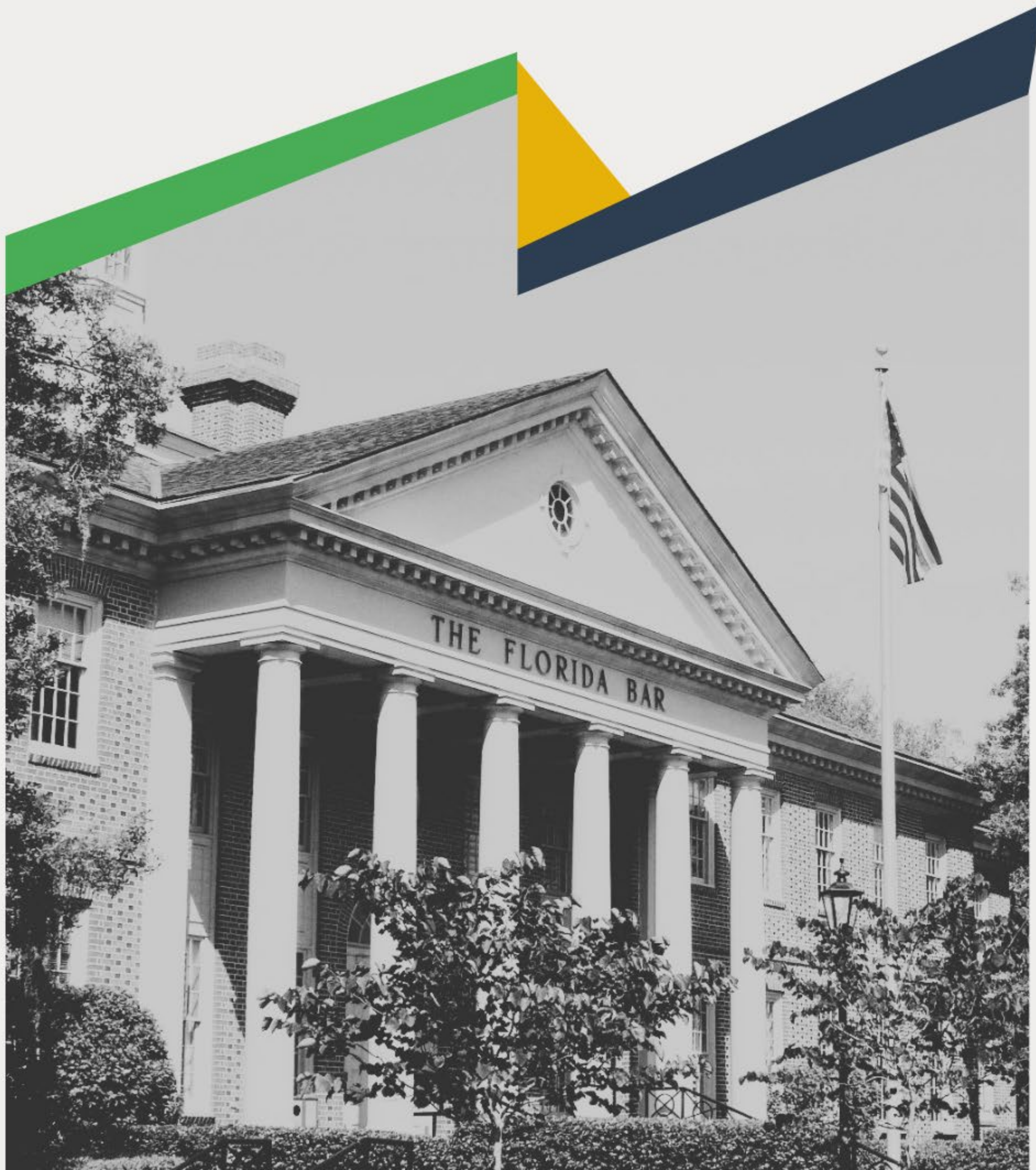




Legal Ethics And Generative A.I.

Jonathan Grabb

Ethics Counsel
The Florida Bar



The Florida Bar

Ethics Department

Jonathan Grabb

Ethics Counsel, The Florida Bar

Ten years with TFB

My Bio as Written By ChatGPT-4

Jonathan Grabb currently holds the distinguished position of Ethics Counsel at The Florida Bar, where he expertly navigates the complex world of professional responsibility and legal ethics. In this role, he provides invaluable counsel to attorneys throughout the state of Florida, offering guidance on matters such as lawyer conduct, professional responsibility, and ethical dilemmas. His commitment to upholding the integrity of the legal profession is unparalleled, and his work greatly contributes to the reputation and trustworthiness of the legal community in Florida.

Before joining The Florida Bar, Jonathan's distinguished career included roles in both private practice and public sectors. He earned his Juris Doctor degree from a prestigious law school and subsequently passed the Florida Bar Exam, setting him on a path to become a well-respected figure in the legal community. His past experiences have given him a unique understanding of the legal system, enabling him to approach ethical issues with a balanced perspective.

In addition to his professional work, Jonathan is an active member of the legal community. He regularly participates in continuing legal education seminars, provides training to new lawyers on ethics, and contributes to scholarly articles on the topic. His dedication to improving the legal profession and upholding its ethical standards is evident in his work both in and out of the office. Jonathan Grabb's role as Ethics Counsel at The Florida Bar is not just a job, but a testament to his unwavering commitment to the principles of justice, fairness, and integrity.

Great Bio! It would be a
shame if it...

- Was factually inaccurate – I have not worked in the private sector
- Violated the Rules of Professional Conduct – It contains numerous improper characterizations of my legal skills, reputation, experience, and record
- Was fundamentally bland, redundant, and generic

Caveats

- I am not a computer scientist, nor am I a computer ethicist.
- My experience is regarding the Rules of Professional Conduct (Chapter 4 of the Rules Regulating The Florida Bar).
- I have not personally had the opportunity to use many of these programs, so much of my information is second-hand based on the sources I have researched.

Outline

- What is A.I. and How is it Being Used?
- Weaknesses of A.I. Programs in Law
- New Guidance and Ethical Uses for A.I. Programs
- Questions and Answers (or maybe just Questions?)



What is A.I. and How is it Used?

- **Artificial Intelligence** (A.I.) as defined by:
 - Britannica.com – “[T]he ability of a digital computer or computer-controlled robot to perform tasks commonly associated with intelligent beings.”
 - IBM uses a 2004 definition from John McCarthy – “It is the science and engineering of making intelligent machines, especially intelligent computer programs.”
 - What is artificial intelligence (AI)?, <https://www.ibm.com/topics/artificial-intelligence> (last visited September 8, 2023).

Weak A.I. and Strong A.I.



IBM further distinguishes between “Weak A.I.” and “Strong A.I.”:

- Weak A.I. –
 - “AI trained and focused to perform specific tasks.”
 - Virtually all current A.I. programs are “weak A.I.” Id.
- Strong A.I. – A.I. programs that equal or exceed human intelligence. Id.

Generative A.I.

- “Generative AI refers to deep-learning models that can take raw data... and ‘learn’ to generate statistically probable outputs when prompted.” Id.

Generative A.I. (cont.)

- Generative A.I. programs include, but are not limited to:
 - Chat programs such as:
 - ChatGPT
 - Microsoft's "new" Bing
 - Perplexity AI
 - Jasper
 - YouChat
 - Image programs such as:
 - MidJourney
 - Dall-E 2
 - Jasper Art

Large Language Models (LLMs)



- Includes ChatGPT and Microsoft Bing
- OpenAI “trained” its AI using 175 billion parameters
 - Tsedal Neeley, 8 Questions About Using AI Responsibly, Answered, Harv. Bus. Rev. (May 9, 2023), available at: <https://hbr.org/2023/05/8-questions-about-using-ai-responsibly-answered>.
- Frequently “self-learning,” which means that they continue to develop parameters based on user data and feedback (Id.)
- Generally impossible for even the developers to know how a response is generated or the supporting data behind that response (Id.)

Generative A.I. (cont.)

- Deepfake

- “[A]n image or recording that has been convincingly altered and manipulated to misrepresent someone as doing or saying something that was not actually done or said.”

- Merriam-Webster (Sept. 8, 2023), <https://www.merriam-webster.com/dictionary/deepfake>

Weaknesses of A.I. Programs in Law

- False Statements and the Duty of Candor
- Confidentiality of Information
- No Copyright Protection?
- Lawyers Ultimately Responsible

Rule 4-3.3 – Candor Toward the Tribunal

- Rule 4-3.3 of the Rules Regulating The Florida Bar
 - What is a tribunal?
 - Defined in the Preamble to Chapter 4, the Rules of Professional Conduct
 - Court
 - Arbitrator in binding arbitration
 - Legislative body, administrative agency, or other body acting in an adjudicative capacity with:
 - Neutral official,
 - Evidence OR legal argument presented, AND
 - Binding judgment affecting party's interests

Rule 4-3.3 – Candor Toward the Tribunal (cont.)

- Prohibits a lawyer from:
 - Making a false statement of fact OR law or failing to correct prior statements
 - Failing to disclose a material fact when necessary to avoid assisting in a crime or fraud by the client
 - Failing to disclose known adverse controlling authority not disclosed by opposing party
 - Offering false evidence, including that provided by a witness

A.I. “Hallucinations”

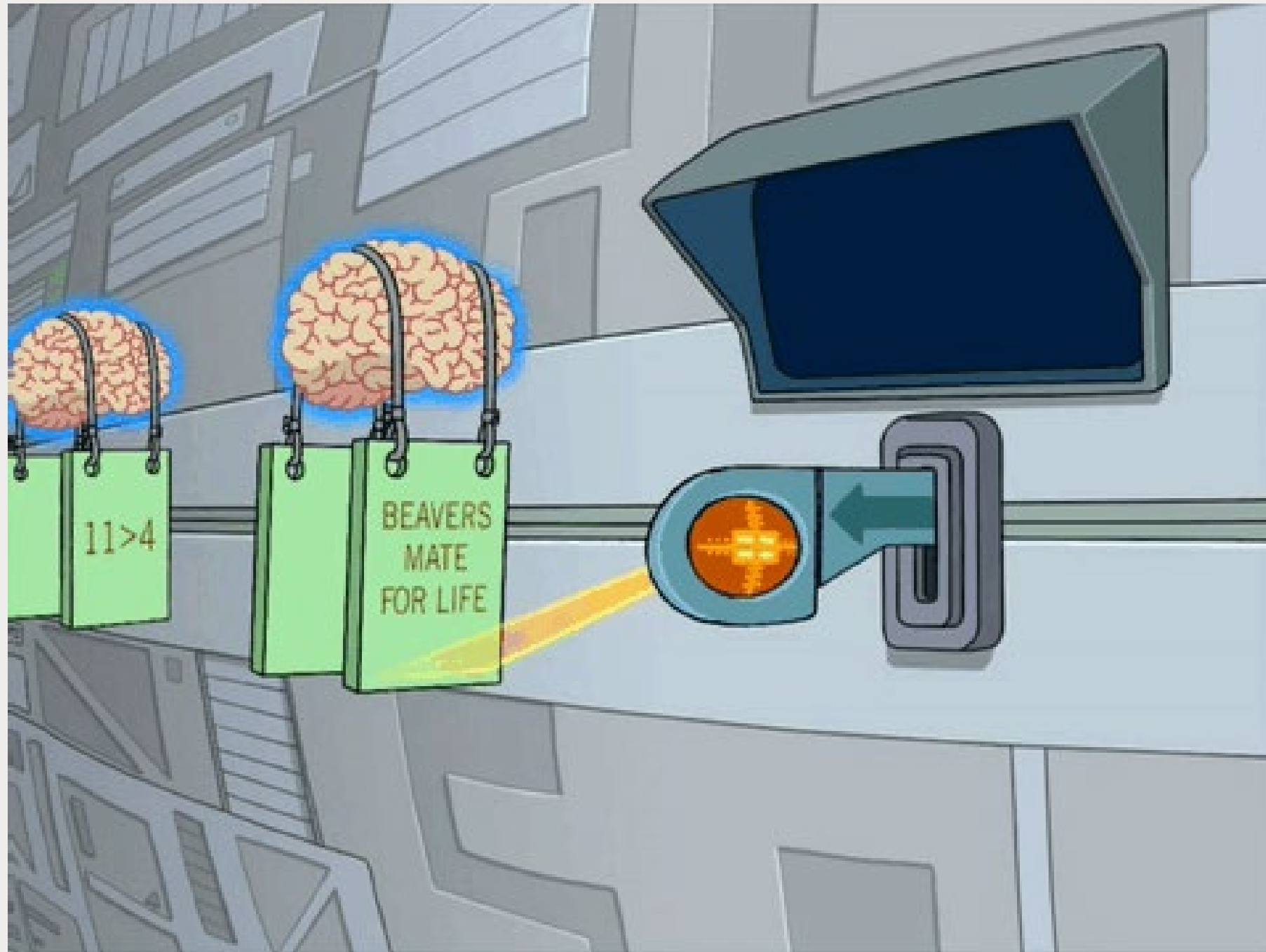


- A.I. programs have been known to have “hallucinations” where a response is created seemingly without any basis for support.
- Examples of A.I. Hallucinations:
 - Creating fake polling data when writing an article in the style of FiveThirtyEight
 - Amelia Thompson-DeVeaux and Curtis Yee, ChatGPT Thinks Americans Are Excited About AI. Most Are Not., (February 24, 2023, 6:00 AM EST), <https://fivethirtyeight.com/features/chatgpt-thinks-americans-are-excited-about-ai-most-are-not/>.
 - Mata v. Avianca, Inc., Case No. 22-cv-1461, 2023 WL 4114965 (S.D.N.Y. June 22, 2023)
 - People v. Zachariah C. Crabill, Case No. 23PDJ067 (Colo. Nov. 22, 2023).

A.I. “Hallucinations” (cont.)

- Google CEO Sundar Pichai: “[A]ll models have this as an issue.... I think we’ll make progress.”
- Sam Altman, CEO of OpenAI: “There is a balance between creativity and perfect accuracy.... And the model will need to learn when you want one or the other.”
- Altman also suggested that it may take approximately 2 years to “get the hallucination problem to a much, much better place[.]”
 - Catherine Thorbecke, AI tools make up things a lot, and that’s a huge problem, CNN (August 29, 2023, 2:35 PM EDT), <https://www.cnn.com/2023/08/29/tech/ai-chatbot-hallucinations/>

Garbage In, Garbage Out?



- Futurama: The Why of Fry (originally aired April 6, 2003). GIF created with Morbotron.com.

Mata v. Avianca, Inc.

- The “Varghese” case: 22-cv-1461 (S.D.N.Y. 2023)
- On March 1, 2023, Peter LoDuca of the firm Levidow, Levidow & Oberman, P.C., filed an “Affirmation in Opposition” that cited to authorities including: Varghese v. China Southern Airlines Co., Ltd., Shaboon v. Egyptair, Peterson v. Iran Air, Martinez v. Delta Airlines, Inc., Estate of Durden v. KLM Royal Dutch Airlines, Ehrlich v. American Airlines, Inc., Miller v. United Airlines, Inc., and In re Air Crash Disaster Near New Orleans, LA.
- After the Court and opposing counsel were unable to locate these decisions or the propositions for which they were cited, the Court directed Mr. LoDuca to provide an affidavit that annexed the full text of the purported opinions.
- Rather than provide the complete opinions, Mr. LoDuca responded that he was providing “only what is made available by online database [sic].” Mr. LoDuca did not identify the database.

Mata v. Avianca, Inc. (cont.)

- On May 5, 2023, the Court issued an Order to show cause directing Mr. LoDuca counsel to appear in person on June 8, 2023, and to address why he should not be sanctioned for “citing non-existent cases to the Court in his Affirmation in Opposition” and “copies of non-existent judicial opinions[.]”
- It was then discovered that Steven A. Schwartz had effectively ghost-written the pleadings for Mr. LoDuca and relied entirely on ChatGPT for his research.
- The Court issued a 34-page opinion and order sanctioning Steven A. Schwartz, Peter LoDuca, and the firm Levidow, Levidow & Oberman, P.C. [“Respondents”].
- “[Respondents] abandoned their responsibilities when they submitted non-existent judicial opinions with fake quotes and citations created by the artificial intelligence tool ChatGPT, then continued to stand by the fake opinions after judicial orders called their existence into question.”

Mata v. Avianca, Inc. (cont.)

- Some of the Respondents' mistakes:
 - The case was originally filed by Steven A. Schwartz in state court. Following the case's removal from state court to the Southern District of New York, Peter LoDuca filed an appearance in the matter as Mr. Schwartz was not licensed to practice before the S.D.N.Y.
 - Mr. Schwartz continued to provide all the substantive legal work while Mr. LoDuca filed the documents and affirmed their accuracy despite not making a cursory review of the documents, including his own affidavit.
 - Ultimately, Respondents pleadings included multiple citations to cases that either did not exist or did not support the proposition for which they were cited.
 - In addition, Mr. LoDuca sought an extension of time by falsely stating that he was out of the office on vacation. In reality, this was to hide Mr. Schwartz's role in the litigation when he, was on vacation, not Mr. LoDuca.

Mata v. Avianca, Inc. (cont.)

- Significant quotes from the Court's June 22, 2023 opinion:
 - “Technological advances are commonplace and there is nothing inherently improper about using a reliable artificial intelligence tool for assistance.”
 - “As it was later revealed, Mr. Schwartz had used ChatGPT, which fabricated the cited cases. Mr. Schwartz testified at the sanctions hearing that when he reviewed the reply memo, he was ‘operating under the false perception that this website [ChapGPT] could not possibly be fabricating cases on its own.’ ‘My reaction was, ChatGPT is finding that case somewhere. Maybe it’s unpublished. Maybe it was appealed. Maybe access is difficult to get. I just never thought it could be made up.’”
 - “Indeed, at the sanctions hearing, Mr. Schwartz testified that he thought a citation in the form of ‘F.3d’ meant ‘federal district, third department.’”

Mata v. Avianca, Inc. (cont.)

- The Court found that both Mr. Schwartz and Mr. LoDuca acted in bad faith.
- In its order, the Court cites to Rule 3.3(a)(1) of the New York Rules of Professional Conduct:
 - “A lawyer shall not knowingly make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer....”
- The Court’s sanctions were imposed on both Mr. LoDuca and Mr. Schwartz even though Mr. Schwartz did not appear in the case and was not admitted to practice before the S.D.N.Y.

Lessons from Mata v. Avianca

- The coverup is often worse than the original act.
 - While they may have received sanctions for using the fake citations regardless, the Court found that Respondents had engaged in bad faith due to their actions following their March 1, 2023, Affirmation in Opposition.
 - The Court explicitly notes that Respondents never withdrew the March 1 Affirmation in Opposition even after they acknowledged that the citations did not exist.
- ChatGPT is primarily based on a predictive text system, which means that its responses are built to mimic common human answers, not provide accurate information. As such, ChatGPT may fabricate answers to satisfy users.

Lessons Not Learned

- People v. Zachariah C. Crabill, Case No. 23PDJ067 (Colo. Nov. 22, 2023).
 - Crabill had never previously drafted a motion and relied on false case law provided by ChatGPT without checking the citations' accuracy.
 - Crabill discovered the false citations prior to hearing, but did not notify the court or withdraw the motion. Instead, Crabill blamed a legal intern before admitting his use of ChatGPT in an affidavit filed six days later.
 - Crabill's conduct resulted in a 90-day suspension of Crabill's license to practice law.
- In December 2023, disbarred New York lawyer Michael Cohen provided his lawyer, David M. Schwartz, fake citations from Google Bard. Schwartz, in turn, provided these to the court on Cohen's behalf only to discover they were false.
 - Michael Cohen say he unwittingly sent AI-generated fake legal cases to his attorney, NPR (December 30, 2023), <https://www.npr.org/2023/12/30/1222273745/michael-cohen-ai-fake-legal-cases>.

Rule 4-1.6 – Confidentiality



- Covers all information learned in representation, not just privilege
- Prohibits voluntary disclosure absent an exception
- Most common exceptions for disclosure:
 - Client provides informed consent
 - Disclosure serves the client's interests and the client does not specifically prohibit disclosure

Relevant Ethics Opinions for Confidentiality

- Ethics Opinion 12-3: Permits a lawyer to use cloud computing resources provided that the lawyer takes reasonable precautions to ensure that client confidentiality is protected and that the provider maintains adequate security and access.
- Ethics Opinion 07-2: A lawyer may use overseas paralegal services provided that the lawyer adequately addresses concerns regarding UPL, supervision of nonlawyers, conflicts of interest, and billing.
- Ethics Opinion 10-2: When using electronic storage media including printers and scanners, a lawyer must take reasonable steps to ensure that client confidentiality is maintained by sanitizing machines prior to disposition.
- Ethics Opinion 06-2: Lawyers must ensure the confidentiality of client information when sending electronic documents, including metadata.

What does this mean for Generative A.I.?

- As previously noted, some generative A.I. programs are “self-learning.”
- When asked, ChatGPT responded that it is not “self-learning” but OpenAI “does use a technique called Reinforcement Learning from Human Feedback (RLHF) to improve the model” and “uses RLHF to iteratively improve the model.”
- ChatGPT states that it “does not store or have access to personal data unless explicitly provided for the purpose of the conversation” and doesn’t “remember or keep track of personal data between conversations.”
- ChatGPT also acknowledges that “OpenAI retains customer API [Application Programming Interface] data for a duration of 30 days.”

What does this mean for Generative A.I.? (cont.)

- Can we trust ChatGPT when it states that it doesn't retain data?
 - Previously, when asked for OpenAI's privacy policy, ChatGPT responds that its training was "cutoff in September 2021" but "retains personal data provided during interactions for 30 days" and "does not use the personal data sent via the API to improve its models."
 - When asked on December 6, 2023, ChatGPT did not provide OpenAI's privacy policy and instead deferred to the company's official website.

What does this mean for Generative A.I.? (cont.)

- According to OpenAI's website, ChatGPT suffered an outage on March 20, 2023. (<https://openai.com/blog/march-20-chatgpt-outage>, last visited Dec. 6, 2023).
- “[W]e also discovered that the same bug may have caused the unintentional visibility of payment-related information of 1.2% of the ChatGPT Plus subscribers who were active during a specific nine-hour window. In the hours before we took ChatGPT offline on Monday, it was possible for some users to see another active user’s first and last name, email address, payment address, credit card type and the last four digits (only) of a credit card number, and credit card expiration date. Full credit card numbers were not exposed at any time.”

Printing Service Data Policies

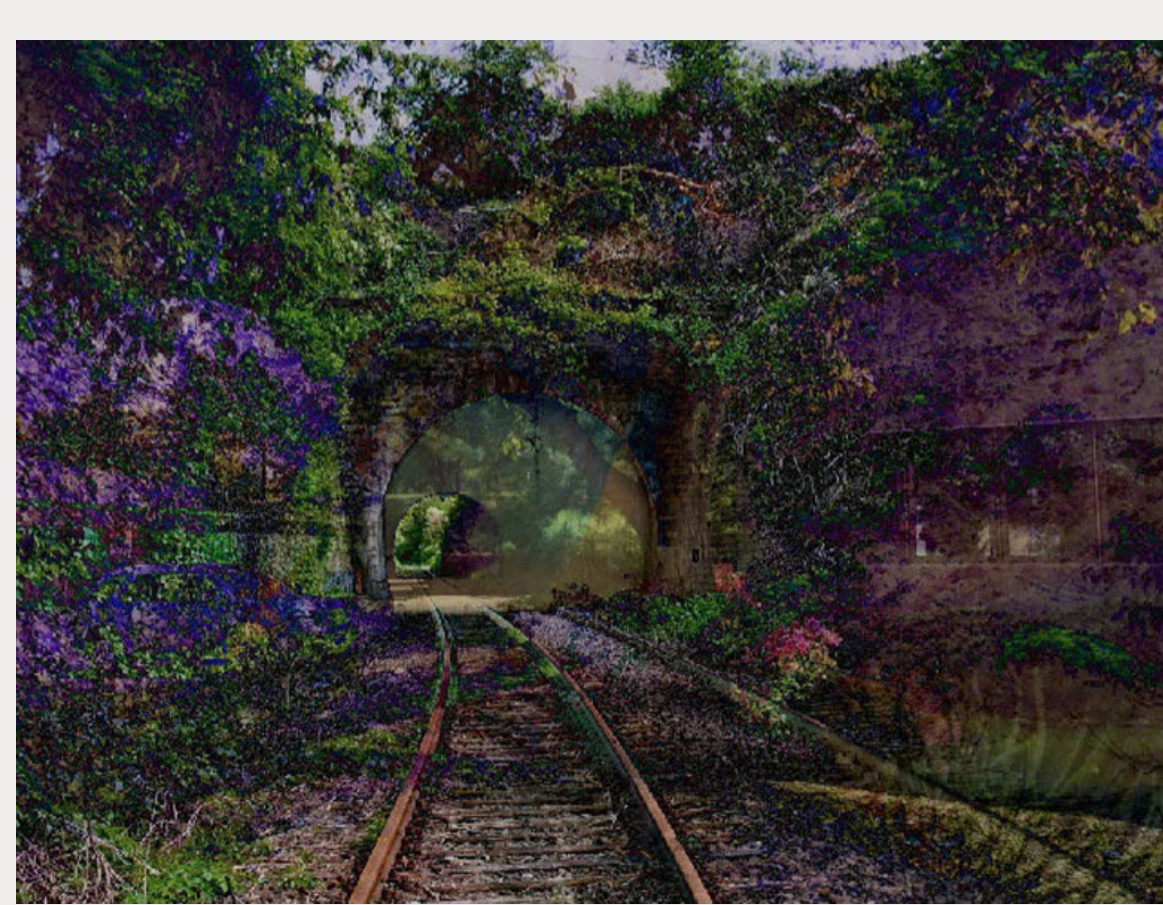
SOURCE: Tatum Hunter, Your printing service might read your documents. Here's what to know. Washington Post (July 10, 2023).

Provider	Doc Content?	Metadata?	Marketing?	Sharing?
HP	Some?	No?	No?	No?
Canon	Yes	Yes	Yes	Maybe?
FedEx	Yes	Maybe?	Yes	Maybe?
UPS	Yes	Maybe?	If consent	Maybe?
Staples	Yes	Maybe?	Yes	Maybe?
PrintWithMe	24 Hours	No?	No?	Maybe?
Libraries	Maybe?	Maybe?	No?	No?

A.I. and Copyright: You Don't Own Me

- At present, AI generated images are not subject to copyright protections due to the lack of an “author,” and inventions are not subject to patent protections due to the lack of an “inventor.”
- Thaler v. Perlmutter, Case No. 22-cv-1564, 2023 WL 5333236 (U.S.D.C. August 18, 2023).
- Thaler v. Vidal, 43 F.4th 1207, 1209 (Fed. Cir. 2022).

Thaler v. Perlmutter



- Stephen Thaler created an A.I. program that he refers to as the “Creativity Machine” and used the program to generate an image he titled “A Recent Entrance to Paradise.”
- Thaler filed the image with the U.S. Copyright Office and listed the Creativity Machine as the author pursuant to Thaler’s “work-for-hire” arrangement with the Creativity Machine as its owner.
- The Copyright Office denied copyright protections due to the “lack [of] human authorship” on August 12, 2019.

Thaler v. Perlmutter (cont.)

- Thaler sought reconsideration (twice) of the denial and again stated that the image “was autonomously generated by AI[.]”
- Thaler’s requests for reconsideration resulted in the Copyright Office affirming its prior decision denying copyright protections.
- Thaler subsequently sued pursuant to the Administrative Procedure Act, bringing the matter before the U.S. District Court for the District of Columbia.

Thaler v. Perlmutter (cont.)

- Facing cross motions for summary judgment, the Court affirmed the Copyright Office's decision denying Thaler's copyright registration "for a work created absent any human involvement."
- In its opinion, the Court notes that its review is limited solely to the evidence in the administrative record. During the appeal, Thaler appeared to have changed his tune, suggesting that the products of the Creativity Machine were partially the result of his own human input.
- **Favorite Quote:** "The issue of whether non-human sentient beings may be covered by "person" in the Copyright Act is only 'fun conjecture for academics' Nonetheless, delving into this debate is an unnecessary detour since '[t]he day sentient refugees from some intergalactic war arrive on Earth... copyright law will be the least of our problems.'"
 - Id., citing Justin Hughes, Restating Copyright Law's Originality Requirement, 44 Columbia J.L. & Arts 383, 408-09 (2021).

Thaler v. Perlmutter (cont.)



- Is Thaler v. Perlmutter the end of this question?
 - Similar debates occurred in the early years of photography, as the images were the product of a “mechanical device that merely reproduced an image of what is in front of the device[.]” Id.
 - With sufficient human input, should A.I. generated images, text, and inventions be protected?
 - Thaler is seeking an appeal of Thaler v. Perlmutter, but the US SC denied Thaler’s petition for writ of certiorari in Thaler v. Vidal.

Thaler v. Perlmutter (cont.)

- In the article, Who Holds the Copyright of Output Generated by Artificial Intelligence (Los Angeles Lawyer, May 2023), Drew Wilson argues that A.I. creations where the human contribution is more than “de minimus” should be considered the property of the person who provided the input.
 - Available at: <https://lalawyer.mydigitalpublication.com/july-august-2023?m=69194&i=793061&p=16&ver=html5>
- Wilson goes on to argue that Haikus are protected despite limited text, as are video game images that are produced through the game’s coding even though they are also the result of input from the person playing the game.
- “No reasonable person would contend that Microsoft has the copyright to this article simply because I wrote it on Microsoft Word.” Id.

Copyright Violations by A.I.

- Various artists and authors have sued OpenAI, Meta, Stability AI, Midjourney, and DeviantArt for copyright violations.
 - Erik Sherman, Copyright Law and Generative AI: What a mess, ABA Journal (August 30, 2023), <https://www.abajournal.com/web/article/copyright-generative-ai-what-a-mess>.
- In essence, these parties allege that the use of their creations in the A.I. programs' "training materials" lead the A.I. programs to generate text and images that violate their intellectual property rights.
- Conversely, the defendants are likely to argue that any creations are derivative works and do not infringe on the rights of those whose work was used for input.
- What if the user asks a program to generate an image "...in the style of Bill Watterson's Calvin and Hobbes"?

Rule 4-5.3 – Responsibilities

Regarding Nonlawyer Assistants

- (c): Nonlawyers may perform certain duties delegated to them by a lawyer without the presence or involvement of the lawyer, but the lawyer must review their work and is *ultimately responsible* for their work product.

Florida Ethics Opinion 87-11

(Reconsideration)

- “[A] lawyer may permit a nonlawyer employee to affix the lawyer’s electronic signature.... The committee cautions that... the lawyer must ‘review and be responsible for the work product’ as required by Rule 4-5.3(c).”
- “The committee’s conclusion in Florida Ethics Opinion 87-11, that generally a nonlawyer may not sign pleadings, otherwise remains unchanged.”

Other Relevant Ethics Opinions

- EO 70-62: Nonlawyer staff may only be delegated mechanical, clerical, or administrative duties, and cannot perform any function requiring a lawyer's personal judgment and/or participation.
- EO 73-41: Nonlawyer staff may not take depositions for a law firm nor may they engage in the practice of law even though they may have graduated from a law school.
- EO 74-35: Nonlawyer law firm employees (not independent public adjusters) cannot ethically be delegated the responsibility of negotiating insurance claims.

Lawyers' Responsibility:

Rules 4-5.1 and 4-5.2

- Rule 4-5.1:

- (a) Partners and managers with comparable authority must make reasonable efforts to assure that other lawyers in the firm comply with the ROPC.
- (b) Must make reasonable efforts to assure subordinates comply with ROPC.
- (c) Addresses potential responsibility for conduct of subordinates.

- Rule 4-5.2:

- (a) Bound by the ROPC even if acting at the direction of another lawyer.

New Guidance and Ethical Uses for A.I.

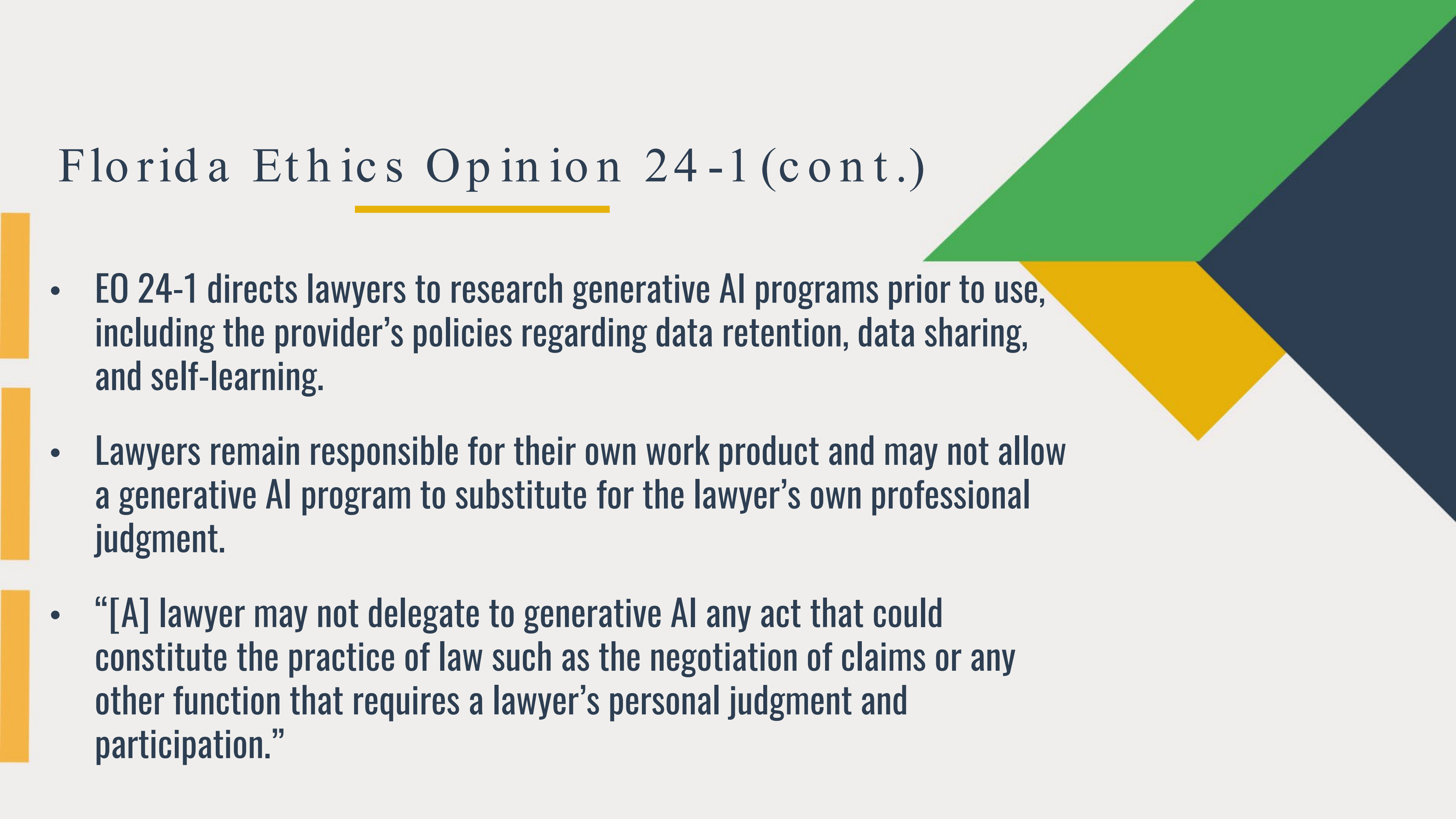
- Florida Ethics Opinion 24-1
- Contract and Discovery Analysis
- Research and Drafting Assistance

Florida Ethics Opinion 24-1



- Published January 19, 2024, EO 24-1 provides guidance regarding when and how a lawyer may ethically use generative AI.
(<https://www.floridabar.org/etopinions/opinion-24-1/>)
- EO 24-1 appears to be the first ethical guidance of its kind in the United States.
- While it acknowledges that generative AI is still in its infancy, EO 24-1 permits the use of generative AI provided that lawyers:
 - Protect the confidentiality of client information;
 - Only provide accurate and competent services;
 - Do not engage in improper billing practices; and
 - Comply with applicable restrictions on legal advertising.

Florida Ethics Opinion 24-1 (cont.)



- EO 24-1 directs lawyers to research generative AI programs prior to use, including the provider's policies regarding data retention, data sharing, and self-learning.
- Lawyers remain responsible for their own work product and may not allow a generative AI program to substitute for the lawyer's own professional judgment.
- “[A] lawyer may not delegate to generative AI any act that could constitute the practice of law such as the negotiation of claims or any other function that requires a lawyer's personal judgment and participation.”

Contract and Discovery Analysis

- Some of the most likely uses for A.I. programs:
 - Document review;
 - Information aggregation; and
 - Summarization.
- LawGeex: An A.I. program developed for the legal community that purports “read[], review[], and understand[] your contracts” followed by a “plain English report” to help you understand what you are signing.
 - Christine Bilbrey, Artificial Intelligence and the Practice of Law, The Florida Bar News (January 15, 2017), <https://www.floridabar.org/the-florida-bar-news/artificial-intelligence-and-the-practice-of-law/>.
- Logikcull: “[A] suite of AI features and ChatGPT integrations that aim to reduce the time spent on discovery by up to 90 percent.”
 - Laura Lorek, How Lawyers can take advantage of ChatGPT and other large language models disrupting the legal industry, ABA Journal (May 11, 2023, 3:26 PM), <https://www.americanbar.org/groups/journal/articles/2023/how-lawyers-can-take-advantageof-chatgpt-and-other-large-language-models-disrupting-the-legal-industry/>.

Research & Drafting Assistance

- While lawyers should be careful regarding their own use of A.I. programs and by their staff, some resources may help lawyers save time in their research and drafting.
- Possible Options?
 - **Harvey AI** – an AI program built by Allen & Overy using OpenAI's GPT system.
 - How Lawyers can take advantage of ChatGPT..., supra.
 - BUT SEE *Ross Intelligence* – an AI program developed from IBM's "Watson" but shut down in January 2021 amidst ongoing litigation.

But Beware ...

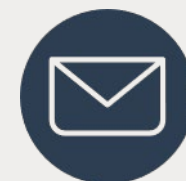
- Not everyone is on board with AI and some law schools are restricting its use.
- The University of Michigan Law School is now asking applicants to certify that they did not use AI technology for essay drafting purposes.
 - Stephanie Francis Ward, If law schools prohibit ChatGPT in writing, can they back it up? ABA Journal (August 31, 2023, 10:32 AM CDT), <https://www.abajournal.com/web/article/law-schools-may-try-to-prohibit-ai-technology-in-writing-but-enforcement-would-likely-be-difficult>.

The Debate Will Go On

- The Florida Bar formed the “**Special Committee on AI Tools & Resources**” to make recommendations to the Board of Governors.
- The ABA has also formed the “**ABA Task Force on Law and Artificial Intelligence**” “to examine the impact of AI on law practice and the ethical implications for lawyers.”
- If enacted, Florida HB 1459 will create the “Government Technology Modernization Council” to study generative AI and to make recommendations regarding regulatory standards, potential uses, potential dangers, and educational standards.



Thank You! Questions?



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