TAGNOLOGYS · LAUNCH PACK 01

Haqqi: GCC Feasibility Study

Market, regulation, competition, unit economics and a Go/No-Go verdict for a compliance-first legal-services marketplace, launching in the UAE.

VERSION	DATE	MARKET	VERDICT
1.0	November 2026	UAE first, then GCC	Go, with conditions

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TAGNOLOGYS
INFORMATION TECHNOLOGY

Contents

1. Executive summary
2. The concept
3. UAE market
4. Regulation & compliance
5. Competitor landscape
6. GCC expansion
7. Business model & unit economics
8. SWOT
9. Feasibility scorecard
10. Go/No-Go verdict
11. Next steps: 90-day pre-launch plan
12. Sources

01 Executive summary

The opportunity, the model, the numbers, the risks and the verdict, up front.

Haqqi is feasible in the UAE, but only as a compliance-first platform. Demand is large and digital reach is near-total; the binding constraint is the law that governs how lawyers win clients. We recommend **Go, with conditions:** launch in Dubai after a written UAE counsel opinion and regulator engagement, with a licensed payment provider holding all client funds and no commission taken from lawyers.

UAE legal services (ceiling)

AED 12.9bn

USD 3.5bn, press estimate [1]

Serviceable market (SAM)

AED 1.34bn

Bottom-up, assumption-based (§3.6)

Labour disputes, H1 2026

≈188k

MoHRE, verified [2]

Internet penetration

99%

DataReportal 2026 [3]

Year 3 revenue (base)

AED 12.1M

Model, §7

Monthly break-even (base)

≈ M33

Estimate, §7.6

Funding need

AED 10.8M

≈ USD 2.9M incl. 20% buffer

Feasibility score

3.10 / 5

Weighted, §9

The opportunity



A large, under-served UAE market: Haqqi turns a confusing search into one clear path to a licensed lawyer.

- A population of about 11.3M, roughly 88% expatriates, with 99% internet penetration [4, 5, 3]. Most people meet the legal system as outsiders: unfamiliar law, two languages, opaque prices.
- High-volume, standardisable demand: about 188k labour disputes in six months [2] and 103,975 rental lawsuits at Dubai's Rental Disputes Centre in nine years [6].
- No incumbent owns the full journey for consumers. The closest rival, Legaline, launched only in May 2026 [7]; the free government tools are one-off and means-tested [8].

The model

A free bilingual AI assistant turns a problem into a case brief; 2–3 licensed professionals in the client's emirate send fixed-price offers; the client pays through a licensed provider that releases funds to the law firm per milestone. Haqqi earns client-side fees and subscriptions only, never a commission from lawyers.

Key risks

Regulation

Art. 101 of Decree-Law 34/2022 fines paid client-steering AED 20,000–200,000 [9]. A commission model is not an option.

Acquisition cost

Legal search clicks cost AED 15–40 in Dubai [10]. A 5% client fee cannot pay for paid search; growth must be mostly organic.

Competition and brand

Legaline is a direct rival [7]; HAQQ (haqq.ai) is funded and its name is close to Haqqi [11].

Verdict up front: Go, with conditions

Proceed to a Dubai pilot once five conditions are met: written UAE counsel opinion; regulator engagement (MoJ / DLAD); MoUs with at least 20 licensed firms; a licensed payment provider's marketplace product; and pilot KPIs agreed in advance (§10).

02

The concept

What Haqqi is, who it serves and how it makes money. Full detail is in the PRD (Launch pack 02).

Subject of this study: Haqqi (حقّي), "UpCounsel for the UAE".

In one sentence

Haqqi is a UAE legal-services marketplace: a free AI assistant explains the law with citations and writes a case brief, licensed professionals compete with fixed-price offers, and the client pays and follows the matter in one account. See the PRD & Product Specs.

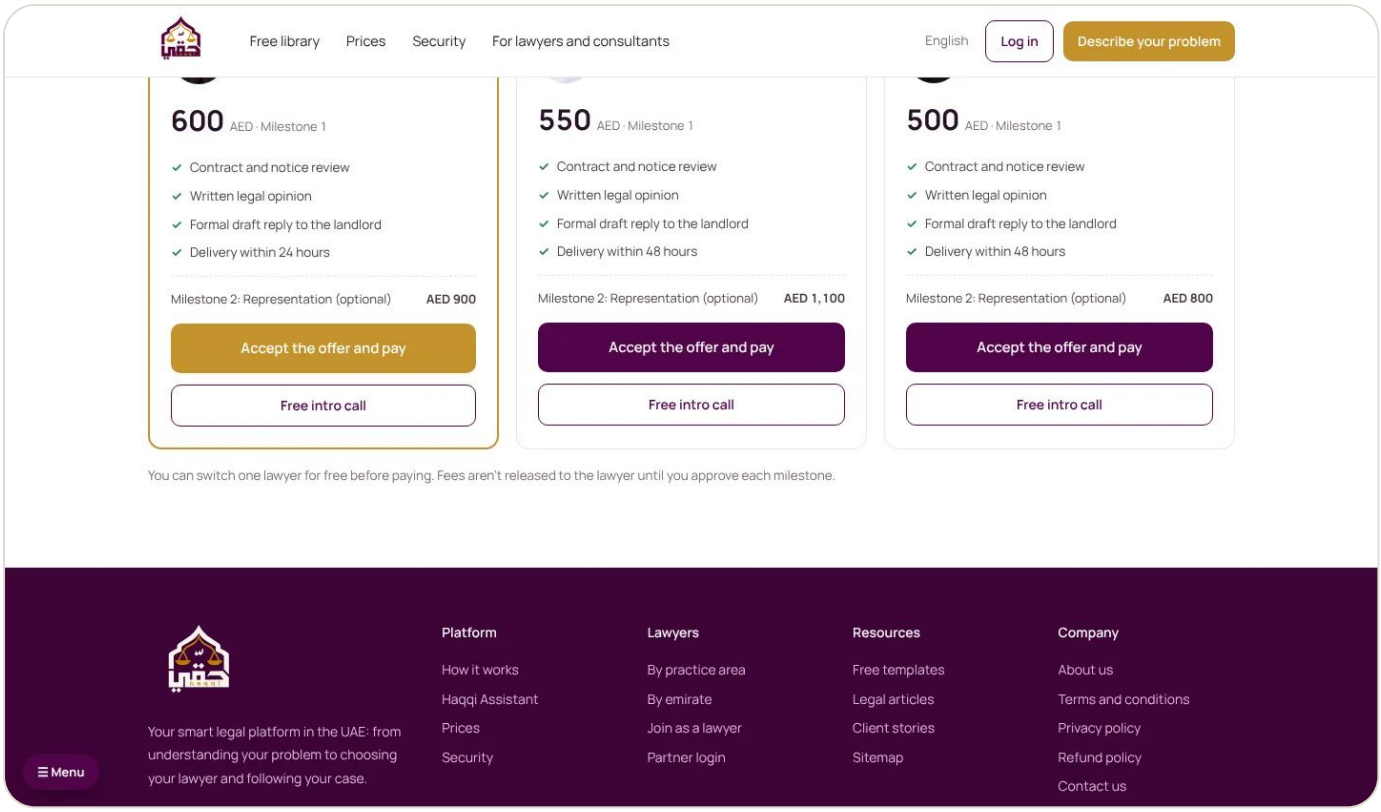
How it works



Four steps: describe the case to the AI assistant, compare offers, pay through a licensed payment provider, receive the signed work.

1 · Ask the AI assistant → 2 · Case brief → 3 · 2–3 fixed-price offers →

4 · Pay via licensed provider → 5 · Milestone release to firm



Prototype: the client compares fixed-price offers from licensed professionals.

Who it serves



Three customer groups: individuals, small businesses and expatriate families.

Segment	Need	Haqqi offer
Residents (expats and nationals)	Labour, rental, family, immigration, criminal questions; price clarity	Free AI answers, fixed-price offers, Haqqi Plus
SMEs and founders	Contracts, company setup, debt recovery, HR	Business plan (AED 2,500/month), retainers with consultants
Advocates (محامون)	Qualified clients, filings log, payments	Court and committee matters; lawyer dashboard
Legal consultants (مستشارون قانونيون)	Advisory and drafting work, AI tools	Written questions, contract review, retainers; refer court work to an advocate

How it makes money (compliance-safe)



Revenue comes from clients and partner subscriptions only. No commission is taken from lawyers.



Client service fee

Draft 5% on the Free plan, 0% on Haqqi Plus. Invoiced by Haqqi to the client.



Haqqi Plus

AED 149/month: unlimited assistant, 3 written questions to a lawyer, all templates with e-signature, no service fee.



Business

AED 2,500/month: multiple users, matters and contracts dashboard, cost reports, account manager.



Partner software

Draft AED 399 / 1,499 per month per firm for listing and tools (price still open).

What Haqqi never does

No per-case commission or referral fee from lawyers; no custody of client funds; no legal advice in its own name. The law firm invoices its own fees, Haqqi invoices only its own fee, and 5% VAT applies to each.

03 UAE market

Size, legal-tech, supply, demand, people and digital adoption, then TAM, SAM and SOM.



Dubai: launch emirate. 4.58M residents at end-2025, +7.5% year on year [12].

3.1 Legal services: market size



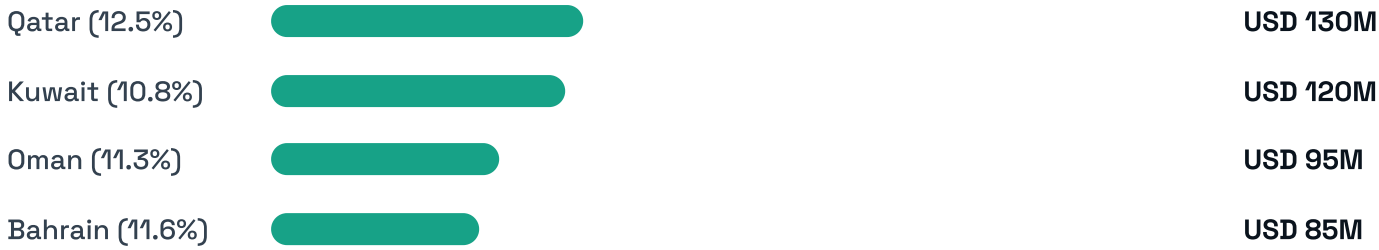
The legal services market grows steadily year after year.

Figure	Value	Confidence	Use in this study
UAE legal services (press) [1]	USD 3.5bn ≈ AED 12.9bn	Medium-low	Top-down ceiling (TAM). No year or method given.
UAE legal services 2025 (vendor) [13]	USD 51.97bn → 82.05bn (2034)	Rejected	Not used. Implausible: about 10% of UAE GDP.
UAE legal services (Ken Research) [14]	Paywalled	Not found	Segment list only (corporate, family, criminal, IP, real estate, employment, litigation).

3.2 Legal-tech, GCC and UAE

GCC legal technology is estimated at USD 1,200M in 2025, rising to USD 2,525M by 2031 (CAGR 13.2%); the UAE is the largest market at USD 390M [15]. A separate estimate of USD 1.2bn for UAE cloud AI legal-tech conflicts with this and is treated as low confidence [16]. These are mostly B2B software figures; the consumer legal marketplace is a smaller segment with no published size [15].





Legal-tech market 2025 by country, with CAGR 2026–31 in brackets. Ken Research estimate [15]. Total: USD 1,200M.

Funding signals are modest: HAQQ raised USD 3M (Feb 2026), Oqood USD 1M and Malakah USD 0.6M; most regional players have not disclosed rounds [17]. Generative-AI use in GCC tax, finance and legal functions rose from about 48% to 71% in one year (secondary citation) [17].

3.3 Supply: licensed practitioners



A large pool of licensed practitioners; every partner is verified before joining.

Dubai legal consultants

3,433

Q1 2026, 91 nationalities

[18]

Dubai consultancy firms

139

86 international (61.8%)

[18]

Registered lawyers (MoJ)

1,034

2018, stale

[19]

Dubai consultant growth

+24%

2,769 → 3,433 in 3.5 years

[20, 18]

The supply pool is small and concentrated, and no current nationwide count of advocates exists [19]. Dubai Legal Affairs Department (DLAD) publishes data on Dubai Pulse [21]; that dataset has not yet been pulled and verified, and should be the basis for partner verification and a supply census before launch. Only UAE nationals can be listed as advocates (Art. 13) [9], so the advocate pool is much smaller than the consultant pool.

3.4 Demand signals



People already search for legal help on their phones; Haqqi meets them there.



Labour: about 188k disputes in H1 2026; 2,481 went to court [2].



Rental: 103,975 lawsuits at Dubai's RDC in 2013–2022 [6].

Signal	Volume	What it means for Haqqi
Labour disputes, MoHRE, H1 2026 [2]	185,793 settled (98.6%); 2,481 to court (1.4%)	≈375k a year annualised: large demand for advice before and during settlement, small court tail.
Dubai RDC, 2013–2022 [6]	103,975 lawsuits; 1.9% of 5.2M leases	≈11,550 a year (our calculation). Committee work: advocates only.
Dubai RDC settlements, Jan–Sep 2026 [22]	2,350 cases, AED 401M; 6 days average	≈AED 171k average value per case (our calculation): high stakes justify paid help.
Free legal-advice services [8]	Ask a Lawyer, Shoor, ADJD Legal Aid, DIFC pro bono	Proof of unmet low-end demand; also partner channels.
Court volumes (Dubai Courts, ADJD 2024)	Not found	Request the Dubai Judicial Authority and ADJD annual reports.

3.5 Population and digital adoption

UAE population, 2024

11.29M

FCSC
[4]

Expatriate share

≈88%

Official 2011: 88.5%
[5]

Mobile connections

23M

202% of population

[3]

Abu Dhabi population, 2024

4.14M

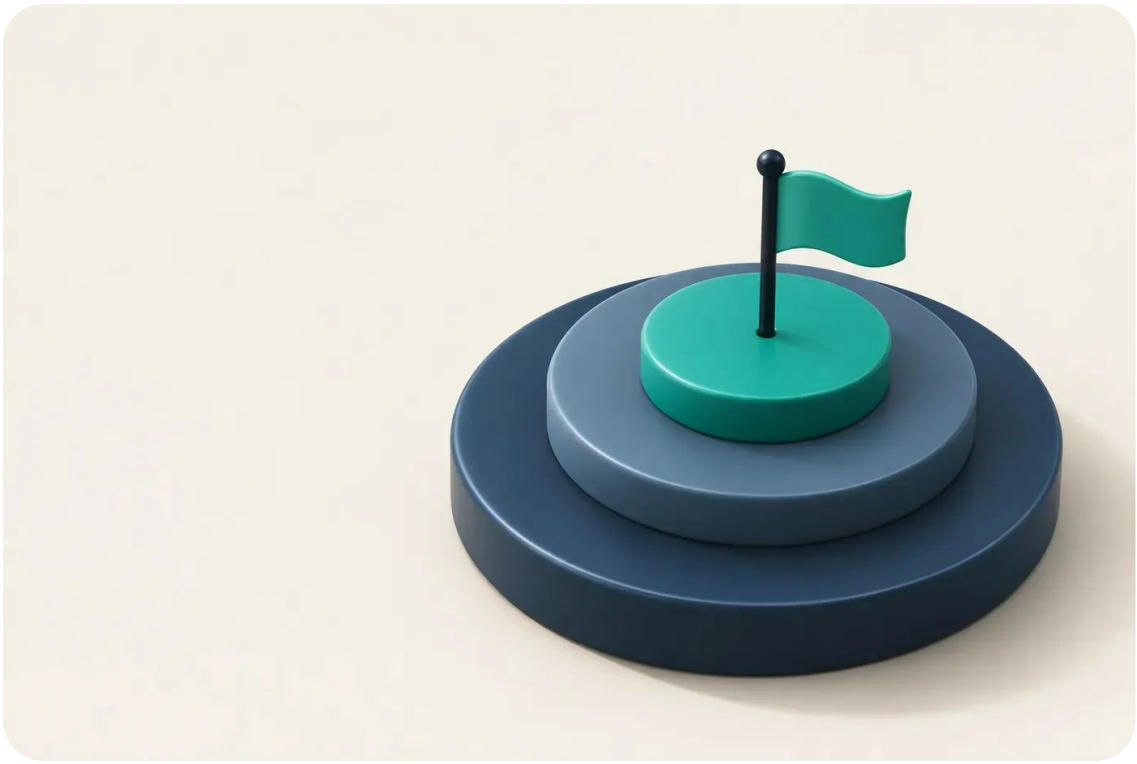
WAM

[23]



Advertising reach by platform, Digital 2026 [24]. Largest communities: India ~4.3M, Pakistan ~1.7M, Bangladesh ~1.2M, Philippines ~0.7M, Egypt ~0.4M (directional) [5]. Implication: smartphone-first, Arabic and English at launch, South Asian languages next.

3.6 TAM, SAM and SOM



Total market, serviceable market and the share Haqqi can win.

Layer	Arithmetic	Value	Basis
TAM	USD 3.5bn × 3.6725	**AED 12.85bn**	Press estimate, ceiling [1]
Known practitioners	3,433 + 1,034	4,467	Dubai consultants [18] + MoJ lawyers 2018 [19]; understates nationwide supply
Billings per practitioner	2.5 × AED 480k	AED 1.2M	**Assumption:** 2.5× average Dubai partner pay [1]
Known-practitioner billings	4,467 × AED 1.2M	AED 5.36bn	≈42% of TAM: consistent with the ceiling
SAM	AED 5.36bn × 25%	**AED 1.34bn**	**Assumption:** 25% of billings are individuals and SMEs with fixed-scope matters
Cross-check (labour only)	375k × 5% × AED 3,500	AED 65.6M	Disputes [2]; 5% buying paid help and ticket are **assumptions**
SOM (Year 3)	AED 47.0M ÷ AED 1.34bn	**3.5% of SAM**	Base-case Year 3 GMV (§7); conservative 1.3%, upside 6.4%

Reading the numbers

SAM is an order-of-magnitude estimate built on two assumptions; the SOM depends only on the bottom-up funnel in §7, not on SAM. Haqqi's own Year 3 revenue (AED 12.1M) is under 0.1% of TAM, so market size is not the constraint.

04

Regulation & compliance

The largest risk to the business model, and the design rules that follow from it. Research, not legal advice.



Compliance first: the model is built around UAE legal-profession and data rules.

Federal Decree-Law No. 34 of 2022 on Advocacy and Legal Consultancy took effect on 2 January 2023 [25]; its Executive Regulations were approved in March 2025 [26] and a Code of Ethics followed [27]. Six articles shape Haqqi directly.

Article	Rule	Design consequence for Haqqi
6	Only licensed lawyers practise; courts accept only lawyers on the Roll [9, 28]	Haqqi is a technology platform, not a law firm; court matters route to advocates only
45(1)(h)	No self-promotion "by any means of promotion or enticement by intermediaries" [9]	No rankings or "best lawyer" claims; profiles show services and prices only; fair rotation, not paid placement
59	Consultants: non-judicial work only; no courts, prosecution, rental or tax committees [9, 28]	Role-based routing; consultants refer court work to an advocate inside Haqqi
61	Consultants may not sign fee agreements or work on their own account [9, 28]	The partner is the licensed firm; offers, retainers and payouts are contracted with the firm
99	Lawyer in partnership with a non-lawyer: AED 50,000–300,000 [9]	No equity, profit-share or fee-split between Haqqi and firms
101	Enticing clients for a lawyer for a commission: AED 20,000–200,000; repeat offence ≥1 year prison [9]	No per-case commission or referral fee from lawyers. Revenue is client-side fees and flat software subscriptions

Also relevant: retainers must be in writing before work starts, and any means, including an e-contract, is accepted (Art. 46(2)); fees are fixed in advance or hourly (Art. 48); a percentage fee is capped at 25% of the award (Art. 49(4)); courts may reduce excessive fees (Art. 52(1)) [9]. Fixed-price offers fit this framework.

4.1 Other rules that apply

Personal data (PDPL, Decree-Law 45/2021)

Consent is the main lawful basis; legitimate interests is not available. Sensitive legal matters mean a DPO and a DPIA. Executive Regulations were unpublished as of Feb 2026; full compliance expected by 1 Jan 2027; fines AED 50k–5M [29, 30]. Host the primary store in a UAE or GCC region and document transfer bases for LLM calls [30].

E-signature (Decree-Law 46/2021)

Electronic, certified and approved signatures are recognised; the approved signature equals a handwritten one. E-signing retainers and milestone sign-offs is supported; notarised documents such as powers of attorney still use notary channels [31].

Payments licensing (CBUAE RPSCS)

No entity may provide retail payment services without a licence; holding funds may trigger Stored Value Facilities rules; DIFC/ADGM licences do not cover mainland [32]. Haqqi uses a licensed PSP's marketplace product: Stripe Connect is live in the UAE with Custom accounts and separate charges and transfers, and connected accounts need a UAE trade licence, which suits law firms [33].

VAT (5%)

Mandatory registration above AED 375,000 of taxable supplies; voluntary from AED 187,500. Under the agent model the firm invoices its fee and Haqqi invoices only its own fee; the principal model would put VAT on the full amount and conflict with non-lawyer practice rules [34]. Base-case Year 1 revenue (AED 1.22M) requires registration. E-invoicing phase dates were not verified.

UAE PASS (Phase 2)

Private companies are eligible with a valid UAE trade licence, via the Developer Portal: questionnaires per feature, user-journey diagram, wireframes, use-case approval. Fees not published [35].

AI legal information

No UAE law specifically governs AI legal information to the public; the AI principles are non-binding [36]. DIFC Courts guidance and the ADGM *Arabyads v Gulrez Alam* wasted-costs order (AED 282,508) set the expectation: verify citations, keep a human in the loop [37]. Kuwait's Bar filed reports against expats advising on social media [38].

4.2 Risk and mitigation



Each key risk is matched with a mitigation that rebalances the plan.

Risk	Likelihood	Impact	Mitigation
Fees read as paid client-steering (Art. 101)	Medium	Critical	Client-side fee and flat software subscription only; written counsel opinion; regulator no-objection
Profiles or ads breach advertising rules (Art. 45)	Medium	High	No rankings; Haqqi promotes the platform, not lawyers; content review against the Code of Ethics [27]
Consultant does court work (Arts. 59, 61)	Low	High	Role-based routing; firm as contracting party; in-app referral to an advocate
Haqqi treated as an unlicensed payment provider	Low	Critical	Licensed PSP holds funds; milestone transfers within the PSP's holding window; CBUAE-perimeter opinion [32]
AI output seen as legal advice or wrong citation	Medium	High	"Legal information plus case brief"; cite article and law; human hand-off; evaluation set and citation-rate monitoring
PDPL breach on sensitive data	Medium	High	DPO, DPIA, explicit consent, GCC hosting, no card data stored by Haqqi [29, 30]

Launch conditions (non-negotiable)

1) A written opinion from UAE counsel on the fee model, the platform role and the AI assistant. 2) Engagement with the Ministry of Justice and Dubai Legal Affairs Department (and ADJD before Abu Dhabi), ideally ending in a no-objection. No DLAD rule on online platforms was found, so this is a gap only the regulator can close [39, 40].

05

Competitor landscape

Regional players, free government substitutes and the global models Haqqi learns from.

5.1 Competitor matrix

Player	Model	Pricing	Threat / lesson
Legaline (UAE, May 2026) [7]	AI-native marketplace; clients post a budget, lawyers bid in closed rounds; drafting, e-signing, payments; EN/AR/RU	Not disclosed	High Closest model; bidding may push lawyer prices down
HAQQ (haqq.ai) (Beirut) [41, 11]	B2B legal AI and practice management with a free consumer chat	Free tier; USD 30/user/month; eFirm USD 25/seat	Medium Funded (USD 3M), ranks for "AI lawyer UAE"; no consumer marketplace or escrow
Legal Meet (Dubai) [42]	AI guidance plus booked consultations; escrow transactions advertised	Not shown	Medium Similar positioning, small footprint (10 reviews)
Legal Inz (UAE) [43]	Single online fixed-fee firm	Fixed fee by quote	Low Proves fixed-price appeal; supply does not scale
Mizan Law · Counselo	Could not be verified: sites blocked, no third-party coverage. A "Mizan Adl" UAE legal AI workspace exists on Product Hunt, possibly unrelated [44]	Not found	Unknown Client to share demo access
Government tools [45, 46, 8]	Dubai Now "Ask a Lawyer"; Dubai Courts "Shoor"; ADJD Legal Aid; DIFC pro bono; MoJ Virtual Legal Consultant (trial 2025)	Free	Medium Trusted but one-off or means-tested; potential partners
Shwra (KSA) [47, 48]	Platform with own lawyer network, pay-per-service, Tamara instalments	Not listed	GCC Incumbent for KSA entry

Player	Model	Pricing	Threat / lesson
UpCounsel (US) [49, 50, 51]	Job posts, curated proposals, on-platform payments	Attorneys pay 3.5–15%; clients pay no platform fee	Model See §5.4
LegalZoom [52]	DIY documents, subscriptions, attorney plans	FY2025 revenue USD 756.0M; ARPU USD 266	Model Subscriptions were 65% of revenue (USD 492.5M)
Rocket Lawyer [53]	Membership plus pay-per-session attorney advice	USD 149–349/yr; sessions USD 149/249	Model Question-count tiers: a template for Haqqi Plus
JustAnswer · LawDepot [54, 55]	Expert Q&A subscription; DIY document subscription	USD 28–125/month; USD 35/month	Model Willingness to pay; avoid their cancellation complaints

5.2 Feature-by-feature

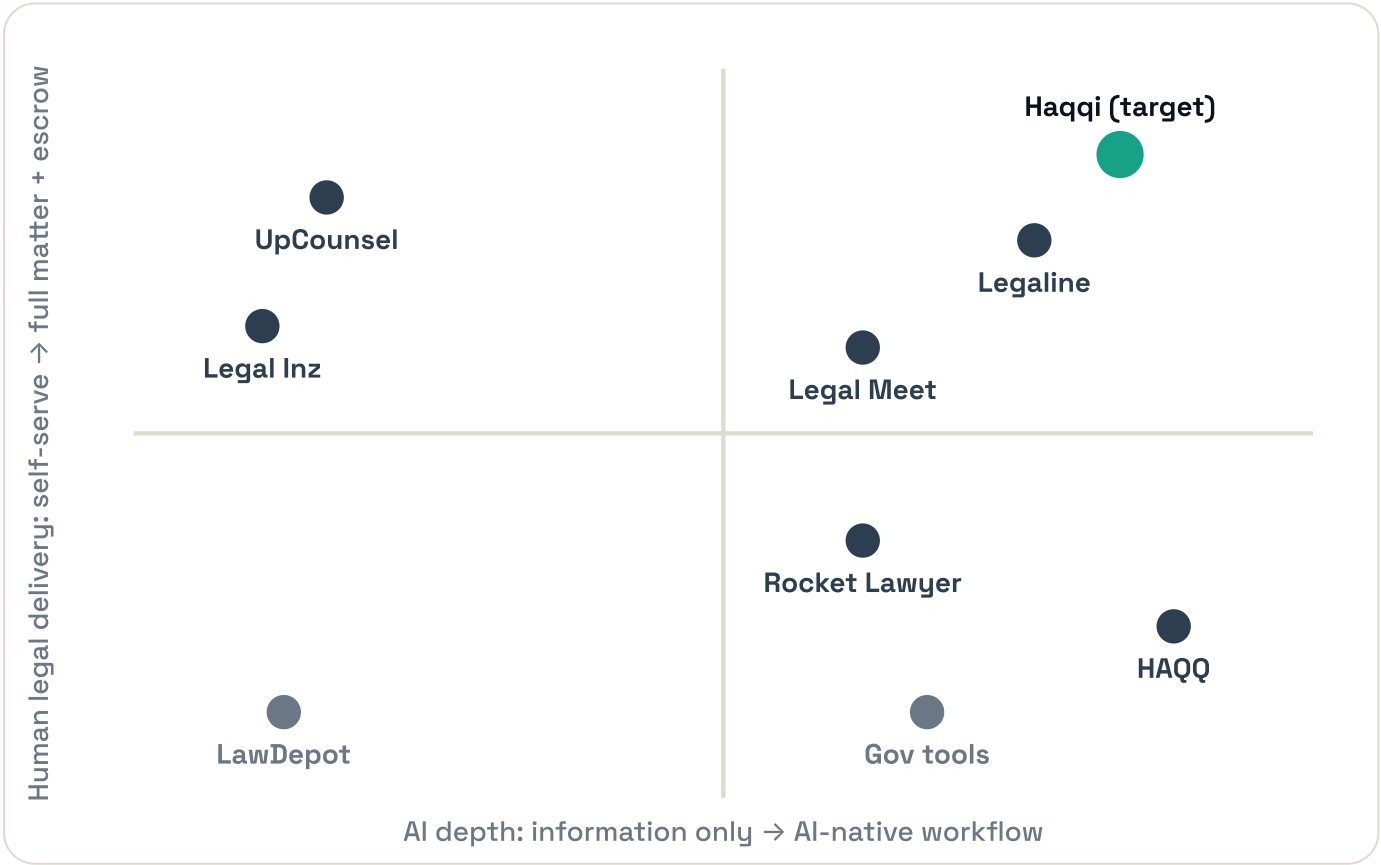
Capability	Legaline	HAQQ	Gov	Shwra	UpCounsel	Rocket	Haqqi
Free AI Q&A with UAE citations	?	✓	✓	✓	×	US	✓
AI turns a problem into a case brief	?	Partial	×	×	×	×	✓
Multiple fixed-price offers	✓	×	×	×	✓	×	✓
Escrow / milestone release	?	×	×	Prepay	Payments	×	✓
Advocate vs consultant routing	?	×	✓	n/a	n/a	n/a	✓
UAE PASS login / e-signature	?	×	✓	n/a	×	×	Phase 2
Business plan	?	✓	×	✓	✓	✓	✓
Lawyer software subscription	?	✓	×	?	✓	×	✓

Source: research comparison built from [7, 41, 8, 47, 49, 53]. "?" means not disclosed.

5.3 Positioning map



Haqqi takes the open position competitors leave empty.



Tagnologys analysis (qualitative placement). The top-right quadrant, deep AI plus full human delivery with escrow, has one occupant today (Legaline). Haqqi's edge there must come from the case brief, advocate/consultant routing and milestone release, all built for compliance.

5.4 What UpCounsel teaches

What worked

- Curated supply: a "deliberately small group of responses" per job [49, 51].
- 15-minute interview and a 3-month pilot, then annual membership; 80%+ convert [50].
- Payments as lock-in: >99% collection, >35% client rehire [51].

What went wrong

- 2016: California State Bar letters to its attorneys over possible improper fee-sharing [51].
- A false-advertising lawsuit over ratings, settled in 2019 [51].
- Raised only about USD 13.9M; announced shutdown in Feb 2020, then rescued by Enduring Ventures [51].

Lesson for Haqqi

Copy the curation, pilot membership and payment lock-in. Do not copy the attorney-side percentage fee, which in the UAE sits next to Art. 101, or ratings-led marketing, which sits next to Art. 45. Plan capital for a longer runway than UpCounsel had.

5.5 Name-similarity risk: HAQQ

HAQQ (haqq.ai) is active in the UAE, publishes multilingual SEO guides such as "AI Lawyer UAE" and ranks for that query [41, 46]. "Haqqi" and "HAQQ" share a root and transliteration, which creates a trademark-opposition and search-confusion risk. Actions: a trademark clearance search in the UAE and GCC before launch; register "حقّي" and "Haqqi" together with the logo; own the Arabic search space with a cited legal library; and use a distinct descriptor in ads ("Haqqi · lawyers and offers").

06

GCC expansion

Country snapshots and an entry sequence. Expansion is Phase 2, after the UAE proves the model.

Country	Market proxy	Regulator and key rules	Local players
KSA	Legal-tech USD 380M, CAGR 15.2% [15]; 15,936 lawyer licences (2023), +315% in seven years [56]	Ministry of Justice; Najiz with ~160 e-services [57]; foreign firms need resident partners and ≥50% Saudi lawyers [58]	Shwra (2020) [47]; Eyas, Baeynh, Adel, Laika, Malakah [17]
Oman	Legal-tech USD 95M [15]; lawyer count not found	MJLA; Royal Decree 41/2024: advocates must be Omani, advocacy and consultancy separate, marketing restricted, PI insurance mandatory [59]	instaSpace (customers in 17 countries) [60]; Qanoon.om [17]
Qatar	Legal-tech USD 130M [15]; 281 lawyers before courts (June 2025) [61]	Ministry of Justice, Attorney Affairs; mandatory training [61]	Laiwyer.ai (700+ users) [62]; Beveron [17]
Kuwait	Legal-tech USD 120M [15]; lawyer count not found	Kuwait Bar Association and MoJ; Feb 2026: 11 lawyers struck off, 3 firms suspended, reports against expats advising online [38]	Muhameen (marketplace) [63]; Uniqarn, Wkeel AI [17]
Bahrain	Legal-tech USD 85M [15]; 1,927 licensed lawyers, 891 practising (Dec 2024) [64]	Ministry of Justice, Islamic Affairs & Endowments	Lawyers.bh (brokerage) [65]; Infiniteware [17]

Entry sequence and conditions

Wave 1 · UAE (Years 1–2)

Dubai pilot, then Abu Dhabi and Sharjah. Condition to move on: base-case KPIs met for two consecutive quarters and no regulatory objection.

Wave 2 · KSA (Year 3+)

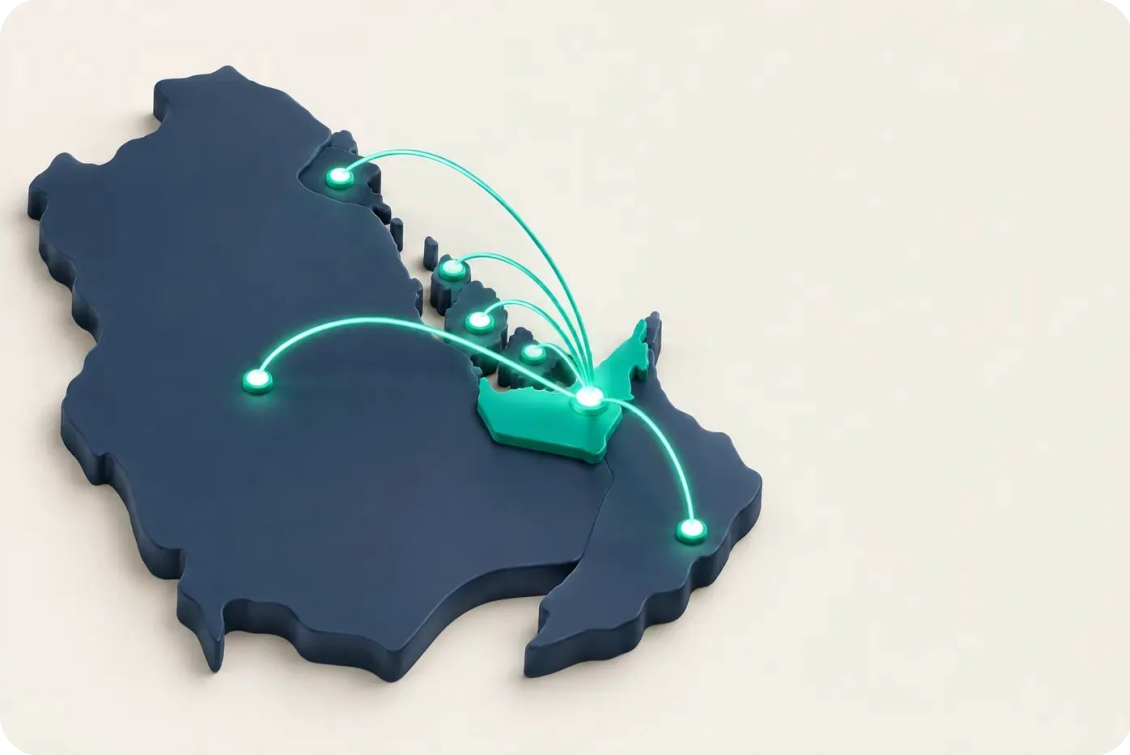
Largest supply and fastest growth, but a local entity and an MoJ position are needed, and Shwra is entrenched [58, 47]. Condition: a local partner and Saudi counsel opinion.

Wave 2b · Oman (Year 3+, low-cost)

Small, but MJLA reforms and Tagnologys' Muscat base lower entry cost [59]. Condition: confirm the marketing restrictions allow a platform model.

Wave 3 · Bahrain, Qatar, Kuwait (later)

Small supply pools; Kuwait is highly sensitive about online advice [61, 38, 64]. Condition: regulator engagement first; non-resident B2C VAT registration where relevant [34].



GCC entry sequence: UAE first, then the next markets in waves.

07

Business model & unit economics

Revenue streams, assumptions, unit economics, a three-year projection in three cases, break-even and funding need. All amounts in AED, excluding VAT.

7.1 Revenue streams and draft prices

Stream	Draft price	Who pays	Benchmark
Client service fee	5% of legal fee (Free plan)	Client	Research suggests 5–8% is the safe client-side range
Haqqi Plus	AED 149/month	Client	≈USD 40.6: above Rocket Lawyer Plus (~USD 20.75/mo), inside JustAnswer's USD 28–125 [53, 54]
Business	AED 2,500/month	Company	In-house counsel substitute; compare Rocket Lawyer Pro [53]
Partner software (Standard / Pro)	AED 399 / 1,499 per firm/month	Law firm	Above HAQQ eFirm (USD 25/seat) [41]; must be framed as software, not lead purchase
Later: paid templates, B2B API	Not modelled	—	Upside only

7.2 Assumptions (all are Tagnologys assumptions unless cited)

Driver	Conservative	Base	Upside
New registered users, Y1 / Y2 / Y3	15k / 40k / 80k	25k / 70k / 140k	35k / 100k / 200k
Registration → paying client	4% / 5% / 6%	6% / 7% / 8%	7% / 8% / 9%
Paid matters per paying client	1.2	1.2	1.2
Average legal fee per matter (fixed price)	AED 3,000	AED 3,500	AED 4,000
Matters on Free plan (pay 5% fee), Y1 / Y2 / Y3	85% / 80% / 75%	85% / 80% / 75%	85% / 80% / 75%
Haqqi Plus average subscribers	120 / 600 / 1,500	250 / 1,200 / 3,000	400 / 1,800 / 4,500
Business average accounts	5 / 25 / 60	10 / 50 / 130	15 / 80 / 200
Paying partner firms, Standard + Pro	15+3 / 35+8 / 60+15	25+5 / 60+15 / 110+30	35+8 / 80+20 / 150+40
Blended marketing cost per registration	AED 50 / 45 / 40	AED 40 / 35 / 30	AED 35 / 30 / 25
Fixed partner acquisition and PR, per year	AED 200,000		
Payment processing on Haqqi revenue	3% (Stripe UAE 2.9% + AED 1; Telr 2.69% + AED 1) [66, 67]		
Plus fulfilment (firm paid per written answer)	AED 50 per subscriber per month (≈1 question used)		
Monthly churn: Plus / Business / partner firms	8% / 3% / 3%		

Supply check: base Year 3 needs 140 paying firms (≈96 matters per firm a year). Dubai alone has 139 licensed consultancy firms plus advocate firms [18], so this requires Abu Dhabi and Sharjah partners by

Year 3. Processing on the legal fee itself is passed to the firm at cost, as a transparent payment charge (as UpCounsel's 3.5% processing tier [49]); counsel must confirm.

7.3 Acquisition cost by channel

Channel	Benchmark	Assumed conversion	Cost per registration	Cost per paying client (7%)
Google Search (legal, Dubai)	CPC AED 15–40 [10]	12% click → sign-up	AED 125–333	AED 1,786–4,762
Meta (Instagram, Facebook)	CPM USD 6.5–16 ≈ AED 23.9–58.8; legal CPC ≈ AED 6.54 [68, 69, 70]	1% CTR; 5% click → sign-up	AED 48–131	AED 683–1,869
Organic: AI assistant, SEO library, social video	Content production cost	—	≈ AED 5	≈ AED 71
Firms onboard their own clients	Partner software value	—	≈ AED 0	≈ AED 0

The decisive number

A Free-plan client yields about AED 210 in fees (1.2 × 3,500 × 5%). Paid search costs AED 1,786+ per paying client, so it cannot carry the model. The base case's AED 35 blended cost per registration assumes about 75% of sign-ups are non-paid (0.25 × ≈AED 120 + 0.75 × ≈AED 5 ≈ AED 34). This must be proven in the pilot with a two-week paid test before CAC is fixed [10].

7.4 Unit economics (base case, Year 2)



From visitors to paying clients: the funnel that drives unit economics.

Per client

Free-plan client: fees 1.2 × 3,500 × 5%	AED 210
less processing 3%	− AED 6.3
Contribution per Free-plan client	**AED 203.7**
Media cost per paying client (35 ÷ 7%)	AED 500
Plus: 149 − 50 fulfilment − 4.47 processing	AED 94.53 / mo
Plus lifetime (1 ÷ 8% = 12.5 months)	AED 1,182
Business: (2,500 − 75) ÷ 3% churn	AED 80,833
Business LTV : CAC (assumed AED 6,000 CAC)	≈ 13.5×

Per partner firm

Matters per firm (5,880 ÷ 75)	78.4 / yr
Legal fees billed via Haqqi (78.4 × 3,500)	AED 274,400
Average subscription per firm (557,100 ÷ 75)	AED 7,428
Subscription as % of fees billed	**2.7%**
UpCounsel attorney charge, for comparison	3.5–15% [49]
Client fees on that firm's matters (274,400 × 80% × 5%)	AED 10,976
Haqqi revenue per firm-year	**AED 18,404**

Read together: the first matter does not pay back a paying client's media cost (AED 204 vs AED 500), so retention, Plus conversion and Business accounts carry the economics. At blended level the base case earns AED 71.8 revenue per new registered user in Year 2 (5,025,900 ÷ 70,000) against AED 35 marketing cost, about 2.1×.

7.5 Three-year projection, base case

AED (unless stated)	Year 1	Year 2	Year 3
New registered users (count)	25,000	70,000	140,000
Paying clients (count)	1,500	4,900	11,200
Paid matters (count)	1,800	5,880	13,440
Paying partner firms (count)	30	75	140
Legal fees processed, GMV (paid to firms, not revenue)	6,300,000	20,580,000	47,040,000
Client service fee (5%, Free plan)	267,750	823,200	1,764,000
Haqqi Plus subscriptions	447,000	2,145,600	5,364,000
Business subscriptions	300,000	1,500,000	3,900,000
Partner subscriptions (399 / 1,499)	209,640	557,100	1,066,320
Total revenue	**1,224,390**	**5,025,900**	**12,094,320**
Payment processing (3% of revenue)	36,732	150,777	362,830
Plus fulfilment (written answers)	150,000	720,000	1,800,000
AI and cloud infrastructure	240,000	420,000	720,000
Gross margin (%)	65.1%	74.3%	76.2%
Marketing and partner acquisition	1,200,000	2,650,000	4,400,000
Team (payroll, fully loaded)	2,400,000	3,600,000	4,800,000
G&A (legal, licences, insurance, DPO, office)	600,000	700,000	900,000
Total costs	**4,626,732**	**8,240,777**	**12,982,830**
EBITDA	**-3,402,342**	**-3,214,877**	**-888,510**

AED (unless stated)	Year 1	Year 2	Year 3
Cumulative EBITDA	-3,402,342	-6,617,219	-7,505,729

All figures are model outputs from the assumptions in §7.2. Revenue = service fee + Plus + Business + partner subscriptions; total costs = processing + Plus fulfilment + AI/cloud + marketing + team + G&A. Team: 8, 12 and 16 FTE average (assumption).

7.6 Three cases compared, break-even and funding

Metric	Conservative	Base	Upside
Year 1 revenue	582,144	1,224,390	1,976,484
Year 2 revenue	2,422,284	5,025,900	7,897,200
Year 3 revenue	5,687,100	12,094,320	18,723,720
Year 1 EBITDA	-3,697,320	-3,402,342	-3,187,811
Year 2 EBITDA	-4,270,385	-3,214,877	-1,849,716
Year 3 EBITDA	-4,123,513	-888,510	2,762,008
Year 3 paying clients	4,800	11,200	18,000
Year 3 partner firms	75	140	190
Year 3 GMV	17,280,000	47,040,000	86,400,000
Cumulative EBITDA, Years 1–3	**-12,091,218**	**-7,505,729**	**-2,275,519**
Monthly break-even (estimate)	**Not reached by Year 4**	**≈ month 33**	**≈ month 23**

Conservative and upside cases use the same cost lines as the base case, except that team and G&A are scaled to volume (assumption): conservative −AED 460,000 in Year 2 and −AED 1,080,000 in Year 3; upside +AED 200,000, +AED 510,000 and +AED 1,080,000 in Years 1–3, versus the base case.

How break-even is estimated

Monthly EBITDA is taken at each year's midpoint (Y1 −283.5k at month 6.5; Y2 −267.9k at 18.5; Y3 −74.0k at 30.5) and a Year 4 extrapolation (revenue +60%, costs +25%, assumption: +260.2k at 42.5). Linear interpolation: 30.5 + 74.0 ÷ (74.0 + 260.2) × 12 ≈ **month 33.** Upside ≈ month 23; conservative not reached by Year 4.

Funding need (base)

Phase 1 build (to be replaced by Tagnologys quote)	750,000
Legal opinion, regulator work, trademark, entity	250,000
Pre-launch team, partner onboarding, launch marketing	500,000
Operating losses, Years 1–3	7,505,729
Subtotal	9,005,729
Contingency 20%	1,801,146
Funding need	**10,806,875 ≈ USD 2.94M**

Sensitivities (base, Year 3)

Service fee at 8% instead of 5%: +1,058,400 revenue, less 31,752 processing, turns Year 3 EBITDA from −888,510 to +138,138. Cost per registration +AED 10: −1,400,000 EBITDA. Conservative case needs about AED 12.1M of operating losses over three years and does not break even, which is why the pilot gates in §10 exist. Funding is comparable to HAQQ's USD 3M round [11].

08

SWOT

Haqqi at launch in the UAE.

Strengths

- AI case brief: a differentiator no listed rival offers [7, 41]
- Compliance designed in: role routing, firm contracting, no commission
- Fixed prices and milestone release build trust
- Working bilingual prototype and a build partner (Tagnologys)

Weaknesses

- Thin take on transactions (5%); paid search does not pay back
- No partner MoUs or brand yet; small advocate pool [19, 9]
- Two-sided cold start

Opportunities

- ≈375k labour disputes a year and large rental volumes [2, 6]
- Government channels as partners; UAE PASS for trust [35, 8]
- SME Business plan; GCC legal-tech growing 13.2% a year [15]
- Arabic search is strong for trust-led legal queries [71]

Threats

- Regulator reads the model as client-steering (Art. 101) [9]
- Legaline moves first; HAQQ name collision [7, 11]
- Free government AI tools improve [45]
- AI citation error damages trust [37]

09

Feasibility scorecard

Weighted criteria; 5 = most favourable. Thresholds: ≥3.75 Go; 3.00–3.74 Go with conditions; <3.00 No-Go.

Criterion	Weight	Score	Weighted	Rationale
Market demand	20%	4	0.80	Large verified dispute volumes; 99% online
Regulatory risk	20%	2	0.40	Arts. 45, 99, 101; no platform rule; mitigable but unproven
Competition	15%	3	0.45	One direct rival, early; free government substitutes
Monetisation	15%	3	0.45	Subscriptions work; transaction take is thin
Technical feasibility	10%	4	0.40	Prototype exists; licensed PSP marketplace products available [33]
Team and partners	10%	3	0.30	Build capability in place; law-firm partners not yet signed
Capital need	10%	3	0.30	≈AED 10.8M base; fundable at seed scale
Total	**100%**	—	**3.10**	**Go, with conditions**



10

Go/No-Go verdict

The recommendation and the conditions attached to it.



Go, with conditions: three milestones open the gate to launch.

Go, with conditions

The demand, digital reach and product edge are real, and the business can reach monthly break-even around month 33 in the base case. But the regulatory question is open and acquisition must be mostly organic. Commit to the pre-launch work now; commit launch capital only when the conditions below are met.

1. **Written legal opinion** from UAE counsel confirming the client-fee and subscription model, the platform/agent role, firm-level contracting and the AI assistant's framing (Arts. 6, 45, 59, 61, 99, 101).
2. **Regulator engagement** with the Ministry of Justice and Dubai Legal Affairs Department, ideally a written no-objection; ADJD before Abu Dhabi.
3. **Partner MoUs with at least 20 licensed firms** in Dubai, of which at least 8 are advocate firms, covering the top three practice areas (criminal, family, immigration) plus labour and rental.
4. **Licensed payment provider** under contract for a marketplace product (separate charges and transfers or equivalent), plus a CBUAE-perimeter opinion; Haqqi never holds client funds.
5. **Six-month Dubai pilot** with KPIs agreed in advance (below). Meeting them releases scale-up capital; missing two or more triggers a model review.

Pilot KPI (proposed targets)	Target
Briefs receiving ≥2 offers within 24 hours	≥ 80%
Brief → hired professional	≥ 15%
Registration → paying client	≥ 5%
Blended cost per registration / non-paid share	≤ AED 40 / ≥ 70%
Registered users → Haqqi Plus	≥ 1%
AI citation accuracy on the evaluation set	≥ 95%
Disputed matters	≤ 3%
Regulatory objections	0

11 Next steps: 90-day pre-launch plan

What happens between this study and the launch decision.

Days 1–30 · Legal and foundations

- Instruct UAE counsel; brief covers fee model, VAT agent model, PDPL and AI framing.
- Trademark clearance for "Haqqi / حقّي" against HAQQ; company entity and trade licence.
- Pull the Dubai Pulse DLAD datasets for a supply census [21]; shortlist PSPs (Stripe, Checkout.com, Tap, N-Genius) and request quotes.

Days 31–60 · Regulator and partners

- Meetings with MoJ and DLAD using counsel's draft opinion.
- Partner outreach to 60 firms to sign 20 MoUs (assumed one-in-three conversion).
- Appoint a DPO, run the DPIA, choose the GCC hosting region.

Days 61–90 · Readiness and gate

- Sign the PSP; complete Phase 1 build and the AI evaluation set.
- Two-week paid test on Google and Meta to validate cost per registration [10, 68]; publish the first bilingual library articles.
- Decision gate: launch the Dubai pilot if conditions 1–4 are met and pilot KPIs are agreed.

Open client questions (not decided here)

Hero CTA wording «احصل على عروض مجانية»; whether step 4 «تابع قضيتك» stays; partner subscription prices (399 / 1,499); whether the consultant's written-answer price (AED 99) is shown.

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