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DOES GOOGLING JUSTICE WORK? AUDITING SEARCH ENGINES' PERFORMANCE AS INTERMEDIARIES OF LEGAL HELP INFORMATION ONLINE

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Abstract

Online search engines are key providers of legal information. Their responses to people's search queries can influence whether and how people make use of the legal system to deal with problems like evictions, domestic violence, debt collection, and natural disasters. This article presents a new research protocol to understand and evaluate what search engines are showing to people who are seeking out legal help. Using this novel search audit protocol, the article identifies concerning trends in search engines' responses to people's legal queries, including low-quality information, incorrect jurisdiction, and an absence of governmental or legal aid links. The article then proposes technical and policy strategies that may improve search engines' role in people's attempts to access the justice system online. In this research paper, we evaluate the search results that Google shows for common legal help queries to determine if the search engine shows jurisdiction-correct, issue-correct results to people seeking help. The paper raises concerns about how the current algorithm's design connects people

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to key information when their rights, houses, jobs, security, and family are at risk.

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Introduction

When people face a legal crisis – such as an eviction notice, a domestic violence incident, a home destroyed by a natural disaster, or a lawsuit filed by a debt collector – they increasingly turn to search engines to help them make sense of their problems and create a strategy to respond.¹ The lawyers, court officers, and self-help center staff who work on access to justice want people facing a legal crisis to participate in the legal system. These professionals want people to learn their rights, to come to court, to file paperwork, and to use the judicial system to protect their interests.² Public interest nonprofit legal organizations have published websites with free legal help that include guides, process maps, frequently-asked questions, sample documents, instructions for court, live chat, and document assembly programs.³

The challenge, however, is connecting people who have legal problems to these public interest, authoritative resources. Research from Rebecca Sandefur has revealed that many people are unaware that the life problems

¹ Pew Research has found that adults use digital resources to make big decisions, with the Internet as their first resource to learning about their options and conducting research. Legal researchers have also found that people, faced with a scenario about a legal problem, go to search engines to find what they can do. Erica Turner & Lee Rainie, *Most Rely on Their Own Research in Making Big Life Decisions, and It's Often Online*, PEW RSCH. CTR. (Mar. 5, 2020), https://www.pewresearch.org/fact-tank/2020/03/05/most-americans-rely-on-their-own-research-to-make-big-decisions-and-that-often-means-online-searches/.

² The Congressionally funded Legal Services Corporation has focused on developing websites and online guides for litigants seeking help on civil justice matters. *Report of the Summit on the Use of Technology to Expand Access to Justice*, LSC AM.'S PARTNER FOR EQUAL JUST. (Dec. 2013), http://www.lsc.gov/sites/default/files/LSC_Tech Summit Report_2013.pdf. See also the special edition of the Harvard Journal of Law and Technology featuring articles from court, legal aid, and government practitioners that detail the need for accessible online legal help. *E.g.*, James E. Cabral et al., *Using Technology to Enhance Access to Justice*, 26 HARV. J.L. & TECH. 243 (2012).

³ These online legal help websites, guides and tools are operated by legal aid groups around the country, supported by the main source of public funding for this work, the yearly TIG grants from LSC. *Technology Initiative Grant Awards: TIG Projects Funded by Year*, LSC AM.'S PARTNER FOR EQUAL JUST. (Aug. 19, 2022),

https://www.lsc.gov/grants/technology-initiative-grant-program/technology-initiative-grant-awards-tig-projects-funded-year.

they are facing are 'legal' ones.⁴ If people are not able to spot the legal dimensions of the housing, money, family, or work situation they are worried about, then they may not know that there is a civil justice system of legal aid, self-help centers, and courts to help them.⁵ Even for someone who is aware that their problem is a legal one, such as when someone has been sent a summons for a debt collection lawsuit or given a notice by their landlord, they may not know where to turn for help.⁶ Across state courts in the US, there are high rates of default in eviction and debt court hearings, in which people do not appear at court to defend themselves or to negotiate a settlement.⁷ This points to an alarming gap in legal capability and

⁵ See the discussion of consequences of limited knowledge about legal issues and access to services at Rebecca L. Sandefur, *What We Know and Need to Know About the Legal Needs of the Public*, 67 S.C. REV. 443, 457–58 (2016).

⁶ See the California State Bar's finding that many people did not know whether their problem was a legal issue and that they also did not know where to look for legal help at *The California Justice Gap: Measuring the Unmet Civil Legal Needs of Californians* (2019), THE STATE BAR OF CAL., https://www.calbar.ca.gov/Access-to-Justice/Initiatives/California-Justice-Gap-Study.

https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2622140; *Rubber Stamp Justice: US Courts, Debt Buying Corporations, and the Poor,* HUM. RTS. WATCH (Jan. 20, 2016, 11:55 PM), https://www.hrw.org/news/2016/01/20/us-courts-rubber-stamp-corporate-suits-against-poor.

⁴ Rebecca L. Sandefur, Accessing Justice in the Contemporary USA: Findings from the Community Needs and Services Study, AM. BAR ASSOC. 3 (2014),

https://www.srln.org/system/files/attachments/sandefur_accessing_justice_in_the_conte mporary_usa._aug._2014.pdf. To further explore the line between life and legal problems, see HAZEL GENN ET AL., PATHS TO JUSTICE: WHAT PEOPLE DO AND THINK ABOUT GOING TO LAW (1999). Genn et al. define a 'justiciable event' as a matter in which a person experiences a problem that raises legal issues, even if the person does not go to a lawyer or to court for it. Another way to identify a "legal" problem is to determine that the person in this situation would benefit from legal guides or consultations with lawyers, to resolve this problem.

⁷ How Debt Collectors Are Transforming the Business of State Courts Lawsuit Trends Highlight Need to Modernize Civil Legal Systems, PEW CHARITABLE TRS. (May 6, 2020), https://www.pewtrusts.org/en/research-and-analysis/reports/2020/05/how-debtcollectors-are-transforming-the-business-of-state-courts. See generally James Greiner & Andrea Matthews, Problem of Default, Part 1 (2015),

empowerment⁸: many people do not feel informed or supported enough to use the legal system to protect their housing and finances.⁹

The Internet presents an opportunity to address this gap, first by helping people realize that their problem is a legal one, and second, by connecting them with information about their rights and services that could build their capability and empowerment. Ideally, a person could visit Google, Bing, Yahoo, Siri, or Alexa, phrase a query about what is happening with them, and then receive information back about what this problem is called, what rights and options they have, and what groups can help them. The search engine plays a large role in people's problem-solving.¹⁰ In fact, many people now go to the Internet when they are dealing with a legal problem and start with a search engine.¹¹ The search engine is an important intermediary of information that helps people make sense of what they are experiencing, what is available to them, and what other people do. People rarely navigate directly to websites, instead they rely on search engines to make sense of their problem and they trust search engine results pages' initial results to offer authoritative information.¹²

⁹ See reports about why tenants do not seek legal assistance or appear at their court date when sued for an eviction, even when they have rights and access to public services that could assist them, Charlotte Journalism Collaborative, *Absent from Court: Where Are TenantsWwho Miss Their Eviction Hearings?*, CAROLINA PRESS (Dec. 2, 2021), https://digitalbranch.cmlibrary.org/charlotte-journalism-collaborative/absent-from-court-where-are-the-tenants-who-miss-their-eviction-hearings/.

⁸ See further discussion about the importance of legal capability and empowerment at Pascoe Pleasence & Nigel J. Balmer, *Justice & the Capability to Function in Society*, DAEDALUS 140, 148 (2019),

https://www.amacad.org/sites/default/files/publication/downloads/19_Winter_Daedalus _Pleasence_Balmer.pdf.

¹⁰ Information Searches That Solve Problems, PEW RSCH. CTR. (Dec. 30, 2007), https://www.pewresearch.org/internet/2007/12/30/information-searches-that-solve-problems/.

¹¹Justice Needs and Satisfaction in the United States of America, HIIL & IAALS 4, 159–68 (2021), https://iaals.du.edu/sites/default/files/documents/publications/justice-needs-and-satisfaction-us.pdf.

¹² Daniel E. Rose & Danny Levinson, *Understanding User Goals in Web Search*, THIRTEENTH INTL. WELS. WIDE WEB CONF. PROC., WWW 2004 13 (2004); Adam Epstein, *People Trust Google for Their News More than the Actual News*, QUARTZ (Jan. 18, 2016), https://qz.com/596956/people-trust-google-for-their-news-more-than-the-actual-news/.

The question then is: when people enter a search query about a legal problem, do search engines respond with quality information? Or, on the contrary, are there more problematic results or dynamics with search engines' treatment of legal queries? Researchers have performed qualitative analyses of Internet search results for legal queries.¹³ This article offers a novel methodology to analyze search engines' performance in responding to legal help queries: the Legal Help Search Audit. This new audit gathers extensive data on what a search engine (in this case, Google) shows people who type in short descriptions of their legal issue. This search engine results page (or, SERP) data then can be analyzed to determine if these technology platforms are serving their users. Search audits have been developed to assess search engine algorithms in other areas, such as politically-related searches.¹⁴ This is the first study that proposes and carries out a large-scale search engine audit to assess the quality of legal information that search algorithms deliver to users.

Section I of this article begins with a background review of the need for a legal help search audit and the metrics by which search results can be assessed. In Section II, it details the research protocol for an automated Legal Help Search Audit, that our team at Stanford Legal Design Lab carried out by adapting the work of Northeastern University's Lazer Lab. Our team used the audit protocol to conduct thousands of searches on Google about four different common legal help topics: debt collection, eviction, domestic violence, and consumer fraud after a natural disaster. It

¹³ In her PhD dissertation, Denvir studied how young people searched the Internet for legal help and in lab-based observations tracked what sites they visited and what the quality of these sites were. *See generally* Catrina Denvir, *What Is the Net Worth? Young People, Civil Justice and the Internet* (Aug. 28, 2014),

https://pdfs.semanticscholar.org/b584/c82bbc1baebd435a36ac1aa25001930344fa.pdf. See Margaret Hagan, *The User Experience of the Internet as a Legal Help Service: Defining Standards for the Next Generation of User-Friendly Online Legal Services*, 20 VA. J.L. & TECH. 395 (2016), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2942478 for the survey results.

¹⁴ The Lazer Lab at Northeastern University has been a leader in search engine result auditing. See examples of its search audits for political and election-related searches in Ronald E. Robertson, David Lazer & Christo Wilson, *Auditing the Personalization and Composition of Politically-Related Search Engine Results Pages, in* PROC. OF THE 2018 WORLD WIDE WEB CONF. ON WORLD WIDE WEB - WWW '18 955 (Apr. 23, 2018), https://doi.org/10.1145/3178876.3186143; Ronald E. Robertson et al., *Auditing Partisan Audience Bias within Google Search,* 2 PROC. ACM HUMAN-COMPUTER INTERACT. 1 (Nov. 1, 2018), http://dl.acm.org/citation.cfm?doid=3290265.3274417.

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ran these searches from specific zip codes in Hawaii and North Florida. For each search, it recorded the first page of SERP results, including ads and other content shown to a user. Section III then presents the findings of the audit, and the analysis of quality concerns and possible harms. This includes an absence of legal aid, court, and other public interest sites; a lack of sensitivity to jurisdiction; and a proliferation of generic, national content that provided little actionable substance to a user. Section IV presents a possible technical intervention that could improve search engines' delivery of local, public interest, actionable content. It details how the team used Schema.org markup with legal aid groups' websites to improve their search engine placement.

Finally, the article concludes with a discussion of additional technical and policy interventions that could address the concerns raised by the Legal Help Search Audit's results. This includes working with search engine companies to prioritize jurisdiction in how it treats search queries with a legal dimension, using technical sources to determine a person's likely location and prioritizing local public interest resources from this jurisdiction. It also highlights search engine interventions from parallel areas like voting information and health information, to spotlight how a larger collaboration between technology companies and legal institutions could improve search engines' results. As more people go online to make sense of legal problems and seek help, search engines could play a hugely beneficial role in access to justice by steering people away from incorrect information, scams, and low-quality sites.¹⁵ Instead, these platforms could connect people with user-friendly information about their rights, tools that help them participate in the justice system, and connections with groups that can assist them. This article both profiles what is wrong with how search engines currently treat legal help searches, and proposes concrete, near-term interventions that can improve these technology platform's role in people's access to justice.

I. Research and Metrics for Legal Help Searches

How do people use the Internet to deal with legal problems? A handful of researchers have studied how people conduct Internet searches, visit

¹⁵ Chirag Shah, *It's Not Just a Social Media Problem – How Search Engines Spread Misinformation*, CONVERSATION (Mar. 10, 2021, 1:51 PM), https://theconversation.com/its-not-just-a-social-media-problem-how-search-engines-spread-misinformation-152155.

websites, and identify strategies to respond to civil justice issues.¹⁶ These researchers have established a base of knowledge about people's online legal help seeking, derived largely from surveys, interviews, and user testing sessions with participants. This past research provides qualitative data about how people tend to use search engines when they need to make sense of a life problem and how they sort through options. It also identifies common mistakes or fail points in how people try to find correct legal information online. Past research also indicates some key criteria by which to judge search engine performance and the websites to which they refer people.

A. How People Use Search Engines to Understand Legal Problems

Researchers have begun to analyze how search engines serve (or harm) people's access to justice through small scale qualitative studies.¹⁷ Scholars like Denvir and Hagan have conducted simulation tasks in lab settings, to determine how people behave online when seeking out legal help information and what kinds of search results they find and use.¹⁸ This research questions if search engines live up to their promise to improve people's understanding and use of the law.¹⁹ The scholars have used surveys and lab studies to evaluate if, in these controlled settings, Internet

¹⁸ Denvir, supra note 13; Hagan, supra note 13; see also Catrina Denvir, Online and in the Know? Public Legal Education, Young People and the Internet (Sydney Law School Legal Studies Research Paper No. 16/02, 2016), http://ssrn.com/abstract=2711489; Catrina Denvir, Nigel J. Balmer & Pascoe Pleasence, Surfing the Web – Recreation or Resource? Exploring How Young People in the UK Use the Internet as an Advice Portal for Problems with a Legal Dimension, 23 INTERACTING WITH COMPUTS. 96, 96–104 (2011), http://www.sciencedirect.com/science/article/pii/S0953543810000949 [hereinafter Denvir, Balmer & Pleasence, Surfing]; Catrina Denvir, Nigel J. Balmer & Pascoe Pleasence, Portal or Pot Hole? Exploring How Older People Use the 'Information Superhighway' for Advice Relating to Problems with a Legal Dimension, 34 AGEING & SOC'Y. 670, 670–99 (2012), http://www.journals.cambridge.org/abstract_S0144686X12001213) [hereinafter Denvir, Balmer & Pleasence, Portal]; Margaret Hagan, The Justice Is in the Details: Evaluating Different Self-Help Designs for Legal Capability in Traffic Court, 7 J. OPEN ACCESS TO L. (Oct.

¹⁶ This section of the paper summarizes this nascent field of research, which consists of work primarily from Catrina Denvir, Nigel Balmer, Pascoe Pleasance, and the co-author of this paper, Margaret Hagan.

¹⁷ E.g., Shah, *supra* note 15.

^{17, 2019),} https://ojs.law.cornell.edu/index.php/joal/article/view/97/94.

¹⁹ Denvir, *supra* note 18, at 8; Denvir, *supra* note 13, at 245; Hagan, *supra* note 13, at 433.

searches help improve the accessibility of legal information and build people's legal capability.²⁰ In this type of study, the researchers present participants with fictional problem scenarios, akin to a fact pattern, about what problem they are dealing with regarding their housing, employment, or family situation.²¹ The researchers then ask the participants if they would use the Internet to respond to this problem, and observe what search queries they use, what search results they see, and which websites they visit and use.²²

Denvir and her colleagues have focused their research on particular demographic groups' use of the Internet for legal help, including young adults and senior citizens.²³ The research also concerns people in England and Wales during the mid-2010s.²⁴ Since then, search engines' performance and design have changed.²⁵ But despite these limitations, this research establishes some base knowledge and hypotheses about how people search and navigate the Internet to deal with their problems. These can be useful as guiding insights to a more systematic, data-driven audit of legal help search performance.

Denvir found that people had certain patterns of searching for help online.²⁶ They used search engines as they would directories – to present a list of help options (like a phone book)– or as brief advice from an acquaintance ('here are important facts to know').²⁷ Many young people relied heavily on the search engine to direct them to the question's answer, rather than a tool to explore many different websites critically.²⁸ They

²⁰ Denvir, *supra* note 13, at 143–56; Hagan, *supra* note 13, at 430–32.

²¹ Denvir, *supra* note 13, at 145–46; Hagan, *supra* note 13, at 437.

²² Denvir, *supra* note 13, at 142–44; Hagan, *supra* note 13, at 438–39.

²³ For studies of older people's use of the Internet for legal help, *see* Denvir, Balmer & Pleasance, *Portal, supra* note 18. For studies of younger people's use, see Denvir, *supra* note 13; Denvir, *supra* note 18; Denvir, Balmer & Pleasance, *Surfing, supra* note 18.

²⁴ See sources cited supra note 23.

²⁵ In-Depth Guide to How Google Search Works, GOOGLE SEARCH CENT.,

https://developers.google.com/search/docs/fundamentals/how-search-works (last visited June 14, 2023).

²⁶ Denvir, *supra* note 13, at 220–23.

²⁷ Id.

²⁸ Id. at 229–30.

wanted the search engine to connect them with a direct answer to the question they had about their life problem, rather than use the search engine as a means for educating themselves about the law.²⁹

Most people in the study did not use the Internet to research their legal issue or to build an in-depth understanding of the law.³⁰ Rather, Denvir observed that they relied on the search results pages to prioritize the right information and organizations for them, so they could efficiently figure out what to do next.³¹ The participants typically used the search engine as a directory that would let them see possible websites that could help them, and briefly visit a number of them to find help.³²

To conduct their searches, participants went to Google and used queries that fell into one of three categories:³³

• **Directed, close-ended questions** like 'do you legally have to work contract hours', or 'do you have to meet working hours in job contract'

• Stories, with a question at the end, 'if my contract says I can work up to 50 hours a week do i have a choice', 'can a contract state the amount of hours you may work a week', 'can a landlord knock on the door and enter', 'can a landlord open a house'

• **Simple decontextualized phrases,** like 'minimum wage' 'employee laws', and 'work and contracts'

Denvir's findings among young people and senior citizens in England and Wales are similar to Hagan's findings in an online survey and simulation task run in the United States in the mid-2010s.³⁴ In this study, adult participants reported how they have used the Internet to deal with life problems or legal problems in the past.³⁵ It then presented them with a fictional housing problem and asked them how they would use the Internet to address it.³⁶ This study found that people relied heavily on Google Search

²⁹ See id. at 230–32.

³⁰ See id.

³¹ See id.

³² Denvir, *supra* note 18, at 28.

³³ Denvir, *supra* note 13, at 182–83.

³⁴ Hagan, *supra* note 13.

³⁵ *Id.* at 431–32.

³⁶ Id. at 435–39.

as their first step in seeking out help, and relied on the search engine to decide which websites to visit and trust.³⁷ People often visited the first results on Google, and relied only on these first sites to understand their issue and form a strategy.³⁸

Both research groups highlighted a few main problem areas for policymakers and service providers to address. These problems include relying on websites from the wrong jurisdiction, relying on irrelevant or inapplicable information, and using commercial sites despite a preference for governmental or nonprofit ones.

Jurisdiction. Both studies discovered that people often do not include jurisdiction in their searches for legal help and search engines do not present localized results for legal searches.³⁹ The young people Denvir studied searched online with little regard to the importance of jurisdiction.⁴⁰ They browsed information from other regions or countries, without realizing that the information was inaccurate for their own case.⁴¹ For example, when they were seeking employment law help for their situation, they would identify and report back employment law from other countries or regions that gave them an incorrect understanding of rights and procedures.⁴² Hagan's study also found that people searching for a civil justice problem did not enter any jurisdictional terms into their search queries and did not note when they visited other states' legal websites.⁴³ For example, people who had a California-based fictional scenario visited and relied upon legal help websites from Maine or Wisconsin.⁴⁴ Both the people and the search engines seemed to be insensitive to jurisdiction,

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³⁷ *Id.* at 433, 440–41.

³⁸ Id. at 441.

³⁹ Denvir, supra note 13, at 190–92; Hagan, supra note 13, at 441.

⁴⁰ Denvir, *supra* note 13, at 190–92.

⁴¹ Id.

⁴² Id. (discussing that approximately 41.5% (n=83) visited websites that were jurisdictionincorrect). Some individuals realized that they were on another jurisdiction's site, and added UK to their search. Others (the author does not give a number here) appeared to not recognize that they were using information from an incorrect jurisdiction.

⁴³ Hagan, *supra* note 13, at 441.

⁴⁴ Id.

despite the importance of jurisdiction in getting the correct legal information.

Irrelevant Information. The second issue the studies identified is irrelevancy. In Denvir's study of young people, she found that many of them visited websites that were irrelevant to the scenario and legal issue they were facing.⁴⁵ Many participants in Hagan's study sought out stories from peers or social settings to try and find stories that aligned with their own experiences.⁴⁶ Participants visited sites with crowdsourced stories of their legal problems and journeys, with the hope that they could find equivalent situations to their own and strategies that they could borrow.⁴⁷ This behavior meant that people had a high likelihood of encountering information that was specific to another's jurisdiction or situation, and inapplicable to their own.

Confusion of public and private sources. A third issue was participants' inability to distinguish between public, meaning nonprofit or government, sites and commercial, for-profit sites. Many people in Denvir's study tended to visit commercial sites rather than public governmental sites, unless they were given hints by the researchers about which sites were from the government or were non-commercial.⁴⁸ Hagan found that most participants wanted to find help from authoritative, public interest websites, but often would confuse a private site for a governmental one based on design cues like flags, seals, eagles, and other official-seeming design cues.⁴⁹ Despite participants' preferences for public interest sites, they often ended up using commercial websites because they appeared higher in search results.⁵⁰

50 Id. at 423-29.

⁴⁵ *See* Denvir, *supra* note 13, at 190–91 (noting that 19.6% of study respondents visited one or more websites containing content irrelevant to their issue, and 41.5% visited websites containing information relevant to another jurisdiction).

⁴⁶ Hagan, *supra* note 13, at 432–34.

⁴⁷ Id. at 455.

⁴⁸ *See* Denvir, *supra* note 13, at 76. The researcher gave a hint through a message that appeared on top of the screen indicating that a potential website (like the Shelter Housing Charity website or the Citizens Advice Bureaux — two official UK government resources) might be of use. *Id.*

⁴⁹ Hagan, *supra* note 13, at 458.

These lab-based studies of participants' use of the Internet to solve legal problems affirm that search engines are key intermediaries. Participants started their problem-solving journey on Internet search engines and trust search engines as authorities. Even if the search engines show information from the wrong jurisdiction, or about irrelevant matters, or from commercial sites rather than public ones, participants tended to visit and rely upon the websites that rank highest on the search engine results page. The studies also flag many potential concerns with the quality of the search results and how participants' reliance on them may lead them to understand the law incorrectly, apply incorrect or irrelevant law to their situation, and make decisions or plans that are harmful to the fair, just resolution of their problem.

B. Practitioners' Observations of Issues with Legal Help Online

Surveys about people's experiences searching for online legal help indicate additional dynamics not uncovered in the controlled lab studies. We conducted an informal, open-ended survey of legal aid practitioners and legal technologists via an email to popular list hosts, asking for their experiences with how people searched online and how they used websites.⁵¹ Because the use of the Internet for legal problem-solving and service-provision is a relatively new area of study, we put out this call for practitioners' experiences in order to identify any apparent trends, hypotheses, and anecdotes that could inform future research directions.

The legal aid lawyers and technologists that replied echoed many of the concerns that the lab-based studies had identified, including lack of jurisdictional awareness, confusion of commercial and governmental sites, and presence of irrelevant information.⁵² The practitioners additionally

⁵¹ We sought out responses on the SRLN listserv and LSNTAP online group discussion board, which serve primarily American legal aid lawyers and technologists, as well as court staff and law librarians who work in public legal help for civil (not criminal) needs. The responses came from legal aid attorneys and from webmasters of statewide US legal help portals, including in Maine, Massachusetts, California, and Illinois. They also came from respondents abroad, like in Australia. Survey, Legal Servs. Nat'l Tech. Assistance Project, Examples of Bad or Misleading Internet Search Results Listserv Discussion Thread (2018) (on file with the author) [hereinafter LSNTAP listserv]; Survey, Self-Represented Litig. Network, Examples of Bad or Misleading Internet Search Results Listserv Discussion Thread (2018) (on file with the author) [hereinafter SRLN listserv].

⁵² See sources cited supra note 51.

flagged other concerns, including the challenge of protecting people from scams and incorrect information, how difficult it is for service providers to get public interest information to people during times of emergency, and how commercial sites outmaneuvered public interest ones to get a higher rank (including, in some cases, co-opting public interest markers).⁵³ The practitioners' described their experiences and concerns in the following areas.

Jurisdiction. As with the research studies, practitioners found many people visited websites outside of their jurisdiction, and seemed to rely on legal information that was inapplicable to their situation.⁵⁴ Some legal aid lawyers reported instances when people in California were trying to follow divorce procedures for court systems in Maine or Wisconsin.⁵⁵ These people found out-of-state websites via an Internet search, and because the website ranked high on the search engine, they assumed that it was reliable and applicable.⁵⁶ A legal aid group in Australia reported that incorrect jurisdictional results are a major problem for users in their country.⁵⁷ US-based resources tend to surface higher on legal help searches in Australia, and many of their clients began doing legal tasks based on US laws and procedures.⁵⁸ Lawyers then have to 'undo' this work and start over in the Australian context.⁵⁹

Not-actionable Information. Practitioners identified a new category of concern about legal websites that provided content that was too general and vague to be actionable. These websites did not provide information that was incorrect or inapplicable.⁶⁰ Rather, the content was not specific, local, and detailed enough to help a person take action.⁶¹ This concern is particularly high for time-sensitive legal queries that could pose an immediate risk to a person's safety, stability, and well-being. In these kinds

⁵³ See sources cited supra note 51.

⁵⁴ See sources cited supra note 51.

⁵⁵ See sources cited supra note 51.

⁵⁶ See sources cited supra note 51.

⁵⁷ See sources cited supra note 51.

⁵⁸ See sources cited supra note 51.

⁵⁹ See sources cited supra note 51.

⁶⁰ See sources cited supra note 51.

⁶¹ See sources cited supra note 51.

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of emergency legal help queries, like for an eviction notice, a debt collection lawsuit, a domestic violence incident, harassment, or otherwise, a person has a small window of time to take legal action to protect themselves and their family. The practitioners expressed concern that search results did not give clear enough information about rights and services to someone searching for this high-risk, time-sensitive query.⁶² They worried that when people see a long list of search result options, rather than a clear statement of their rights, step-by-steps of what to do, or link to a hotline, that the person might not be able to take the key action needed in the time window.⁶³

Climate and health emergencies. These concerns about high-risk, timesensitive queries were amplified in reference to times of crisis. Practitioners raised concerns about being able to get key information to people during natural disasters. They were especially concerned because search results tended to favor commercial sites over public interest ones and commercial organizations were eager to dominate the search results page for potentially lucrative searches.⁶⁴ A local legal aid group in California reported that they struggled to get public, free resources to people affected by the 2017-19 wildfires, mudslides, and other disasters.⁶⁵ This group, the Legal Aid Association of California (LAAC), is the group responsible for maintaining legal help information in the main statewide free legal services site for California and for coordinating statewide emergency hotlines.⁶⁶ In the wake of a natural disaster, they create dedicated pages to inform people about their rights, resources, and services in order to connect them with free and low-cost service providers that may assist them with housing, money, family, and work problems that arise after a disaster.⁶⁷

LAAC is eager to use Internet search to engage people, so they learn about the rights and services the group provides. But it has struggled to compete with private actors that are also trying to use Internet search to advertise their more costly services for disaster victims. For example, the

⁶² See sources cited supra note 51.

⁶³ See sources cited supra note 51.

⁶⁴ See sources cited supra note 51.

⁶⁵ See sources cited supra note 51.

⁶⁶ See sources cited supra note 51.

⁶⁷ See sources cited supra note 51.

legal aid group used Google's nonprofit Adwords program to try and buy ads for their public interest Law Help portal.⁶⁸ For any possible ad slot, the program limited the legal aid group to a \$2.00 bid.⁶⁹ During the postemergency phase, they were often outbid by private attorneys or commercial groups who were bidding \$4, \$5, or \$7 per search.⁷⁰ The legal aid group felt hamstrung by the nonprofit program's bidding limits, which seemed to prevent them from connecting people with helpful disaster relief information.⁷¹ Ultimately, they could not afford to advertise free emergency services to people in need of them.⁷²

Scams, tricks, and consumer protection. A final category that practitioners flagged was the trend of private companies providing fraudulent information or forms to people, or misrepresenting their organization as being public interest. One area of concern was around companies that charged for free government forms, in which the companies sell consumers access to form files that the consumer could otherwise access from government agencies for free.⁷³ There are also companies that promise to help people get divorced or get a visa but then charge high fees for forms that only work in very limited situations.⁷⁴ These form sites are concerning because people may pay large amounts of money, thinking that they are saving money by doing their legal forms themselves, only to discover that the forms they have paid for are freely available or are inapplicable for their situation.

Another example in this category is when for-profit providers co-opt a non-profit's status markers. A practitioner identified instances when this has happened in the search engine's advertising system, in which website administrators can list out keywords about their website to inform search engine's advertising match-making.⁷⁵ The practitioner described a situation where a private for-profit website used the name of legal aid

⁶⁸ See sources cited supra note 51.

⁶⁹ See sources cited supra note 51.

⁷⁰ See sources cited supra note 51.

⁷¹ See sources cited supra note 51.

⁷² See sources cited supra note 51.

⁷³ See sources cited supra note 51.

⁷⁴ See sources cited supra note 51.

⁷⁵ See sources cited supra note 51.

groups and the Legal Services Corporation in its advertising keywords.⁷⁶ The practitioner was concerned that this use of their organization's name led people to click on the ads with the expectation that the link would take them to free legal services or a government agency.⁷⁷ The practitioner reported seeing this practice in Maine and Massachusetts, but has not looked systematically for it.⁷⁸

C. Standards for Assessing the Quality of Websites

In addition to studying how people use the Internet to solve legal problems, researchers have also begun to establish a standard rubric by which to evaluate legal websites' quality. There is not one universal rubric about which website is a 'good' one for people to use to learn about the law, learn their options, and get started on problem-solving tasks. But there are some lists of key labels that have been used by practitioners and researchers to make sense of different legal help websites. A UK group Access Now assembled an initial list of labels to differentiate legal help websites which Denvir adapted to label the websites that participants in her studies visited.⁷⁹

Label 1: Jurisdiction-Relevance: This label addresses whether the site offers information that is jurisdiction appropriate for the person. It also covers whether the website makes its jurisdiction clear to people. This label is important, because if the information is relevant to a different

⁷⁶ See sources cited *supra* note 51 for a discussion from a Maine legal aid attorney at the legal aid group Pine Tree Legal Assistance who reported that "There was a guy who paid for google advertising for his lawyer referral service. When 'Pine Tree Legal' or 'Pine Tree Legal Assistance' was entered as a search term a link to his referral site would show up with the words 'Pine Tree Legal Assistance' being the live link, followed by some generic language . . . like 'experienced lawyers to represent you.'" The legal aid group discovered this misdirection, hired a law firm to sue him, and settled in order to stop this deceptive advertising. *See* sources cited *supra* note 51.

⁷⁷ See sources cited supra note 51.

⁷⁸ Our group is unable to verify if people have clicked on these advertisements, or that these advertisements exist, or how often they do. We do not know how common a practice this is. The lawsuit brought by Pine Tree, as mentioned in the previous footnote, did end in a settlement to address the concerns. But there is no audit or data source that would let us determine how frequently deceptive ads are placed, or what users do when shown these ads.

⁷⁹ See Denvir, *supra* note 13, at 250–51 for her formulation and use of a quality rubric to evaluate websites that appeared in search results for legal help queries.

jurisdiction, it has the potential to provide irrelevant information to the person searching. Additionally, if the information is too generic, meaning not about any specific jurisdiction, it may help a person at a high level, but will not give them actionable, local information.

Label 2: Issue-Relevance: This label addresses whether the site offers information that can help the person understand and resolve the issue they searched for. It notes whether the site provides specific enough information so that a person can now understand their issue, their options, their rights, and their obligations. The issue-relevance label is important because, if the site presents information about a different legal issue, or describes the issue too generically, then again there is potential to harm the person. The person may act on the wrong information or the person may not act at all because the information is too generic to act upon.

Label 3: Accuracy of Information around the law and available services: This label addresses whether the site offers up-to-date, correct information about legal options, rights, and procedures. It includes whether the site offers current, correct listings of courts, legal aid groups, and other service providers that can help a person resolve their problem. Sites that intentionally offer incorrect information, or those that inadvertently offer out-of-date or incorrect information, may harm people by leading them to rely on incorrect information. In this category, sites should also be evaluated for possible misrepresentations about their status or services, including whether they are presenting themselves as a government agency or a nonprofit offering free services, and when they are for-profit and may charge a person. Similarly, sites should be evaluated on whether they are presenting government forms as a paid service when the forms are freely available on government sites.

Label 4: Cost to Access Resources: This label addresses whether the site presents any burdens to use the legal information, tools, or connections to services. These burdens might be costs (like paywalls, which allow a person to get some general content for free but require them to pay for the more substantive and detailed information). Or the burdens might be advertisements, pop-ups, or data collection, which allow a person to use content without paying but then impose advertisements or data collection upon them.

Label 5: Type of Organization Running the Site: This label addresses what kind of organization authors and hosts the site. These different organizations are not inherently good or bad, but their motivations should be understood to spot where there might be possible harms to visitors.

- It is a commercial organization, like a law firm, a legal services provider, or other company that is hosting the site to attract visitors to serve advertisements, to build clout, or to get client leads.

- It is a government or nonprofit site that has a public interest mission to distribute legal information freely to the public, so that they can better access the justice system and make use of free legal services.

- It is a union, collective, or community group that wants to distribute legal information to people, with a public interest mission to empower more people to know their rights and use the legal system.

- Is it a news or journalism site that wants to distribute information that matters to local residents about their rights and options, and that also might want to increase visitor counts, serve advertisements, and get subscribers.

- It is a social media or forum site that wants to attract visitors generally, promote activity and interactions, and get high engagement from visitors so that they can increase their usage statistics and serve more advertisements.

- It is an individual's blog or website, that may be motivated by increasing visitor numbers and serving advertisements or a public interest endeavor to spread information out to others.

These labels, which past researchers used to categorize their study participants' search results, can be useful to make sense of the many websites that appear in search results.⁸⁰ Within these labels are more specific indicators of what a 'quality score' for a website might be. They begin to indicate what researchers should look for when evaluating whether search engines are showing people 'good' or 'bad' websites.

The overarching point of these criteria are whether a site is helping a person continue their justice journey in a correct and empowered way, or if it might either be leading them astray or discouraging them from continuing. Synthesizing these past criteria leads us to insights about what makes for quality in a legal help website. A quality site would provide relevant, correct, and actionable information. It would be specific enough that a person experiencing a problem knows what their concrete next steps

⁸⁰ See Denvir, supra note 13, at 172–74.

might be: what group they might call, what form they might file, what program they might apply to, what evidence they might collect, or what right they might invoke. A quality site will build people's legal capability, making them more knowledgeable, strategic, and prepared to act to resolve their justice problem.

D. Proposed Quality Metrics for Legal Help Websites & Search Results

Using our labels, we can create an initial draft of 'quality' criteria. These are not just labels about what the site is doing or who operates it. Rather, these criteria can be used to judge the site vis-a-vis its potential to help or harm a visitor who is seeking help for a life problem.

Quality Criteria 1: The site has jurisdiction-correct, accurate, current information. A website listed on a search results page should give a person information that they can rely upon to take action, find services, and start resolving their problem. This information should not be for another jurisdiction, and thus irrelevant or harmful to the person. It should not be out-of-date, with legal procedure, forms, rights, or services that would be incorrect to rely upon. Some news reports have called out examples of legal misinformation online that might be scams⁸¹ or conspiracy theories.⁸²

Quality Criteria 2: The site presents specific, detailed, actionable information about rights, process, and services. A website should provide specific actions someone can take to address their problem. Generic information that describes a problem or legal options at a high level may

⁸¹ There are no academic studies of harms from online legal services, though some news reports have compiled complaints from various Internet users about forms or advice they had followed from websites. *See* Mitch Lipka, *Can You Trust Online Legal Services?*, CBS NEWS: MONEY WATCH (July 20, 2015, 8:55 AM), https://www.cbsnews.com/news/can-you-trust-online-legal-services/.

⁸² Legal misinformation has been spread as conspiracy theories about the courts and legal rights by groups like the Sovereign Citizens movement and QAnon. *See* Jennifer Williams, *Why Some Far-right Extremists Think Red Ink Can Force the Government to Give Them Millions*, VOX (Feb. 9, 2016, 8:10 AM),

https://www.vox.com/2016/2/9/10942860/sovereign-citizens-movement. *See also* Daniel Villareal, *Florida QAnon Supporter Shoots Dead Legal Theorist over Alleged Conspiracy Involving Her Child, Police Say,* NEWSWEEK (Nov. 17, 2020, 11:26 PM),

https://www.newsweek.com/florida-qanon-supporter-shoots-dead-legal-theorist-over-alleged-conspiracy-involving-her-child-1548237.

have some use in establishing a person's basic understanding of the law.⁸³ But far more valuable is a website that tells them groups that they can call for help, local courts and authorities that they can visit to get started on filings or hearings, and local procedures to follow. The more specific and local the information is, the more it can help a person take quick action to respond to the problem.

Quality Criteria 3: The site puts minimal burden or cost on a person to access information about rights, process, and services. A website should be easy for a person to use. Specifically, it should be easy to find the key information needed to begin resolving an issue. The website should have minimal distractions, barriers, and costs that could prevent them from using the site's information. Ideally, a person should not have to give up data, money, or privacy in order to know their legal rights, procedures, paperwork, and available services to help them.

There are some indicators related to these quality criteria that researchers may use to evaluate the websites listed on search results. These indicators are not decisive about the quality of a site, but they can be an important factor that researchers should make note of, particularly as more research is done about the landscape of legal help online and the quality or harms of different kinds of sites and organizations.

Indicator 1: The site is run by a public interest organization, not a commercial one. This indicator is based on the hypothesis that a website from a public interest organization (with no commercial intentions, upselling, paywalls, advertisements, or data-gathering) provides better legal information than a commercial organization's website. The presumption is that a public interest-run website will present more detailed information with fewer restrictions or burdens. Similarly, we assume public interest websites will not try to hide key information behind paywalls or make a burdensome site that is filled with advertisements or trackers. They will not hide key information from visitors, in the hopes that they can upsell the person to hire a lawyer or buy a book. More research is needed to determine if the hypothesis that public interest sites are more likely to provide quality information is true. Either way, because of their

⁸³ See Denvir, *supra* note 18, at 35–39 for an analysis of how people's knowledge of the law and capability may show slight improvements while searching the Internet and browsing various websites—though their knowledge and capability may decrease when they go to a site with incorrect or irrelevant information (like form another jurisdiction).

differences, it is worthwhile to track what kinds of organizations' sites are appearing on search results.

Indicator 2: The site is run by a legal organization rather than a non**legal one.** We chose this indicator because we hypothesize that a site run by an organization directed by lawyers, court officials, or others close to the legal system will be more likely to present quality information than a site run by an organization directed by people outside the legal system. On the other hand, other kinds of websites, like news sites, social media, or other may present legal information to attract visitors, sites, serve advertisements, and gather data about visitors that they can resell. Legal organizations' sites are likely to present accurate, detailed information because they work closely with the legal system and are close to the judicial authority.⁸⁴ Other kinds of non-legal websites may have issues with accuracy, specific details, and timely updates because they are more peripheral to the legal system and have fewer experts involved in authoring and maintaining the sites.⁸⁵ Again, further research is necessary to determine if legal organizations run higher quality sites than non-legal ones. But for the purposes of our study, it is worthwhile to track the type of organizations running the websites appearing on search results to see if there are concerning trends.

These quality criteria and indicators are a draft protocol by which to begin larger-scale research about how search engines are responding to legal help queries. As this study moves from doing tens of searches to thousands, the criteria and indicators can be useful in sorting through the thousands of websites that appear in search results. That said, we encourage more research and stakeholder involvement in defining a quality

⁸⁴ E.g., in Ohio, the statewide legal help website Ohio Legal Help is built under a task force from the state supreme court, and coordinates among local legal aid attorneys, court clerks, and other justice system professionals to ensure it has relevant, correct content for the public. Taylor AziZachary, *Ohio Legal Help Provides Access to Justice*, COLUMBUS CEO (Feb. 4, 2021, 7:53 PM),

https://www.columbusceo.com/story/business/2021/02/03/ohio-legal-help-provides-access-to-justice/115434342/.

⁸⁵ The home improvement website Angi (formerly Angie's List) posts articles about legal problems like contractors' breach of contracts, but some are written by staff writers without a legal background, that give short synopses about legal options and procedures. *See* Stephanie Shaykin, *What Can I Do If a Contractor Doesn't Adhere to Our Contract?*, ANGI (Sep. 28, 2021), https://www.angi.com/articles/what-can-i-do-if-contractor-rippedme.htm.

scoring system for legal help websites and analyzing our presumptions that public interest sites provide higher quality sites than commercial ones and legal organizations' sites provide higher quality than non-legal ones.

E. The Public Interest Legal Help Website Landscape

Websites with quality jurisdiction-correct, local, actionable, low-burden, and free information about a person's legal options, rights, and services do exist.⁸⁶ In most jurisdictions across the US, there are such websites, often operated by public interest groups like legal aid groups or court self-help centers.⁸⁷ These public interest legal help websites offer visitors free access to legal how-to guides, description of key rights, answers to frequently asked questions, free tools to fill in court forms, and chatbots or similar tools to help a person understand what law might apply to them.⁸⁸ These sites also have robust service directories, to connect a person to free legal aid lawyers, financial assistance, and other nonprofit providers to help a person with their problem.⁸⁹

1. Legal Aid Groups as Legal Help Website Providers

Over the past 20 years, national funders of legal aid work have invested in building a network of statewide legal help portal websites to deliver high quality information to people with civil legal needs.⁹⁰ The Legal Services Corporation (LSC), a congressionally funded non-profit with a mandate to support legal aid efforts for low-income Americans, has been funding efforts in each state to establish local websites that offer legal information

⁸⁸ Id.

⁸⁹ Id.

⁸⁶ See Public Interest Legal Help Websites, STAN. LEGAL DESIGN LAB,

https://legalhelpdashboard.org/websites/public-sites (last visited Sept. 11, 2023) (providing a comprehensive list); *see also* Margaret Hagan, *The Supply and Demand of Legal Help on the Internet, in* LEGAL TECH AND THE FUTURE OF CIV. JUST. 199–224 (David Freeman Engstrom ed., 2023) (giving an analysis of the websites).

⁸⁷ Hagan, *supra* note 97, at 201.

⁹⁰ See generally Summary of TIG Awards 2000-2009, LEGAL SERVS. CORP. (Oct. 19, 2016), https://www.lsc.gov/sites/default/files/attach/2016/10/TIG_Awards_2000_to_2009.pdf. See also 2021 Technology Initiative Grant Awards, LEGAL SERVS. CORP.,

https://www.lsc.gov/grants/technology-initiative-grant-program/technologytechnology technologytechnology-initiative-grant-awards-tig-projects-funded-year (last visited June 13, 2023) (describing how TIG awards contribute to developing online legal aid).

and service referral directories.⁹¹ Through their Technology Innovation Grants, issued to local legal aid groups since the early 2000s, the LSC has incentivized public interest actors to publish detailed, actionable legal help information for public use on central statewide websites.⁹² Other foundations, like those associated with bar associations and lawyers' trust accounts, have also supported the development of these statewide sites. Some examples of these non-profit statewide legal help portals include Illinois Legal Aid Online,⁹³ Michigan Legal Help,⁹⁴ LawHelp Hawaii,⁹⁵ and Florida Law Help.⁹⁶ Each state's most prominent law help website can be seen in Appendix A, with a comprehensive list of links.

More recently, LSC has partnered with Microsoft to invest in more coordinated, detailed, and personalized legal help websites through the Legal Navigator Project.⁹⁷ Through extensive user research and technology experimentation, the Legal Navigator Project is piloting new centralized legal help websites in Hawaii and Alaska.⁹⁸ These new legal help websites are meant to be the kind of site that would satisfy the evaluation rubrics listed above: they will guide a person to make sense of their problem scenario; help them find the exact detailed legal options and procedure they have in their jurisdiction; and connect them to free or low-cost providers in their jurisdiction who can assist them in completing their tasks.⁹⁹

⁹¹ *Who We Are*, LEGAL SERVS. CORP., https://www.lsc.gov/about-lsc/who-we-are (last visited Feb. 2, 2024).

⁹² See sources cited supra note 90.

⁹³ See ILL. LEGAL AID ONLINE, https://www.illinoislegalaid.org/ (last visited Sept. 22, 2023).

⁹⁴ See MICH. LEGAL HELP, https://michiganlegalhelp.org/ (last visited Sept. 22, 2023).

⁹⁵ See LEGAL AID SOC'Y OF HAW. https://www.lawhelp.org/hi/ (last visited Sept. 22, 2023).

⁹⁶ See FLA. L. HELP, https://www.floridalawhelp.org/ (last visited Sept. 22, 2023)

⁹⁷ *Simplifying Legal Help*, LEGAL SERVS. CORP., https://www.lsc.gov/simplifying-legal-help (last visited Sept. 22, 2023) (providing updates of the project).

⁹⁸ Press Release, Legal Services Corporation, The Legal Services Corporation Announces Pilot States for Innovative Program to Increase Access to Justice, (Apr. 24, 2017), https://www.lsc.gov/press-release/legal-services-corporation-announces-pilot-statesinnovative-program-increase-access.

⁹⁹ Id.

2. Courts As Legal Help Website Providers

In addition to legal aid groups, courts have also published more legal help websites to support litigants seeking options and guidance. Though not all state or county courts have established public-oriented websites, many court systems have invested in self-help websites that give extensive guides, live chats with librarians, and links to forms, court information, and other concrete details that let a person take action on their problem.¹⁰⁰ Court systems which provide robust self-help websites include those in California,¹⁰¹ Massachusetts,¹⁰² and Florida.¹⁰³ A full list of the state courts' self-help websites can be found in Appendix B.

The quality of the court self-help websites is varied. Some merely provide links to forms and case lookups, with minimal guidance or description.¹⁰⁴ Other court sites provide extensive step-by-step guides, support for filling forms, connections to in-person services, and the ability to file or interact with the court online.¹⁰⁵

This growing network of public and non-profit legal help websites, from legal aid coalitions, state courts, and individual legal nonprofits, provides

¹⁰⁰ Casey Chiappetta, *New California Civil Court Web Portal: A Model for Other States?*, PEW (Aug. 31, 2022), https://www.pewtrusts.org/en/research-and-

analysis/articles/2022/08/31/new-california-civil-court-web-portal-a-model-for-otherstates; *What Is a Legal Assistance Portal?*, PEW (Oct. 9, 2019), https://www.pewtrusts.org/-/media/assets/2019/10/what_is_a_legal_assistance_portal.pdf.

¹⁰¹ See Self-Help Guide to the California Courts, CAL. CTS., https://www.courts.ca.gov/selfhelp.htm (last visited Sept. 22, 2023).

¹⁰² See COMMONWEALTH OF MASS., https://www.mass.gov/topics/court-forms (last visited Sept. 22, 2023).

¹⁰³ See Self-Help Information, FLA. CTS., https://www.flcourts.gov/Resources-Services/Office-of-Family-Courts/Self-Help-Information (last visited Sept. 22, 2023).

¹⁰⁴ See, e.g., Administrative Office of the Courts Downloadable Forms, OKLA. STATE CTS. NETWORK, https://www.oscn.net/static/forms/AOCforms.asp (last visited October 4, 2023).

¹⁰⁵ See, e.g., CAL. CTS., supra note 101(containing large amounts of step-by-step guides, connections with librarians over live chat, and automated document assembly tools); Self-Help Resources / Self-Represented Parties, UTAH CTS., https://www.utcourts.gov/selfhelp/ (containing similar useful information and tools that California's website provides).

web content that is free, authoritative, and local.¹⁰⁶ These websites' aim to equip people with enough information, contacts, official forms, and details so they can complete legal tasks or make use of free legal services from legal aid groups or court services. The websites from legal aid and state court providers aim to attract a wide public in their local jurisdiction in order to promote broad access to the justice system.¹⁰⁷ Whether they are able to do so, with limited budgets for search engine optimization or advertisement, is an open question that this study begins to answer.

II. The Legal Help SERP Audit

How can the legal practitioner and academic community know more about how Internet search engines perform, when people come online to seek help for legal problems? Building from the previous research just summarized, we propose a semi-automated Legal Help Search Audit ("Audit"). In this paper, we document how we have developed this Audit as a step-by-step protocol. We also demonstrate that such a large-scale Audit of search engines' performance is feasible by running an initial version of it. Finally, we analyze the results of this first ever Audit to discuss what it reveals about what people see when they turn to Internet search engines for legal help.

This Audit moves away from small-scale studies, towards a data-driven way to assess search engines' performance in responding to legal queries. The Audit can supply stronger evidence than previous simulation-based lab studies for the following reasons. First, rather than having a small number of participants conduct legal help searches, a semi-automated audit can run thousands of user queries on a wider range of help problems. Second, this methodology can capture the search results in a machinereadable way, so that they can be analyzed more systematically and with lower burden. In the near future, it might be possible to automate some parts of the quality analysis. We do not believe that many of the quality

¹⁰⁶ There has not yet been research evaluating these sites' usability and improvement of people's legal capacity. We encourage further comparative, user-centered research of these sites.

¹⁰⁷ See How to Use Technology to Serve Your Community, LEGAL AID DISASTER RES. CTR., https://www.ladrc.org/how-to-use-technology-to-serve-your-community/ (last visited June 13, 2023); see also Technology Initiative Grant Data, LEGAL SERVS. NAT'L TECH. ASSISTANCE PROJECT, https://www.lsntap.org/node/525/technology-initiative-grant-data (last visited Sept. 22, 2023) (showing the funding that the Legal Services Corporation has given to website projects of legal aid groups in order to improve access to justice).

factors outlined above, such as the jurisdiction-correctness, accuracy of the information, actionability, or accessibility burden, can be automated currently, but the audit can support the manual review too.

We created the first Legal Help Search Audit protocol in the autumn of 2019. We adapted techniques and software used in human-computer interaction labs like Northeastern University's Lazer Lab to conduct large-scale batches of Internet queries and analyze the search results pages.¹⁰⁸ Researchers at the Lazer Lab had developed a Search Engine Results Page (SERP) audit protocol to assess how search engines respond to different individuals' queries on news events.¹⁰⁹ The Lazer Lab team shared their SERP audit software tool, which is able to run large numbers of searches on Google from specified zip codes and save the first page of search results as a data file.¹¹⁰

Based on their earlier work and software, we developed an initial Legal Help Search Audit protocol which does the following:

1. Legal Problem Scenario Choice: The team identifies the legal problem scenarios that they wish to analyze. These include the type of life situation and corresponding legal help the team wishes to understand. After they do so, they write a user story for the scenario.

2. Search Query Generation: The team draws from user surveys and tools that analyze past Internet searches to list out the search queries that correspond with the legal problems. For example, the team might use a survey to determine what search queries people might use if they were in the described scenario. They can also incorporate SEO research tools to see what keywords and queries are commonly used for this scenario.

3. Run Batch Searches: The team then begins automatically running the identified queries through the Google search engine. The team uses the Audit tool to specify which zip codes the search engine should be using, so that it corresponds to what a person searching from that zip code would see. The Audit tool runs these batch searches and saves the first page of

¹⁰⁸ See Ronald E. Robertson et al., Auditing the Personalization and Composition of Politically-Related Search Engine Results Pages, in WWW '18: PROCS. OF THE 2018 WORLD WIDE WEB CONF., 955, 957–58 (Int'l World Wide Web Conf. Comm. ed., 2018).

¹⁰⁹ Id.

¹¹⁰ See generally Ronald E. Robertson & Christo Wilson, *WebSearcher: Tools for Auditing Web* Search, in PROCS. OF THE COMPUTATION + JOURNALISM SYMP. (2020) https://cbw.sh/static/pdf/robertson-cj20.pdf.cj2021.northeastern.edu/research-papers/.

results, including advertisements, images, knowledge panels, and other special entries, into a database.

4. Run Automated Analysis of SERPs: The team then analyzes the database to understand how the search engine results fit within the important indicators. The team does this analysis for each legal problem scenario they are researching.

a. Top URLs: The team identifies which websites are appearing most frequently on the first page, and which websites are appearing most frequently in the top 1 or top 3 results.

b. Types of organizations: The team analyzes the proportions of different domain types (e.g., .gov vs .org vs .com), including foreign domains (e.g., .co.uk or .com.au), that appear.

c. Proportion of Ads: The team identifies how many ads appear on the search results page.

d. Presence of expected Public Interest websites: The team works with local judicial, legal aid, and community leaders to ask them which help websites would be of greatest value to local people searching for help. They compare this list of local, quality websites to the websites that show up in the search results. This comparison and frequency count can be an initial indicator of quality issues with the search results.

5. Conduct Manual Analysis of SERP quality. The team runs an indepth, manual analysis of the websites being shown to people to understand which organization runs each website and the quality of each site's content. The automated analysis is not sufficient to understand how the SERPs are performing. Considering the quality criteria and indicators discussed earlier in the paper, it is still necessary to manually review the websites and specific pages that the audit uncovers, in order to understand how they perform in regards to its information's quality, the actionability of the information, and the burdens it might place on a visitor.

This section details this five-step protocol in more detail, by walking through how we carried out a first version of the Audit around eviction, debt, domestic violence, and consumer contract problem scenarios. The next section presents the results and findings of the initial Audit. We note that this was the first round of the Audit. We welcome input about how to refine this protocol to establish a strong, consistent protocol that can be run regularly on different search platforms, to determine how search engines and legal help websites change over time.

A. Step 1: Choosing Legal Problem Scenarios

For our initial run of the Legal Help Search Audit, we chose legal problem scenarios that are common among the US population and of concern to legal providers and policymakers. We consulted stakeholders from legal aid groups and civil justice organizations about legal needs, and where they have heard anecdotally that people are searching online for help.¹¹¹ Our initial list of scenarios from the stakeholders included: being evicted; having a home in foreclosure; filing for bankruptcy; applying for a visa status; seeking help for domestic violence; filing for divorce; dealing with child custody and support payments; responding to consumer fraud for housing renovations after a natural disaster; and being sued for an outstanding debt.

We decided to use four of these problem scenarios in our initial Audit: (1) eviction, (2) restraining orders, (3) debt lawsuit, and (4) post-disaster contractor fraud. We chose four scenarios because we wanted to test how the Audit protocol would work in different situations. Having four different scenarios lets us compare cross-problem to see what kinds of websites and advertisements were being shown to people with different kinds of problems. It also lets us see if there were some problem scenarios that were more likely to lead people to sites with quality problems, incorrect information, or scams.

Another factor in problem scenario choice was the search engines' policy priorities. Google, for example, publishes general guidelines for website publishers that explain how they rate the quality and reputation of a site.¹¹² These policies make it explicit that the search engine will give special attention to search quality for queries that fall into "Your Money or Your Life" ("YMYL") topics.¹¹³ Google defines YMYL topics as topics where websites might significantly impact or harm a user or others in their

¹¹¹ Some organizations have reports that quantify which legal needs are most common. For example, we drew on the frequency of problems with debt and consumer issues and rental housing highlighted in the Legal Service Corporation's Justice Gap study. *See* LEGAL SERVS. CORP., THE JUSTICE GAP: MEASURING THE UNMET CIVIL LEGAL NEEDS OF LOW-INCOME AMERICANS, 22–24 (2017), https://www.lsc.gov/justicegap2017.

¹¹² See generally GOOGLE, SEARCH QUALITY RATER PROGRAM: GEN. GUIDELINES (2022), https://static.googleusercontent.com/media/guidelines.raterhub.com/en//searchqualityev aluatorguidelines.pdf.

¹¹³ Id. at 11.

network.¹¹⁴ YMYL topics include those where the topic itself is harmful or dangerous (e.g., self-harm, criminal acts, or extremism), or the topic could cause harm if the content is not accurate and trustworthy (e.g., sites that affect someone's health, financial stability, or safety).¹¹⁵ Google, as of 2022, lists some example YMYL topics as symptoms of a heart attack; what to do if there is an earthquake; how to obtain a driver's license; how to vote; and how to invest money.¹¹⁶..Google commits itself to paying particular attention to its search results page's quality and websites' quality for YMYL topics.¹¹⁷ Google claims it reviews websites and search rankings based on possible harms or positive impact that results could have on people who search YMYL topics.¹¹⁸

We reviewed whether our possible legal problem scenarios would qualify as a YMYL topic. We hoped to align the Audit's findings with the search engines' priorities, so that concerning results might inspire search engines to make policy changes. Search engines have changed how results are presented for certain mental and public health queries by showing fewer advertisements and curating higher quality responses.¹¹⁹

Based on the input from legal aid lawyers and search engines' YMYL definitions, our team chose to focus on the following four scenarios as ones that both occur frequently and qualify as a YMYL topics:

1. **Being sued for eviction:** in this scenario a person arrives home at their rental home to find a summons and complaint informing them that their landlord is suing them for eviction.

2. **Being sued for a debt:** in this scenario a person receives notice that a company is suing them for money the company alleges they owe.

3. **Facing domestic violence:** in this scenario a person argues with their domestic partner and has been threatened with violence.

¹¹⁸ Id.

¹¹⁴ Id.

¹¹⁵ *Id*.at 12.

¹¹⁶ Id.

¹¹⁷ See id. at 13.

¹¹⁹ See, e.g., Google "Suicide" Search Feature Offers Lifeline, ABC NEWS (April 7, 2010, 1:16 PM), https://abcnews.go.com/Technology/google-suicide-search-feature-offers-lifeline/story?id=10313064.

4. Fearing a post-disaster scam: in this scenario a person hires a contractor to repair their roof after flood damage, and then realizes the contractor is not following through on the agreed-upon work.

In each of these scenarios, a person would benefit from quality search results. A good outcome with quality results would include local information about what options and rights they have, what procedural steps to follow, how to find services to help them, and what outcome they would get if they went through a court or dispute resolution process. A bad outcome would occur if search results showed them low-quality information that had inaccuracies, was for the wrong jurisdiction, was outof-date, was based on idiosyncratic experiences, or was based on conspiracy theories. If people relied on low-quality search results, they could take incorrect steps or no action at all, and consequently face physical harm, financial loss, or housing instability.

B. Step 2: User Queries for the Problem Scenarios

Once our team selected the four scenarios, we then needed to identify the phrases that people use to search for legal help with these scenarios. The goal was to have a list of common search queries that represented how different people would type in a search query or speak into a voice assistant. Initially, we considered using site analytics from legal aid groups to see the phrases that people had searched for that ultimately brought them to the legal aid group's website. But this has a limitation: these queries 'worked' to bring them to a public interest legal aid group. We wanted to identify queries that people might use, even if they would not necessarily lead them to see a legal aid group's website.

We ran a survey to understand various queries people might use in response to the four problem scenarios.¹²⁰ We recruited 120 participants through the online survey platform Amazon Mechanical Turk,¹²¹ and

¹²⁰ Please contact the authors if interested in a copy of the survey instrument used for each of the four problem scenarios.

¹²¹ We recruited from the general Mechanical Turk respondent pool, screening for only highly-rated respondents. We did not put geographic limitations on participants, though if there are future studies we would recommend doing so to ensure that there is greater control of location. We had explored using YouGov as a platform to get higher reliability responses, but struggled to get the YouGov team to connect with us to scope out an experiment plan. We also were not able to design an experiment in the form of a short poll – instead needing time to have a person read a scenario, understand it, and then

presented them with a short narrative (about two paragraphs long) about one of the four legal problem scenarios.¹²² After the participant read this fictional scenario, the survey asked them to type in the words they would use to search for help online for this scenario. After they entered an initial query, the survey then asked them to pretend that their first search did not lead to anything useful, and to tell us the different search queries they would use. In total, each participant provided four different search queries for the problem scenario they were shown. Throughout the survey recruitment, scenario, and search question, we intentionally did not use any language around "law", "legal problems," or "legal help." Rather, the survey was framed as investigating how people use the Internet to seek help for a life problem. This was to ensure that the queries did not use legal terms unless the person thought to do so in response to the scenario.

We collected the hundreds of participant-generated queries for each scenario, and then reviewed them to remove any repeated phrases or phrases that were off-topic.¹²³ This resulted in four lists of 60-80 search queries for each of the four problem scenarios.¹²⁴ We then used these lists to run Google searches from various zip codes in two jurisdictions.

1. Location Indicators In The Queries

We only presented a jurisdiction detail to the survey participants in one of the four legal problem scenarios (the eviction scenario). We told participants that they, in the fictional scenario, lived in San Francisco, California. This prompted many of the participants to use location details in their search queries. They appended "in California" or "in SF" to their

enter in search queries. As described on the next page, we think a better strategy for future audits is to draw the queries from databases of people's past questions, rather than from surveys.

¹²² Please contact the authors if interested in a copy of the survey instrument used for each of the four problem scenarios.

¹²³ For example, in the domestic violence scenario, some survey participants formed search queries that were more about repairing a dysfunctional relationship than about seeking legal protection. Others searched for generic emergency queries like "calling 911" or "PTSD." We excluded these help queries from our audit, though they potentially could have value in the future, in helping us understand that some relationship-oriented queries might actually be linked with scenarios that have legal issues (even if the person is not seeking help from the law).

¹²⁴ See infra Appendix C.

queries about renters' rights, eviction process, or help. In the three other legal problem scenarios (domestic violence, debt lawsuit, and post-flood home contractor fraud), we did not include a jurisdiction detail in the fictional scenario shown to survey participants. In those three surveys, the participants did not include location details in their queries.

When we prepared the search queries for the Florida and Hawaii zip codes, we substituted local equivalents for the California location indicators. For example, we substituted Pensacola for San Francisco, or Florida for California. By having these location indicators in some of the queries for one of the problem scenarios, we were able to observe if the location indicators tended to produce different quality of search results. Future studies may do this in a more controlled and deliberate way. In this initial audit, we did it as an exploratory choice to observe any trends that might result.

Problem Scenario	Example user search queries
Domestic Violence	 partner threatened me Steps to take when being threatened in a relationship where to go for advice with a troublesome relationship How to leave an abusive partner who is making threats? leaving a toxic situation
Post-Disaster Scam	 fraudulent contractor help how to sue a contractor who has defaulted on a contract and failed to provide service dealing with contractor scams Legal help service not done contractor took my money roofing contractor won't being work after payment
Debt Collection	 What are the best steps to take when being sued by a credit card company? How to settle medical debt What to do if a credit card company sues you

2. Queries And Keyword Research

2023	
2020	

	 credit lawsuit response What happens if I do not show up for a civil court case from credit card company what can credit card company do over unpaid balance Need advice on creditor judgements
Eviction	 how much notice does landlord need to provide for eviction Illegal eviction, change in rent, legal help for eviction can a landlord evict you if someone pays more landlord laws in [state] reasons that a landlord can evict eviction legal aid what are my rights in eviction landlord leaving a last minute notice

For future groups that run a Legal Help Search Audit, we recommend that at this step, the group also use 'keyword research tools' that present data on past search queries that people have used on search engines and social media fora. These keyword research tools can supplement the usergenerated queries that are created in a survey environment when presented with a fictional scenario. When planning for our Audit, we were not aware of these tools, like People Also Ask, Answer the Public, and Question DB, which are used primarily by digital marketing groups.¹²⁵ On a keyword research tool, a researcher enters in one or two keywords around a given problem scenario (like the phrase 'eviction notice', 'restraining order', or

¹²⁵ Keyword research tools like People Also Ask, Answer the Public and Question DB are meant to help website administrators find the ways that people are talking about the topics that these administrators have offerings around. Answer the Public takes the 1-3 keywords entered by the user, and then combines them with various prepositions or suppositions, enters them into Google search boxes, and records the AutoComplete suggestions that Google provides. People Also Ask takes a similar approach, but records what Google Search presents in "People Also Ask" boxes on the results page. QuestionDB searches popular forums, like Reddit, Quora, and Stack Exchange, for any questions that have these keywords or their variations. They list back these posts' titles, text, and original links. *See People Also Ask*, TOPIC, https://www.usetopic.com/peoplealso-ask (last visited Sept. 16, 2023); *see also* QUESTION DB, https://questiondb.io/ (last visited Sept. 16, 2023); *Answer the Public*, NP DIGITAL, https://answerthepublic.com/ (last visited Sept. 16, 2023).

'credit card lawsuit') to see common related search queries from Google AutoComplete, Google Search's People Also Ask panel, or on social media sites like Reddit, Quora, or Stack Exchange. Then the researcher can take a snowball approach, to use the supplied search queries to identify other combinations of keywords (like landlord fight, boyfriend hit, or debt court) to collect more example queries people have used.

We recommend that future teams that run Legal Help SERP Audits combine surveying people's queries with keyword research databases to build their query list. The databases do not always have easy ways to sort by problem scenario¹²⁶, so our research team felt we could not rely on them The queries generated in a survey are limited by the exclusively. artificiality of the scenario and search experience.¹²⁷ Our team, after running the audit and then discovering the keyword research tools, collected real-life queries related to the problem scenarios from these tools that draw on Google AutoComplete and People Also Ask, Reddit, Quora, and Stack Exchange.¹²⁸ We compared the survey-generated queries to those from keyword research tools. The queries used similar queries and phrasings (e.g., how to ____, what are my rights regarding ____, what should I do if _____, ____ next steps, what can be done if _____, is it legal for _____, etc.). Future teams can use both methods to identify representative search queries for their chosen legal problem scenario. Ideally, they could get frequent search terms directly from the search engines themselves, but this data is not currently publicly available.

C. Step 3: Running Batch Queries of Google Searches

We used the survey-generated search queries for each of the four problem scenarios to then run automated searches on Google. We ran each of the four scenarios' 60-80 search queries from different zip codes in Florida and Hawaii, where legal aid groups were willing to help us review the SERP results for quality issues. We used a software tool developed at Northeastern University's Lazer Lab to search Google with the queries all from the same computer but simulating that they were coming from the

¹²⁶ See Tim Soulo & Joshua Hardwick, *How to Do Keyword Research for SEO*, AHREFS BLOG, https://ahrefs.com/blog/keyword-research/ (last updated Sept. 13, 2022).

¹²⁷ Denvir, *supra* note 13, at 168–69.

¹²⁸ Please contact the authors if interested in a list of these queries from keyword research tools.

specified zip codes. The tool then recorded the first page of results (including any ads and other special features) into a machine-readable csv sheet.¹²⁹ We ran these queries in November and December 2019. The Lazer Lab developed its search tool to run non-personalized audits, so that they did not have to rely on human subjects running search queries and deal with the web history or other personalization factors that might affect the search results.¹³⁰ It is important to note that each person's search results pages may differ, as Google Search develops more personalization. This will be a limitation on any search audit protocol.

Any team running a Legal Help Search Audit should make a deliberate choice about the geographic areas they use to search from. We chose to run the searches from both urban and rural regions of Hawaii and of Florida. Specifically, we searched from zip codes in Oahu and Honolulu, Hawaii and Jacksonville, Pensacola, and Tallahassee, Florida. We partnered with the legal aid groups Legal Services of North Florida and Legal Aid Society of Hawaii, which operate legal aid websites and participate in statewide legal help portals.¹³¹ These partners helped us understand the local landscape of online legal help, ensured that there were public interest legal help websites available in these geographic areas, and contributed to our quality analysis. They also were able to identify local regions in which people often have legal needs, for us to use in our Audit.¹³²

¹²⁹ Researchers in the Lazer Lab have been running large numbers of searches to audit search platforms for partisan audience and personalization of political search queries. This technique, to run large numbers of searches, and record search engine results pages, for analysis, was the inspiration for our search protocol (though we are auditing different factors than personalization and partisan audience bias). The Lazer Lab team graciously shared with us their codebase, with which they run search queries and specify different simulated locations of the searches.

¹³⁰ Robertson et al., *supra* note 108, at 955.

¹³¹ For more information on these organizations, see *About LSNF*, LEGAL SERVS. OF N. FLA., https://www.lsnf.org/about-us/ (last visited June 13, 2023); *About LASH*, LEGAL AID SOC'Y OF HAW., https://www.legalaidhawaii.org/about.html). (last visited June 14, 2023).

¹³² Legal Help Search Audit Results, LEGAL HELP ONLINE DASHBOARD,

https://legalhelpdashboard.org/legal-help-search-audit/ (last visited June 13, 2023). See, for example, our colleagues in Hawaii recommended that we search from zip code 96792 for a more rural population and 96813 for a more urban one. Our colleagues in North Florida recommended we search from urban centers like Pensacola, Tallahassee, and Jacksonville.

In total, we ran 1400 search engine queries using the tool. From each of the five locations, we searched 81 debt collection queries, 77 flood contractor queries, 69 eviction queries, and 53 domestic violence queries. Each batch of queries produced a variable number of results on the search page, typically around 10 to 15 per query. In total, the 1400 queries resulted in 15,381 website URLs or ads listed on the resulting search results pages.¹³³

D. Step 4: Automatic Analysis of the SERP Results

With the machine-readable database of all the searches' results, we moved on to our first round of analysis. We analyzed each of the search engine result pages' list of URLs and advertisements to find quantifiable trends.¹³⁴ Following the protocol, we looked for trends around the sites that appeared most frequently, which kinds of domains were most common, and how many advertisements appeared on the results page.

Website Frequency: We analyzed the frequency of websites with a few different variables. We counted the website URLs (meaning the specific website that people were visiting, as opposed to a specific sub-page of the website) that appeared most frequently among all problem scenarios and locations. This count helped us see which websites appear most frequently in search results for legal help queries. We also counted the most frequent websites shown for specific problem scenarios. This count helped us identify if certain websites are more prevalent for particular types of legal help scenarios. We also counted which sites appeared most frequently in the top three results listed on a search results page (as opposed to across the top ten results that the first page shows). If a site is listed in one of the top three places, it is more likely that a person might click on it.¹³⁵ Sites that have made it 'above the fold' are more likely to be seen and used.¹³⁶

¹³³ Id.

¹³⁴ Our full methodology is detailed in *infra* Appendix D.

¹³⁵ For an exploration of how search engines direct users to top results, see generally Daniel E. Rose & Danny Levinson, *Understanding User Goals in Web Search, in* WWW '04: PROC. OF THE 13TH INT'L CONF. ON WORLD WIDE WEB 13 (2004), https://doi.org/10.1145/988672.988675.

¹³⁶ Studies by industry groups of users' behavior analyze what the "click-through rate" is for websites listed at different positions on the search results page. These analyses identify that websites listed in the first spot (aside from advertisements) would be ten times more likely to be clicked. Websites listed lower on the search results page have

We note that the audit tool also records special content, or snippets, that the search engine features. These are not the typical websites or advertisements listed out on the search results page.¹³⁷ These special pieces of content include featured answers, knowledge panels, and frequently asked question panels. The search companies continue to design new kinds of snippets, in which they try to answer a person's question on the search results page (rather than directing them to a website to find information).¹³⁸ In this Audit, we did not analyze these snippets. Future research might analyze the frequency that these snippets appear, which websites are providing the content featured in these snippets, and the quality of these snippets. This is particularly important as voice assistants or mobile phones may read these snippets aloud to a person after they have searched for help.

Domain Type: Our team then analyzed the types of domains that appeared in the search results. We counted how many websites had certain domain designations (e.g., .com, .org, and .gov) in the search results, both in the top ten and the top three spaces.¹³⁹ These domains are generally proxies for which kind of organization operates the website: .com indicates a commercial organization, .org indicates a nonprofit, and .gov indicates a government. These approximations do not always hold true; a nonprofit or a government organization may host their website on a .com or other type

decreasing click-through rates. The lower a website is listed on the results page, the lower the chance that a person will click on it. *See* Brian Dean, *We Analyzed 4 Million Google Search Results. Here's What We Learned About Organic Click Through Rate,* BACKLINKO, https://backlinko.com/google-ctr-stats (last visited June 13, 2023); John E. Lincoln, *Google Click-Through Rates (CTR) By Ranking Position,* IGNITE VISIBILITY (May 15, 2020), https://ignitevisibility.com/google-ctr-by-ranking-position/.

¹³⁷ For a guide to these designs on search results, see Nikolai Boroda, *What Are SERP Features? An In-Depth Guide*, SEMRUSH BLOG (Jan. 7, 2022), https://www.semrush.com/blog/serp-features-guide/.

¹³⁸ Google, for example, regularly beta tests new ways to present information on its search results pages. *See, e.g.,* Chandraveer Mathur, *Google Search Picks Up New Tools to Show You Where Results Are Coming From,* ANDROID POLICE (Mar. 29, 2023), https://www.androidpolice.com/google-search-more-information-about-results/.

¹³⁹ LEGAL HELP ONLINE DASHBOARD, *supra* note 132. We tracked all domain suffixes that the website results had. The most frequent domains were .com, .org, and .gov. We also counted less frequent domains, like .net, .edu, .co, .ai, .blog, .io, or .tv. We did not prioritize them in our analysis, because of their low frequency. In addition, we looked for foreign domains, where the suffix (like gov.uk, go.jp, org.nz, co.uk, or gov.sg) would directly indicate it was for another jurisdiction.

of domain.¹⁴⁰ A commercial organization may also operate a .org domain, even if many people assume that only nonprofits are allowed to have a .org site.¹⁴¹ But for a .gov domain, only a public sector organization in the United States can operate a website with this domain.¹⁴² Additionally, we scanned the results for foreign domains, like .ca (for Canada), .uk (for the United Kingdom), .au (for Australia), or .nz (for Australia). These domain suffixes indicate that the website is operated by an organization from outside the US.

Advertisements: We counted how many advertisements were shown on the different queries' search results pages. This indicates whether a person searching is sees the websites that the search engine thinks are the best match to their query or the websites that organizations have paid to place higher. It is important to note that not only commercial organizations use ads. Many public interest organizations use search advertisements to increase their outreach, with financial support from search engine grants.¹⁴³ We analyzed which websites were being advertised to determine if the advertisements were from commercial or public interest organizations. We also counted how often advertisements were shown for each of the four different problem scenarios to see if certain kinds of help queries resulted in more ads.

Local Public Interest Sites' Performance: In our final quantitative analysis, we counted how frequently the local Hawaii and Florida public interest websites appeared in the search results. We created a list with our legal aid partners in these states with websites they hoped people would see in the search results.¹⁴⁴ Our partners based this list on which organizations offered free legal services, had a public interest mission, and offered content that was current and trustworthy. We counted how often

¹⁴⁰ William T. Adler, Only 1 in 4 Election Websites Uses the .gov Domain. That's a Problem — and an Opportunity, CTR. FOR DEMOCRACY & TECH. (Oct. 19, 2022),

https://cdt.org/insights/only-1-in-4-election-websites-uses-the-gov-domain-thats-a-problem-and-an-opportunity/.

¹⁴¹ Sam Wineburg & Nadav Ziv, *The Meaninglessness of the .Org Domain*, N.Y. TIMES (Dec. 5, 2019), https://www.nytimes.com/2019/12/05/opinion/dot-org-domain.html.

¹⁴² *Domain Requirements,* GET.GOV, https://get.gov/registration/requirements/ (last visited Sept. 10, 2023).

¹⁴³ See Google Ad Grants: Free Google Ads for Nonprofits, GOOGLE, https://www.google.com/grants/ (last visited Sept. 13, 2022).

¹⁴⁴ See infra Appendix D.

these local public interest sites appeared in the top ten or the top three of the search results pages. This count can indicate if high-quality websites (from the legal aid experts' points of view) are shown to people experiencing a legal problem.

E. Step 5: Manual Analysis of Quality of Search Results

In this initial run of our Legal Help Search Audit, we began to explore how to conduct a manual assessment of the websites appearing in the search results. Using the criteria and indicators taken from past studies, we visited a sample of the websites that appeared most frequently in the results. We noted what kind of organization operated the website, what jurisdiction its content applied to, and what type of content it provided to a visitor.

In this initial run, we did not systematically score the quality of the websites in the search results. Future researchers may develop a scoring instrument and protocol to rate the quality of the various sites. In this first instance, our focus was on establishing the audit protocol generally. We call for future research teams to establish and vet a protocol for evaluating the quality of the websites and search result snippets that are shown on the search results page. This will be a substantial effort involving the establishment of specific steps by which raters can evaluate a website or knowledge panel for its quality. Though we had identified the key criteria and indicators of a legal help website's quality, our research project did not have the capacity to develop a scoring system by which researchers can consistently review web content according to these standards.

III. Findings of Our SERP Audit

In this section, we present the results of our first search audit of the search results for eviction, debt, domestic violence, and contractor fraud in Hawaii and Florida. We begin with the automatic analysis of website frequency, domain type, advertisements, and presence of local public interest websites. Then we consider what a more manual, detailed analysis might be to understand the results' quality.

A. Most Frequent Overall Websites

Across all jurisdictions, similar websites appeared in the top spots of the search results. There were some differences among the four different problem scenario queries, which we lay out in the tables below. It is notable that in the different Hawaii and Florida zip codes, there was minimal difference in which websites appeared on the first page of search results. For all search results in the audit, the most common websites are as follows.¹⁴⁵

Website domain	Number of times it appears in the first page of Google search results (top 10)
Nolo.com	915
Usnews.com	356
Creditcards.com	344
Angieslist.com	310
Nerdwallet.com	297
Findlaw.com	235
Incharge.org	208
Credit.com	186
Thehotline.org	185
Natlbankruptcy.com	184
Legalmatch.com	181

Almost all the most frequent websites are commercial providers. Only two nonprofit websites appeared with the highest frequency: the nonprofit credit counseling group Incharge.org and the nonprofit domestic violence organization Thehotline.org.¹⁴⁶ Also worth noting is that the most frequent websites are all websites for a national audience that are not jurisdictionspecific by default (though some websites do have sub-pages with information for a particular jurisdiction). Even though we were searching from specific zip codes in Honolulu, Oahu, Pensacola, Jacksonville, and Tallahassee, the search engine was showing many more national sites than local ones.

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¹⁴⁵ LEGAL HELP ONLINE DASHBOARD, *supra* note 132.

¹⁴⁶ Id.

Overall, among all four legal problem scenarios, Nolo.com was the website that appeared most frequently. Among the most frequent websites, there are commercial legal providers (Nolo.com, Findlaw.com, Legalmatch.com) that attempt to sell consumers legal guides or legal services by offering limited amounts of legal help articles in order to attract customers to pay for full legal guides or for hiring an attorney.¹⁴⁷ These commercial legal providers offer some amount of actionable content which is sometimes local to a jurisdiction.¹⁴⁸ Generally, though, there are limits to how much content they offer, because they are trying to compel the visitor to pay for content that is behind a paywall or because they are trying to convert the user into a paying client of an attorney.¹⁴⁹

Many of the other top websites are general commercial organizations that publish help articles about these problems (housing, debt, domestic violence, and contractor fraud) but do not necessarily have legal expertise.¹⁵⁰ These commercial organizations tend to publish content with general information about a given problem scenario, but do not reference specific legal procedures, services, requirements, or local providers.¹⁵¹ They

¹⁴⁸ See, e.g., Ann O'Connell, *The Eviction Process in Florida*, NOLO.COM, https://www.nolo.com/legal-encyclopedia/the-eviction-process-florida-rules-landlordsproperty-managers.html (last visited Sept. 10, 2023).

¹⁴⁹ *Id.* In this article on Florida-specific legal rights and options, the article limits what it offers to statements about what the relevant laws are in a given scenario. It does not provide forms, form-filling tools, guides to how the court process works, guides on how to present information in a trial, or other details about how to act upon the law. Rather, the website has banners, sidebars, and pop-ups that urge the visitor to start chatting with a lawyer, that would then lead them to considering hiring a lawyer to help them. The article also concludes with advice to buy a Nolo book *Every Tenant's Legal Guide* for more information.

¹⁵⁰ These non-legal commercial websites include those that appear most frequently in the audit results: Usnews.com, Creditcards.com, Angieslist.com (now Angi.com), Nerdwallet.com, and Credit.com.

¹⁵¹ See, e.g., Sean Pyles, *How to Handle a Default Judgment in 3 Steps*, NERDWALLET (Aug. 5, 2021), https://www.nerdwallet.com/article/finance/handle-default-judgment. This article from top-ranking site Nerdwallet.com analyzes how a person could respond to a default judgment entered against them in a state court. The article provides a few hundred

¹⁴⁷ See more about these frequent websites at *About Us*, NOLO,

https://www.nolo.com/about/about.html (last visited Oct. 5, 2023), *About FindLaw*, FINDLAW, https://www.findlaw.com/company.html (last visited Oct. 5, 2023), and *About LegalMatch*, LEGALMATCH, https://www.legalmatch.com/company/about_us.html (last visited Oct. 5, 2023).

offer short, general articles about how a credit card lawsuit may proceed, or what to look for if you suspect a contractor is defrauding you.¹⁵² Their content matches the search queries. However, the content is not local, specific, or actionable.¹⁵³ These sites are written for a cross-jurisdiction audience, and lack any specific procedure, reference to local rules or protections, or links to local legal aid groups or court self-help centers.¹⁵⁴

Because civil legal procedure and services are all very jurisdictionspecific, these national sites' generic content do little to help a person take specific action or find help. Rather, they tend to provide a basic orientation in the problem area and give a high-level overview of what a person might do if facing this kind of legal problem.

B. Most Frequent Websites in Each Problem Area

Our team also explored which websites were shown in the search results pages for each of the four different legal problem scenarios. We were interested in seeing which domains have higher ranking for particular topics. This can help future researchers know how many problem-specific audits they should run, and to know which sites are deserving of further manual, qualitative review for their quality performance.

For debt collection queries in the jurisdictions, the most frequent websites in the top ten search result spots had some overlap with the general list of frequent websites. Nolo.com was the most frequent website, but the other popular debt collection sites were more focused on financial help topics, like Creditcards.com and Nerdwallet.com. Debt collection had one nonprofit that appeared in the top ten: Incharge.org, a national nonprofit counseling services site.

words of guidance that gives a quick summary of three steps: gathering information, consulting legal help, and deciding on a course of action. It has no local detail, and it does not provide specific action steps, legal references, timelines, procedural rules, or state-specific protections.

¹⁵² See, e.g., Liz Stapleton, Here's What Happens When a Credit Card Company Sues You, WUSA9.COM (Aug. 16, 2017), https://www.wusa9.com/article/money/magnifymoney/heres-what-happens-when-a-credit-card-company-sues-you/285-464920443; see also Jedediah Mannis, My Home Contractor Isn't Finishing the Job: What Can I Do?, NOLO.COM, https://www.nolo.com/legal-encyclopedia/my-home-contractor-isntfinishing-the-job-what-can-i.html (last visited Sept. 23 2023).

¹⁵³ See Mannis, supra note 152; Stapleton, supra note 152; Pyles, supra note 151.

¹⁵⁴ See Mannis, supra note 152; Stapleton, supra note 152.

Scuren Engine Result i uges			
Name of main domain	Number of times it appears in top 10	Proportion of time it appears in top 10 within debt collection results	
Nolo.com (commercial legal information and referral)	412	0.08931281	
Creditcards.com (a commercial financial information site)	344	0.07457186	
Nerdwallet.com (a commercial financial information site)	294	0.06373292	
Usnews.com (a national commercial news site)	245	0.05311077	
Incharge.org (a nonprofit financial counseling services site)	208	0.04508996	
Credit.com (a commercial financial information site)	186	0.04032083	
Natlbankruptcy.com (a commercial financial services site)	184	0.03988727	
Consumerhelpcentral.com (a commercial financial services site)	171	0.037069152	
Wusa9.com (a commercial news site for Washington DC)	155	0.03360069	
Consumerrecoverynetwork.com (a commercial financial services site)	136	0.02948189	

1. Debt Collection Queries' Most Frequent Websites on Search Engine Result Pages

For post-disaster contractor fraud, the most frequent websites included general commercial legal sites like Nolo.com, mixed with commercial sites around housing and contractor services.

For the searches of contractor fraud after a flood, the results trended toward commercial websites. Angieslist.com, a commercial site that offers contractors and other housing repair services, was the most frequent site for this type of search. Similar national housing construction-oriented sites, like Houselogic.com, Homes.com, and Hg.org also appeared frequently. National commercial legal help websites like Nolo.com, Legalmatch.com, and Avvo.com appeared frequently, as did general news sites like Washingtonpost.com and Usnews.com.

Name of main domain	Number of times it appears in top 10	Proportion of time it appears in top 10 within contractor fraud results
Angieslist.com (a commercial property repair site)	310	0.076675736
Nolo.com (a commercial legal information and referral site)	253	0.062577294
Houselogic.com (a commercial site on home repairs)	174	0.043037349
Homes.com (a commercial home search site)	151	0.037348504
Legalmatch.com (a commercial legal information and referral site)	142	0.035122434
Avvo.com (a commercial legal information and referral site)	129	0.031907
Lendinghome.com (a commercial home-lending site)	129	0.031907
Hg.org (a commercial legal information and referral site)	112	0.027702201
Washingtonpost.com (a commercial news site for Washington, DC)	98	0.024239426
Usnews.com (a commercial national news site)	95	0.023497403

2. Contractor Fraud Queries' Most Frequent Websites on Search Engine Result Pages

The eviction problem queries also resulted in a mix of legal and real estate websites on the search results pages. Like with other topic areas, Nolo and Findlaw appeared frequently. But for eviction, unlike with contractor fraud or debt collection, there were more local websites rather than exclusively national websites. These local websites were often public interest ones, operated by legal aid groups rather than commercial organizations. But these local public interest websites were not appropriate for the zip codes that our search engines were searching from, because they presented legal guides, service directories, and court forms that only applied to residents of their states (not Hawaii or Florida). Our manual review identified this jurisdiction mismatch between these out-of-state public interest websites, with local guidance and referrals, and the searches coming from Hawaii and Florida zip codes. If visitors from Honolulu or Jacksonville were to follow the top search results, they would find information from the wrong jurisdiction, and thus could face harms if they were to rely on its legal rules, court procedure, or court forms.

Name of main domain	Number of times it appears in top 10	Proportion of time it appears in top 10 for eviction results
Nolo.com (a commercial legal information and referral site)	248	0.173547936
Findlaw.com (a commercial legal referral site)	126	0.088173548
Thebalancesmb.com (a commercial content site for small businesses and landlords)	86	0.060181945
Sfgate.com (a commercial news site for San Francisco)	52	0.036389083
Landlordology.com (a content site from a software company, meant for landlords to share advice)	45	0.031490553
Legalnature.com (a commercial legal forms website, to allow people to make their own documents)	43	0.030090973
Floridalawhelp.org (a nonprofit statewide legal help portal for the correct jurisdiction)	41	0.028691393
Masslegalhelp.org (a nonprofit statewide legal help portal for the incorrect jurisdiction of Massachusetts)	41	0.028691393
Tenantsunion.org (a nonprofit organization for the incorrect jurisdiction of Washington State)	35	0.024492652

3. Eviction Queries' Most Frequent Websites on Search Engine Result Pages

Ptla.org (a nonprofit legal aid website for			
the incorrect jurisdiction of Maine)	34	0.023792862	

There was one notable result on this list: a Florida Law Help page that gives tenants free, public interest guides on how to respond to evictions in Florida.¹⁵⁵ This site is the only one that would match the quality standards and indicators laid out in the earlier paper section. This site has local, authoritative, and actionable information for the user. It appeared thirty-one times on Google's results for Florida-based searches on evictions. This site appeared when location indicators specifying city or state were included in the search queries.

But alongside this one jurisdiction-specific result, there were many jurisdiction-incorrect results. The news site sfgate.com, from San Francisco, appeared fifty-two times. Its pages present California and San Francisco-specific legal articles, like a short article on how to respond to an eviction notice.¹⁵⁶ San Francisco has rent control and tenant protection laws that make it an outlier compared to most jurisdictions in the US.¹⁵⁷ California's rules on warning notices and requirements for eviction are also different from most states.¹⁵⁸ Another frequent domain, masslegalhelp.com, is a public interest website but one for an incorrect jurisdiction:

¹⁵⁵ Cmty. Legal Servs. of Mid-Florida, *Evictions: What Every Tenant Should Know*, FLA. L. HELP (Sept. 27, 2019), https://www.floridalawhelp.org/content/Evictions-What-Every-Tenant-Should-Know-Now.

¹⁵⁶ Laura Agadoni, *How to Reply to an Eviction Notice*, WEEKAND (Dec. 15, 2018), https://homeguides.sfgate.com/reply-eviction-notice-52160.html.

¹⁵⁷ See All About the Right to Counsel for Tenants in San Francisco, NAT'L COAL. FOR A CIV. RIGHT TO COUNS. (Feb. 3, 2022), http://civilrighttocounsel.org/major_developments/1179, which provides a description of San Francisco's specific tenant protections. Compare these unique rules to the laws and protections that apply in most other US regions, as seen in the comprehensive eviction laws database. *See Eviction Laws Database*, LEGAL SERVS. CORP., https://www.lsc.gov/initiatives/effect-state-local-laws-evictions/lsceviction-laws-database (last visited Feb. 2, 2024).

¹⁵⁸ See Eviction Cases in California, CAL. CTS. SELF-HELP GUIDE,

https://selfhelp.courts.ca.gov/eviction (last visited June 13, 2023). This set of eviction requirements is different from that in most other states, as found in a national database of eviction laws. *See New Eviction Laws Database Reveals Striking Differences in Eviction Processes Around the Country*, LEGAL SERVS. CORP., https://www.lsc.gov/press-release/new-eviction-laws-database-reveals-striking-differences-eviction-processes-around-country (last visited Oct. 4, 2023).

Massachusetts.¹⁵⁹ Its housing law guides are for a state with different procedures, timelines, and forms than the Hawaii or Florida zip codes the searches came from.¹⁶⁰

Domestic violence search results were distinct from the other three problem areas. These searches also tended to lead to national organizations' websites, like with the eviction, debt, and contractor fraud searches.¹⁶¹ But the domestic violence searches included more public interest results from nonprofits working on domestic violence and mental health.¹⁶² There were some commercial sites, including sites hosted by news and psychology commercial organizations.¹⁶³ There was also a jurisdiction mismatch, like with eviction, in which a local nonprofit (from Iowa, in this case) was shown to people searching from Florida and Hawaii.¹⁶⁴

4. Domestic Violence Queries' Most Frequent Websites on Search Engine Result Pages

Name of main domain	Number of times it appears in top 10	Proportion of time it appears in top 10
Thehotline.org (a nonprofit domestic violence services site)	185	0.078623034
Helpguide.org (a nonprofit mental health services and information site)	95	0.040373991

¹⁶² Id.

¹⁶³ Id.

¹⁵⁹ *See About Us,* MASSLEGALHELP, https://www.masslegalhelp.org/about-us (last visited Feb. 2, 2024).

¹⁶⁰ See Mass. L. Inst., *Housing*, MASSLEGALHELP, https://www.masslegalhelp.org/housing (last visited Oct. 4, 2023). The guides available on this Massachusetts site only apply to tenants living in the state. The rules, forms, and services discussed only apply to people in this jurisdiction.

¹⁶¹ LEGAL HELP ONLINE DASHBOARD, *supra* note 132.

¹⁶⁴ *Id.* See DOMESTIC VIOLENCE INTERVENTION PROGRAM, https://dvipiowa.org/ (last visited June 13, 2023) for a site for the Domestic Violence Intervention Program was only built to serve 8 counties in Iowa, but it appeared over 60 times in the search results from Hawaii and Florida).

Theguardian.co.uk (a commercial UK		
news site)	65	0.027624309
Quora.com (a web forum)	64	0.02719932
Psychologytoday.com (a commercial lifestyle and relationships information		
site)	63	0.026774331
Dvipiowa.org (an Iowa-focused nonprofit domestic violence services site)	62	0.026349341
Womenshealth.gov (a national government site from the US Department of Health and Human Services' Office on Women's Health)	57	0.024224394
Ncadv.org (a nonprofit domestic violence services site)	55	0.023374416
Joinonelove (a nonprofit foundation on healthy relationships)	51	0.021674458
Verywellmind.com (a commercial lifestyle and relationships information		0.010054501
site)	47	0.019974501

The domestic violence queries show the highest proportion of public interest website results. Only four commercial organizations appear in the top ten. This was the only problem scenario that did not yield legal help websites as its most frequent results. The highest-ranking websites presented content on navigating interpersonal and family violence, rather than focusing on legal rights and processes. These public interest domestic violence websites connect people with advocates who can help with one's safety, relationships, or restraining orders.¹⁶⁵ These sites do have trustworthy, actionable information, even if they are not from legal providers.

C. Most Common Domain Types

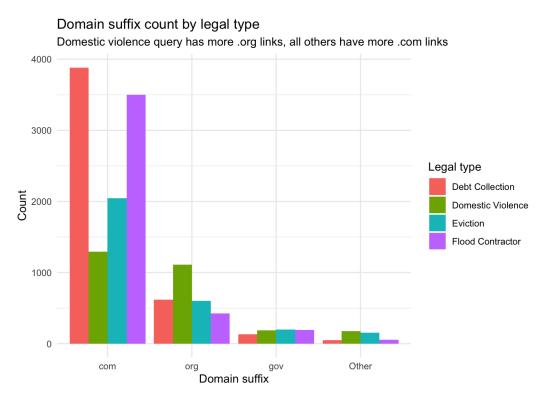
The search audit revealed that most of the search results were from .com domains (with 11,064 search results served from URLs that end in .com).

¹⁶⁵ The most frequent site, Thehotline.org, directs people to prominent links to call, chat, or text directly with professionals who will answer people's questions for free. *See* NAT'L DOMESTIC VIOLENCE HOTLINE, https://www.thehotline.org/ (last visited Sept. 6, 2023).

The second most frequent domain type was .org (2,999 search results) and then .gov ones (686 search results).¹⁶⁶ Of the four problem areas, domestic violence queries tended to result in a greater proportion of .org and .gov sites than the three other problem scenario's queries.

Legal problem scenario	Domain URL suffix	Frequency of this domain
Debt Collection	com	3832
Debt Collection	gov	134
Debt Collection	org	601
Debt Collection	other	46
Domestic Violence	com	1034
Domestic Violence	gov	156
Domestic Violence	org	1020
Domestic Violence	other	143
Eviction	com	1071
Eviction	gov	20
Eviction	org	281
Eviction	other	57
Flood Contractor	com	3414
Flood Contractor	gov	188
Flood Contractor	org	396
Flood Contractor	other	45

¹⁶⁶ LEGAL HELP ONLINE DASHBOARD, *supra* note 132.



These domains do not always directly correspond to the organization type. Some courts, clerks, and nonprofits use .com as a domain, especially at the local level.¹⁶⁷ Also, some governmental organizations, like courts, have registered as .org.¹⁶⁸ But overall, the domain frequency indicates that more commercial websites are being shown on search results pages than nonprofit or government sites.

D. Public Interest Websites' Performance

Going more specific than domain, we analyzed what kinds of .gov and .org websites were appearing in the results. We had intended to analyze the performance of the recommended public interest websites that local subject matter experts recommended as the most authoritative and helpful, but the results showed that most of the public interest sites appearing in the results were from national agencies, rather than the local websites that our experts recommended.

¹⁶⁷ See, e.g., FIFTEENTH JUD. CIRC. OF FLA., https://15thcircuit.com (last visited Sept. 17, 2023); ST. JOHNS CNTY. CLERK OF THE CIRC. CT. AND COMPTROLLER, https://stjohnsclerk.com/ (last visited Sept. 17, 2023).

¹⁶⁸ See, e.g., SEVENTH JUD. CIRC. OF FLA., https://circuit7.org (last visited Sept. 17, 2023).

Overall, .gov sites were infrequent in the search results that appeared. Of this small proportion of .gov sites, the ones that appeared most frequently in the search results tended to be from federal government agencies, rather than local governments.¹⁶⁹ The one exceptional legal problem search scenario was eviction.¹⁷⁰ Landlord-tenant queries were the only problem type that resulted in more local nonprofit and court resources websites being shown, rather than national ones. Even though local public interest .gov sites were appearing for eviction-related searches, they were still shown at a low rate compared to commercial, national, or out-of-state sites with .com or .org domains.

Legal problem scenario	Most frequent public interest domain	Number of appearances	Proportion within problem area's results	Average SERP rank
Debt Collection	Consumerfinance.gov	59	0.01	8.17
Debt Collection	Ftc.gov	39	0.006	9.07
Debt Collection	Ed.gov	14	0.002	3
Debt Collection	Usa.gov	13	0.002	10.46
Domestic Violence	Womenshealth.gov	57	0.021	5.47
Domestic Violence	Justice.gov	17	0.006	9.7
Domestic Violence	Hhs.gov	14	0.005	6.43
Domestic Violence	Psc.gov	10	0.004	8.1
Domestic Violence	Benefits.gov	8	0.003	6.5
Eviction	Floridalawhelp.org	41	0.020	3.23

¹⁶⁹ LEGAL HELP ONLINE DASHBOARD, *supra* note 132.

¹⁷⁰ Id.

2023

Eviction	Lawhelp.org	18	0.009	4.94
Eviction	Hud.gov	11	0.005	3.72
Eviction	Ca.gov	5	0.002	9.8
Eviction	Hawaii.gov	2	0.001	3.72
Flood Contractor	Ca.gov	48	0.010	2.5
Flood Contractor	Ftc.gov	27	0.005	7.33
Flood Contractor	Hawaii.gov	20	0.004	4.05
Flood Contractor	Myfloridalegal.com	15	0.003	4

When we checked for the local Hawaii or Florida government websites that our subject matter experts recommended as authoritative and helpful, these recommended sites appeared infrequently, and many did not appear at all in the search results.

Name of Local Government Domain	Frequency with which it appeared in 15,381 results	Description of site
Hawaii.gov	28	Hawaii's main government site
Flcourts.org	2	Statewide Florida court site
Leon.fl.us	1	Tallahassee county court clerk site
Leoncountyso.com	1	Tallahassee county sheriff's office
State.fl.us	1	Florida legislature's site of statutes
Escambiaso.com	1	Pensacola county's sheriff's office
State.hi.us	0	Hawaii's statewide court site
Escambiaclerk.com	0	Pensacola county's court clerk
Duvalclerk.com	0	Jacksonville county court clerk

Like with the local government sites, local Florida and Hawaii legal aid groups and legal help websites that were recommended by legal experts as useful and accurate appeared infrequently in the search results.

Name of Legal Aid or Law Help Portal Domain	Frequency with which it appeared in 15,381 results	Description of site
Floridalawhelp.org	41	Statewide non-profit legal help portal for Florida
Trls.org	5	Northern Florida legal aid group, Three Rivers Legal Services
Jaxlegalaid.org	1	Northern Florida legal aid group, Jacksonville Legal Aid
Lawhelp.org/hi	0	Statewide non-profit legal help portal for Hawaii
Legalaidhawaii.org	0	Hawaii's main legal aid website
Lsnf.org	0	Northern Florida legal aid group Legal Services of Northern Florida

E. Frequency of Jurisdiction Mismatches

In the above chart of the legal aid nonprofits and law help portals, we also include the sites that appeared that are jurisdictional mismatches. The jurisdiction-mismatch results are public interest sites with high-quality, actionable, local information. But they are listed for the incorrect locality — with Massachusetts, Washington, or Maine's legal information being shown to people in Florida and Hawaii. These out-of-state legal aid groups appear with greater frequency than the correct, local ones.

Name of Legal Aid or Law Help Portal Domain	Frequency with which it appeared in 15,381 results	Description of site
Masslegalhelp.org	97	Jurisdiction-incorrect statewide portal from Massachusetts
Washingtonlawhelp.org	38	Jurisdiction-incorrect statewide portal from Washington state
Ptla.org	34	Jurisdiction-incorrect Legal aid group from Maine, Pine Tree Legal Aid
Oregonlawhelp.org	22	Jurisdiction-incorrect statewide portal from Oregon state

Lawhelp.org/dc	21	Jurisdiction-incorrect statewide portal from Washington, DC
Ctlawhelp.org	11	Jurisdiction-incorrect statewide portal from Connecticut state

The jurisdictional mismatches are of major concern. For example, when someone searches for domestic violence problems from Honolulu, in five instances the content from Massachusetts' legal help portal— Masslegalhelp.org-placed in the top three results.¹⁷¹ In twenty-two searches from Hawaii and in thirty-nine searches from Florida, an Iowa on domestic violence intervention organization focused site-Dvipiowa.org—placed in the top ten results. Even more specifically, if a woman from Pensacola, Florida, searches "domestic abuse who to contact in case of threats," the top ten search results provided content from: the California Courts, Massachusetts Legal Help, Alaska's Victim Assistance Program, the Vancouver Police Department's investigative services, and the prosecutor's office in Tucson.¹⁷² Each of these are jurisdictional mismatches that provide high-quality content but for the wrong jurisdiction.

We hypothesize that these other jurisdictions' sites that appear frequently have invested in search engine optimization (SEO) techniques like using keywords that match people's searches and schema markup that make their local content appear nationwide in the top results. We confirmed with one of the groups, Pinetree Legal Aid, that they did focus on SEO improvements.¹⁷³ However, Pinetree Legal Aid also reported that they are now struggling with too many out-of-state visitors spending several minutes on their online Maine-specific legal guides.¹⁷⁴

In addition, there were several instances in which foreign governments' resources appeared in Hawaii and Florida search results. For example, domestic violence queries led to results from foreign domains like org.uk, co.uk, nhs.uk, org.au, org.nz, police.uk, and qld.gov.au—indicating that legal guidance was being provided by Canadian, Australian, British, and

¹⁷¹ Id.

¹⁷² Id.

¹⁷³ LSNTAP listserv, *supra* note 51.

¹⁷⁴ Id.

New Zealand jurisdiction-specific sources.¹⁷⁵ Content from foreign domains appeared most frequently for domestic violence queries, with just over 3 percent of all results coming from abroad.¹⁷⁶

While these instances of foreign sources appearing may not be frequent, they are still of concern because they contribute to the risk of people relying on inaccurate legal information. Our colleagues at legal aid groups in Canada and Australia have presented anecdotes of U.S.-based sources appearing frequently in their local search results.¹⁷⁷ Additional research and audits from other non-English-speaking countries would be valuable to determine if there is a bias towards U.S. legal help and consequent foreign reliance on inaccurate resources.

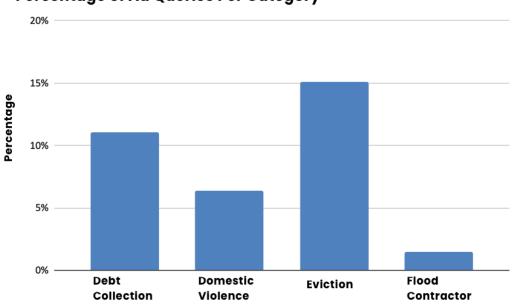
F. Frequency of Advertisements in Search Results

Advertisements appeared on the search results pages for all four types of problem scenarios. They were more frequent for domestic violence and debt collection queries—appearing at a rate of approximately 15 percent of the search results—and they were lower for eviction queries, appearing in approximately 5 percent of the results.

¹⁷⁵ STAN. LEGAL DESIGN LAB, *supra* note 86.

¹⁷⁶ Id.

¹⁷⁷ SRLN listserv, *supra* note 51.



Percentage of Ad Queries Per Category

From our consultations with legal aid experts, we know that nonprofit groups purchase ads to direct people to their services.¹⁷⁸ Additionally, ads came from a variety of domains—including the public interest websites—and varied depending on the specific search. Most of the ads were from commercial companies, including companies that provide both commercial legal and non-legal services.¹⁷⁹ Commercial legal services that frequently appeared in the ads were Justanswer.com, Legalmatch.com, and Legalshield.com.¹⁸⁰ Domestic violence queries had advertisements from commercial lifestyle companies—like Activebeat.com—that offered relationship advice, and from public interest organizations like Domesticshelters.org .¹⁸¹ The flood contractor queries had ads from commercial roofing services and housing contractors, along with commercial legal referrals.

Interestingly, the ads tended to be more localized than the search results. For example, ads for commercial Hawaiian and Floridian lawyers appeared frequently, even when local legal nonprofit resources were not appearing in the search results. This may be a benefit to the users, depending on the

¹⁷⁸ Id.

¹⁷⁹ STAN. LEGAL DESIGN LAB, *supra* note 86.

¹⁸⁰ Id.

¹⁸¹ Id.

quality of the domain to which the ad directs them. Further manual evaluation should be done to determine if the advertisements lead to quality sites or if their destinations are problematic sites. The local ad results also indicate that the search companies are able to geographically focus peoples' searches, even when a person does not put a location explicitly in their query.¹⁸² It thus seems the search engine's location affects the ads served more than the regular search results that appear.

IV. Discussion of SERP Audit Findings

Our initial Legal Help Search Audit consisted of a test of whether we could run a large-scale, automated analysis of what a search engine shows to people researching a legal problem. The protocol that we followed, relying on automated analysis of the thousands of search results, gave us some insight into search engines' current policies and what recommendations legal experts might propose to increase their quality and reduce possible harms.

The audit also allows our team to reflect on the need for future expansions in this research. The limits of the automated analyses—which largely involved the counting of frequencies of various websites, ads, and jurisdictions—became clear throughout the audit. Though automated analyses provide important insights into the general dynamics of what people are seeing when searching problems online, the analyses are unable to provide details about the quality or the possible harms of the various search results. At this point, it is not possible to automate a quality classification of the webpages that appear in the search results. The Legal Help Search Audit can quantify the domains and specific pages that appear, how many ads appear, and the domains they are in. But the audit, as it stands in this version, cannot automatically assess whether the content on the listed webpages is specific, actionable, jurisdiction-correct, or the other quality criteria discussed above in Section I.C.

It is important to note that the findings of the audit are also time-limited. Search engines change their matching algorithms, quality scoring, and search results page design regularly, and with little forewarning.¹⁸³ Any findings reported here are in regards to the search engine and website versions that were published during the period of November 2019–January

¹⁸² Id.

¹⁸³ See supra note 138 and accompanying text.

2020. However, search audits should be run regularly to identify changes in the engines' algorithms and policies, the websites' performances, and to determine the new features that might change how users interact with the search engines and get help online.

With those limitations, the first Legal Help Search Audit points to several key findings that can inform future research, technology policy, and access to justice efforts.

A. Predominance of National, Commercial Websites in Legal Search Results

Often, the search engine presents people with national, commercial sites.¹⁸⁴ These are often commercial legal services sites mixed with news, finance, and home repair sites, including Nolo.com, Findlaw.com, Credit.com, Hg.org, or Theguardian.co.uk.¹⁸⁵ These national, commercial sites tend to provide articles that summarize legal problems, provide a general introduction to the legal system, and discuss what options a person in this situation might have.¹⁸⁶ The articles are not jurisdiction-specific or timely. Instead, they tend to be short and general, meant for an audience across many jurisdictions.¹⁸⁷

To summarize the findings, there were two main types of websites being presented by Google on its search results pages: (1) those with national, generic articles on the legal topic; and (2) those with local, specific guidance on how to address the legal problem. The results in the first category far outnumbered those in the second. The second category, of local and specific websites, tended to come from public interest sources, like legal aid groups and courts.¹⁸⁸ For example, the website from the North Florida legal aid group Three Rivers Legal Services, Trls.org, can take people directly to an online form to apply for free, local legal services for the 4 issues of eviction, domestic violence, debt collection, or contractor fraud. The public interest website Law Help Hawaii, Lawhelp.org/hi, similarly takes visitors

¹⁸⁴ LEGAL HELP ONLINE DASHBOARD, *supra* note 132.

¹⁸⁵ Id.

¹⁸⁶ See supra notes 149–52 and accompanying text.

¹⁸⁷ See supra notes 149–52 and accompanying text.

¹⁸⁸ See, e.g., Debt Collection, LEGAL AID SOC'Y OF HAW.,

https://www.lawhelp.org/hi/issues/consumer/debt-collection-issues (last visited Sept. 19, 2023).

directly to an online application signup for legal aid, or to specific guides that walk through how a person can file documents and follow court procedure in Hawaii to address these four issues. These websites appeared only a handful of times in the search audit's results, but they have detailed, actionable information about local procedures, rights, and services. Unfortunately, many of these local, specific, public interest websites were also jurisdiction mismatches, containing specific legal help for people in states other than Florida or Hawaii.¹⁸⁹ The national sites tended to provide generic, short articles that gave a high-level introduction to the legal topic, as opposed to the local public interest sites that provide detailed guides to legal rights, court procedure, forms, and finding free services.¹⁹⁰ There were a few exceptions to the high-level information, with some national sites also providing state-specific guidance on a person's rights, or providing information about local, state-specific court rules (with specific forms, deadlines, requirements, and pleading options) to address the legal issue. However, the national commercial sites often do not include links to local legal aid or other free services that would help searchers in their legal queries.¹⁹¹ Domestic violence was an exceptional topic because the search results had more links to specific, actionable content, often from nonprofit and national providers.¹⁹² In the domestic violence legal problem scenario, the search engine was more likely to show people relevant content that they could use to take action, as well as content that was provided by nonprofit groups.193

Nolo.com is an exception to the two-category framework presented above. It is a national legal site that in some cases, offers some jurisdiction-

¹⁸⁹ LEGAL HELP ONLINE DASHBOARD, *supra* note 132.

¹⁹⁰ See supra notes 149–52 and accompanying text.

¹⁹¹ *E.g.*, Marcia Stewart, *Can I Sue My Landlord for an Illegal Eviction?*, NOLO.COM, https://www.nolo.com/legal-encyclopedia/can-i-sue-landlord-illegal-eviction.html (last visited June 15, 2023). Nolo.com presents a tenant-focused article with guidance about fighting an eviction, but it does not include any links to legal aid, court self-help, right to counsel services, or free document assembly tools. Rather, it presents links to Nolo publications for a fee, or urges the visitor to consult with a lawyer through Nolo's referral network. *See, e.g., id.*

¹⁹² LEGAL HELP ONLINE DASHBOARD, *supra* note 132.

¹⁹³ Id.

specific guides.¹⁹⁴ Many of its pages do fit into the first category outlined above, presenting generic, jurisdiction-agnostic short articles about a legal topic.¹⁹⁵ Like other commercial websites, it seems to have a business model that relies on creating content that will rank high on search engines, to attract as many people from across the country to its website, so that it can then monetize these visits by either persuading the visitor to hire a local attorney through the website's referral system or upselling the visitor to purchase access to a fully detailed legal guide from its Nolo publishing press. In most cases, the articles refer a visitor to either hire a local attorney through the platform's referral site, or they direct a visitor to buy a book from the platform's publishing press in order to get the full details of how to respond to a legal problem.¹⁹⁶

In addition to the typical commercial generic, jurisdiction-agnostic articles, Nolo.com does offer some articles that show indicators of quality, according to Section I's criteria. These Nolo.com provide state-specific summaries of what a person's rights, deadlines, and proper steps are to deal with various legal problems.¹⁹⁷ For example, if a person in Pensacola

¹⁹⁴ See, e.g., Beth Dillman, *The Eviction Process in Hawaii: Rules for Landlords and Property Managers*, NOLO.COM, https://www.nolo.com/legal-encyclopedia/the-eviction-processhawaii-rules-landlords-property-managers.html (last visited June 15, 2023). For evictionrelated queries, Nolo.com tended to show more state-specific content like eviction process guides tailored to a state like Hawaii. For debt or contractor related queries, Nolo.com tended to show more general, national content.

¹⁹⁵ See, e.g., Ann O'Connell, *How Evictions Work: What Tenants Need to Know*, NOLO.COM, https://www.nolo.com/legal-encyclopedia/evictions-renters-tenants-rights-29824.html (last visited June 12, 2023). This kind of generic article talks through how an eviction might happen, but it does not detail any specific timelines, rights, defenses, court procedures, notices, or other actionable information because these are all local details, and the article is aiming to provide a national summary.

¹⁹⁶ *Id.* If a visitor visits the above page, the generic article is presented alongside large banner ads encouraging the visitor to purchase a Nolo book on Landlord/Tenant law, sidebar ads to live chat with an attorney, and a pop-up chat box that covers the page, urging the visitor to begin a free consultation with an attorney, that will then lead the visitor to hire this attorney. In the footer disclosures on the page, Nolo acknowledges that the site contains paid attorney advertising.

¹⁹⁷ Nolo.com tends to have local guides to laws, rights, and procedure in its "Legal Encyclopedia" series of webpages. For example, Nolo.com presents visitors with free summaries of state laws, like the California Fair Debt Collection Practices Act, with articles that walk a reader through the laws and how it might apply to a debt collection action. Amy Loftsgordon, *What Is the California Fair Debt Collection Practices Act?*,

conducts a search regarding an eviction problem, a Nolo.com page appears high in the search results that covers Florida landlord-tenant laws.¹⁹⁸ If someone clicked on it, they will learn key local laws: how tenants can legally withhold rent in Florida, how an eviction action proceeds in the court, and landlords' obligations when they are suing a tenant in the state.¹⁹⁹ This kind of article on Nolo has local, actionable, and authoritative information—the kind that would score well according to the quality metrics presented in Section I.C.

But this kind of local, detailed information is the exception among all of the websites that appear most frequently in the search results. Many of the top-ranking websites that are shown most frequently have much more generic information.²⁰⁰ For example, if a person searching for help on a debt lawsuit visited a highly ranked page on the U.S. News and World Report website,²⁰¹ they would see a short article that describes options a person might take—like talking with a lawyer, hiring a debt settlement company, filing for bankruptcy, or trying to settle with the creditor—with some basic details about what each option entails.²⁰² The page does not: provide links to the local laws; detail how to find local, free lawyers with this expertise; give directions on how to file a lawsuit; provide timelines or costs of these options; or give other relevant local details.²⁰³ Thus, the news article may

²⁰³ Id.

NOLO.COM, https://www.nolo.com/legal-encyclopedia/california-fair-debt-collectionlaws.html (last visited June 13, 2023). Nolo.com tends to provide these state-specific articles about the law when they have books to sell on this topic, or lawyers in their paid referral service that specialize in this topic. For example, they do not have these detailed, state-specific guides for domestic violence.

¹⁹⁸ See, e.g., Marcia Stewart, Overview of Landlord-Tenant Laws in Florida, NOLO.COM, https://www.nolo.com/legal-encyclopedia/overview-landlord-tenant-laws-florida.html (last visited June 13, 2023).

¹⁹⁹ LEGAL HELP ONLINE DASHBOARD, *supra* note 132 (finding a site rank of zero for a Nolo article on the specific eviction process in Florida).

²⁰⁰ See supra notes 149–52 and accompanying text.

²⁰¹ Ben Luthi, *What Happens When Your Credit Card Company Sues You?*, U.S. NEWS & WORLD REPORT: MONEY (June 23, 2023, 9:00 AM), https://money.usnews.com/credit-cards/articles/what-happens-when-your-credit-card-company-sues-you.

²⁰² Id.

give a high-level overview of some options, but it does not provide referrals, directions, or other actionable information.²⁰⁴

These national, commercial articles do not have misinformation, scams, or other explicitly harmful content. Rather, these websites lack sufficient detail to provide meaningful assistance to people seeking help online. Their potential harm is not in false information, it is in low-quality information. The articles are typically designed to apply to the broadest possible audience, likely with the motive of optimizing the website's search engine performance and attracting more online visitors.²⁰⁵ However, this generic approach means the articles tend to lack specific detail. They do not have jurisdiction-specific guidance to tell a visitor what steps they can take, what rights they have, what their timeline or deadlines are under local laws, and what legal or financial services are available to them.²⁰⁶ These generic sites also do not link to the forms and documents that are needed to take legal action in a specific jurisdiction or link to the free services that local public interest groups can provide.²⁰⁷ Accordingly, if a person comes to these national commercial sites, they are not being directed to their local legal aid group, court self-help center, or free legal help websites.²⁰⁸ Rather, the articles are often intended to attract the searcher to other content or paid services on the commercial platform.²⁰⁹ The commercial sites are not incentivized to help a person find free legal experts in their jurisdiction who can help them with their housing, debt, domestic violence, or fraud problems. The possible harm is therefore that they are keeping people from free services and that they are displacing local, actionable content with their national, generic content.

Why do these national, commercial websites appear so frequently in response to legal help searches? Much like the jurisdiction-mismatch results, it is likely that these legal, news, home, and finance sites have

²⁰⁴ Id.

²⁰⁵ Piet Bakker, *Aggregation, Content Farms, and Huffinization: The Rise of Low-Pay and No-Pay Journalism,* 6 JOURNALISM PRACT. 627, 634 (2012); R. Lee Sims & Roberta Munoz, *The Long Tail of Legal Information: Legal Reference Service in the Age of the Content Farm,* 104 L. LIBR. J. 411, 415 (2012).

²⁰⁶ See supra notes 148–54 and accompanying text.

²⁰⁷ See supra notes 148–54 and accompanying text.

²⁰⁸ See supra notes 148–54 and accompanying text.

²⁰⁹ See supra note 196 and accompanying text; see also Bakker, supra note 205.

business models that depend on a high volume of online traffic, and have accordingly invested in SEO techniques to attract people to their site.²¹⁰ These techniques include adding frequently-used keywords into their content, writing articles that match what people are searching for, and improving the technical performance of their websites to be mobile- and user-friendly, and fast-loading.²¹¹ These SEO techniques seem to have worked for the commercial websites to have their webpages ranked high, even higher than local government and nonprofit websites.²¹²

We recommend that future research be done about the benefits and harms of the national, commercial websites offering short, general articles about legal problems. While they may play a role in educating people at a very broad level about the law, when judged according to the quality standards that previous groups have identified,²¹³ the sites likely score low based on their jurisdiction-irrelevance and lack of actionability.

B. Domestic Violence's Results as a Possible Model of National Help Sites

As noted above, the search results for domestic violence queries deviated from those of eviction, debt collection, and contractor fraud. Domestic violence queries resulted in a higher proportion of websites served by nonprofits as well as free and detailed information, services, and hotlines.²¹⁴ While some commercial, general articles sites that did not provide specific actions or resources did appear—including those from commercial news sites, relationship sites, and lifestyle sites—as the domestic violence queries' nonprofit results often were from national public interest sites run by national charitable organizations or government agencies.²¹⁵ Similar to the three other problem queries, local legal aid

²¹⁰ See Sims & Munoz, supra note 205; see also Bakker, supra note 205.

²¹¹ Brian Dean, *How to Create an Effective SEO Strategy In 2023*, BACKLINKO, https://backlinko.com/seo-strategy (last visited June 14, 2023) (explaining search optimization techniques).

²¹² LEGAL HELP ONLINE DASHBOARD, *supra* note 132.

²¹³ See *supra* Section I.C for further discussion of quality standards and indicators.

²¹⁴ See discussion supra Section I.C.

²¹⁵ See discussion supra Section I.C.

groups, government resources, mediation groups, or other free nonprofit services did not appear prominently.

One hypothesis for domestic violence's different performance is that there are more national public interest organizations focused on domestic violence that offer direct service outreach and guides to people experiencing this legal problem. In other legal help areas, such as service providers around rental housing or debt collection problems, have local organizations with direct service resources, while national groups tend to be more focused on policy-making, research, and advocacy.²¹⁶ There are few national public interest sites devoted to people facing eviction or being sued by credit card companies, unlike with domestic violence.²¹⁷ The existence of a national, user-focused site seems to impact the search results overall, with public interest information appearing more prominently.

A potential policy takeaway from this finding is that groups working on legal issues other than domestic violence should create national help websites as well. Having a national site devoted to housing, financial, family, and employment legal problems might then result in higher placement in search results. The current network of legal aid sites is primarily local. An increased number of national hubs of content could lead to public interest resources placing higher on search results, thus informing people of their local legal rights and services. These national hubs could be the broker that the search engines do not currently have, directing the platforms towards authoritative public interest sites for each jurisdiction.

²¹⁶ For example, help around rent and evictions are provided by a network of local legal aid groups, tenant unions, and community organizations. There is not a national group providing public help for tenants' legal problems. See the landscape of local groups at Pro Bono Net, *Rent and Eviction Help Resources*, LAWHELP.ORG,

https://www.lawhelp.org/resource/rent-and-eviction-help-resources (last visited June 14, 2023).

²¹⁷ Id.; see, e.g., How Do I Find a Lawyer or Attorney to Represent Me in a Lawsuit By a Creditor or Debt Collector?, CONSUMER FIN. PROT. BUREAU (Aug. 2, 2023),

https://www.consumerfinance.gov/ask-cfpb/how-do-i-find-a-lawyer-or-attorney-torepresent-me-in-a-lawsuit-by-a-creditor-or-debt-collector-en-1433/. Unlike in the domestic violence area, there is not a nationwide legal help hotline or set of guides for a person facing debt collection. Rather, people are directed to find local resources, services, and statements of law on their own.

C. Localization of Search Queries as a Possible Model for Search Engines' Algorithm

As mentioned in Section III, queries that referenced local cities, states, or counties performed differently than the other queries.²¹⁸ They tended to result in more localized results that were jurisdiction-correct and that provided more non-commercial, specific legal help information.

like the portal The appearance of sites nonprofit help Floridalawhelp.org were largely due to the eviction help searches relating to how tenants can respond to eviction actions in their region.²¹⁹ These results from nonprofit legal help portals or government court sites provided specific information on the state of the law, what steps people can take in court or with a legal aid lawyer to protect their rights, and what procedure and deadlines to expect to follow if they pursued help.²²⁰ These sites also linked a person to free lawyers from legal aid providers or from the court's self-help centers.²²¹

This indicates that search engines can effectively surface higher quality results if the person happens to include jurisdiction-related information explicitly in their query. Search engines also deliver jurisdiction-correct advertisements, as discussed in the previous section.²²² They appear to be appending the person's location to the search queries when they are choosing and displaying advertisements to people.²²³ They do not appear to do this for the regular results, however. If searchers do not input their state, city, or county (as in our three other problem scenarios), the search results are not affected by local state or city jurisdiction.

This jurisdiction-sensitivity could be a point for search engine improvement. Search engine algorithms might append locations automatically onto search queries regarding legal topics, especially legal topics where state or local laws control the procedure and rights. For

²¹⁸ See discussion supra Section III.

²¹⁹ See discussion supra Section III; see also FLA. L. HELP, supra note 155.

²²⁰ FLA. L. HELP, *supra* note 155.

²²¹ Id.

²²² See discussion supra Section III.

²²³ See Target Ads to Geographic Locations, GOOGLE, https://support.google.com/googleads/answer/1722043?hl=en (last visited June 13, 2023) (explaining how prospective advertisers can use location to target advertisements to certain populations).

example, if an engine receives a query about "rights against an eviction," the search engine could recognize that the topic is about a local legal matter, recognize the browser's location as being in Florida, and add location into the query to now read "rights against an eviction in Florida." This automatic correction could be flagged to the user on the search results page, with a message at the top of the page asking, "Did you mean 'rights against an eviction in Florida?' If not, change the jurisdiction below."

This algorithm change might be carried out in collaboration with legal domain experts. These domain experts can work with search engine experts to devise lists of local and national legal issues and the keywords used to describe these issues. This adjustment of search engine algorithms could then ensure that people searching for legal help are more likely to avoid harmful out-of-jurisdiction content.

D. Quality Review of the Websites That Search Engines Display

Returning to the quality standards and indicators reviewed in Section I²²⁴, some findings emerge from the audit's results. In that section, we had synthesized a handful of quality criteria to determine if a website appearing on a search results page was high quality or low. We also had identified two indicators that did not conclusively determine a site's quality but could indicate whether a site was higher quality or lower.

- **Quality Criteria 1:** The site has jurisdiction-correct, accurate, current information.

- **Quality Criteria 2:** The site presents specific, detailed, actionable information about rights, process, and services

- **Quality Criteria 3:** The site puts minimal burden or cost on a person to access information about rights, process, and services.

- **Indicator 1:** The site is run by a public interest organization or than a commercial one.

- **Indicator 2:** The site is run by a legal organization rather than a non-legal one.

²²⁴ See discussion supra Section I.C.

How did Google's search results pages perform in light of these quality criteria and indicators? Did the search results pages reveal high quality, low quality, or concerning websites?

Jurisdiction-Correct, Accurate, Current Information. Overall, the audit indicated that there were no major quality issues with accuracy and currency of information, though there were concerns about jurisdiction-matching. Our team explored the websites that appeared commonly, exploring the content that they presented on the page. Based on our manual review, we did not find examples of fraudulent or incorrect information. Rather, most of the results delivered generic summaries of legal issues, which did not have enough details about laws, procedures, options, forms, or services. This national, generic content means that there is less concern about inaccurate or out-of-date content on them. Because these sites are offering content with few details, there are no examples of incorrect information on them. The national generic sites also are not jurisdiction-incorrect for people in the United States.

For the search results' display of local, detailed websites, there are more concerns about these criteria. Because many of these local, detailed websites are for the wrong jurisdiction, there are quality concerns. They provide accurate and current information for people in the target jurisdiction, but search engines are showing them to people outside that target area which renders the information incorrect²²⁵, and possibly harmful if a person improperly relies on it. They might get forms, deadlines, services, and rules wrong, and thus miss their opportunity to access the justice system to resolve their problem.

For example, a person searching from California could find information about eviction notices in Ohio. This could lead them to believe that they will be given a court date automatically to present their defenses.²²⁶ Relying on this information would harm them, because in California a tenant needs to proactively file an "Answer" document within 5 days of getting notice of an eviction lawsuit in order to get a trial.²²⁷ If they don't file this document correctly within this deadline, the court will find them in default and side

²²⁵ Denvir, *supra* note 13, at 191–93.

²²⁶ Eviction Timeline in Ohio, OHIO LEGAL HELP (Jan. 11, 2022), https://ohiolegalhelp.org/eviction-timeline.

²²⁷ *The Eviction Process for Tenants*, CAL. CTS., https://selfhelp.courts.ca.gov/eviction-tenant (last visited Sept. 15, 2023).

with the landlord by giving them an eviction order.²²⁸ The same could happen if they file a form from the wrong state.²²⁹

In an earlier section²³⁰, we have already discussed the opportunity for search engines to work with legal domain experts to adjust their algorithm to automatically add location, to increase jurisdiction sensitivity. Another opportunity exists for court and legal aid website administrators to prioritize jurisdiction in their design, content, and titles. If possible, such administrators can flag to a visitor that this local, detailed information is for people in a certain state and city. This could be accomplished through site headers with the name of the jurisdiction, state outlines, flags, and frequent mention throughout the page about the jurisdiction. While seemingly redundant, this can prevent the harm of people from out-of-jurisdiction visiting that site and relying on its information.

Specific, Detailed, Actionable Information about Rights and Services. As mentioned previously²³¹, national websites showing generic content currently dominate the search results. On this second criteria, there are quality concerns about these national, generic websites. While these sites often provide high-level introductions to legal problems and lists of possible options a person might have across the country, they lack specific timelines, links to forms, connections to legal aid or court groups, or other actionable details.²³² Because these national websites' business models are primarily concerned with serving advertisements or upselling attorney services²³³, their goal is not to pass the visitor over to their next step on their justice journey.

As discussed above²³⁴, there are quality problems surrounding local, detailed websites when there is a jurisdiction mismatch. But for such websites that are visited by people inside their jurisdiction, they tend to have high quality in these criteria. The local websites often have the exact forms to fill in, locations of help centers or court clerk's offices, phone

²²⁸ Id.

²²⁹ Id.

²³⁰ See discussion supra Section IV.C.

²³¹ See discussion supra Sections III.A, IV.A.

²³² See discussion supra Sections III.A, IV.A.

²³³ See discussion supra Sections III.A, IV.A.

²³⁴ See discussion supra Sections III.C, IV.C, IV.D.

numbers of free services, deadlines and warnings about potential pitfalls, and procedural requirements to follow. These details allow people to move from the website information to taking steps to address their specific legal problem.

Ideally, search engines should show more of these jurisdiction-correct local, detailed websites. To accomplish this, they may alter their search rank algorithm, to avoid prioritizing websites with overly generic content. Alternatively, they may factor in the level of actionable, specific details in a legal help website page. When someone searches about their rights, the law, or groups who can help them with their legal problem, the search engine might rank those sites that can provide this detailed, specific information. Currently, search engine algorithms prioritize generic content with few specific details. They might work with domain experts to assess which domains tend to have more specific, actionable content and give more priority to these domains. They may also flag domains that tend to provide overly generic content with no specific guidance. These domains may still be displayed to a user, but they shouldn't be the exclusive kind of site that people are being shown when they search for legal help.

Burden, Cost, and Accessibility of the Websites. In this audit, we did not develop a scoring system to evaluate how burdensome a website was. We also did not measure if the sites had paywalls, were collecting data about users, or had accessibility problems. This quality criteria deserves future study to determine automatic or manual analysis of the websites that Our initial review did see the prevalence of a search engine lists. commercial websites²³⁵, but this indicator does not necessarily show how costly or burdensome it is to access important content. It does demonstrate that several kinds of businesses, including legal publishers, financial service providers, news outlets, real estate providers, and how-to publishers, have found that publishing legal help content online is beneficial for their business.²³⁶ We might assume that publishing articles on legal topics attracts monetizable website traffic. They might reinvest some of the profit in search engine optimization, so that they can increase their search rank further and attract more traffic. This resource cycle may lead to further division in commercial sites' ability to place higher than non-profit sites.

²³⁵ See discussion supra Section III.A.

²³⁶ See discussion supra Section IV.A.

Future study could entail surveying the different kinds of commercial websites that provide legal help content, possibly including evaluation of sites that have different legal help models: those that include paywalls, upselling, referrals, or advertisements. Such further research might also identify other, emerging business models that motivate commercial organizations to publish legal help content. This exploration of different commercial models could then help domain experts and search engines address quality concerns with these different models. It might be that some commercial websites' business models motivate them to produce high quality, actionable, detailed, local information to users. Other business models might motivate the site to only provide generic content that is general and national in scope, so that the entity does not have to spend resources on updating or localizing it. Other business models might lead a group to obscure the most useful information behind paywalls, or through the purchase of a book, or through the hiring of an attorney. That kind of organization might be incentivized to provide only generic information, or to provide excessive warnings, making searchers anxious enough about their situation that they want to spend money to get help to resolve it. This model might eventually have high quality legal information for a visitor, but only after that person has spent money or shared data.

For these criteria, the other area for future evaluation is accessibility. There may be automatic means to evaluate the websites' accessibility for people with disabilities or limited English proficiency. These tools might scan the website to identify its technical performance for those with auditory or visual impairments. They might also scan for availability of information in other languages. Accessibility scans might also assess technical performance, to determine if the site is accessible to people who are using a mobile device on a slow Internet connection to seek help. There are tools that can automatically review websites to determine whether they are mobile-friendly and fast-loading.²³⁷ The various automated accessibility tools could be used on the websites that appear in the search results. These tools' scans could score their quality based on accessibility. This could be combined with manual review to flag any other issues that

²³⁷ For example, the Lighthouse tool from Google is an open-source, free audit tool which website administrators can use to assess their website's performance and identify ways to improve it. This tool compares the website's performance around speed, bugs, security, markup, and other factors to benchmark standards. *See* Google Developers, *Lighthouse*, CHROME DEVELOPERS (May 24, 2022),

https://developer.chrome.com/docs/lighthouse/overview/.

are not caught by the automated tools, for features or choices that impede accessibility.

Public Interest Versus Commercial Websites. During discussions with local legal services leaders in Hawaii and Florida, such leaders recommended sites that they would consider to be of sufficient quality.²³⁸ They exclusively recommended local public interest websites, including local legal aid groups, legal help portals, court self-help centers and clerks' offices, police department, and nonprofit mediation and counseling services.²³⁹ Their recommendation also included the websites of their own legal aid organizations.²⁴⁰ These legal services experts considered public interest and nonprofit status to be definite indicators of the site's quality.

However, further exploration about whether a site's quality is directly tied to ownership by a commercial versus a public interest group is necessary. This first Legal Help Search Audit found that commercial sites dominate Google search results, with some exceptions of national nonprofits appearing frequently for domestic violence queries.²⁴¹ Further automatic and manual analyses of these different commercial and public interest websites will lead to more definite statements about whether commercial or public interest sites better serve visitors with quality legal help.

Further exploration could also entail increased examination of which kinds of commercial or public interest models lead to higher levels of quality. Some public interest groups might not have resources to produce detailed, updated content. Other public interest groups might make online help a priority and may have staff dedicated to the provision of high-quality legal help online. Further detailed evaluation of quality can then inform search engines about how they should use domain endings—such as .com, .org, or .gov—to better indicate quality and to inform the ranking of sites. For now, our team does not recommend that these domain endings be used

²³⁸ See discussion supra Sections II.D, III.D.

²³⁹ See discussion supra Sections II.D, III.D.

²⁴⁰ Future studies may try to list out the highest quality sites in a given jurisdiction based on user behavior and legal capacity improvement. In this study, we relied on legal aid experts' evaluation of quality as a proxy, but their evaluation must be taken with caution because of their relationship with the sites. That said, the sites they highlight as quality all do have local, free, correct information, and according to the rubric presented in *supra* Section I, would qualify as high-quality.

²⁴¹ See discussion supra Sections III.C, IV.B.

as direct representations of a site's quality. Further evaluations of the quality of commercial, nonprofit, and government websites need to be done to determine the quality for the user's outcomes of these various sites. Future research on how frequently public interest websites use .com domain endings would be beneficial.

A clear takeaway established by this first Audit is that public interest websites did not perform well on Google Search. Of the websites that local legal experts recommended as high quality, only the statewide sites (like the statewide nonprofit legal help portal Florida Law Help, or the statewide court site for Hawaii) appeared with any frequency in the top 10 search results.²⁴² Sites with the most localized, jurisdiction-correct information for individual counties, as well as sites for individual legal aid organizations or self-help centers, hardly appeared at all.²⁴³

One policy recommendation from this Audit is that local legal aid, court self-help, and other public interest websites should focus on their search rank. Currently, these sites rarely appear in the first page of search results.²⁴⁴ This low search rank should be a cause for concern. To effectively serve the public, the website must be readily discoverable, particularly on a dominant platform like Google Search. Nonprofits and courts should allocate more resources to the development of website performance, content, and search engine optimization strategies that can increase their sites' discoverability through higher search rankings. In response to this Audit's findings, our team has established a hub of best practices for legal help websites' performance, on Legal Help Online Dashboard.²⁴⁵

Legal Versus Non-Legal Organization Running the Website. Our first Legal Help Search Audit documented that many non-legal organizations are highly ranked in the search results for legal help queries. As noted above²⁴⁶, this is likely due to business models that revolve around traffic. These news, home repairs, financial services, and how-to websites have illustrated that there are traffic opportunities for legal help queries.²⁴⁷ They

²⁴² See discussion supra Section III.D.

²⁴³ See discussion supra Section III.D.

²⁴⁴ See discussion supra Section III.D.

²⁴⁵ LEGAL HELP ONLINE DASHBOARD, *supra* note 132.

²⁴⁶ See discussion supra Section IV.A.

²⁴⁷ See discussion supra Section IV.A.

have produced articles and blog posts to answer the queries that people are asking online.²⁴⁸

As with the above discussion of the differing quality of commercial and public interest providers²⁴⁹, further evaluation of the quality of legal help websites provided by legal and non-legal providers is required. Our local legal experts recommended only websites from groups that are run by organizations directed by lawyers, court officials, government agencies, or law enforcement.²⁵⁰ They did not recommend any non-legal organizations as providing a quality legal help resource.²⁵¹ Further research can evaluate the performance of websites run by non-legal organizations, to see how they perform on the three quality criteria. Based on an initial manual review, the non-legal organizations tended to have more generic, non-actionable information. We recommend future researchers to do a more extensive comparison of legal versus non-legal websites' quality performance.

Conclusions and Future Work on Legal Help Search

This initial run of the Legal Help Search Audit provides a contribution to research on effective legal services and access to justice. It details a protocol of how practitioners and policymakers can regularly monitor what people see when using search engines to seek out help for legal issues. This Audit can be run from locations across the country and for particular legal issues, to determine if people are seeing quality, concerning, or harmful content. It can also show public institutions and their funders how their online resources are performing. In particular, it can help answer the question of whether these legal aid, courts, and nonprofit websites effectively connect with searchers by delivering key information about rights and services.

This paper also proposes a set of criteria and indicators by which groups can assess the quality of legal help websites. It combines these quality metrics with the audit, to allow future researchers to assess the quality of websites and search engines' performance more efficiently. Section IV outlines particular research topics for further exploration: increased

²⁴⁸ See discussion supra Section IV.A.

²⁴⁹ See discussion supra Section IV.A.

²⁵⁰ See discussion supra Section II.D.

²⁵¹ See discussion supra Section II.D.

evaluation of various websites' quality through a combination of automatic and manual review of commercial, nonprofit, legal, and non-legal organizations' legal help websites. By improving the quality review protocols, future Search Audits' results can be interpreted to not only say which websites are appearing most frequently, but also reveal whether people are seeing high quality, medium quality, low quality, or harmful information when searching.

In addition, this paper identifies particular action items for practitioners, particularly for search engine teams and legal website administrators. The article finds that search engines currently are displaying many jurisdictionincorrect resources, and that there is an opportunity to explore automatic localization of legal search queries. Website administrators from legal help groups, courts, and legal aid groups can also improve through further flagging of their jurisdiction, use of keywords and other search engine optimization strategies, and the development of national hub websites that can compete with national commercial websites.

Policymakers and service-providers might also consider a broader initiative to improve public interest organizations' search rank. Groups working on parallel issues, such as elections and public health, have developed technical and partnership models to improve how key information and services are presented on search results. For example, the Voting Information Project, developed as a collaborative effort between The Pew Charitable Trusts, Google, and local election officials, established a system of authoritative, detailed, local information to show people searching for information on their local elections.²⁵² This information provides specific procedures, locations, requirements, and other actionable information to help people ensure they can participate in elections in their local jurisdiction.²⁵³

²⁵² *Voting Location Lookup Tools*, VOTING INFO. PROJECT, https://www.votinginfoproject.org/ (last visited Feb. 9, 2022); *see also Our History*, VOTING INFO. PROJECT, https://www.votinginfoproject.org/our-history (last visited Sept. 15, 2023).

²⁵³ Stephanie Mlot, *Google Is Making It Easy to Find Where and When You Can Vote*, PCMAG (Oct. 19, 2020), https://www.pcmag.com/news/google-is-making-it-easy-to-find-whereand-when-you-can-vote; Shashi Thakur, *Google and YouTube Can Help Keep You Informed on Election Day*, GOOGLE (Nov. 7, 2016), https://blog.google/products/search/google-andyoutube-can-help-keep-you-informed-election-day/.

The health information panels on Google search offer similar visions of what better legal help search results might look like.²⁵⁴ With this effort, the search engine works with medical subject matter experts to distill, vet, and present clear synopses of the health problem scenario that a person is searching about.²⁵⁵ Rather than displaying undifferentiated search results, it directs a person to a panel of clear information about their problem, with actionable information that helps them understand their situation and decide on steps to respond to it. It may be possible that for the most common legal problem scenarios, like divorce, eviction, debt lawsuits, medical debt, contractor fraud, immigration applications, and domestic violence, legal experts may collaborate with search companies to produce similarly standardized, actionable presentations of information about the problem, which direct people to local laws and free services.

These suggestions point to a better future for legal help searches. With efforts from legal domain experts, search engine teams, policymakers, and funders, there can be more attention to what people see when they go online to seek help, and how to improve the likelihood that they see accurate, actionable, accessible help information about their rights and services. Ideally, the Internet will be a portal to access the justice system, providing people with resolutions to their legal problems or access to affordable legal help groups. The Legal Help Search Audit has shown that, currently, people are not seeing local, specific sites from their courts or legal aid groups in their top search results. With more research and development on this topic, there are clear opportunities to improve people's online justice journeys.

²⁵⁴ Prem Ramaswami, A Remedy for Your Health-Related Questions: Health Info in the Knowledge Graph, GOOGLE (Feb. 10, 2015), https://blog.google/products/search/health-info-knowledge-graph/.

²⁵⁵ See Medical Information on Google, GOOGLE: SEARCH HELP,

https://support.google.com/websearch/answer/2364942?hl=en (last visited Sept. 15, 2023) (describing how Google surfaces and summarizes this information).

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Appendix

These appendices provide more detail for readers who want to explore the data or resource mentioned in the article. We expect these can be put online, either at your site or our Lab's, for reference.

Appendix A: Non-Profit Statewide Legal Help Portals

This table displays the primary legal help portal for each state. Not every state has an official, independent "legal help" statewide site, in some cases the primary legal help portal is a legal aid organization in the state which operates as the main statewide provider of free legal guides and service directories.

State	Statewide Legal Help Portal
Alaska	https://alaskalawhelp.org/
Alabama	https://www.alabamalegalhelp.org/
Arkansas	http://www.arlegalservices.org/
Arizona	http://www.azlawhelp.org/
California	http://www.lawhelpca.org/
Colorado	https://lawhelp.coloradolegalservices.org/
Connecticut	https://ctlawhelp.org/
District of Columbia	https://www.lawhelp.org/DC/
Delaware	http://www.declasi.org/
Florida	https://www.floridalawhelp.org/
Georgia	https://www.georgialegalaid.org/
Hawaii	https://www.lawhelp.org/hi/
Iowa	https://www.iowalegalaid.org/
Idaho	https://www.idaholegalaid.org/
Illinois	https://www.illinoislegalaid.org/
Indiana	https://www.indianalegalservices.org/

Kansas	https://www.kansaslegalservices.org/
Kentucky	http://kyjustice.org/
Louisiana	https://louisianalawhelp.org/
Massachusetts	https://www.masslegalhelp.org/
Maryland	https://www.peoples-law.org/
Maine	https://ptla.org/
Michigan	https://michiganlegalhelp.org/
Minnesota	https://www.lawhelpmn.org/
Missouri	https://www.lsmo.org/
Mississippi	https://www.mslegalservices.org/
Montana	https://www.montanalawhelp.org/
North Carolina	https://www.lawhelpnc.org/
North Dakota	http://www.legalassist.org/
Nebraska	http://www.legalaidofnebraska.org/
New Hampshire	http://www.nhlegalaid.org/
New Jersey	http://www.lsnjlaw.org/
New Mexico	https://www.newmexicolegalaid.org/
Nevada	https://nevadalawhelp.org/
New York	https://www.lawhelpny.org/
Ohio	http://ohiolegalhelp.org/
Oklahoma	https://oklaw.org/
Oregon	https://oregonlawhelp.org/
Pennsylvania	https://www.palawhelp.org/
Puerto Rico	https://ayudalegalpr.org/
Rhode Island	https://www.helprilaw.org/

South Carolina	https://www.lawhelp.org/sc
South Dakota	https://www.dpls.org/
Tennessee	http://las.org/
Texas	https://texaslawhelp.org/
Utah	https://www.utahlegalservices.org/
Virginia	https://www.valegalaid.org/
Vermont	https://vtlawhelp.org/
Washington	https://www.washingtonlawhelp.org/
Wisconsin	http://www.legalaction.org/
West Virginia	http://www.lawv.net/
Wyoming	http://www.legalhelpwy.org/

Appendix B: Court Self-Help Websites

State courts each have their own website, oftentimes at a .gov or a .org domain. Within the overall website, the court typically has a page dedicated to self-represented litigants or self-help topics.

State	Court's Page for Self-Help
Alaska	http://www.courts.alaska.gov/shc/representing- yourself.htm
Alabama	http://www.alacourt.gov/
Arkansas	https://courts.arkansas.gov/directories/resources
Arizona	https://www.azcourts.gov/selfservicecenter
California	http://www.courts.ca.gov/selfhelp.htm
Colorado	https://www.courts.state.co.us/Forms/Index.cfm
Connecticut	https://www.jud.ct.gov/selfhelp.htm
District of Columbia	https://www.dccourts.gov/services/family-matters/self-help- center
Delaware	https://courts.delaware.gov/help/index.aspx
Florida	http://www.flcourts.org/
Georgia	http://www.georgiacourts.gov/georgia-courts

Hawaii	http://www.courts.state.hi.us/self-help/help
Iowa	https://www.iowacourts.gov/for-the-public/representing- yourself/
Idaho	https://www.idaho.gov/agencies/court-assistance-office/
Illinois	http://www.illinoiscourts.gov/citizen.asp
Indiana	https://www.in.gov/judiciary/selfservice/index.htm
Kansas	http://ksd.uscourts.gov/self-representation/
Kentucky	https://courts.ky.gov/Pages/default.aspx
Louisiana	http://louisiana.gov/Government/Judicial_Branch/
Massachusetts	https://www.mass.gov/topics/courts-self-help-center
Maryland	https://mdcourts.gov/selfhelp#
Maine	http://www.courts.maine.gov/citizen_help/represent_self.ht ml
Michigan	http://courts.mi.gov/self-help/center/pages/default.aspx
Minnesota	http://www.mncourts.gov/Help-Topics/Self-Help- Centers.aspx
Missouri	https://www.selfrepresent.mo.gov/page.jsp?id=5240
Mississippi	https://courts.ms.gov/newsite2/index.php
Montana	http://courts.mt.gov/selfhelp
North Carolina	https://www.nc.gov/services/courts-and-justice
North Dakota	http://www.ndcourts.gov/ndlshc/
Nebraska	https://supremecourt.nebraska.gov/self-help
New Hampshire	https://www.courts.state.nh.us/selfhelp/
New Jersey	https://www.judiciary.state.nj.us/selfhelp/index.html
New Mexico	https://www.nmcourts.gov/Self-Help/self-help-guide.aspx
Nevada	http://selfhelp.nvcourts.gov/
New York	https://www.nycourts.gov/courthelp/
Ohio	https://www.sconet.state.oh.us/
Oklahoma	http://www.okwd.uscourts.gov/self-representation/

Oregon	http://www.courts.oregon.gov/help/Pages/default.aspx
Pennsylvania	http://www.pacourts.us/learn/representing-yourself
Puerto Rico	http://www.prd.uscourts.gov/?q=pro-se-forms
Rhode Island	https://www.courts.ri.gov/Self%20Help%20Center/Pages/de fault.aspx
South Carolina	https://www.scd.uscourts.gov/default.asp
South Dakota	http://ujslawhelp.sd.gov/
Tennessee	http://www.tsc.state.tn.us/programs/self-help-center
Texas	http://www.txcourts.gov/programs-services/self-help/
Utah	https://www.utcourts.gov/selfhelp/family.php
Virginia	https://selfhelp.vacourts.gov/
Vermont	http://www.vermont.gov/portal/government/index.php?id= 38
Washington	https://www.courts.wa.gov/forms/
Wisconsin	https://www.wicourts.gov/services/public/selfhelp/
West Virginia	http://www.courtswv.gov/
Wyoming	https://www.courts.state.wy.us/legal-assistances-and- forms/court-self-help-forms/

Appendix C: Users' Queries on Four Legal Help Areas

These are the queries written by our survey participants, which they generated to use on a potential Google Search after reading a scenario text and being asked what they'd search for in response to the scenario's problems. Our team went through these generated queries to remove duplicates, and to replace any specific location (like 'CA' or 'Illinois") with the location of the SERP Audit's specified zipcode (like 'FL' or 'Hawaii').

Debt Collection Queries

- Alternative ways to pay credit card bills
- bankruptcy lawyers
- being sued by credit card company
- being sued by creditor
- being sued for bills- help!
- Best steps to protect myself from being sued credit card company

- can credit card company really sue me?
- Consequences faced by credit card unbilled customers?
- credit card company legal action
- credit card company sue me
- credit card company suing for balance
- credit card company suing me
- credit card company suing me
- credit card debt lawsuit
- credit card debt lawsuit
- credit card debt settlement
- credit card lawsuit defense
- credit card lawsuit help
- Credit card lawyer
- credit card suing me
- credit card unpaid sued
- credit lawsuit response
- credit suit attorney
- deal with credit problems
- Dealing with student loans
- debt counseling
- debt lawyer
- debt relief lawyers
- debt relief, debt refinancing, bankruptcy
- do I need a lawyer for getting sued by credit card company
- don't pay credit card bill
- filing bankruptcy to avoid medical debt
- Good solutions to solve unpaid bill problems?
- help after credit card files lawsuit
- help for lawsuit, credit card
- Help paying unpaid bills
- help with being sued for credit card payments
- Help with creditors
- help with unpaid credit card bills
- How bad can I get into trouble for unpaid credit cards?

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 - how to deal with credit card lawsuit threat
 - How to pay down bills
 - how to respond to lawsuit threat credit card debt
 - how to respond to legal action credit cards
 - How to settle medical debt
 - is getting sued by credit card company serious
 - Law about unpaid bill problems
 - Laws in my state that limit bill collectors like credit card companies
 - lawsuit by credit card company debt
 - lawsuit credit card debt
 - lawsuit from credit card company help
 - lawsuit help
 - legal action unpaid credit card
 - legal help for lawsuit for debt
 - loan defaulting
 - loan forgiveness
 - Need advice on creditor judgements
 - Next action to take after being sued
 - response credit card lawsuit
 - response to lawsuit unpaid bills
 - restructure debt
 - rights against threatening credit card company
 - Services to help with unpaid credit cards
 - settle out of court medical debt
 - steps to take getting sued by credit card company
 - sued by credit card company
 - sued by credit card company laws
 - sued by credit card company options
 - sued credit card unpaid bills
 - sued for medical and school loans by a creditor- what to do
 - sued for unpaid bills help
 - Unpaid credit card payment lawsuits
 - Ways to deal unpaid credit card bills?

- What are the best steps to take when being sued by a credit card company?
- what can credit card company do over unpaid balance
- what can i do about medical debt i can't pay
- what do I do if I get sued by a credit card company
- What happens if I do not show up for a civil court case from credit card company
- what if I don't pay credit card
- What to do if a credit card company sues you
- what to do if being sued by my credit card company over unpaid bills
- What to do if sued by credit card company
- what to do sued by credit card company
- what to do when a credit card sues you

Domestic Violence Queries

- 911
- abusive relationship resources
- abusive relationships
- Best methods for good marriage life
- Best way to document or protect myself from threats
- couple's counseling bay area
- defusing a situation
- Domestic abuse
- domestic abuse
- Domestic abuse who to contact in case of threats.
- domestic violence
- domestic violence
- domestic violence resources
- emergency phone number
- Emergency shelters for abuse victims nearby.
- escape threatening relationship
- escaping relationship
- female on male domestic abuse
- help for women in violent relationships

- help with abuse
- How do I address my wife's threats of physical violence
- How to contact the police
- how to deal with a potentially violent partner
- How to deal with an abusive partner.
- how to escape a abusive partner.
- How to get a protection order.
- how to get away from violent partner
- How to get help with domestic abuse.
- How to get out of an abusive relationship.
- How to leave an abusive partner who is making threats?
- how to make good relationship with partner
- How to protect yourself from an abusive partner.
- How to run away
- Husband & wife problem solving tricks
- Husband said he wants to hit me
- Husband threatened me
- I need help
- I need help fighting off a 110 pound woman
- insecurity and anger
- leaving a toxic situation
- Leaving an abusive partner safely.
- living with someone threatening me
- local police department
- men's shelter
- My lover wants to attack me after argument.
- My significant other threatened to beat me.
- My wife threatened to hurt me what do I do?
- order of protection, protection rights, womens domestic violence • shelters
- paranoia •
- partner abuse •
- partner threatened me
- partner threatening me what to do •

- peacekeeper solutions
- Places I can stay
- Places that are safe
- police number
- Problems and solutions with wife
- PTSD
- relationship abuse help
- relationship abuse reddit resources
- relationship advice and coaching
- relationship threatened
- relationship unsafe help
- scared partner is going to hurt me
- shelter for violence
- Spouse/husband said he would hurt me
- Steps to take when being threatened in a relationship.
- struggling with a verbally abusive partner
- support group locations
- Support line for domestic violence
- threatening partner help
- threatening relationship
- Ways to get out of a violent relationship.
- What do I do if why wife threaten to physically harm me
- What do when your husband/boyfriend threatens you physically
- What to do if my partner is threatening me with violence, what are my options.
- what to do when threatened
- where to go for advice with a troublesome relationship
- why is my wife threatening to hurt me
- womens protection shelters

Eviction Queries

- 2 weeks notice to get out by landlord in california
- CA renters rights
- California can landlord evict because he has new tenant

- California eviction laws, California eviction for higher rent, tenants rights in California, laws governing rental agreements in California
- California landlord break lease
- California landlord tenant law and breaking a lease by landlord
- california landlord tenant law forced to vacate
- California rent law
- California rental laws
- california renters rights
- California state eviction laws
- california state eviction laws
- California state law on how long landlord has to give me to legally evict me
- california tenant law
- California tenants rights
- California, landlord, rent, kicking out, tenant.
- can a landlord evict you if someone pays more
- can a landlord kick you out in order to charge someone higher rent california, landlord tenant rights in california,
- can a landlord legally make a tenant leave to get more rent for someone else
- can landlord evict me to rent to someone else
- does my landlord have a case to evict me
- Eviction during lease.
- eviction laws in san francisco valid causes for eviction in san francisco
- eviction notice law in California
- eviction notices
- eviction with no reason
- how long does my landlord have to make me move out in california
- how much notice does landlord need to provide for eviction
- how the eviction process is
- how to get landlord to back down
- how to respond to landlord's eviction notice
- Illegal eviction, change in rent, legal help for eviction

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 - illegal evictions
 - is landlord within rights to evict for higher rent
 - is two weeks notice enough for eviction
 - landlord eviction san francisco tenant eviction rights sf
 - landlord found someone pay higher
 - landlord give two weeks notice
 - landlord kicking me out for higher rent
 - landlord laws in california
 - landlord lease violations
 - landlord leaving a last minute notice
 - landlord wants me to move to rent to a higher payer
 - landlord wants tenant to move out to get higher rent
 - laws for landlord evicting a tenant
 - laws in CA pertaining to landlord eviction laws and regulations
 - laws in California for eviction
 - laws on eviction and wrongful eviction
 - legal rights that tenants have
 - reasons for eviction
 - reasons that a landlord can evict
 - renter and landlord laws
 - renter rights
 - RENTER RIGHTS SAN FRANCISCO
 - renters rights in Ca
 - rights of renters
 - san francisco eviction higher rent
 - san francisco eviction law
 - San Francisco eviction laws
 - san francisco eviction legal aid
 - San Francisco tenant laws
 - tenant rights California
 - tenant rights california eviction
 - tenant rights group
 - tenant rights in CA
 - tenant rights, laws and protections in California

- valid causes for eviction
- violations of leases by landlord
- what are my rights in eviction
- what does my landlord have to do to evict me

Flood Contractor Fraud Queries

- after flood contractor fraud
- bad roofing company
- BBB complaints and reviews about contractor
- building contractor fraud
- construction law
- contractor abandons job law
- contractor breach of contract
- contractor didn't do the work
- contractor didnt pay "legal help"
- contractor didnt work how to get money back
- contractor doesn't respond after payment
- contractor is not responding to me after payment
- Contractor legal action
- contractor license board
- contractor license report
- contractor never returns calls
- contractor never started work
- contractor not doing the work i paid for
- contractor not doing work
- contractor not responding, paid up front and work not done
- contractor ripped me off
- Contractor scam help
- Contractor scams
- contractor stole money
- Contractor stole money from client what to do
- contractor stole my money
- contractor stole my money
- Contractor stolen money
- contractor stolen money lawyer

- contractor stopped communication
- contractor took my money
- contractor tricked me
- contractor tricked me how do i get my money back
- contractor vanished
- contractor was paid and wont to job
- contractor will not do what he was paid to do, how to proceed
- contractor won't begin work and is not responding
- contractor won't respond
- Contractors who disappear after getting paid but no work.
- dealing with a bad contractor
- Dealing with Bad Contractors
- dealing with contractor scams
- file criminal charges against contractor
- filing a claim against a roofing contractor
- fraudulent contractor help
- free legal aid
- getting money back from contractor
- how can I force a contractor to honor their contract
- how to get a contractor to pay up or finish the work they were paid to do
- how to sue a contractor who has defaulted on a contract and failed to provide service
- how to sue a roofing contractor
- how to sue contractors
- lawyer money stolen
- lawyer sue roofing contractor
- lawyers construction theft of money
- legal action against contractor
- legal action for contractor fraud
- legal help home renovation
- Legal help service not done
- legal options bad contractor
- Lodge complaint against contractor

- PA report contractor not doing work
- paid contractor upfront and wont fix roof/answer calls
- police report against contractor
- recoup money contractors
- resolution for contractor trouble
- Roofing contractor reporting
- roofing contractor state licensing report
- roofing contractor won't being work after payment
- State contractor laws and complaint
- Sue contractor for missed work
- sue contractors scammed
- sue roofing company
- suing a roofing company contractor
- what do i do to get my money back from contractor
- what to do if a contractor defaults on their contract
- what to do if a contractor steals my money
- What to do when a contractor won't reply.
- what to do when your contractor doesn't show up
- X contractor company court cases

Appendix D: Local-Expert-Recommended Public Interest Websites

<u>Florida</u>

Statewide

- Debt Issues
 - https://www.floridalawhelp.org/
 - https://www.flcourts.org/
 - https://www.floridabar.org/
- Domestic Violence Issues
 - https://www.floridalawhelp.org/
 - https://www.flcourts.org/
 - https://www.floridabar.org/
 - o https://www.flclerks.com/
 - https://www.womenslaw.org/
- Eviction Issues
 - https://www.floridalawhelp.org/

- o https://www.flcourts.org/
- https://www.floridabar.org/
- Post-Disaster Fraud Issues
 - https://www.floridalawhelp.org/
 - https://www.flcourts.org/
 - https://www.floridabar.org/
 - o https://myfloridalegal.com/
 - o https://www.fdacs.gov/
 - https://www.myfloridacfo.com/

Northern Florida

- Debt Issues
 - o https://www.lsnf.org/
 - https://www.trls.org/
 - o https://www.nwfls.org/
- Domestic Violence Issues
 - o https://www.lsnf.org/
 - o https://www.trls.org/
 - o https://www.nwfls.org/
- Eviction Issues
 - o https://www.lsnf.org/
 - https://www.trls.org/
 - https://www.nwfls.org/
- Post-Disaster Fraud Issues
 - o https://www.lsnf.org/
 - o https://www.trls.org/
 - o https://www.nwfls.org/

Pensacola-Specific

- Debt Issues
 - http://www.escambiaclerk.com/
- Domestic Violence Issues
 - http://www.escambiaclerk.com/
 - o https://www.cityofpensacola.com
- Eviction Issues
 - http://www.escambiaclerk.com/
- Post-Disaster Fraud Issues
 - o http://www.escambiaclerk.com/

Tallahassee-Specific

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 - Debt Issues

 https://cvweb.clerk.leon.fl.us/
 - Domestic Violence Issues
 - o https://cvweb.clerk.leon.fl.us/
 - http://www.leoncountyso.com/
 - Eviction Issues
 https://cvweb.clerk.leon.fl.us/
 - Post-Disaster Fraud Issues
 - https://cvweb.clerk.leon.fl.us/

Jacksonville-Specific

- Debt Issues
 - o http://www2.duvalclerk.com/
- Domestic Violence Issues

 http://www2.duvalclerk.com/
- Eviction Issues
 - http://www2.duvalclerk.com/
- Post-Disaster Fraud Issues
 - http://www2.duvalclerk.com/

<u>Hawaii</u>

Statewide

- Debt Issues
 - https://www.courts.state.hi.us/
 - o https://www.lawhelp.org/HI
 - https://www.legalaidhawaii.org/
 - http://cca.hawaii.gov/
 - o https://www.auw.org/
 - o https://www.mediatehawaii.org/
- Domestic Violence Issues
 - https://www.courts.state.hi.us/
 - o https://www.lawhelp.org/HI
 - o https://www.legalaidhawaii.org/
 - o https://www.auw.org/
 - https://www.womenslaw.org/
 - o https://pacthawaii.org/
 - http://www.womenhelpingwomenmaui.com/
- Eviction Issues
 - https://www.courts.state.hi.us/
 - https://www.lawhelp.org/HI

- https://www.legalaidhawaii.org/
- http://cca.hawaii.gov/
- o https://www.auw.org/
- https://www.mediatehawaii.org/
- Post-Disaster Fraud Issues
 - https://www.courts.state.hi.us/
 - https://www.lawhelp.org/HI
 - https://www.legalaidhawaii.org/
 - o http://cca.hawaii.gov/
 - o https://www.auw.org/

Oahu-Specific

- Debt Issues
 - o None
- Domestic Violence Issues
 - o None
- Eviction Issues
 - o None
- Post-Disaster Fraud Issues
 - o None

Maui-Specific

- Debt Issues
 - o None
- Domestic Violence Issues
 - https://www.mauicounty.gov/
- Eviction Issues
 - o None
- Post-Disaster Fraud Issues
 - o None

Honolulu-Specific

- Debt Issues
 - o None
- Domestic Violence Issues
 - http://www.honolulupd.org/
- Eviction Issues
 - o None
- Post-Disaster Fraud Issues
 - o None

Hilo-Specific

- Debt Issues
 - o None
- Domestic Violence Issues
 - https://www.hawaiipolice.com/
- Eviction Issues
 - o None
- Post-Disaster Fraud Issues
 - o None