



ELA sources and references

Checked 1-2 October 2026

Confidential, for the founders

What this is

Every fact in our materials that came from research rather than from Jon or Stevan, with the source behind it, so anyone can spot-check it. Figures that came from the founders are listed at the end (section 7) so nobody mistakes them for sourced facts.

How to read the tables

- **Where it appears.** Plan: the business plan draft of 2 October, by section (s1 to s9). Its Word comments, and the referral-commission point, are only in the Jon edition (ELA-business-plan-draft-2026-10-02-jon.docx). Teaser: the one-page teaser of 2 October. Briefing: Stevan's briefing page, by section. Outreach: the launch outreach list.
- **Checked.** "2 Oct 2026" means the source was opened again today and the quote read at source. "1 Oct" or "30 Sep" means it was checked then and not reopened today. "Derived" means our own arithmetic on sourced inputs. "Partly" means the source supports a narrower claim than our wording.
- **Link status.** The result of a plain automated request (curl with a browser user agent, following redirects) between 09:15 and 09:35 UTC on 2 October. 200 means the page loaded. 403 means the site blocks automated requests; it normally opens in a browser. Where a site served a bot check, the content was read through the Wayback Machine or a headless browser.

What the checks found

Of 43 items, 30 are confirmed at source (27 of them re-opened on 2 October) and 4 more are our arithmetic that checks out; 1 negative finding is not contradicted; 7 are only partly supported and 1 is not confirmed. The Odeh and Legal Cover facts hold, and the 2025 promotion is the TikTok video of 22 May 2025 (P3).

Fix before anything goes out

- **Outreach list and briefing (P4).** He never says "Sign up for Legal Cover now!"; he says "Sign up to Legal Cover. The link is in my bio." And "promotes" should be "promoted ... in May 2025": we found one video, and his bio now links to MIO.
- **Plan SWOT (C13).** "Consulates are not routinely told of arrests" widens a US-only statement. Say the US says UAE authorities don't routinely tell it of US citizens' arrests.
- **Plan s8 note (C14).** LegalShield's "over 4.5 million" counts the whole company, identity-theft plans and Canada included. Reword or drop it.
- **Plan s8, Who advises (L3).** Licensed legal consultants may advise too (Art. 69), not only lawyers.
- **Plan s8 table (C3).** Legal Cover's targets are 24-hour, eight-hour, priority or same-working-day, by plan.
- **Plan s8 comment (L4).** The Central Bank point is now checked: Art. 61(1)(h) read with (j). Drop "not yet checked at source".
- **Outreach list (P9, P11).** The quoted Odeh video title was not re-found. The Lyra link to /crisis-resources/ is the wrong page.

Weaker sources, worth knowing

- The "no product in the Gulf" line is a negative search result, thin in Arabic (C1).
- International SOS's referral wording is from an old copy on a US university site (C11).
- "Amex 2022 terms": the PDF is undated; 2022 comes from its file data (C9).

Links

- No broken links. Four sites block automated requests with a 403: the US State Department, LegalShield, Clutch and the Central Bank's web pages (its PDFs load). Wayback copies stand in where needed. MIO's site serves automated requests a bot check but opens in a browser.

1 People and partners

Ahmed Odeh, MIO & Partners and Legal Cover, and Lyra Wellbeing. Wording rule: Legal Cover's terms name MIO & Partners as a partner firm, and Odeh promoted Legal Cover. Nothing found says MIO owns or backs Legal Cover, and our materials must not imply it.

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
P1	"about 420K TikTok followers" Research report: "about 422K".	Outreach , Ahmed Odeh Briefing , Launch outreach	TikTok , Ahmed Odeh (@lawbyodeh) profile https://www.tiktok.com/@lawbyodeh	Profile data: 422,327 followers on 2 Oct (422,285 on 1 Oct); 357 videos. Bio: "Lawyer / Educator" Bio link: "www.miopartners.ae"	Confirmed 2 Oct 2026	200 (counts are in the page data)
P2	"MIO & Partners, where Ahmed Odeh is Managing Partner" Also "his firm, MIO & Partners"; "Dubai lawyer who oversees MIO & Partners".	Plan s4, legal content creators (text and comment); s8 source note Outreach , Ahmed Odeh Briefing , Launch outreach	MIO & Partners , team page: Ahmed Odeh https://www.miopartners.ae/team/ahmed-odeh/ Wayback copy, 3 Jan 2026: https://web.archive.org/web/20260103084806/https://www.miopartners.ae/team/ahmed-odeh/	"Ahmed Odeh MANAGING PARTNER" "As owner and Chief Executive Officer, much of Ahmed's work involves engaging with his team to ensure results are being delivered to the clients." Footer: "Abu Baker Salem Advocates and Legal Consultants LLC" Note: Read live through a headless browser, and in the Wayback copy.	Confirmed 2 Oct 2026	200, but automated requests get a bot-check page ("One moment, please..."); opens in a browser 200 (Wayback)
P3	"he promoted Legal Cover in 2025" Comment: "He promoted Legal Cover on TikTok in May 2025." Outreach: "His Legal Cover promo on TikTok dates from 22 May 2025."	Plan s4, legal content creators (text and comment) Outreach , Ahmed Odeh	TikTok , video by @lawbyodeh https://www.tiktok.com/@lawbyodeh/video/7507308994151648530 TikTok oEmbed record (author and caption): https://www.tiktok.com/oembed?url=https://www.tiktok.com/@lawbyodeh/video/7507308994151648530	Author: "Ahmed Odeh", handle lawbyodeh. Posted 22 May 2025, 16:33 UTC (page data; the video ID decodes to the same time). 24,500 plays. Caption: "Legal Cover makes expert legal support affordable, fast, and easy to access. Visit legalcover.ae to claim a free consultation now." Auto-captions: "So what are you waiting for? Sign up to Legal Cover. The link is in my bio." Note: This is the 2025 promotion. It was the only Legal Cover video found; his 357 videos were not all checked.	Confirmed 2 Oct 2026	200 200 (JSON)
P4	"promotes Legal Cover (legalcover.ae) on TikTok ("Sign up for Legal Cover now!")" Briefing: "He promotes Legal Cover".	Outreach , Ahmed Odeh: Watch out Briefing , Launch outreach	TikTok , video by @lawbyodeh (as P3) https://www.tiktok.com/@lawbyodeh/video/7507308994151648530 TikTok https://www.tiktok.com/@lawbyodeh	He says "Sign up to Legal Cover. The link is in my bio." The words "Sign up for Legal Cover now!" appear in no caption or transcript. His bio links to "www.miopartners.ae", not Legal Cover. Note: Use his actual words, and the past tense: "promoted Legal Cover on TikTok in May 2025".	Not confirmed 2 Oct 2026	200 200
P5	"Legal Cover's terms name his firm, MIO & Partners, as a partner firm" Comment: its legal work is provided through partners "including MIO & Partners" (terms updated 24 August 2026).	Plan s4 (text and comment); s8 source note Outreach , Ahmed Odeh Briefing , Competitor scan and Launch outreach	Legal Cover , Terms & Conditions https://legalcover.ae/terms-and-conditions/	"Legal services and legal work are provided through Legal Cover's network of legal partners, including MIO & Partners and other qualified legal professionals and firms, as applicable ("Partner Firms")." "Last updated: 24/08/2026." Operator: "a trading name of ALRABT ALDHKY MARKETING SERVICES VIA SOCIAL MEDIA CO. L.L.C" Note: The terms say partner firm, nothing more. Nothing found says MIO owns or backs Legal Cover.	Confirmed 2 Oct 2026	200

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
P6	<i>"Legal Cover's LinkedIn gives its address as Office 704, Crystal Tower, Business Bay, one of MIO's two Dubai office units."</i> Briefing: "Legal Cover gives one of MIO's Business Bay office units as its address".	Outreach, Ahmed Odeh Briefing, Launch outreach	LinkedIn , company page: Legal Cover UAE https://www.linkedin.com/company/legal-cover-uae	Locations, primary: "Crystal tower, M Hotel Downtown, Business Bay Office No. 704 Dubai, Dubai, AE" "Founded 2024"; 290 followers.	Confirmed 2 Oct 2026	200 (public page; a browser may ask you to sign in)
P7	MIO's office units: "offices in Business Bay, Dubai and in Abu Dhabi"; Office 704 is "one of MIO's two Dubai office units"	Outreach, Ahmed Odeh Briefing, Launch outreach	MIO & Partners , home page and criminal practice page https://www.miopartners.ae/ Wayback copy, 3 Jan 2026: https://web.archive.org/web/20260103085105/https://www.miopartners.ae/ LinkedIn , company page: MIO & Partners https://www.linkedin.com/company/mio-and-partners	Live site: "Dubai Office Office No. 603 & 704, Crystal Tower, Business Bay, Dubai, UAE." Wayback: "Office No. 603 and 704, Crystal Tower, Business Bay, Dubai" LinkedIn: "Crystal Tower, M Hotel Downtown, Business Bay Office No. 603"; Abu Dhabi: Al Fardan Tower (LinkedIn), Darwish Bin Ahmed & Sons Building (site). Note: The live site was read through a headless browser.	Confirmed 2 Oct 2026	200, but automated requests get a bot-check page ("One moment, please..."); opens in a browser 200 (Wayback) 200 (public page; a browser may ask you to sign in)
P8	<i>"MIO already does police-station work, so an arrest add-on could come quickly (the scan's inference)."</i>	Briefing, Competitor scan	MIO & Partners , criminal practice page https://www.miopartners.ae/expertise/criminal/	"Representation before police authorities, prosecutors, and courts" Note: The practice is confirmed; the add-on is our inference, labelled as such.	Confirmed 2 Oct 2026	200, but automated requests get a bot-check page ("One moment, please..."); opens in a browser
P9	<i>"Posts short UAE-law explainers ("Can you get a lawyer for free in the UAE?"). Also on YouTube as @lawbyodeh."</i>	Outreach, Ahmed Odeh	TikTok https://www.tiktok.com/@lawbyodeh YouTube https://www.youtube.com/@lawbyodeh/about	Bio: "Lawyer Educator"; 357 videos. The YouTube channel exists (239 subscribers on 1 Oct). Note: The quoted video title came from a search listing on 30 Sep. No URL was kept, and it was not re-found.	Partly 2 Oct 2026	200 200 (redirects to a consent page)

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
P10	"Lyra Wellbeing (Lyra Health MENA, formerly ICAS MENA)", an "employee assistance programme (EAP) provider with its regional office in Dubai". Plan: "First target: Lyra Health MENA."	Plan s4, partner channels Outreach , Lyra Wellbeing Briefing , Launch outreach	Lyra Wellbeing , home page ("Lyra Health MENA") https://lyrawellbeing.ae/ Lyra Wellbeing https://lyrawellbeing.ae/faqs/ PR Newswire , Lyra Health acquires ICAS World, 19 Jan 2022 https://www.prnewswire.com/news-releases/lyra-health-acquires-icas-world-to-expand-its-mental-health-care-services-globally-301463635.html	"Our regional office is located in Dubai, UAE." "ICAS (the former name for the Lyra Wellbeing EAP) was established in 1987 and our MENA operations were set up in 2010." "Lyra Health ... today announced it has acquired ICAS World, a global employee assistance program provider" Note: The site calls ICAS the EAP's former name; it does not use "ICAS MENA".	Confirmed 2 Oct 2026	200 200 200
P11	"Offers 24/7 critical-incident management for employers, with counselling in Arabic, English, Hindi, Urdu and French." Briefing: "24/7 crisis support for employers".	Outreach , Lyra Wellbeing Briefing , Launch outreach	Lyra Wellbeing , Our services https://lyrawellbeing.ae/our-services/ Lyra Wellbeing , Crisis management https://lyrawellbeing.ae/our-services-crisis-management/ Lyra Wellbeing , Crisis resources (linked from the outreach list) https://lyrawellbeing.ae/crisis-resources/	"Telephonic counselling available in Arabic, English, Hindi, Urdu and French." "Your employees have 24 hour access to a team of clinical experts, seven days a week." "Critical Incident Stress De-Briefing (CISD)" Note: "24/7 critical-incident management" is our paraphrase. The outreach list links /crisis-resources/, a page on coping with conflict; the claim is on the crisis management page.	Confirmed 2 Oct 2026	200 200 200

2 Competitors

Each row of the plan's competitor table (section 8) and the briefing page's competitor scan.

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
C1	"Our scan found no product in the UAE or the Gulf where one button sends for a lawyer, the consulate and family. Today people pay a firm per case."	Plan s8, introduction Teaser , side panel Briefing , Competitor scan	ELA competitor scan, 1 Oct 2026 (research/competitors.md): seven research agents. A negative finding, so no single page proves it.	Scan: no prepaid membership where one button alerts a lawyer, the consulate and a trusted contact in the UAE, Saudi Arabia, Qatar, Kuwait, Bahrain or Oman. 2 Oct: six more searches, two in Arabic, found nothing that contradicts it. Nearest: Lawyers.bh (a lawyer only), Saudi consultation apps (Ayas, Tashawr, Shwra) and police SOS apps. Note: Searches were mostly in English and thin in Arabic, as the plan's and teaser's comments say. Worth a native-speaker check.	Not contradicted 2 Oct 2026	Not applicable
C2	"Legal-advice subscription from AED 95 a month. Markets "police matters" but sells advice calls" Briefing: "AED 95 to 399 a month". Outreach: "covering employment, rental, family and "police matters", with "Legal SOS support".	Plan s8, competitor table Briefing , Competitor scan Outreach , Ahmed Odeh	Legal Cover , home page https://legalcover.ae/ Legal Cover , personal plans https://legalcover.ae/personal-plans/	"Employment issues / Rental disputes / Custody and divorce / Debt and loan issues / Police matters / Agreement reviews" "Legal SOS support: When an urgent dispute, police matter, or contract problem appears, Legal Cover provides a clear route to request legal support." "From AED 95/month" Plans: Lite AED 95 a month ("Limited time"), Essential 299, Premium 399; annual AED 999 to 3,960. Note: AED 95 is a limited-time Lite price; the prices sit in the page's script data.	Confirmed 2 Oct 2026	200 200

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
C3	"with response targets from the same working day to 24 hours"	Plan s8, competitor table	Legal Cover , home page and FAQ https://legalcover.ae/	"Response targets vary by plan, including 24-hour, eight-hour, priority, and same-working-day options." Premium plan: "Guaranteed lawyer booking within the same working day" Note: Loose: "same working day" is a lawyer-booking promise, and there is an eight-hour option. Safer: "response targets of 24 hours, eight hours or the same working day, by plan".	Partly 2 Oct 2026	200
C4	"No app and no court representation." Briefing: "Office-hours advice calls, no court work, no app."	Plan s8, competitor table Briefing , Competitor scan	Legal Cover , Terms & Conditions https://legalcover.ae/terms-and-conditions/ Legal Cover , contact page https://legalcover.ae/contact/ Apple App Store and Google Play , searches in the UAE store fronts, 2 Oct.	"Legal Cover does not provide court representation or advocacy services." "Working hours Monday to Friday 9:00 AM to 6:00 PM UAE time" No Legal Cover UAE app in either store. "Legal Cover Plus" on Google Play belongs to an unrelated South African firm. Note: "No app" rests on not finding one.	Confirmed 2 Oct 2026	200 200 Not applicable
C5	Lawyers.bh Legal SOS (Bahrain): "An SOS page that sends the nearest advocate within minutes, around the clock. Pay per incident: BHD 150 for an arrest." Briefing: "Bahrain's Lawyers.bh "Legal SOS", at BHD 150 a call-out."	Plan s8, competitor table; SWOT threats ("like Bahrain's") Briefing , Competitor scan	Lawyers.bh https://www.lawyers.bh/en/sos Lawyers.bh https://www.lawyers.bh/en/about	"We connect you to the nearest advocate in Bahrain within minutes. Available 24/7." "Arrest, Detention & Investigations ... 150 BHD Initial Response Fee" About: "an online brokerage platform ... It is not a law firm" Note: It "connects" rather than sends, and BHD 150 is an initial response fee, which may not be the full cost.	Confirmed 2 Oct 2026	200 200
C6	Dubai law firms with 24/7 arrest lines: "Call after an arrest. Some promise a response within 30 minutes and attend the police station. Fees set per case."	Plan s8, competitor table Briefing , Partner or competitor (Al Arabi, Ittihad)	Al Arabi Legal Consultancy , alarabi.law: Criminal law https://www.alarabi.law/en/services/criminal-law Ittihad Legal Consultants , ittihadlegalconsultants.com: Lawyers in Dubai https://ittihadlegalconsultants.com/lawyers-in-dubai/	Al Arabi: "Available 24/7 for Emergency" "our team responds in under 30 minutes, attends the station with you" Ittihad: "Arrested or summoned? We attend Dubai Police stations 24/7." "Court representation typically ranges from AED 5,000–50,000" Note: Both are legal consultancies; Al Arabi says its "partner's licensed criminal lawyers" handle court work. Ittihad's range is for court work in general.	Confirmed 2 Oct 2026	200 200
C7	Phone SOS (Apple, Android): "Free. Calls emergency services and alerts the member's emergency contacts with their location." Briefing: "Phones already have SOS buttons, which call the police."	Plan s8, competitor table Briefing , Competitor scan	Apple Support , iPhone User Guide: contact emergency services https://support.apple.com/guide/iphone/contact-emergency-services-iph3c99374c/ios Apple Support , Emergency SOS on Apple Watch https://support.apple.com/en-us/108374 Google Android Help , Emergency SOS on Android https://support.google.com/android/answer/9319337?hl=en	"After an emergency call ends, your iPhone alerts your emergency contacts with a text message, unless you choose to cancel." "Your iPhone sends your current location (if available)" Android: "press the power button 5 times or more" then "touch and hold inside the red circle for 3 seconds" Note: Contacts are told after the call ends. "Free" is our word: it is built in and no fee is mentioned. They call emergency services, not only the police.	Confirmed 2 Oct 2026	200 (redirects to the UK copy) 200 200

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
C8	Travel insurance and premium cards: “Bail, or a lawyer’s fee advanced to the card, on trips only (Sukoon Travel Easy, Amex Platinum). Sukoon’s travel policy excludes detention for breaking the law.”	Plan s8, competitor table; SWOT strengths (“card and travel cover only works on trips”)	Sukoon Insurance , Travel Easy terms and conditions (PDF, 04/2025) https://www.sukoon.com/-/media/project/sukoon/sukooninsurance/documents/personal/travel/product-information---travel-easy-terms-and-conditions-english.pdf Sukoon Insurance https://www.sukoon.com/travel-insurance Amex Platinum: see C9 and C10.	Section 15: “We will pay Bail Bond costs an Insured Person incurs during the course of an Insured Journey, as a result of false arrest or wrongful detention” An Insured Journey “Begins and ends in the Insured Person’s Country of Residence” Section 13.2: “We shall not be liable for any Detention attributable to the Insured Person breaking the law of any country or state.” Bail limits USD 5,000 to 15,000. Note: The “breaking the law” exclusion sits in the detention benefit (s13); bail is paid only for false arrest or wrongful detention anyway.	Confirmed 2 Oct 2026	200 200
C9	“Amex Platinum’s 2022 terms named AIG’s Dubai branch (American Home Assurance Company) for the card’s benefit that appoints a lawyer and advances bail when a cardmember is jailed on a trip”	Plan s2, Insurance row (comment for Jon)	American Express Middle East , Platinum card insurance benefits, terms and conditions (PDF) https://www.datocms-assets.com/93849/1677841622-card-insurance-benefits-terms-conditions.pdf	“This insurance policy is underwritten by American Home Assurance Company (Dubai Br.) – Policy number A&H/AMEX/2021” “If You are jailed (or threatened to be jailed) We shall appoint and advance the fees of a lawyer up to US\$ 1,000 (to be charged to Your account and subject to authorisation).” Bail bond advance up to US\$ 10,000, also charged to the card. A trip can be a UAE journey with a flight or one pre-booked night. Note: The PDF prints no date: “2022” comes from its file data (created 26 Apr 2022). AIG appears through its claims address (myclaim@aig.com).	Confirmed 2 Oct 2026	200
C10	“the current wording (March 2026) names Liva Insurance”	Plan s2, Insurance row (comment for Jon); s8 source note	American Express Middle East , Platinum policy wording, UAE, March 2026 (PDF) https://www.datocms-assets.com/93849/1774869687-amex-nac-policy-wording-uae-platinum-mar26-v3.pdf Linked as “Terms and Conditions for Insurance Benefits” from americanexpress.ae: The Platinum Card https://www.americanexpress.ae/en-ae/cards/the-platinum-card-aed/	“This insurance policy is underwritten by Liva Insurance B.S.C. Closed – Dubai Branch – Policy number A&H/AMEX/2021” The jailed lawyer (US\$ 1,000) and bail (US\$ 10,000) advances and the trip definition are unchanged. Note: File created 25 Mar 2026 (name ends “mar26-v3”).	Confirmed 2 Oct 2026	200 200
C11	Employer assistance (International SOS): “24-hour assistance for organisations’ staff, with a Dubai assistance centre. For an arrest, its published service is a lawyer referral.” Briefing: “For an arrest it gives lawyer names only.”	Plan s8, competitor table Briefing , Partner or competitor	International SOS , internationalsos.com: United Arab Emirates https://www.internationalsos.com/locations/uae International SOS service description, hosted by the University of the Incarnate Word (US) , uiw.edu: isosservices.pdf https://www.uiw.edu/studyabroad/_docs/isosservices.pdf	“DUBAI ASSISTANCE CENTRE ... Office Hours: Open 24 hours” “Workforce resilience subscription for your domestic population and international assignees.” PDF: “Intl SOS will provide the Assistance Service Member with the name, address, telephone numbers ... for referred lawyers and legal practitioners.” “Intl SOS will not give any legal advice to the member.” Note: The Dubai centre is confirmed. The referral wording comes from an old, generic copy (created 2015, edited 2021) on a US university site, not from International SOS’s own pages.	Partly 2 Oct 2026	200 200 (PDF)

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
C12	Consulates: “Help once they are told, with lists of local lawyers.”	Plan s8, competitor table	GOV.UK (FCDO), Arrested or detained abroad https://www.gov.uk/guidance/arrested-or-detained-abroad GOV.UK (FCDO), Arrested or in prison in the UAE https://www.gov.uk/guidance/arrested-or-in-prison-in-the-united-arab-emirates-uae	“The embassy or consulate provides a list of local English-speaking lawyers.” “The embassy or consulate cannot: ... pay for lawyers ... offer legal advice or represent you” UAE page: “Your personal items including your mobile phone will be taken” “In most cases there’s no legal aid in the UAE” Note: UK guidance only; other countries’ consulates were not checked.	Confirmed 2 Oct 2026	200 200
C13	“The US says UAE authorities “do not routinely notify” it of a citizen’s arrest.” SWOT: “Consulates are not routinely told of arrests (US State Department).”	Plan s8, competitor table and SWOT opportunities Briefing , Competitor scan	US Department of State, travel.state.gov: UAE country information (Wayback copy, 9 Jul 2026) https://web.archive.org/web/20260709012511/https://travel.state.gov/content/travel/en/international-travel/International-Travel-Country-Information-Pages/UnitedArabEmirates.html Live page https://travel.state.gov/content/travel/en/international-travel/International-Travel-Country-Information-Pages/UnitedArabEmirates.html	“Arrest Notification: UAE authorities do not routinely notify the U.S. Embassy or consulate of a U.S. citizen’s arrest.” Page “Last Updated: August 14, 2023”. Note: Supports the table and the briefing. The SWOT line widens it to all consulates; the source speaks only for the US.	Partly 2 Oct 2026	200 (Wayback) 403 (blocks bots)
C14	“Abroad, LegalShield in the US sells membership legal plans whose 24/7 line covers arrests, and says it serves over 4.5 million people.”	Plan s8, note under the competitor table	LegalShield, legalshield.com FAQ (Wayback copy, 27 Aug 2026) https://web.archive.org/web/20260827221758/https://www.legalshield.com/faq LegalShield, legalshield.com pricing (Wayback copy, 8 Aug 2026) https://web.archive.org/web/20260808143533/https://www.legalshield.com/pricing Live FAQ https://www.legalshield.com/faq	“empower over 4.5 million individuals and 140,000 businesses across the United States and parts of Canada” “Access after-hours legal consultation for covered legal emergencies such as an arrest or detention” Pricing: “24/7/365 phone access to a lawyer if your rights, freedoms or liberties are being denied or threatened.” Note: The 4.5 million is company-wide (legal and IDShield identity plans) and includes Canada; its app says “more than 1.1 million members”. Reword or drop the number.	Partly 2 Oct 2026	200 (Wayback) 200 (Wayback) 403 (blocks bots)
C15	Banks and card issuers: “Their legal and bail benefits work only on trips, so ELA can sit behind a premium-card benefit.”	Briefing , Partner or competitor	Emirates NBD (Visa Infinite travel insurance), Visa Infinite travel insurance terms, 2023 (PDF) https://www.emiratesnbd.com/-/media/enbd/files/promotions/2023/travel_insurance_tc.pdf Amex Platinum: C9 and C10.	From the 1 Oct scan: Visa Infinite pays legal fees and advances bail “as a result of false arrest or wrongful detention” on card-paid trips, up to USD 7,500 each. Note: A “trip” can be a stay inside the UAE (Amex: a flight or one pre-booked night; Visa: two pre-booked nights).	Confirmed 1 Oct Not re-opened on 2 Oct	200 (PDF)
C16	Lyra and other EAPs: “Their legal lines are booked civil-law calls; HR will say “our EAP covers legal””	Briefing , Partner or competitor	Lyra Wellbeing, Our services https://lyrawellbeing.ae/our-services/ MetLife UAE, EAP for employees https://www.metlife.ae/en/WellnessHub/eapemployee/	Lyra: “Our lawyers and independent financial consultants offer expert guidance on practical legal and financial issues such as: Tenancy issues Consumer rights Wills and inheritance Marriage/divorce/separation Debt management” MetLife (1 Oct scan): requests go to partner firms “to set an appointment for a 30-minute phone discussion” Note: Lyra re-checked on 2 Oct; the MetLife quote is from the 1 Oct scan.	Confirmed 2 Oct 2026	200 200

3 Law and regulation

Federal Decree-Law 34 of 2022 on the legal profession (Ministry of Justice copy) and the Central Bank's licensing law.

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
L1	"UAE law fines anyone who, for a commission, brings clients to a lawyer (Federal Decree-Law 34 of 2022, Art. 101)" Comment: "fine AED 20,000 to 200,000; prison for repeat offences".	Plan s3, legal referral row (comment); s8 SWOT and "Legal checks" (Jon edition) Teaser, comment on legal referral Briefing, The legal referral line	UAE Ministry of Justice, moj.gov.ae: Federal Decree-Law No. 34 of 2022 (English PDF) https://www.moj.gov.ae/assets/d984aaa6/federal-decree-law-no-34-of-2022-regulating-the-legal-profession-and-legal-consultation-638441976591014059.aspx Federal Decree-Law No. 34 of 2022 Regulating the Legal Profession and Legal Consultation. Issued 3 Oct 2022, in force 2 Jan 2023.	Art. 101: "A fine penalty of not less than AED (20,000) twenty thousand dirhams, and not exceeding AED (200,000) two hundred thousand dirhams, shall be imposed on any person who attempts, in consideration of a commission, to entice clients in favor of any lawyer." "Imprisonment sentence for a term of not less than one year shall be imposed in the event of recidivism." Note: For accuracy: "repeat offences" is "recidivism", with at least one year in prison.	Confirmed 2 Oct 2026	200 (the .aspx address serves a 43-page PDF)
L2	"Article 45(1)(h) also bars lawyers from promotion "by intermediaries"."	Plan s3, legal referral row (comment); s8 (comment, Jon edition) Briefing, Competitor scan	UAE Ministry of Justice, moj.gov.ae: Federal Decree-Law No. 34 of 2022 (English PDF) https://www.moj.gov.ae/assets/d984aaa6/federal-decree-law-no-34-of-2022-regulating-the-legal-profession-and-legal-consultation-638441976591014059.aspx As L1.	"The Lawyer shall be prohibited from: ... (h) Promoting, or attempting to promote, himself / herself in any manner that goes against the ethics of the profession, by any means of promotion or enticement by intermediaries." Note: Art. 45(2) makes this a disciplinary matter for the lawyer; Art. 101 is the criminal offence.	Confirmed 2 Oct 2026	200
L3	"Only licensed lawyers may advise or represent people before the police and prosecutors (Art. 6), so our response team coordinates and the firm advises."	Plan s8, Legal checks before launch (both editions)	UAE Ministry of Justice, moj.gov.ae: Federal Decree-Law No. 34 of 2022 (English PDF) https://www.moj.gov.ae/assets/d984aaa6/federal-decree-law-no-34-of-2022-regulating-the-legal-profession-and-legal-consultation-638441976591014059.aspx Arts. 6 and 69.	Art. 6: "Only lawyers duly licensed in the State shall practice the legal profession ..." (a) representing people before "the courts, the public prosecution, ... the investigation bodies and the police" (b) "Giving legal opinion and advice" Art. 69(1): licensed legal consultants (UAE nationals) may give "the legal opinion, advice and consultation" Note: Licensed legal consultants may also advise (Art. 69). Safer: "Only licensed lawyers may represent people before the police and prosecutors, and only licensed lawyers or legal consultants may advise (Arts. 6 and 69)."	Partly 2 Oct 2026	200
L4	"Earning commission on the add-on, or promoting it in the app, may need a licence or a licensed intermediary." Comment: the Central Bank's licensed activities "include promoting and marketing insurance (Decree-Law 6/2025, Art. 61); not yet checked at source". SWOT: "Earning insurance commission may need a Central Bank licence."	Plan s8, Legal checks (comment) and SWOT threats Briefing, Competitor scan	Central Bank of the UAE rulebook, rulebook.centralbank.ae: Art. 61 https://rulebook.centralbank.ae/en/rulebook/article-61-licensed-financial-activities Federal Decree-Law No. (6) of 2025 Regarding the Central Bank, Regulation of Financial Institutions and Activities, and Insurance Business. In force from 16 Sep 2025. rulebook.centralbank.ae: Art. 1 definitions https://rulebook.centralbank.ae/en/rulebook/article-1-definitions-73	Art. 61(1): activities "subject to the Central Bank licensing" include (h) "Arranging, promoting, marketing for Licensed Financial Activities." and (j) "Providing insurance, reinsurance, and Insurance-Related Professions business and services" Note: Now checked at source. The law does not say "marketing insurance" in one place: it is (h) read with (j). Whether ELA is caught is a question for counsel.	Partly 2 Oct 2026	200 200

4 Apple

The App Store commission behind the plan's net-per-member table.

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
A1	"Apple keeps 30% of a member's first year and 15% from their second year." Comment: "Apple keeps 30% until that member has a year of paid service, then 15%, whatever our size."	Plan s3, What a member is worth (note and comment) Briefing , Numbers to fix	Apple Developer https://developer.apple.com/app-store/subscriptions/ Auto-renewable subscriptions. Apple Developer Program License Agreement , developer.apple.com: licence agreement, Schedule 2 https://developer.apple.com/support/terms/app-le-developer-program-license-agreement/ Schedule 2, s3.4(a); Schedules 2 and 3 last updated 17 Dec 2025.	"During a subscriber's first year of service, you receive 70% of the subscription price at each billing cycle, minus applicable taxes. After a subscriber accumulates one year of paid service, your net revenue increases to 85%" Schedule 2: a commission of "thirty percent (30%)", then "fifteen percent (15%) ... for each subsequent renewal" Note: The year counts per subscription group; free trials do not count.	Confirmed 2 Oct 2026	200 200
A2	"Its Small Business Program charges 15% from day one, but only while our App Store sales stay under USD 1 million a year." Comment: "only while our proceeds stay under USD 1 million in a calendar year (and the year before)".	Plan s3, What a member is worth (note and comment) Briefing , Numbers to fix	Apple Developer https://developer.apple.com/app-store/small-business-program/ App Store Small Business Program. Apple Developer Program License Agreement , developer.apple.com: licence agreement, Schedule 2 https://developer.apple.com/support/terms/app-le-developer-program-license-agreement/ Schedule 2, s3.4(b).	"a reduced commission rate of 15% on paid apps and Apple In-App Purchases" "Existing developers who made up to 1 million USD in proceeds in the prior calendar year ... can qualify" "If a participating developer surpasses the 1 million USD threshold in the current calendar year, the standard commission rate will apply to future sales." Note: Wording: Apple counts proceeds (after its commission and taxes), not sales, as the comment says. Enrolment is required.	Confirmed 2 Oct 2026	200 200
A3	"Past USD 1 million, which is about 6,000 annual members"	Plan s3 (comment) Briefing , Numbers to fix	Our arithmetic on A1, A2, A4 and the peg (F3).	USD 1,000,000 of proceeds ÷ AED 607 net per annual member at 15% (USD 165) = about 6,050 members. Note: Checks out.	Derived 2 Oct 2026	Not applicable
A4	"Net per member per year in AED, after 5% UAE VAT and Apple's commission." Weekly 869 / 1,056; monthly 640 / 777; annual 500 / 607. Teaser: "AED 500 a year".	Plan s3 table; s5 Teaser , Year one (comment) Briefing , Numbers to fix	UAE Government portal , u.ae: Value Added Tax https://u.ae/en/information-and-services/finance-and-investment/taxation/vat/valueaddedtaxvat UAE Ministry of Finance , mof.gov.ae: VAT https://mof.gov.ae/en/public-finance/tax/vat/ Apple Developer Program License Agreement , developer.apple.com: licence agreement, Schedule 2 https://developer.apple.com/support/terms/app-le-developer-program-license-agreement/ Schedule 2, s3.4(a).	"The rate of VAT is 5 per cent." Apple: "the prices payable by End-Users shall be net of any and all taxes collected" Annual: 749.99 ÷ 1.05 × 0.70 = 500; × 0.85 = 607. Note: The derived figures check out.	Confirmed 2 Oct 2026	200 200 (redirects to the VAT page) 200

5 Exchange rates

ECB euro reference rates of 1 October 2026 and the dirham's dollar peg.

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
F1	EUR 1 = USD 1.1298 (ECB reference rate, 1 October 2026). Not printed; it sits behind F4 and F5.	Plan s7, COO time (comment); s5, budget comments	European Central Bank , ecb.europa.eu: reference rates, last 90 days (XML) https://www.ecb.europa.eu/stats/eurofxref/eurofxref-hist-90d.xml ecb.europa.eu: US dollar (USD) page https://www.ecb.europa.eu/stats/policy_and_exchange_rates/euro_reference_exchange_rates/html/eurofxref-graph-usd.en.html	"<Cube time="2026-10-01"><Cube currency="USD" rate="1.1298"/>"	Confirmed 2 Oct 2026	200 200
F2	EUR 1 = GBP 0.85373 (ECB reference rate, 1 October 2026). Not printed; it sits behind F4.	Plan s7, COO time (comment)	European Central Bank , ecb.europa.eu: reference rates, last 90 days (XML) https://www.ecb.europa.eu/stats/eurofxref/eurofxref-hist-90d.xml ecb.europa.eu: pound sterling (GBP) page https://www.ecb.europa.eu/stats/policy_and_exchange_rates/html/eurofxref-graph-gbp.en.html	"<Cube currency="GBP" rate="0.85373"/>" Same day, same file.	Confirmed 2 Oct 2026	200 200
F3	"the dirham's dollar peg of 3.6725" Also behind "AED 7M (about USD 1.9M)".	Plan s7 (comment); s1 and s9 (USD 1.9M) Teaser , the raise	Central Bank of the UAE , centralbank.ae: Annual Report 2014 (PDF) https://www.centralbank.ae/media/e44dkkze/cb-uae-annual-report-2014-en.pdf Central Bank of the UAE , centralbank.ae: exchange rates for VAT, Sep 2025 (PDF) https://www.centralbank.ae/media/vj5boxwl/fx_sep25_en.pdf	"The fixed peg of the exchange rate of the dirham to the US dollar, at a rate of 3.6725 dirhams per US dollar" Sep 2025 table: "01-Sep-2025 US Dollar 3.6725" Note: The Central Bank's current web pages block automated requests, so the explicit "peg" wording is from its 2014 report; the 2025 table gives the same rate.	Confirmed 2 Oct 2026	200 200 centralbank.ae web pages: 403 (blocks bots)
F4	"£1 = AED 4.86 (ECB reference rates, 1 October 2026, through the dirham's dollar peg of 3.6725)"	Plan s7, COO time (comment)	Our arithmetic on F1 to F3.	1.1298 ÷ 0.85373 = USD 1.3234 per £1; × 3.6725 = AED 4.8601. Note: Checks out.	Derived 2 Oct 2026	Not applicable
F5	"EUR 1 = AED 4.15 (ECB, 1 October 2026)" Unrounded: €1 = AED 4.149.	Plan s5, budget: outsourced tech support (comments)	Our arithmetic on F1 and F3.	1.1298 × 3.6725 = AED 4.1492. 3 × EUR 40,000 = EUR 120,000 = AED 497,900, "about AED 500,000". Note: Checks out.	Derived 2 Oct 2026	Not applicable
F6	"AED 7M (about USD 1.9M)"	Plan s1 and s9 Teaser , the raise	Our arithmetic on F3.	7,000,000 ÷ 3.6725 = USD 1,906,059. Note: Checks out.	Derived 2 Oct 2026	Not applicable

6 Rate benchmarks on the briefing page

Background figures on the briefing page only; none of these is in the plan or the teaser. From the 30 September rate research (research/bench.md).

#	Claim as worded in our materials	Where it appears	Source	Key quote or evidence	Checked	Link status, 2 Oct
R1	<i>"At normal Romanian senior agency rates (€55-75 an hour) the same hours cost AED 0.73-0.99M a year"</i>	Briefing , Team and dev resources: Reality check on the AED 600k (background, not in the plan)	Accelerance , 2026 outsourcing rate trends https://www.accelerance.com/blog/2026-outsourcing-rate-trends-asia-europe-latam Northdan , Developer hourly rates, Romania https://northdan.com/en/pricing/developer-hourly-rates-romania/ Clutch , Romanian developers https://clutch.co/ro/developers	From research/bench.md: Accelerance, Europe senior USD 64-76 an hour (€56-67); Northdan, Romanian agency senior €60-90; Clutch Romania, 12 of 18 listed firms at USD 50-99. The €55-75 band is the researcher's synthesis of these. Note: Converted at €1 = AED 4.1701 (ECB, 30 Sep).	Checked 30 Sep Not re-opened on 2 Oct	200 200 403 (blocks bots)
R2	<i>"at UAE in-house cost (about AED 34k)"</i> A senior engineer, per person-month, fully loaded. Also "salary and rate benchmarks from Robert Walters 2026, Charterhouse 2026, Hays GCC 2025, Cooper Fitch 2025 and Hays Romania 2025".	Briefing , Invested to date (background) and Versions and sources	Robert Walters , Middle East Salary Survey 2026 (PDF) https://www.robertwalters.ae/content/dam/robert-walters-redesign/country/middle-east/files/reports---e-guides-2026/Robert%20Walters%20Middle%20East%20Salary%20Survey%202026.pdf Charterhouse , Salary levels 2026 https://www.charterhouseme.ae/salary-levels-2026 Hays , GCC Salary Guide 2025 (PDF) https://www.hays.ae/documents/d/hays-salary-guide-ae/hays-gcc-salary-guide-2025-1 Cooper Fitch , UAE Salary Guide 2025 (PDF) https://cooperfitch.ae/wp-content/uploads/2024/12/Salary-Guide-UAE-2025-Cooper-Fitch.pdf Hays Romania , Salary Guide 2025 (PDF, third-party host) https://i0.1616.ro/media/2/2621/33243/21962471/7/hays-romania-salary-guide-2025.pdf	From research/bench.md: senior mobile developer salary AED 25-45k a month (median 32.5k) across the UAE guides; with visa, insurance, gratuity and leave, about AED 34.8k a month fully loaded (our calculation). Note: The 34k is our derivation from the guides, not a figure printed in them.	Checked 30 Sep Not re-opened on 2 Oct	200 200 200 (serves a PDF) 200 200

7 Not researched: from the founders

These numbers came from Jon or Stevan, or from ELA's own records, not from external research. They are not sourced externally, so a reader should not treat them as checked facts.

Figure	What our materials say	Where it came from
Membership prices	AED 24.99 a week, 79.99 a month or 749.99 a year	The founders' pricing, App Store subscriptions from 22 August 2026.
Insurance add-on premium	AED 3,000 per adult a year	The Sukoon talks, 12-14 August. To confirm with Howden and AIG.
Insurance add-on cover	Legal fees up to AED 100,000 and bail up to AED 50,000 a claim; AED 20,000 deductible; 30-90 day cooling-off	Jon's 31 July plan.
ELA's share of the premium	10%	Stevan, 1 October (as in Jon's 9 September teaser). Jon to confirm with Howden and AIG.
Insurers	"Agreed in principle with Howden and AIG"	Jon's messages.

Figure	What our materials say	Where it came from
Legal referral commission	10% of legal fees	Jon's 31 July plan. See L1 for the legal risk.
Claims model	0.5-1.5% of policyholders claim each year, "from comparable legal expenses insurance markets"; each claim uses the full cover	Jon's 31 July plan. It names no source, and we have not checked one.
Members and channels	100,000, 300,000 and 500,000 members in year one; base case 200,000 individuals, 50,000 corporate, 25,000 SME and 5,000 consular; half take the add-on	Jon's July 2026 model.
Year-one budget	AED 4.62M, including Helios AI Agency, social ads and PR at AED 480,000 each, office AED 500,000 and personnel AED 600,000	Jon's 31 July plan. Helios AI described by Stevan, 1 October.
Outsourced tech support	AED 600,000 for 12 months: three people at about EUR 40,000 a year each	Stevan's basis, 2 October. Only the EUR to AED step is sourced (F5).
Board fees	AED 10,000 a month each for four board members (AED 480,000 a year)	Stevan, 1 October. Jon to confirm.
The raise	AED 7M: the AED 4.62M budget plus AED 2.38M contingency; about 18 months of runway	Jon's July plan. The runway is our arithmetic ($7.0 \div 4.62 \times 12 = 18$ months).
Delivery team	Lead engineer about 160 hours a month; backup 40; DevOps 25; designer 25, or 60 around launch; coordination 15	Stevan's 15 August partner scope.
Development partner options	AED 600,000 envelope, or AED 1.91M in kind; implied partner rate about AED 30,000 a person-month	Stevan's 15 August scope; Jon's 19 August document.
COO hours (the hours estimate)	About 600 hours, 7 May to 30 September 2026	Counted from ELA's own commit and session records. An internal count, not external research.
Value of founder time	COO about AED 180,000 at his salary rate; CEO about AED 92,000	Stevan's salary rate (kept out of every document) and his estimate of Jon's time. The £ to AED step is sourced (F4).
Cash spent	About AED 15,000: Claude about USD 2,500, Codex about USD 1,200, servers about £300	Stevan's notes.
Launch work left	About 4-6 weeks	ELA's 22 September launch stock-take (internal).
Build effort (briefing background only)	41-55 person-months	Our own agents' estimate of 30 September, not an external source.
Milestones, roll-out and targets	Milestone dates; the year 1-5 country roll-out; the named corporate targets	Repo history and the founders' records; Jon's July plan. Named organisations are targets, not customers.

Prepared on 2 October 2026 from the competitor scan of 1 October (research/competitors.md and its notes), the rate research of 30 September (research/bench.md) and re-checks at source on 2 October by three research agents (Claude Opus 5.5) and direct fetches. Quotes are verbatim; "..." marks a cut.