I will have to speak in general terms about the services we provide. Legally Mine provides two basic services, one called Premium+, and the second called Premium Asset Protection Document Access with Entity Creation. I will address not only our general operation, but both of these services.

First, it is important to understand our general operations; Legally Mine does not hold itself out as a law firm. While the rules regarding the unauthorized practice of law are different in Utah, as compared with North Carolina, we take special precautions to draw the distinction between the services we provide, and the services provided by a law firm. For example, we do not represent customers in court, we do not provide customized legal documents, and we do not advise clients as to their specific rights in any legal action. We strive to make this clear to any potential customers at events, and throughout our communications with customers after they purchase our services. We encourage clients to confer with local legal counsel, and we are ultimately happy to implement whatever plan their local counsel recommends. We train our event staff, including event speakers, to be clear on the fact that Legally Mine is not a law firm. Furthermore, in our Terms of Service for our website, the very first point clearly states Legally Mine is not a law firm.

1. I understand and agree that Legally Mine is not a law firm or an attorney, may not perform services performed by an attorney, and is not the substitute for the advice of an attorney. Rather, I am representing myself in this legal matter. No attorney-client relationship or privilege is created with Legally Mine.

You can see the rest of our Terms of Service here: <http://legallymineusa.com/terms-of-use.html>. Any email communication with a customer also clearly indicates Legally Mine is not a law firm, and does not provide legal advice. The full language of the disclaimer can be seen here:

This email does not constitute personal legal or tax advice. For personal legal or tax advice, please consult your licensed personal attorney or personal accountant. Our company accepts no liability for the content of this email, or for the consequences of any actions taken on the basis of the information provided, unless that information is subsequently confirmed in writing. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited.

We implemented these notices several years ago, in an attempt to make it abundantly clear that Legally Mine is not a law firm. If your office has further recommendations, we would be happy to put those into effect.

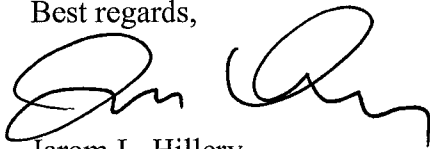
The first service we provide to customers is called Premium+. It is a one-year contract at \$100 per month. All Legally Mine customers sign up for this service at the minimum. Premium+ entitles a client to several services, including: web-software updates, an Asset Protection Blueprint, meetings and minutes preparation for business entities, other basic document preparation (such as Articles of Organization for an LLC and standard operating agreements), information about general business and tax strategies, and access to our staff attorneys and other office staff for questions about general tax and asset protection principles. We are careful to defer to local attorneys and CPAs for state-specific questions regarding taxes, business entities, or other legal matters. We also offer to review any documents for existing business entities in order to point out areas of concern and to incorporate those entities into the overall asset protection structure.

As stated above, we cannot give legal advice or provide representation, so instead we walk customers through the process of creating basic limited liability companies and limited partnerships, offer general business planning information, and provide federal tax strategies. Our staff attorneys consult with our customers' CPAs, attorneys, and financial advisers to ensure to ensure that any business or tax recommendations do not conflict with local laws or regulations. The outline of the business plan and tax strategies that we provide is referred to internally as the Asset Protection Blueprint. A member of our legal team reviews this Blueprint with a customer and any local advisers the customer would like us to speak with. In this meeting, we talk about the general differences between a Last Will & Testament & Living Trusts, the differences between various business entities (e.g. LLCs, sole proprietorships, and corporations), and discuss some basic tax strategies. A sample Blueprint can be provided upon request. I did not see anything in the rules you sent to us which would indicate that these services are inappropriate or otherwise conflict with North Carolina law.

The second service we provide is our Premium Asset Protection Document Access with Entity Creation (hereinafter "DAECP"). The primary service provided by our DAECP is access to fillable legal forms on our website, mylegalstronghold.com. The primary difference between our website and a website like legalzoom.com is, instead of paying per-document, the customer pays a flat fee to gain access to the website and can create as many documents as he or she likes. As a complimentary service (meaning no additional fees are charged by our company for the filing of an entity), we also file any LLCs, Limited Partnerships, Trusts, or other entities requested by the client. I noted that § 84-4 in the excerpts from the North Carolina General Statutes states that non-attorneys cannot "organize corporations or prepare for another person, firm or corporation, any other legal document." Legally Mine very rarely files corporations, and works almost exclusively with LLCs, LPs, and various types of trusts. These entities are generally filed in Utah or Alaska, though states rules frequently require foreign entities to register in the state where the customer resides. Due to the prevalence of websites such as incorporate.com, business-genesis.com, and incfile.com, which purport to similarly file LLCs in North Carolina, we assumed that such a practice was permitted.

This covers the general nature and operation of, and services provided by, Legally Mine. We will be happy to provide any further clarification as requested, though any specifics will require additional information about the complaining party.

Best regards,

A handwritten signature in black ink, appearing to read 'Jarom L. Hillery', written over a horizontal line.

Jarom L. Hillery
Senior VP of Legal Team



The North Carolina State Bar
Office of Counsel

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March 6, 2015

Mr. Jarom L. Hillery
Legally Mine, LLC
225 W. 520 N.
Orem, Utah 84057

Re: Alleged unauthorized practice of law
Our file number: 15AP0008

Dear Mr. Hillery:

Your response in the above-listed matter was received by the State Bar on March 5, 2015.

Your response will be filed pending completion of the investigation. If additional information is needed, you may be contacted. Your response, as well as other information gathered during the investigation, will be provided to the Authorized Practice Committee for consideration at its quarterly meeting following completion of the investigation. You will be notified for the State Bar's decision shortly thereafter.

Thank you for your cooperation.

Sincerely,

David R. Johnson
Deputy Counsel

DRJ/lb

C. Colon Willoughby, Jr., Chair
Rebecca Eggers-Gryder, Vice-Chair



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Authorized Practice Committee

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March 26, 2015

Mr. Ammon McNeff
Legally Mine, LLC
225 W. 520 N.
Orem, Utah 84057

NOTICE OF MEETING

Re: Allegation of Unauthorized Practice of Law
File number: 15AP0008

Dear Mr. McNeff:

This is to inform you that the Authorized Practice Committee of the North Carolina State Bar will review the information that it has received concerning the allegation that you are engaged in activities that may constitute the unauthorized practice of law in North Carolina at its regularly scheduled meeting on April 15, 2015, beginning at 1:30 pm in Room 221 of the North Carolina State Bar, Raleigh, North Carolina. As you will recall, you were contacted about the inquiry and were given an opportunity to respond and provide information to the Committee. The Committee will consider both your response and all other information it has received. A copy of the Committee's agenda is enclosed.

The meetings of the Committee are generally open to the public and you are welcome to attend. If you wish, you may request an opportunity to make a brief presentation to the Committee. However, because of the nature of the Committee and time constraints, such presentations may not exceed five minutes without the prior consent of the Chair. If you wish to make a presentation, please contact me at least two days before the meeting so that any necessary arrangements may be made.

Sincerely,

David R. Johnson
Deputy Counsel

/drj

Enclosure

C. Colon Willoughby, Jr., Chair
Rebecca Eggers-Gryder, Vice-Chair



The North Carolina State Bar
Authorized Practice Committee

217 E. Edenton Street (27601)
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May 1, 2015

Ammon McNeff
Legally Mine, LLC
225 W. 520 N.
Orem, Utah 84057

LETTER OF CAUTION

Re: Allegation of Unauthorized Practice of Law
File number: 15AP0008

Dear Mr. McNeff:

On April 15, 2015, the Authorized Practice Committee of the North Carolina State Bar met and considered the results of its investigation into the above referenced matter as it is charged with doing by N.C. Gen. Stat. § 84-37 and the State Bar's rules and regulations. You were informed of the allegations before the Committee and given an opportunity to respond. You responded and the Committee carefully considered both your response and the other information received by it.

Based upon all of the information available to it, the Committee believes these are the pertinent facts in this matter:

You are the president of a Utah corporation entitled "Legally Mine, LLC." Neither you nor your company is registered to do business or provide legal services in North Carolina. Yet, at a recent continuing education seminar in North Carolina, you held out as able to provide legal services to those in attendance, which included several North Carolina residents. Some of these residents retained you to provide them with legal services relating to asset protection and lawsuit representation. You indicated that you could provide these services to them and charged them for the same. You provided these residents with no beneficial assistance and yet you did not refund any of their money.

In response to the Committee's inquiry, you do not dispute the factual allegations in the complaint, but rather attempt to explain the nature of your services, claiming that they do not constitute the practice of law in North Carolina. You note that since your company "cannot give legal advice or provide representation, [you] instead walk customers through the process of creating basic limited liability companies and limited partnerships, offer general business planning information, and provide federal tax strategies." You claim that your "staff

C. Colon Willoughby, Jr., Chair
Rebecca Eggers-Gryder, Vice-Chair

attorneys consult with [] customers . . . to ensure that any business or tax recommendations do not conflict with local laws or regulations.”

The North Carolina General Statutes prohibit individuals or entities other than active members of the North Carolina State Bar from practicing law or providing or offering to provide legal services in North Carolina to other persons, firms, or corporations. Under the statutes, legal services include giving legal advice or counsel and aiding or assisting in representation of the party before the courts. The statutes also prohibit a nonlawyer from holding out to others as a lawyer or as able to provide legal services for others. A business may not offer legal services or the services of a lawyer to its customers even if those services are provided by a licensed North Carolina attorney. N.C. Gen. Stat. §§ 84-2.1, 4, and 5.

The Committee considered your contentions in response but did not find them dispositive of the issues. Many of the services you describe your company providing unquestionably constitute the practice of law in North Carolina, including, but not limited to: business creation services, incorporation services, legal representation or protection, document creation services, the services of “staff attorneys,” and legal advice. Given that you admit to having “staff attorneys” who “consult with [] customers . . . to ensure that any business or tax recommendations do not conflict with local laws or regulations[,]” it is abundantly clear to the Committee that you are offering legal services and the services of attorneys to North Carolina residents, in violation of N.C. Gen. Stat. §§ 84-2.1, 4, and 5. Accordingly, because the Committee concluded that there was probable cause to believe that your activities violate the unauthorized practice of law statutes, it voted to issue you this Letter of Caution.

The Committee expects that you will stop engaging in these activities that violate the unauthorized practice of law statutes as a result of this Letter of Caution. The Committee is using its discretion not to pursue any proceedings for injunction or other action at this time but reserves its right to re-visit your conduct in the future in its discretion should you elect to continue it.

Thank you for your cooperation in this matter. Please contact the Committee’s counsel, David R. Johnson, if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "C. Colon Willoughby, Jr.", written in a cursive style.

C. Colon Willoughby, Jr., Chair
Authorized Practice Committee



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Authorized Practice Committee

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May 1, 2015

Mr. Nathaniel Coleman
Attorney at Law
211 S. Wright Street PO Box 340
Burgaw, NC 28425

Re: Authorized Practice Committee complaint filed against Legally Mine, LLC
Our file number: 15AP0008

Dear Mr. Coleman:

Enclosed please find a copy of the Authorized Practice Committee's action in the above referenced matter. Thank you for bringing this matter to our attention. If you have any questions, please do not hesitate to contact me.

Sincerely,

David R. Johnson
Deputy Counsel

Enclosure

DRJ/lb

C. Colon Willoughby, Jr., Chair
Rebecca Eggers-Gryder, Vice-Chair

WAKE COUNTY

NORTH CAROLINA

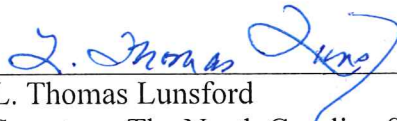
Certificate of True Copy

Office of the Secretary of the North Carolina State Bar

As Secretary and official custodian of the public records of the North Carolina State Bar and the Disciplinary Hearing Commission of the State of North Carolina, I certify:

The attached copy of the Letter of Caution in the matter before the Authorized Practice Committee of the North Carolina State Bar with respect to Legally Mine, LLC, file number 15AP0008, is a true and accurate copy of the original now on file in this office.

This the 7th day of July, 2017



L. Thomas Lunsford
Secretary, The North Carolina State Bar

