October 2, 2025

Submitted via email to comments@gasupreme.us

Honorable Chief Justice Michael P. Boggs
Members of the Supreme Court of Georgia
244 Washington Street, SW, Suite 572
Atlanta, Georgia 30334

RE: Public Comment on Proposed Pilot Program for Limited Licensed Legal Practitioners (LLLPs)

Dear Chief Justice Boggs and Members of the Court:

Thank you for the opportunity to provide comments on Georgia's proposed pilot program for Limited Licensed Legal Practitioners. This is an exciting development, and we are grateful for the Court's leadership in recognizing that new models of legal help are urgently needed to address the state's widening civil justice gap.

Frontline Justice is a national, nonpartisan initiative committed to closing that gap by building a community-based workforce of trained and supervised justice workers. Our mission is to mobilize, support, and equip trusted community advocates to serve as frontline legal helpers, ensuring that everyone across the country can access affordable, practical legal assistance for everyday civil matters.

Georgia's civil justice crisis mirrors the national picture and, in some ways, is even more acute. An estimated 1.8 million Georgians (16.9% of the state's population) meet federal income guidelines for civil legal aid, with annual household income below 125% of the poverty level ($18,825 for an individual or $39,000 for a family of four). According to the 2025 State of ALICE Report published by United Way, an additional 31% of households fall into the ALICE (Asset-Limited, Income-Constrained, Employed) category. Based on the ABA's 2020 *Profile of the Legal Profession* data, 67 of Georgia's 159 counties have fewer than 10 lawyers or "legal deserts." Several counties (e.g., Baker, Clay, Echols, Glascock, Long, Montgomery, Quitman, Schley, Webster, Wheeler, Wilcox) have only 0–1 lawyer. Georgia also has one of the lowest ratios of legal aid attorneys to eligible residents in the nation, with just 0.52 attorneys per 10,000 people in poverty, compared to a national average of 0.97 and a benchmark of 10. As a result, many Georgians are left stranded between civil legal aid, which serves only the poorest households, and the private bar, which is far out of reach for most working families. Evictions,

debt collection, benefit denials, and family disputes are among the most common problems; rural communities, seniors, veterans, and other vulnerable populations often confront these challenges without meaningful support.

The proposal before the Court is a promising step toward remedying these gaps. By authorizing a new tier of service providers, Georgia acknowledges that lawyers alone cannot meet the scale of need. Focusing initially on high-volume issues such as housing and consumer debt, and elevating the role of community partnerships are positive features. Additionally, taking an incremental approach through piloting is a beneficial strategy, provided the pilot is structured to capture lessons learned that inform ongoing improvement and subsequent rollout.

At the same time, the central consideration is whether to create a license for these roles. Licensing can send a strong signal of legitimacy, but it can also introduce barriers that limit who can serve and how quickly the role can scale. In other jurisdictions, community-based approaches have shown that training, supervision, and organizational affiliation can provide public protections without requiring a license. **Fundamentally, Georgia faces two related questions: (1) What should the design of this pilot program be, and (2) is licensure the most effective and equitable way to expand access to our civil justice system?**

As currently drafted, the pilot blends elements of a community justice worker model with aspects of professional licensure. Without careful consideration, this hybrid could become difficult to scale, less accessible to the communities it aspires to serve, and too burdensome to sustain. Entry requirements that privilege professionalized credentials, a narrow subject-matter scope, and constraints on advocacy functions risk reproducing the same barriers the pilot seeks to overcome. Georgia has the opportunity to chart a path toward a community-embedded model that scales and delivers meaningful relief, serving as a blueprint for other jurisdictions to follow.

We recognize that the Court may have intentionally issued a high-level proposal at this stage. In the comments that follow, we offer observations, note ambiguities that may warrant clarification, and suggest certain refinements. Our intention is not to pre-judge implementation details, but we also do not want to miss the opportunity to help surface areas that may benefit from tighter definitions or guardrails as Georgia advances through its rulemaking and pilot design processes. In that spirit, the following comments are organized by the major elements of the proposed pilot:

PROGRAM DESIGN

Permitted Activities

Summary

The pilot would authorize LLLPs to provide legal advice, assist with litigation strategy, “conducting discovery,” and prepare documents such as pleadings and settlement offers in housing and consumer debt cases. They would also be permitted to advise clients on qualified appeal options. LLLPs would not be allowed to contact opposing parties or appear in court on a

client's behalf. When a client's needs exceed the permitted scope of practice, LLLPs would be required to make a referral to another legal service provider.

Comment

The design contains limitations that may prevent the pilot from achieving its intended goals. By prohibiting LLLPs from contacting opposing parties or appearing in court, the proposal denies them the advocacy functions that could make the greatest difference for unrepresented litigants. Many Georgians struggle with functional literacy, mental health challenges, or the lasting effects of trauma. According to the Georgia Literacy Commission, 1.7 million adults in Georgia are low literate, about one in ten adults statewide. For these individuals, even well-intentioned advice can be difficult to understand, implement, or follow through on without direct advocacy. A trauma-informed approach recognizes that stress and fear can impair decision-making, and that clients may not be able to represent themselves effectively even if they receive accurate legal guidance. Without the authority to step in at key moments, whether negotiating directly with an opposing party or speaking on a client's behalf in court, LLLPs risk being reduced to offering advice that vulnerable Georgians cannot realistically put into action.

At the same time, the proposal authorizes advice on negotiation strategy and litigation preparation, creating an internal inconsistency that could confuse both practitioners and clients. Without the ability to act on the guidance they provide, LLLPs risk becoming advisors without meaningful tools to resolve disputes. Restricting the scope to housing and consumer debt cases also narrows the learning that can be gained from the pilot. Georgia families often face intertwined challenges, such as family stability, public benefits, or probate issues, and excluding these areas may limit the program's value as a comprehensive test of the model.

The proposal states that LLLPs will have an obligation to refer clients when their needs exceed the permitted scope of practice. However, it does not specify how those referrals are supposed to work. For example, it is unclear whether LLLPs would be required to refer clients to legal aid organizations, private attorneys, court-based self-help centers, or other resources. It is also unclear whether referrals must be made through a formal process, such as a written handoff or a scheduled appointment, or whether it would be sufficient for the LLLP to inform the client that they cannot continue. Finally, the proposal does not say whether LLLPs will have any responsibility to follow up to ensure that a client actually receives the help they were referred to. These questions matter because the existing referral pipeline, especially to legal aid, is already stretched to capacity and often cannot absorb additional demand. Without clarity on these points, the referral safeguard could end up being more symbolic than practical.

In addition to the referral process, the scope of permitted discovery activities also needs explanation. The text does not indicate whether LLLPs may draft discovery requests, review responses, or sign documents on behalf of clients (referring to the proposal's statement that LLLPs can "conduct" discovery). The same uncertainty applies to the provision on negotiation strategy, which authorizes advice on negotiation while barring direct communication with the opposing party. These internal contradictions raise practical questions about how much value the pilot can deliver in real cases.

Subject Matter

Summary

The pilot would authorize LLLPs to assist in housing and consumer debt cases. In housing, LLLPs could provide pre-filing and post-judgment assistance in eviction, security deposit, and conditions-related matters under specified code sections, including counterclaims. Housing discrimination and public housing termination matters would be excluded. Both tenants and unrepresented property owners could receive assistance. In consumer debt cases, LLLPs can assist defendants within Magistrate Court jurisdictional limits ($15,000), including credit card, medical, and consumer loan debt, as well as related default judgment and garnishment issues.

Comment

Focusing on housing and consumer debt is a practical starting point, as these are high-volume case types where unrepresented litigants are common and timely help can prevent cascading harms. Permitting pre-filing and post-judgment assistance expands the value of the role by supporting clients before disputes escalate and after judgments are entered. Restricting consumer debt assistance to defendants is appropriate, given that plaintiffs are almost always represented by counsel.

However, the limited scope of the subject matter areas risks producing only a partial picture of whether LLLPs can meaningfully close the justice gap. Many pressing legal needs in Georgia involve family law or probate matters, which are excluded from the pilot. Even within housing, the carve-out of discrimination and public housing termination claims leaves out some of the most consequential issues for low-income renters.

The jurisdictional cap of $15,000 in consumer debt cases may also exclude significant portions of medical debt, which often exceed that threshold. Finally, limiting LLLPs to advice and document preparation without authority to negotiate directly or appear in court again narrows the potential effectiveness of the role.

Several aspects of the proposal require clarification to understand how the pilot would function in practice. The proposal refers to “qualifying cases” in State and Superior Court, but does not define what qualifies, leaving ambiguity about the scope of the role in higher courts. Additionally, more detail is needed on how conflicts will be handled when both tenants and landlords are eligible for assistance, particularly in smaller communities where personal and business relationships often overlap. The definition of “conditions-related issues” should also be clarified to confirm whether habitability claims tied to health and safety violations are included. Finally, the description of post-judgment assistance does not specify whether LLLPs would be permitted to prepare and file appeal paperwork themselves or only advise clients to seek legal aid. This distinction could significantly affect access to remedies.

Service Delivery

Summary

The proposal envisions LLLPs providing services both in court or court-adjacent settings and in community-embedded locations. Courthouse-based assistance would provide "just-in-time" help to litigants facing urgent deadlines and hearings, while also improving court efficiency. Community placements would enable tenants and debtors to seek assistance before disputes escalate into court, allowing for early intervention and potentially avoiding litigation.

Comment

Including both courthouse and community-based service delivery reflects an understanding that legal needs arise at different stages. Just-in-time help in court can prevent procedural mistakes and support litigants under pressure. Community placements expand access to trusted, familiar locations where people are more likely to seek help early. Together, these approaches combine prevention with urgent support.

However, the proposal does not specify how resources will be balanced between in-court and community placements. If the program leans too heavily on courthouse support, it risks becoming narrowly focused on crisis management rather than prevention. Conversely, if community placements are not tied into court processes, litigants may still arrive at hearings unprepared.

The section also does not address rural access. Many Georgians live in legal deserts where there are few lawyers, limited public transportation, and significant barriers to reaching courthouses or even community centers. Without specific attention to how LLLPs will be deployed in these areas, the pilot may reinforce existing geographic inequities. The absence of any discussion of virtual service delivery further compounds this gap. For people in rural areas, those with mobility or childcare constraints, and those who cannot afford time away from work, the ability to connect with an LLLP remotely will be critical. Additionally, for community hosts without in-house legal staff, the supervision and quality assurance structure (including documentation standards and audit/review cadence) should be specified so that expectations are consistent across sites.

Pilot Sites

Summary

The pilot would be implemented at three to four sites, selected to represent an urban area, a smaller metropolitan area, and a small town or rural community. Site selection would consider the strength of partnerships among local Magistrate Courts (and to a lesser extent State and Superior Courts), legal service providers, and non-legal community-based organizations.

Comment

Selecting sites across diverse geographic contexts is a strength, as it acknowledges that legal needs and service delivery challenges differ between urban and rural areas. Considering partnerships as part of the selection process also reflects an understanding that collaboration among courts, legal aid, and community organizations is essential to success.

However, while geographic variation is a strength, limiting the pilot to only three or four sites may produce too narrow a data set to fully evaluate how the model functions statewide. The emphasis on court and organizational capacity could unintentionally favor better-resourced areas and exclude regions with the greatest unmet need, such as rural legal deserts where partnerships are weakest but justice gaps are most severe. By focusing primarily on Magistrate Courts, the pilot may also miss important lessons about how the model could work in higher-stakes matters handled in State or Superior Courts.

The Court should clarify how the three to four sites will be selected in practice, and what weight will be given to demonstrated community need compared to existing capacity. It should also explain whether rural legal deserts will be prioritized even where partnerships are less developed and how findings will be aggregated to inform statewide decisions. Finally, more detail is needed on how Magistrate Court–centered pilots will generate lessons applicable to State and Superior Court matters.

LLLP PROGRAM PARTICIPANTS

Title Terminology

Summary

Non-attorney participants in the program would be titled Limited Licensed Legal Practitioners (LLLPs). The intent is to signal that they are licensed but limited in scope, with “practitioner” chosen to parallel other professional roles such as nurse practitioners.

Comment

The proposal acknowledges the importance of consumer-facing terminology and seeks to use a title that conveys both licensure and limited authority. Drawing a parallel to nurse practitioners may help some members of the public understand that the role is licensed but distinct from attorneys.

At the same time, the chosen title is cumbersome. The triple “L” acronym is awkward, not intuitive, and could be confusing rather than clarifying. It is also unclear whether the terminology translates effectively into other languages spoken in Georgia, particularly Spanish, where terms like “limited licensed” may not carry equivalent professional connotations. Without testing consumer understanding across languages, the title risks undermining clarity.

We suggest confirming whether the title will be consumer-tested (including in Spanish and other prevalent languages) before launch, and whether plain-language descriptors will accompany the title in public materials to avoid confusion with attorneys. While the chosen title may reassure members of the Bar by emphasizing that the role is licensed but limited, it may not necessarily serve the public interest. This program is ultimately being designed for the public, and the terminology should reflect clarity and accessibility from the consumer's perspective.

Eligibility for Licensure

Summary

To be eligible for licensure, candidates must be employed by or affiliated with an approved legal services provider or a community-based organization participating in the pilot. They would also need to meet either an educational requirement (such as a J.D., paralegal degree, or paralegal certificate) or an experience requirement, as determined by the certifying entity, such as prior work experience as a clerk, paralegal, or experience working with individuals who require legal services.

Comment

Requiring affiliation with an approved organization ensures that LLLPs operate within structured institutions rather than in isolation, which promotes accountability. Allowing relevant work experience as an alternative to formal education introduces some flexibility and may open the door to nontraditional candidates.

However, the eligibility framework is heavily weighted in favor of individuals with prior professional legal training. This risks excluding trusted community members, such as housing counselors, reentry navigators, or health workers, who may lack formal legal credentials but are already serving as frontline helpers. If the pipeline is limited to those with J.D.s, paralegal degrees, or legal clerk backgrounds, the program may replicate existing professional barriers and fail to build a diverse, community-rooted workforce. Leaving determinations of qualifying "experience" to the certifying entity without clear standards also risks inconsistency and could narrow participation.

The Court should clarify what counts as qualifying "experience" and how broad that category will be. It should also explain whether community-based workers without legal credentials but with relevant expertise (such as tenant advocates or case managers) could qualify. Finally, more detail is needed on how the affiliation requirement will work for community organizations that do not traditionally employ legal staff but may wish to host LLLPs.

Training

Summary

The training curriculum would be designed by an implementation committee and delivered by attorneys, likely from legal aid partner sites. It would combine statewide asynchronous and

remote modules with in-person skill-based training at pilot sites. Materials could be adapted from existing resources used to train legal aid staff and new Magistrate Judges. The curriculum would cover landlord/tenant and consumer debt law, court rules and procedures, evidence, and ethics and professional conduct.

Comment

Centralized curriculum development promotes consistency across sites, and using attorneys as trainers helps ensure accuracy. Combining remote learning with in-person instruction strikes a balance between flexibility and hands-on skill building. Including substantive law, court procedures, evidence, and ethics provides a comprehensive foundation, and adapting existing training materials may reduce costs.

At the same time, relying primarily on attorneys from legal aid to deliver training may create bottlenecks, especially given the already limited capacity of legal aid organizations. The proposal does not specify whether training will be low-barrier (e.g., modular or stackable), which could allow participants to expand their scope over time. Using materials designed for lawyers or judges may not translate well to non-attorney practitioners, who need more accessible and practice-oriented content.

The Court should clarify the composition of the training committee and whether community representatives will be included. It should also explain whether the curriculum will be modular, allowing for incremental expansion of responsibilities, how attorney-trainers will be resourced to prevent strain on legal aid, and what requirements will be in place for ongoing professional development. Additionally, the Court should consider partnering with low-barrier adult education specialists to ensure that training is accessible to a diverse range of candidates. More details are also needed on how training will be evaluated for effectiveness before and during the pilot.

The Court should clarify the composition of the training committee and whether community representatives will be included. It should also explain whether the curriculum will be modular, allowing for incremental expansion of responsibilities, how attorney-trainers will be resourced to prevent strain on legal aid, and what requirements will be in place for ongoing professional development. Finally, more details are needed on how training will be evaluated for effectiveness before and during the pilot.

Certification

Summary

Certification would require three components: an exam testing substantive and procedural knowledge, a portfolio of written work assessing applied skills, and a streamlined character and fitness evaluation modeled on the attorney process. Certified LLLPs would be listed on a public registry for public verification.

Comment

Combining an exam with a portfolio balances theoretical knowledge with practical application, and a public registry promotes transparency and consumer trust. A streamlined character and fitness review offers safeguards without the full burden of the attorney process.

However, the exam and portfolio requirements may set high entry barriers that exclude otherwise qualified community members without formal legal training. Without clear guidance on how the portfolio will be developed and evaluated, the process could become burdensome or inconsistently applied across candidates. A character and fitness evaluation modeled on the attorney system, even if streamlined, may replicate unnecessary gatekeeping practices that disproportionately affect candidates from marginalized backgrounds.

Rather than refining the proposed exam, portfolio, and character and fitness requirements, we recommend that the Court reconsider this entire certification framework. As currently drafted, it risks creating unnecessary barriers that would exclude otherwise qualified candidates and replicate inequities from the attorney licensing process. A more effective approach would start from the ground up, designing a system that ensures competence and consumer protection without importing unnecessary costs, gatekeeping practices, or procedural burdens. We encourage the Court to engage community representatives, adult education specialists, and legal aid partners in co-creating an alternative model that is accessible, fair, and proportionate to the scope of practice envisioned for LLLPs.

Mentoring and Oversight

Summary

After training and certification, LLLPs would complete a provisional period that includes observing court proceedings and shadowing an attorney. Once this is complete, they would be licensed to provide legal advice in the approved subject areas. They would not require ongoing direct supervision but would be expected to maintain a mentor relationship with an attorney, either within their host organization or externally. The proposal emphasizes ethics and professional conduct as part of training, but does not specify the exact rules or oversight structure that will apply.

Comment

The structure balances public protection with flexibility. Court observation and attorney shadowing offer valuable preparation without creating lengthy or costly barriers. The mentor model allows LLLPs to access experienced legal guidance when needed, while also giving them the space to work independently, which is essential for scalability and responsiveness in underserved communities. Mentorship in the proposal is designed as a light-touch, flexible model, suitable for the pilot stage.

Malpractice Insurance

Summary

The proposal recommends that the implementation committee address malpractice insurance for LLLPs by either requiring or encouraging it. Other states with similar programs, including Oregon and Washington, required paraprofessionals to carry malpractice coverage, often through a supervising attorney. The report notes that Oregon requires both attorneys and paraprofessionals to maintain insurance, with premiums currently around $3,500 annually, and that Washington's discontinued LLLT program had similar requirements. Because Georgia's LLLPs are unlikely to be paid during the pilot, the proposal suggests exploring whether existing organizational policies, such as those carried by legal aid providers, could be extended to cover them.

Comment

Acknowledging malpractice coverage reflects a strong commitment to public protection. Considering the extension of existing organizational policies is a practical way to minimize costs while ensuring client safety. However, if malpractice insurance is made mandatory for individual practitioners, it could create a prohibitive financial barrier, particularly for volunteers and community-based participants. To avoid discouraging participation, the Court should ensure that coverage options are affordable and flexible, whether through organizational policies, pooled approaches, or by recommending (rather than requiring) individual coverage during the pilot phase.

PROGRAM IMPLEMENTATION

Program Phases

Summary

The pilot is designed to expand gradually. In Years 1–3, the program would launch with limited activities and subject areas, followed by an evaluation in Year 3 to decide whether to continue statewide. If extended in Year 4, the pilot could be made permanent, scaled statewide, and potentially expanded to include new practice areas such as family law or probate, as well as additional activities like negotiation and limited representation at hearings. Between Years 5 and 8, the Court could either conduct a second pilot to test these expansions or implement them directly based on the evaluation results.

Comment

The phased design reflects caution and accountability, allowing the Court to monitor outcomes before making long-term commitments. Explicitly identifying potential areas for expansion demonstrates foresight and responsiveness to Georgia's most pressing civil legal needs.

The concern is that the cautious design, while prudent, risks producing a pilot that is too narrow to generate meaningful evidence. Limiting the program to only housing and consumer debt during the first three years means the evaluation will not capture how LLLPs perform in the highest-need areas, such as family law or public benefits, or in advocacy functions like negotiation. If the Court expands the program statewide without testing these contexts, it may commit to a model that has not been evaluated, where the need is greatest. In addition, the proposed timeline, potentially waiting up to eight years before authorizing broader subject areas or advocacy functions, is too slow, given the urgency of the justice gap.

Evaluation

Summary

The proposal suggests establishing a committee, similar to Minnesota's model, to oversee the pilot. This body would monitor progress, collect data, and make recommendations about continuation. Data points to be collected annually include the number of LLLPs, clients served, tasks completed, client evaluations, complaints and resolutions, attorney and judicial feedback, analysis of documents prepared by LLLPs, and case outcomes.

Comment

Creating a dedicated committee provides accountability and ensures lessons from the pilot are carefully tracked. Collecting both quantitative and qualitative data enables a more comprehensive understanding of the program's performance, including outcomes for clients and feedback from judges and attorneys.

The evaluation design may create unnecessary burdens for smaller community-based organizations with limited administrative capacity. At the same time, the current list of metrics overlooks equity measures, such as client demographics and geographic reach, which are crucial in determining whether the pilot is serving underserved populations. To avoid overburdening participants, these equity measures should be collected in a streamlined way that balances the need for accountability with the capacity of host organizations. The proposal also does not explain how the evaluation committee itself will be resourced, leaving open questions about sustainability.

Public Messaging

Summary

The proposal emphasizes the need to communicate clearly with the public, the Bar, and the judiciary about the pilot. Public messaging would help ensure consumer awareness, recruit applicants, and reduce resistance from the legal profession. Suggested strategies include program announcements, town halls, guidance for judges and court staff, outreach to paralegals and social service workers, and engagement with community colleges and universities.

Comment

Recognizing communications as central to the pilot is a strength. Clear messaging can foster public trust, enhance transparency, and support recruitment efforts. Proactively engaging the Bar and judiciary helps reduce professional resistance that could otherwise hinder the program. Outreach to educational institutions and social service networks can broaden the applicant pool.

CONCLUSION

The Supreme Court of Georgia has taken an important step by proposing a pilot program for Limited Licensed Legal Practitioners. The decision to test new models reflects a clear understanding that the civil justice needs of Georgians cannot be met solely by attorneys.

As currently drafted, however, the pilot resembles a high-barrier cousin to the Community Justice Worker programs now emerging nationwide. Without adjustments, it risks becoming another professional track—one that adds a new license but does not fundamentally change who can participate, how communities can access legal help, or how those same communities are given a voice in shaping the systems meant to serve them. The promise of this effort lies in creating a role that is community-embedded, accessible, and scalable, without duplicating the barriers of the traditional bar. Expanding the scope of practice, authorizing core advocacy functions, refining the training model, preserving flexible placements, embedding services in trusted institutions, strengthening equity in workforce recruitment, and simplifying evaluation are the steps that would allow the Court to transform this pilot into a model of national significance.

For additional context on how these models are being developed and tested across the country, and how we are supporting community justice workers and their hosting organizations on the ground, we invite the Court to review the following resources: Task Force Briefing Report, Task Force Members, Community Justice Worker Stories, and the Groundwork Online Community.

Experience from other jurisdictions demonstrates that CJW programs are both effective and safe. In Alaska, Alaska Legal Services trained approximately 60 CJWs, 50 of whom were mobilized to respond to the state's SNAP backlog. Together, they resolved 3,093 SNAP cases in 2023 (up from just 125 in 2022), with CJWs themselves closing nearly 500 cases and securing $1.43 million in benefits for families.[1] The program demonstrated scalability and responsiveness by assisting hundreds of clients who otherwise would have been turned away, while community partners expressed eagerness to expand the model into family law and end-of-life planning.[2] An upcoming NSF-funded evaluation of a CJW program is underway, which will show further growth and significant economic impact.

---

[1] Lincoln Caplan, *The Justice Worker*, The American Scholar, June 4, 2025, https://theamericanscholar.org/the-justice-worker/.

[2] *See* Nikole Nelson, Rebecca L. Sandefur & Matthew Burnett, *Empowering Justice Through Community Justice Workers*, MGMT. INFO. EXCH. J., Spring 2024, at 30, https://img1.wsimg.com/blobby/go/edc44ae6-300c-4a50-b54b-84410f4af739/downloads/MIE_Journal_Spring_2024_Empowering%20Justice%20Thr.pdf?ver=1724702445362.

While we do not yet have final published figures, the upcoming results of this study promise to deepen the evidence base for CJW scaling and return on investment.

Frontline Justice sincerely values the Court's leadership and appreciates the opportunity to share these comments. We welcome the chance to offer additional insights and collaborate with Georgia stakeholders to develop solutions that ensure every Georgian has meaningful access to justice.

Respectfully submitted,

Nikole Nelson, JD
Chief Executive Officer
Frontline Justice
nikole@frontlinejustice.org

Alicia Mitchell-Mercer, DPA, PMP
Chief Operating Officer
Frontline Justice
alicia@frontlinejustice.org