

WISTAF

Funding Civil Justice

January 9, 2023

Clerk of the Wisconsin Supreme Court
P.O. Box 1688
Madison, WI 53701-1688

Re: Rules Petition 22-05 In the Matter of Amendment of Supreme Court Rules
20:1.15 and 20:1.0, Relating to Electronic Banking

To the Clerk of the Wisconsin Supreme Court:

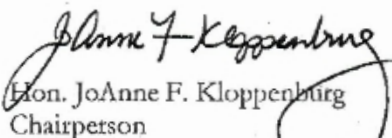
I am writing on behalf of the Wisconsin Trust Account Foundation, Inc. (WisTAF) in support of Petition 22-05, which seeks to amend Supreme Court Rule (SCR) 20:1.15 (Safekeeping property; trust accounts and fiduciary accounts) and SCR 20:1.0 (Terminology) to permit electronic transactions in lawyer trust accounts and to make other related changes to the rules governing lawyer trust accounts.

We concur with the Office of Lawyer Regulation's assessment that deletions of the general prohibitions on electronic transactions found in current SCR 20:1.15(f)(2)c. and (3), along with the accompanying E-Banking and all-in-one exceptions of current SCR 20:1.15(f)(3)b. and c. will allow attorneys to do business in the modern banking world without putting the public at increased risk.

WisTAF is a non-stock, tax-exempt corporation authorized and regulated by Chapter 13 of the Wisconsin Supreme Court Rules to "aid the courts in carrying on and improving the administration of justice and to facilitate the improved delivery of legal services to persons of limited means in non-criminal matters." As Wisconsin's designated interest on Lawyers Trust Accounts (IOLTA) program administrator, WisTAF currently oversees the participation of approximately 165 financial institutions in the trust account program. We work closely with our banking community partners to provide education and monitor compliance with applicable rules and regulations. As a trusted resource on proper trust account management practices for attorneys and firms, WisTAF will join the Office of Lawyer Regulation in educating the legal and banking professions with regard to the proposed Rule amendments should the Court see fit to grant Petition 22-05.

We appreciate the opportunity to provide comment on this petition.

Sincerely,


Hon. JoAnne F. Kloppenburg
Chairperson

Cc: Timothy C. Samuelson and Travis J. Stieren, Office of Lawyer Regulation
Rebecca L. Murray, WisTAF Executive Director

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