

RECEIVED MAY 23 2024



ARIZONA SUPREME COURT
Application for Initial License of
Alternative Business Structure

CAREFULLY READ THE INSTRUCTIONS AND INFORMATION ON PAGE 11.

Pursuant to Arizona Code of Judicial Administration §7-209(E)(2), failure to provide or fully disclose information may result in denial of the application, delay in processing, or other disciplinary action. If the Alternative Business Structure is not formed at the time of filing, this application is reflective of the facts that will exist upon licensure.

SECTION I: APPLICANT INFORMATION

Organization Legal Name: Sterling Shield Legal LLC	
List name of business to be certified with this application: Sterling Shield Legal LLC List ALL assumed, DBA's or trade names:	
Business Address: 3800 N Central Ave Ste 460, Phoenix, AZ, 85012 (Street Address) (City) (State) (Zip)	
Business Telephone Number: [REDACTED]	Business Fax Number:
Business E-Mail Address:	Date business formed: (Month/Day/Year) 05/13/2024
Federal Tax ID Num [REDACTED]	State Tax ID Number:
Check appropriate business organization: ☐ Corporation ☒ Limited Liability Co. ☐ Partnership ☐ Sole Proprietorship Applicant is applying as a: ☒ Traditional Law Firm ☐ Large non-law firm ☐ Small non-law firm ☐ Non-profit – Arizona ☐ Non-profit – non-Arizona ☐ International applicant Applicant is registered with the Arizona Corporate Commission or Secretary of State: ☒ Yes – If registered, applicant must submit copies of Articles of Incorporation/Organization or Partnership Agreements, and a Certificate of Good Standing. ☐ No – If not registered, applicant must submit copies of draft Articles of Incorporation/Organization or Partnership Agreements and explain why entity is not registered. (See instructions for additional information)	

S/23 MW 60005
#144

Statutory Agent's Name: C T Corporation System	
Statutory Agent's Address (not a P.O. Box): Phoenix, AZ, 85012 (Street Address) (City) (State) (Zip)	
Statutory Agent's email address:	
Business and Home Telephone Number: 	

Designated Principal's Full Name: William Vacek	
Designated Principal's Business address: Phoenix, AZ, 85012 (Street Address) (City) (State) (Zip)	
Designated Principal's email address:	
Designated Principal's Home address: 	
(State) (Zip)	
Number:	

Compliance Lawyer's Full Name: Harold Dawson	
Compliance Lawyer's Business address: Peoria, AZ, 85382 (Street Address) (City) (State) (Zip)	
Compliance Lawyer's email address:	
Compliance Lawyer's Home address: 	
(State) (Zip)	

SECTION II: BUSINESS ENTITY AUTHORIZED PERSON(S) INFORMATION. List ALL Authorized Persons (add additional pages, if necessary). Each person listed below must complete and sign the **Authorized Person Application**.

☒ Individual ☐ Entity

Authorized Person's Full Name:	
William Vacek	
Email address	[REDACTED]
Social Security Number	[REDACTED]
Does authorized person have a legal right to exercise decision making authority on behalf of the alternative business structure applicant? (see Arizona Code of Judicial Administration § 7-209 for definitions of Authorized Person and decision making authority)? ☒ Yes ☐ No	
Does authorized person have an economic interest in the alternative business structure equal to or more than 10 percent of all economic interests of the alternative business structure? (see Arizona Code of Judicial Administration § 7-209 for definition of "economic interest") ☒ Yes ☐ No	

Authorized Person Entity's Name:	
Name and Title/Position of entity contact:	
Social Security Number:	Email address:
Does person have contract, voting, business operation negotiation authority? ☐ Yes ☐ No	
Does person have an economic interest in the alternative business structure equal to or more than 10 percent of all economic interests of the alternative business structure? ☐ Yes ☐ No	

Authorized Person's Full Name:	Corporate Title/Position:
Social Security Number:	Email address:
Does person have contract, voting, business operation negotiation authority? ☐ Yes ☐ No	
Does person have an economic interest in the alternative business structure equal to or more than 10 percent of all economic interests of the alternative business structure? ☐ Yes ☐ No	

SECTION III: BUSINESS DESCRIPTION. Submit additional sheets if necessary.

Provide a brief description of the general nature of the business:

his general nature of our business model is driven by a noble mission: to democratize access to justice.

We seek to bridge the gap for disadvantaged and low-income families who often face insurmountable barriers to legal assistance. By offering affordable services, our aim is to empower individuals with the legal support they need for critical matters like housing, employment, family disputes and appropriate claim settlement.

Through community outreach, partnerships, and innovative pricing models, our business model fosters social

SECTION IV: BUSINESS OBJECTIVES

Describe how the business will advance one or more of the following regulatory objectives:

- Protecting and promoting the public interest
- Promoting access to legal services
- Advancing the administration of justice and rule of law
- Encouraging an independent, strong, diverse, and effective legal profession
- Promoting and maintaining adherence to professional principles

Our business objectives are centered on enhancing accessibility and inclusivity within the legal landscape:

Affordable Legal Fees: We commit to a maximum hourly rate of \$175, ensuring that legal services remain within reach for all individuals, irrespective of their financial standing.

Flexible Payment Plans: Clients will have the option to spread payments over time, easing the burden of upfront costs and facilitating access to crucial legal support.

Support for Indigent Clients: We prioritize assisting indigent clients who cannot afford traditional legal fees, ensuring that justice is not limited by financial constraints.

Diversified Workforce: We are dedicated to building a diverse team, reflecting the communities we serve, and fostering an inclusive environment that values different perspectives and experiences.

Community Outreach: Through targeted advertising campaigns, we aim to raise awareness about the availabil

SECTION V: GOVERNANCE STRUCTURES AND POLICIES

Describe how the governance structures and policies in place ensure:

- Lawyers providing legal services to consumers act with independence consistent with the lawyers' professional responsibilities;
- The alternative business structure maintains proper standards of work;
- The lawyer makes decisions in the best interest of clients;
- Confidentiality consistent with Arizona Rule of Supreme Court 42 is maintained; and
- Any other business policies or procedures that do not interfere with a lawyers' duties and responsibilities to clients. (Submit additional sheets or supporting documents if necessary.)

All decisions will be made in the best interest of the client, staff will be monitored and periodically reviewed for adherence to model rules for professional conduct. The compliance lawyer will supervise all legal decisions to ensure proper standards of work is maintained. Firm case management software will be supervised and monitored to ensure all confidentially, all conflicts will be checked in a timely manner to ensure no conflicts are present before taking on new clients. The duties to the client will be come above all.

SECTION VI: NON-LEGAL SERVICES RELATED ACTIVITIES

List the non-legal services related activities of the business if not listed in the Business Description Section above:

NA

SECTION VII: APPLICANT BACKGROUND INFORMATION

Note: Starting with this page, do not include personal identifying information (social security number, date of birth, home address, etc.) in the application or in any response to questions from this point forward

Has the business entity, designated principal, compliance lawyer, or ANY authorized person:

Committed material misrepresentation, omission, fraud, dishonesty, or corruption in applying for a certificate or on a certificate examination in this state or any other jurisdiction?	☐ Yes ☒ No
Committed any act constituting material misrepresentation, omission, fraud, dishonesty or corruption in business or financial matters?	☐ Yes ☒ No
Had conduct showing incompetence or a source of injury and loss to the public?	☐ Yes ☒ No
Been convicted by final judgment of a felony, regardless of whether civil rights have been restored?	☐ Yes ☒ No
Been convicted by final judgment of a misdemeanor, regardless of whether civil rights have been restored?	☐ Yes ☒ No
Been admitted to practice law in any jurisdiction? If yes, please identify the jurisdiction(s), Bar license number(s), and provide a disciplinary history for all jurisdictions (including Arizona.)	☐ Yes ☒ No
Had a professional or occupational license or certificate denied, revoked, suspended, lapse, expire, or any disciplinary action taken?	☐ Yes ☒ No
Been terminated, suspended, placed on probation, or other disciplinary action taken in the course of employment since the age of 21?	☐ Yes ☒ No
Been placed on probation or parole?	☐ Yes ☒ No
Violated any decision, order or rule issued by a professional regulatory entity?	☐ Yes ☒ No
Violated any order of a court, judicial officer, administrative tribunal, or the Board?	☐ Yes ☒ No
Made a false or misleading statement or verification in support of an application for a certificate filed by another person?	☐ Yes ☒ No
Made a false or misleading oral or written statement to division staff or the Board?	☐ Yes ☒ No
Failed to respond or furnish information to the division staff or the Board when the information was requested and was reasonably available to you and pertains to certification or investigative inquiries?	☐ Yes ☒ No
Been named as a defendant (including counter-defendant, co-defendant, and third-party defendant) or a respondent, or had a petition or complaint filed against you in any civil proceedings (excluding domestic relations matters that did not include orders of protection)? If so, provide the details, including the case name and number, a copy of the original complaint, and a copy of the final disposition with your application. Disclose only bankruptcies involving adversarial proceedings against you.	☐ Yes ☒ No
Been contacted by any court, state, or federal administrative or regulatory agency or professional association or the Better Business bureau regarding allegations of adversarial actions or complaints?	☐ Yes ☒ No
Been the subject of a court sanction/order, a complaint to the State Attorney General or the Better Business Bureau, or been contacted by any prosecutorial, judicial, or administrative agency or association regarding business practices?	☐ Yes ☒ No

If you answer “Yes” to any question in this section:

- You must submit a list of all incidents and complete a written explanation of the events for each. This includes incidents which may be pending and/or in litigation, and
- You must submit any and all documentation which shows where the violation, finding, or conviction occurred, the nature and details of the case, case disposition, court, case number, and any other relevant information.
- Submit additional sheets, if necessary.

SECTION VIII: BUSINESS INFORMATION

Please answer all questions. Submit additional sheets if necessary.

1. List (a) the states or countries in which your organization operates including whether the jurisdiction requires licensing, certification or registration and (b) for all jurisdictions requiring licensing, certification or registration list the address and telephone number of each entity. Arizona
2. How long has your organization been operating in these states or countries? May, 2024
3. List parent corporations, branch offices, or other entities that will perform, or assist in performing the work of the organization associated with legal services including addresses, contacts, and the functions to be performed: NA
4. If applicable, submit a list of any individuals who may derive a profit (other than rental income at fair and reasonable market rates) from the operation of this business. ☐ See Submitted list ☒ None
5. Will the Alternative Business Structure have professional liability insurance? ☒ Yes ☐ No
6. Are there any shareholder agreements, voting agreements or restrictions or other agreements that restrict or affect decision making? If yes, upload copies of all agreements in the documents section of this application ☐ Yes ☒ No
7. Does the applicant use or intend to use sources of finance? If yes, provide details in the documents section of this application regarding the type of financing, name of the provider, amount of financing, and interest rate. ☐ Yes ☒ No

8. Has the applicant or any Authorized Person been involved in a business that has declared bankruptcy? If yes, submit a list of all incidents and a written explanation of the events for each. This includes incidents which may be pending and/or in litigation. You must also submit all documentation which shows the nature and details of the case, case disposition, court, case number, and any other relevant information. ☐ Yes ☒ No
9. Will the applicant share premises, staff or data with any other person or entity? If yes, provide details in documents section of this application. No
10. Will the applicant be required to comply with Arizona Trust Account Rules? If yes, provide details in the documents section of this application relating to the collection and disbursement of fees and the reports generated for compliance. Yes, any collections will be deposited in a separate trust account and not disbursed without written approval from the client and only after verification that collection has cleared.
11. Describe how your business will comply with Arizona's Rules of Professional Conduct for lawyers, Code of Conduct for Entities and for Owners and Managers. Training will be held with staff going over all Arizona Rules of Professional Conduct to ensure continued compliance. Legal decisions will be discussed and reviewed by compliance attorney and staff will be monitored and supervised closely to ensure adherence to all rules of professional conduct.
12. Describe your policies and procedures for protecting client information and confidentiality. Client information shall not be disclosed without written informed consent from the client, all information will be securely stored within firm case management software. Firm will adhere to all confidentiality rules outlined in rule 1.6 of the Arizona Professional Conduct regulations.
13. Describe policies and procedures for checking for conflicts of interest. We will gather basic information from client and basis for their claim, we will run that information against our firm case management software to check for any potential conflicts.
14. Explain procedures developed to ensure confidentiality of client records. All client information will be stored within firm case management software and access to client records will be supervised and monitored and not disclosed without written client consent.
15. Describe your policies and procedures to ensure no inducements are offered to clients or potential clients for choosing the business's course other than for the best interest of the client. All staff will be properly trained and instructed to act within the guidelines of the model rules for professional responsibilities. Calls between staff and clients will be monitored on a regular basis in order to ensure continued compliance.

If you answer "Yes" to any question in this section:

- You must submit a list of all incidents and complete a written explanation of the events for each. This includes incidents which may be pending and/or in litigation, and

- You must submit any and all documentation which shows where the violation, finding, or conviction occurred, the nature and details of the case, case disposition, court, case number, and any other relevant information.
- Submit additional sheets, if necessary.

SECTION IX: ACKNOWLEDGMENT

SECTION IX-a: CONFLICT OF INTEREST STATEMENT

Pursuant to Arizona Code of Judicial Administration (ACJA) § 7-209(K)(1), I certify that the business entity named in this application and seeking a license to operate as an Alternative Business Structure in the state of Arizona, shall not take any action or engage in any activity that interferes with the professional independence of lawyers or others authorized to provide legal services, or allow the legal representation of clients, if the representation involves a conflict of interest as governed by Supreme Court Rule 42, ERs 1.7, 1.8, 1.9, 1.10, 1.11, 1.13 and 1.18.

SECTION IX-b: INDEMNIFICATION STATEMENT

Pursuant to ACJA § 7-209 (G), I certify that the business entity named in this application agrees to indemnify, defend, and hold harmless the Arizona Supreme Court, its Committees, Committee members, and employees from any and all claims, demands, suits, actions, proceedings, loss, cost and damages of every kind and description. This includes any reasonable attorney's fees and litigation expenses which may be brought or made against or incurred by the court, its Committees, Committee members, and employees on account of loss or damage arising out of, or contributed to, in whole or in part, by reason of the operation of the business entity.

SECTION IX-c: SUBMISSION TO JURISDICTION, AUTHORIZATION, AND RELEASE

I certify that the business entity named in this application submits to the exclusive jurisdiction of the Arizona Supreme Court and is subject to the regulatory and disciplinary authority of the Supreme Court and the State Bar of Arizona.

I consent to having an investigation made of the businesses character, professional reputation, and fitness for Alternative Business Structure license. I agree to give any further information which may be required in reference to the past record of the business.

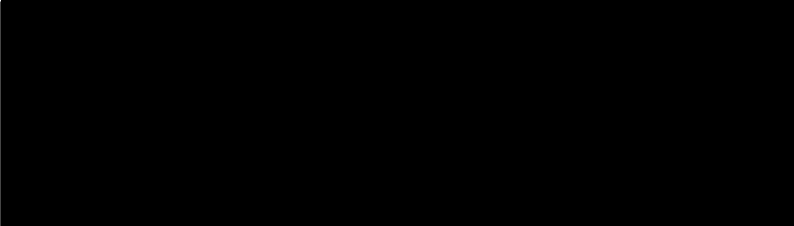
I also authorize and request every person, firm, company, corporation, governmental agency, court, association, or institution having control of any documents, records, and other information including documents, records, charges or complaints filed against the business, formal or informal, pending or closed, or any other pertinent data, and to permit the Arizona Supreme Court, or any of its agents or representatives to inspect and make copies of such documents, records, and other information.

I release, discharge, and exonerate the Arizona Supreme Court, its agents and representatives, the State of Arizona, and any person furnishing information pursuant to this Authorization and Release from all liability which may arise from the investigation made by the Arizona Supreme Court.

I acknowledge that I have read this application form and that all statements are true and complete to the best of my knowledge and belief and that this Authorization and Release is freely given.

I understand willful omission or misrepresentation of any fact required to be disclosed in this application, or any accompanying statement, is grounds for refusing to issue or renew a license or for revoking or suspending a license.

I also declare under penalty of perjury under the laws of the State of Arizona that the foregoing is true and correct.



ADDITIONAL INSTRUCTIONS AND INFORMATION

1. **Instructions:** Carefully read all instructions prior to completing the application. Incomplete application submissions will result in the rejection of the application. For assistance, call the Certification and Licensing Division at (602) 452-3378.
2. **Completion:** Pursuant to ACJA § 7-209(E)(3)(b), applicants have 90 days to complete the application process. After 90 days, applicants will be required to submit a new application and new fees. **Pursuant to § 7-209(E)(1)(a)(6), applicant shall notify the Certification and Licensing Division of any change relevant to the application for licensure within five (5) days of the change.**
3. **Registered Business Entity Documentation:** Pursuant to ACJA § 7-209(G)(1)(g), applicants must submit copies of Articles of Incorporation/Organization or Partnership Agreements and a Certificate of Good Standing or otherwise demonstrate authorization to do business in the State of Arizona.
4. **Unregistered Business Entity Documentation:** Pursuant to ACJA § 7-209(G)(1)(g), applicants must submit copies of Articles of Incorporation/Organization or Partnership Agreements with the application. Therefore, unregistered business entity applicants must submit draft Articles of Incorporation/ Organization or Partnership Agreements and explain why the proposed business entity is not registered. Division staff's recommendation concerning licensure presented to the Committee on Alternative Business Structures will note that the entity has not yet been formed. Before the Committee provides its recommendation for licensure to the Supreme Court, applicant must be formed, authorized to do business in Arizona, and provide evidence of those facts that are satisfactory to Division Staff. At the time the evidence is presented to Division staff, applicant shall also submit **Update of Application** forms for the applicant, Designated Principal and Compliance Lawyer. Formation of the proposed business entity is not required if the Committee recommends denial of the license to the Supreme Court and the applicant does not challenge that recommendation.
5. **Authorized Persons:** ACJA § 7-209(G)(1) requires each applicant to "submit completed applications for the alternative business structure and each authorized person." ACJA § 7-209(A) defines "Authorized Person" as "a person possessing: 1. An economic interest in the alternative business structure equal to or more than 10 percent of all economic interests in the alternative business structure; or 2. The legal right to exercise decision-making authority on behalf of the alternative business structure." ACJA § 7-209(A) further defines "decision-making authority" as "the authority, by operation of law or by agreement, to directly or indirectly: 1. Legally bind the ABS; 2. Control or participate in the management or affairs of the ABS; 3. Direct or cause the direction of the management and policies of the ABS; or 4. Make day-to-day or long-term decisions on matters of management, policy, and operations of the ABS." Therefore, a complete application requires the following:
 - a. **Appointment of Designated Principal** form for the person identified in Section I. Pursuant to Arizona Code of Judicial Administration § 7-209(G)(1)(f), a designated principal for the business entity must be an individual with whom Division Staff may communicate on any procedural or operational concern and who will have responsibilities pursuant to subsection §7-209(F), including contracting authority within the State of Arizona.
 - b. **Appointment of Compliance Lawyer** form for the person identified in Section I. Pursuant to ACJA § 7-209(G)(3) each Alternative Business Structure must designate a Compliance lawyer with prescribed qualifications who agrees to responsibilities set forth in §7-209(G)(3)(b).
 - c. **Authorized Person (Individual) Application and Authorized Person (Entity)** forms for each additional Authorized Person listed in Section II.
6. **Fees:** All applicable NON-REFUNDABLE fees shall accompany this application and be made payable to the Arizona Supreme Court. Initial application fees are listed in ACJA § 7-209 (K). Applicants may "skip" the online fee submission for amounts over \$5000 and submit payment by cashier's check or money order directly to Arizona Supreme Court to complete the application.

7. Assumed Name (or D.B.A.) and Trade Names: While conducting business as an Alternative Business Structure, a licensee shall use the name as shown on the license and shall not transact business in this state under an assumed name or under any designation, name or style, corporate or otherwise, other than the real name of the business entity unless the business entity files with the Division Staff a certificate setting forth the name under which business will be transacted.
8. Conflict of Interest and Indemnification Statements and Submission to Jurisdiction, Authorization and Release: The business entity owner or Designated Principal's signature and notary verification for these statements are required in Section IX.
9. Applicant Background Information: If you answered "YES" to any question in Section VII of this application or the Authorized Person Application, the Designated Principal is required to submit:
 - a. a list of all incidents and complete a written explanation of the events for each. This includes incidents which may be pending and/or in litigation; and,
 - b. any and all documentation which shows where the violation, finding, or conviction occurred, the nature and details of the case, case disposition, court, case number, and any other relevant information. Submit as many additional sheets as is necessary to fully explain each "yes" answer.
10. Submission: Submit your completed application, required documents, and fees online or to:

**Certification and Licensing Division
Arizona Supreme Court
1501 W. Washington, Suite #104
Phoenix, AZ 85007**



ARIZONA SUPREME COURT Alternative Business Structure Designated Principal Application

The Designated Principal, as defined in Arizona Code of Judicial Administration (ACJA) § 7-209, must complete and submit this form with the Alternative Business Structure application.

Please select one:

- ☒ Initial appointment of designated principal
☐ Change of designated principal
☐ Renewal of designated principal

Designated Principal's Full Name:			
Vacek, Williem, Vacek			
Legal Last Name	Full First Name	Full Middle Name	
Business Title/Position: Owner			
Business Address (may not be a P.O. box)			
[REDACTED] Phoenix, AZ, 85012			
(Street Address)	(City)	(State)	(Zip)
Home Address (may not be a P.O. box):			
[REDACTED]			
(Street Address)	(City)	(State)	(Zip)
Business Telephone Number	[REDACTED]		
Home Telephone Number	[REDACTED]	Date of	[REDACTED]
Social Security Number	[REDACTED]		

Background Information	
Have you or any business entity in which you have or had an economic interest or control in:	
FOR RENEWALS: If a director, officer, partner, owner, or manager, is an Authorized Person in the active Alternative Business Structure, disclose only information since the last application.	
DO NOT answer "Yes" if you have only civil traffic violations. Regarding criminal matters, the fact that you entered into a plea bargain or plead "no contest" or your conviction has been vacated, pardoned, expunged, sealed, set aside, dismissed, or appealed, or your civil rights have been restored this question must be answered "Yes." If the answer is "Yes", give details of the offense, and explain.	
1) Committed material misrepresentation, omission, fraud, dishonesty, or corruption in applying for a certificate or on a certificate examination in this state or any other jurisdiction?	☐ Yes ☒ No
2) Committed any act constituting material misrepresentation, omission, fraud, dishonesty or corruption in business or financial matters?	☐ Yes ☒ No
3) Had conduct showing incompetence or a source of injury and loss to the public?	☐ Yes ☒ No
4) Been convicted by final judgment of a felony, regardless of whether civil rights have been restored?	☐ Yes ☒ No
5) Been convicted by final judgment of a misdemeanor, regardless of whether civil rights have been restored?	☐ Yes ☒ No
6) Been admitted to practice law in any jurisdiction? If yes, please identify the jurisdiction(s), Bar license number(s), and provide a disciplinary history for all jurisdictions (including Arizona.)	☐ Yes ☒ No
7) Had a professional or occupational license or certificate denied, revoked, suspended, lapse, expire, or any disciplinary action taken?	☐ Yes ☒ No
8) Been terminated, suspended, placed on probation, or other disciplinary action taken in the course of employment since the age of 21?	☐ Yes ☒ No
9) Been placed on probation or parole?	☐ Yes ☒ No
10) Violated any decision, order or rule issued by a professional regulatory entity?	☐ Yes ☒ No
11) Violated any order of a court, judicial officer, administrative tribunal, or the Board?	☐ Yes ☒ No
12) Made a false or misleading statement or verification in support of an application for a certificate filed by another person?	☐ Yes ☒ No
13) Made a false or misleading oral or written statement to division staff or the Board?	☐ Yes ☒ No
14) Failed to respond or furnish information to the division staff or the Board when the information was requested and was reasonably available to you and pertains to certification or investigative inquiries?	☐ Yes ☒ No
15) Been named as a defendant (including counter-defendant, co-defendant, and third-party defendant) or a respondent, or had a petition or complaint filed against you in any civil proceedings (excluding domestic relations matters that did not include orders of protection)? If so, provide the details, including the case name and number, a copy of the original complaint, and a copy of the final disposition with your application. Disclose only bankruptcies involving adversarial proceedings against you.	☐ Yes ☒ No
16) Been found civilly liable in an action involving misrepresentation, material omission, fraud, misappropriation theft or conversion?	☐ Yes ☒ No

Regarding criminal matters, the fact you entered into a plea bargain, or entered a “no contest” plea, or that a conviction has been vacated, pardoned, expunged, dismissed, or appealed does not mean that you can answer the question “No.” You must answer “Yes”.

If you answer “Yes” to any question in this section:

- You must submit a list of all incidents and complete a written explanation of the events for each. This includes incidents which may be pending and/or in litigation, and
- You must submit any and all documentation which shows where the violation, finding, or conviction occurred, the nature and details of the case, case disposition, court, case number, and any other relevant information.

ACKNOWLEDGEMENT OF DESIGNATED PRINCIPAL

I, William D Vacek, the Designated Principal pursuant to ACJA §7-209(K)(1), agree to ensure that the Alternative Business Structure:

- 1) Shall not allow the legal representation of clients, if the representation involves a conflict of interest as governed by Supreme Court Rule 42, ERs 1.7, 1.8, 1.9, 1.10, 1.11, 1.13 and 1.18.
- 2) Shall not take any action or engage in activity that interferes with the professional independence of lawyers or others authorized to provide legal services.
- 3) Shall ensure that legal services are delivered with reasonable diligence and promptness.
- 4) Shall not take an action or engage in any activity that misleads or attempts to mislead a client, a court, or others, either by the ABS’s own acts or omissions, or those of its members or employees, or by allowing or being complicit in the acts or omissions of others.
- 5) Shall maintain effective governance structures, arrangements, systems, and controls to ensure:
 - (i) Compliance with the requirements of Supreme Court rules and this section; and
 - (ii) Managers, economic interest holders, decision-makers, employees, or anyone employed, associated with, or engaged do not cause or substantially contribute to a breach of the ethical rules of Supreme Court Rule 42 or ACJA §7-209(K).
- 6) Must maintain records to demonstrate compliance with its obligations under the Supreme Court rules and ACJA §7-209(K).
- 7) Must monitor financial stability and business viability. When an ABS becomes aware it will cease to operate, it must affect an orderly wind-down of business activities and comply with the requirements for surrender of an ABS license.
- 8) Must monitor and manage all material risks to the business, including those which arise from connected businesses or connected services.

- 9) Must hold property of legal services clients separate from the property of the ABS. The requirements of Supreme Court Rules 42, ER 1.15 and Rule 43 are applicable to all legal services-related client property.
- 10) An ABS, its Authorized Persons and employees must cooperate with the Administrative Office of Courts, Committee on Alternative Business Structures, the State Bar of Arizona, the presiding disciplinary judge, and any court who oversees and investigates concerns related to its delivery of legal services.
- 11) Must respond promptly to the Administrative Office of Courts, Committee on Alternative Business Structures, the State Bar, the presiding disciplinary judge, and the Supreme Court and provide full and accurate information and documentation in response to any request or investigation.
- 12) Shall not attempt to prevent any person from providing information or documents in response to any request or investigation.
- 13) Must act promptly to take any remedial action requested by the State Bar, the Administrative Office of Courts, the presiding disciplinary judge, and the Supreme Court.
- 14) Shall assure that all authorized persons and employees, in matters pertaining to legal services, perform all duties and functions in the manner ethically required of a lawyer pursuant to Supreme Court Rule 42.

CONFLICT OF INTEREST STATEMENT:

Pursuant to Arizona Code of Judicial Administration (ACJA) § 7-209(K)(1), I certify Sterling Shield Legal LLC, a business entity seeking a license to operate as an Alternative Business Structure in the state of Arizona, shall not take any action or engage in any activity that interferes with the professional independence of lawyers or others authorized to provide legal services, or allow the legal representation of clients, if the representation involves a conflict of interest as governed by Supreme Court Rule 42, ERs 1.7, 1.8, 1.9, 1.10, 1.11, 1.13 and 1.18.

ACKNOWLEDGMENT AND INDEMNIFICATION:

Being duly sworn and under oath or affirmation, I acknowledge that I have read and agree to abide by Arizona Supreme Court Rule 31 and ACJA §7-209 governing Alternative Business Structures. Pursuant to ACJA § 7-209(G), I agree to indemnify, defend, and hold harmless the Arizona Supreme Court, its Committees, Committee members, and employees from any and all claims, demands, suits, actions, proceedings, loss, cost and damages of every kind and description. This includes any reasonable attorney's fees and or litigation expenses which may be brought or made against or incurred by the court, its Committees, Committee members, and employees on account of loss or damage arising out of, or contributed to, in whole or in part, by reason of the operation of the business entity.

SUBMISSION TO JURISDICTION, AUTHORIZATION AND RELEASE

I hereby submit to the exclusive jurisdiction of the Arizona Supreme Court and agree to be subject to the regulatory and disciplinary authority of the Supreme Court and the State Bar of Arizona.

I hereby consent to having an investigation made of my character, professional reputation, and fitness for Alternative Business Structure certification. I agree to give any further information which may be required.

I also authorize and request every person, firm, company, corporation, governmental agency, court, association, or institution having control of any documents, records, and other information including documents, records, charges or complaints filed against me, formal or informal, pending or closed, or any other pertinent data, and to permit the Arizona Supreme Court, or any of its agents or representatives to inspect and make copies of such documents, records, and other information.

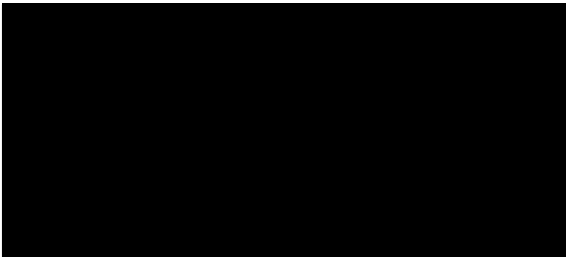
I release, discharge, and exonerate the Arizona Supreme Court, its agents and representatives, the State of Arizona, and any person furnishing information pursuant to this Authorization and Release from all liability which may arise from the investigation made by the Arizona Supreme Court.

I acknowledge that I have read this application form and that all statements are true and complete to the best of my knowledge and belief and that this Authorization and Release is freely given.

I understand willful omission or misrepresentation of any fact required to be disclosed in this application, or any accompanying statement, is grounds for refusing to issue or renew a license or for revoking or suspending a license.

I understand that resigning as the designated principal does not in any way impact or alter the Arizona Supreme Court, its agents and representatives, or State of Arizona authorities to pursue any issues or pending matters stemming from my time as the named Designated Principal.

I also declare under penalty of perjury under the laws of the State of Arizona that the foregoing is true and



5/20/2024

Date



ARIZONA SUPREME COURT
Alternative Business Structure
Compliance Lawyer Application

The Compliance Lawyer, as defined in Arizona Code of Judicial Administration (ACJA) § 7-209, must complete and submit this form with the Alternative Business Structure application. **If the Alternative Business Structure is not formed at the time of filing, this appointment is reflective of the facts that will exist upon licensure. Any change of information in this appointment requires applicant to file an Update of Application form prior to initial licensure by the Arizona Supreme Court.**

Please select one: ☒ Initial appointment of compliance lawyer
☐ Change of compliance lawyer
☐ Renewal of compliance lawyer

Compliance Lawyer's Full Name:

Dawson

Legal Last Name

Harold

Full First Name

David

Full Middle Name

Business Title/Position:

Compliance Lawyer

Business Address (may not be a P.O. box)

(Street Address)

(City)

(State)

(Zip)

Home Address (may not be a P.O. box)

(Street Address)

(City)

(State)

(Zip)

Business Telephone Number

Date of Birth:

Home Telephone Number

Social Security Number

Arizona State Bar License Number:

Date of admission: 4/11/2008

Pending Admission on Motion?: ☐ Yes Application Submitted Date:

☒ No

Previous Authorized Person, Compliance Lawyer, or Designated Principal Application Submitted:

☐ Yes Date:

☒ No

Background Information

Have you or any business entity in which you have or had an economic interest or control in:

FOR RENEWALS: If a director, officer, partner, owner, or manager, is an Authorized Person in the active Alternative Business Structure, disclose only information since the last application.

DO NOT answer "Yes" if you have only civil traffic violations. Regarding criminal matters, the fact that you entered into a plea bargain or plead "no contest" or your conviction has been vacated, pardoned, expunged, sealed, set aside, dismissed, or appealed, or your civil rights have been restored this question must be answered "Yes." If the answer is "Yes", give details of the offense, and explain.

1) Committed material misrepresentation, omission, fraud, dishonesty, or corruption in applying for a certificate or on a certificate examination in this state or any other jurisdiction?	☐ Yes ☒ No
2) Committed any act constituting material misrepresentation, omission, fraud, dishonesty or corruption in business or financial matters?	☐ Yes ☒ No
3) Had conduct showing incompetence or a source of injury and loss to the public?	☐ Yes ☒ No
4) Been convicted by final judgment of a felony, regardless of whether civil rights have been restored?	☐ Yes ☒ No
5) Been convicted by final judgment of a misdemeanor, regardless of whether civil rights have been restored?	☐ Yes ☒ No
6) Been admitted to practice law in any jurisdiction? If yes, please identify the jurisdiction(s), Bar license number(s), and provide a disciplinary history for all jurisdictions (including Arizona.)	☒ Yes ☐ No ARIZONA BAR NO DISCIPLINARY HISTORY (RENEWED) FOLLOWS BAR
7) Had a professional or occupational license or certificate denied, revoked, suspended, lapse, expire, or any disciplinary action taken?	☐ Yes ☒ No
8) Been terminated, suspended, placed on probation, or other disciplinary action taken in the course of employment since the age of 21?	☐ Yes ☒ No
9) Been placed on probation or parole?	☐ Yes ☒ No
10) Violated any decision, order or rule issued by a professional regulatory entity?	☐ Yes ☒ No
11) Violated any order of a court, judicial officer, administrative tribunal, or the Board?	☐ Yes ☒ No
12) Made a false or misleading statement or verification in support of an application for a certificate filed by another person?	☐ Yes ☒ No
13) Made a false or misleading oral or written statement to division staff or the Board?	☐ Yes ☒ No
14) Failed to respond or furnish information to the division staff or the Board when the information was requested and was reasonably available to you and pertains to certification or investigative inquiries?	☐ Yes ☒ No
15) Been named as a defendant (including counter-defendant, co-defendant, and third-party defendant) or a respondent, or had a petition or complaint filed against you in any civil proceedings (excluding domestic relations matters that did not include orders of protection)? If so, provide the details, including the case name and number, a copy of the original complaint, and a copy of the final disposition with your application. Disclose only bankruptcies involving adversarial proceedings against you.	☐ Yes ☒ No
16) Been found civilly liable in an action involving misrepresentation, material omission, fraud, misappropriation theft or conversion?	☐ Yes ☒ No

Regarding criminal matters, the fact you entered into a plea bargain, or entered a “no contest” plea, or that a conviction has been vacated, pardoned, expunged, dismissed, or appealed does not mean that you can answer the question “No.” You must answer “Yes”.

If you answer “Yes” to any question in this section:

- You must submit a list of all incidents and complete a written explanation of the events for each. This includes incidents which may be pending and/or in litigation, and
- You must submit any and all documentation which shows where the violation, finding, or conviction occurred, the nature and details of the case, case disposition, court, case number, and any other relevant information.

ACKNOWLEDGEMENT OF COMPLIANCE LAWYER

I, Harold David Dawson, hereby consent to the designation of Compliance Lawyer pursuant to ACJA §7-209(G). I confirm that I meet the requirements of Arizona Supreme Court Rule 31.1(a)(1), and that I have not been subject to discipline by the State Bar of Arizona or any similar agency in any other jurisdiction during the past 10 years. I further confirm that I possess the qualifications set forth in §7-209(G)(3)(a) and experience in the legal field to ensure that ethical obligations, protection of the public, and standards of professionalism are adhered to. Pursuant to §7-209(G)(3)(b), I agree to take all reasonable steps to:

- (1) Ensure compliance with the ethical and professional responsibilities of lawyers in the Alternative Business Structure (“ABS”) providing legal services;
- (2) Ensure compliance by the ABS’s authorized persons;
- (3) Ensure the ABS’s authorized persons and others employed, associated with, or engaged by the ABS do not cause or substantially contribute to a breach of the regulatory requirements of this code or the ethical and professional obligations of lawyers;
- (4) Ensure that a prompt report is made to the state bar of any facts or matters reasonably believed to be a substantial breach of the regulatory requirements of this code or the ethical and professional obligations of lawyers;
- (5) Ensure that the State Bar is promptly informed of any fact or matter that reasonably should be brought to its attention in order that the state bar may investigate whether a breach of regulatory or ethical requirements has occurred; and
- (6) Notify division staff and the state bar in writing when the compliance lawyer has ceased to be the compliance lawyer for the ABS.

I agree that I have read and understand Rule 61 of the Rules of Supreme Court and that if I fail to comply with these obligations, including any failure to report any facts or matters reasonably believed to amount to a substantial breach of the regulatory requirements of ACJA §7-209 or the ethical and professional obligations of lawyers, in addition to other possible sanctions, I may be suspended on an interim basis.

CONFLICT OF INTEREST STATEMENT:

Pursuant to Arizona Code of Judicial Administration (ACJA) § 7-209(K)(1), I certify Sterling Shield Legal, LLC, a business entity seeking a license to operate as an Alternative Business Structure in the state of Arizona, shall not take any action or engage in any activity that violates Supreme Court Rule 42, or allow the legal representation of clients, if the representation involves a conflict of interest as governed by Supreme Court Rule 42, ERs 1.7, 1.8, 1.9, 1.10, 1.11, 1.13 and 1.18.

AUTHORIZATION AND RELEASE

Having filed this application, I hereby consent to having an investigation made of my character, professional reputation, and fitness for Alternative Business Structure certification. I agree to give any further information which may be required.

I also authorize and request every person, firm, company, corporation, governmental agency, court, association, or institution having control of any documents, records, and other information including documents, records, charges or complaints filed against me, formal or informal, pending or closed, or any other pertinent data, and to permit the Arizona Supreme Court, or any of its agents or representatives to inspect and make copies of such documents, records, and other information.

I release, discharge, and exonerate the Arizona Supreme Court, its agents and representatives, the State of Arizona, and any person furnishing information pursuant to this Authorization and Release from all liability which may arise from the investigation made by the Arizona Supreme Court.

I acknowledge that I have read this application form and that all statements are true and complete to the best of my knowledge and belief and that this Authorization and Release is freely given.

I understand willful omission or misrepresentation of any fact required to be disclosed in this application, or any accompanying statement, is grounds for refusing to issue or renew a license or for revoking or suspending a license.

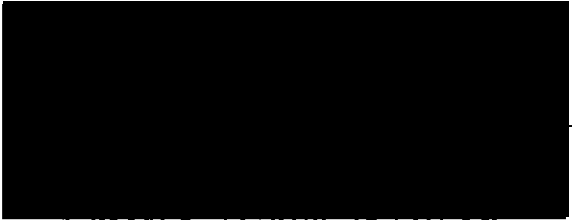
I understand that resigning as Compliance Lawyer does not in any way impact or alter the Arizona Supreme Court, its agents and representatives or State of Arizona authorities to pursue any issues or pending matters stemming from my time as the named Compliance Lawyer.

I also declare under penalty of perjury under the laws of the State of Arizona that the foregoing is true and correct.

☒ **By checking this box, I agree to the following:**

I certify under penalty of perjury that all information contained in my application, including all supporting documents, is true and correct to the best of my knowledge and belief. I understand that any false statements, misrepresentations or failures to disclose (omissions) made in this application may be grounds for denial of certification, subsequent suspension or revocation of certification or other disciplinary action.

5/17/24
Date


TERESA WILSON
Printed Name of Compliance Lawyer



ARIZONA SUPREME COURT
Alternative Business Structure
Authorized Person Application

Each Authorized Person, as defined in ACJA § 7-209, must complete and submit this form with the Alternative Business Structure application. Pursuant to Arizona Code of Judicial Administration §7-209(E)(2), failure to provide or fully disclose information may result in denial of the application, delay in processing, or other disciplinary action. If the Alternative Business Structure is not formed at the time of filing, this application is reflective of the facts that will exist upon licensure.

Select one: ☒ Initial Application ☐ Renewal Application

Legal Name:

Vacek, Williem, Daniel

Legal Last Name

Full First Name

Full Middle Name

Alias:

Business Title/Position:

Owner

Email address:

Business Address (may not be a P.O. box)

Phoenix, AZ, 85012

(Street Address)

(City)

(State)

(Zip)

Home Address (may not be a P.O. box):

(City)

(State)

(Zip)

Business Telephone Number:

Home Telephone Number:

Date of Birth:

Social Security Number:

I have an economic interest in the Alternative Business Structure equal to or more than 10 percent of all economic interests in the Alternative Business Structure. If Yes, provide an affidavit with an explanation of your economic interest.

☒ Yes ☐ No

If yes, what is your percentage of ownership:

100

I have a legal right to exercise decision making authority on behalf of the alternative business structure applicant. If yes provide an affidavit with an explanation of your decision making authority.

☒ Yes ☐ No

Background Information	
Have you or any business entity in which you have or had an economic interest or control in:	
FOR RENEWALS: If a director, officer, partner, owner, or manager, is an Authorized Person in the active Alternative Business Structure, disclose only information since the last application.	
DO NOT answer "Yes" if you have only civil traffic violations. Regarding criminal matters, the fact that you entered into a plea bargain or plead "no contest" or your conviction has been vacated, pardoned, expunged, sealed, set aside, dismissed, or appealed, or your civil rights have been restored this question must be answered "Yes." If the answer is "Yes", give details of the offense, and explain.	
1) Committed material misrepresentation, omission, fraud, dishonesty, or corruption in applying for a certificate or on a certificate examination in this state or any other jurisdiction?	☐ Yes ☒ No
2) Committed any act constituting material misrepresentation, omission, fraud, dishonesty or corruption in business or financial matters?	☐ Yes ☒ No
3) Had conduct showing incompetence or a source of injury and loss to the public?	☐ Yes ☒ No
4) Been convicted by final judgment of a felony, regardless of whether civil rights have been restored?	☐ Yes ☒ No
5) Been convicted by final judgment of a misdemeanor, regardless of whether civil rights have been restored?	☐ Yes ☒ No
6) Been admitted to practice law in any jurisdiction? If yes, please identify the jurisdiction(s), Bar license number(s), and provide a disciplinary history for all jurisdictions (including Arizona):	☐ Yes ☒ No
7) Had a professional or occupational license or certificate denied, revoked, suspended, lapse, expire, or any disciplinary action taken?	☐ Yes ☒ No
8) Been terminated, suspended, placed on probation, or other disciplinary action taken in the course of employment since the age of 21?	☐ Yes ☒ No
9) Been placed on probation or parole?	☐ Yes ☒ No
10) Violated any decision, order or rule issued by a professional regulatory entity?	☐ Yes ☒ No
11) Violated any order of a court, judicial officer, administrative tribunal, or the Board?	☐ Yes ☒ No
12) Made a false or misleading statement or verification in support of an application for a certificate filed by another person?	☐ Yes ☒ No
13) Made a false or misleading oral or written statement to division staff or the Board?	☐ Yes ☒ No
14) Failed to respond or furnish information to the division staff or the Board when the information was requested and was reasonably available to you and pertains to certification or investigative inquiries?	☐ Yes ☒ No
15) Been named as a defendant (including counter-defendant, co-defendant, and third-party defendant) or a respondent, or had a petition or complaint filed against you in any civil proceedings (excluding domestic relations matters that did not include orders of protection)? If so, provide the details, including the case name and number, a copy of the original complaint, and a copy of the final disposition with your application. Disclose only bankruptcies involving adversarial proceedings against you.	☐ Yes ☒ No
16) Been found civilly liable in an action involving misrepresentation, material omission, fraud, misappropriation theft or conversion?	☐ Yes ☒ No

Regarding criminal matters, the fact you entered into a plea bargain, or entered a "no contest" plea, or that a conviction has been vacated, pardoned, expunged, dismissed, or appealed does not mean that you can answer the question "No." You must answer "Yes".

If you answer "Yes" to any question in this section:

- You must submit a list of all incidents and complete a written explanation of the events for each. This includes incidents which may be pending and/or in litigation, and
- You must submit any and all documentation which shows where the violation, finding, or conviction occurred, the nature and details of the case, case disposition, court, case number, and any other relevant information.

CONFLICT OF INTEREST STATEMENT

Pursuant to Arizona Code of Judicial Administration (ACJA) § 7-209(K)(1), I certify that the business entity named in this application and seeking a license to operate as an Alternative Business Structure in the state of Arizona, shall not take any action or engage in any activity that interferes with the professional independence of lawyers or others authorized to provide legal services, or allow the legal representation of clients, if the representation involves a conflict of interest as governed by Supreme Court Rule 42, ERs 1.7, 1.8, 1.9, 1.10, 1.11, 1.13 and 1.18.

SUBMISSION TO JURISDICTION, AUTHORIZATION, AND RELEASE

I hereby submit to the exclusive jurisdiction of the Arizona Supreme Court and agree to be subject to the regulatory and disciplinary authority of the Supreme Court and the State Bar of Arizona.

I hereby consent to having an investigation made of my character, professional reputation, and fitness for Alternative Business Structure certification. I agree to give any further information which may be required.

I also authorize and request every person, firm, company, corporation, governmental agency, court, association, or institution having control of any documents, records, and other information including documents, records, charges or complaints filed against me, formal or informal, pending or closed, or any other pertinent data, and to permit the Arizona Supreme Court, or any of its agents or representatives to inspect and make copies of such documents, records, and other information.

I release, discharge, and exonerate the Arizona Supreme Court, its agents and representatives, the State of Arizona, and any person furnishing information pursuant to this Authorization and Release from all liability which may arise from the investigation made by the Arizona Supreme Court.

I acknowledge that I have read this application form and that all statements are true and complete to the best of my knowledge and belief and that this Authorization and Release is freely given.

I understand willful omission or misrepresentation of any fact required to be disclosed in this application, or any accompanying statement, is grounds for refusing to issue or renew a license or for revoking or suspending a license.

I also declare under penalty of perjury under the laws of the State of Arizona that the foregoing is true and correct.

5/20/2024

Date

William D Vacek

Printed Name of Authorized Person