

August 13, 2010

Clerk of Supreme Court  
Attn: Carrie Janto, Deputy Clerk  
PO Box 1688  
Madison, WI 53701-1688

**RECEIVED**

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CLERK OF SUPREME COURT  
OF WISCONSIN

Re: Supreme Court Rule Matter 06-04 and 06-04A,  
In the matter of review of amendments  
to SCR 20:1.15

Dear Clerk and Members of the Supreme Court:

Thank you for the opportunity to provide comments on the 2010 proposed amendments to the trust account rules. The comments below are respectfully submitted on behalf of the Board of Directors of the Wisconsin Association of Legal Administrators.

Our concern relates to the manner in which funds received by credit card are required to be transferred from the credit card trust account to the IOLTA account once available for disbursement. Sub-section 20:1.15(e)(4)h.3.a requires advanced costs and advanced fees to be transferred by check.

We believe the necessity to transfer funds by check is an unnecessary burden, requiring firms to bear the expense of printed checks for the credit card trust account and additional staff time to effect the transfers. We believe electronic transfers are not only more efficient, but that such transactions are no less secure than transfers via paper check. In addition, written documentation can be provided that is detailed enough to provide an appropriate audit trail. Also, having physical checks makes them more susceptible to theft and conversion.

In addition, we recommend that you allow firms to transfer funds from their IOLTA advanced fee trust account to their operating account using wire transfers for the same reasons as outlined above. Again, thank you for the opportunity to provide our comments. If you have any questions, we would appreciate the opportunity to discuss these comments in more detail.

Very truly yours,

Tracey L. Reams, CLM  
President, Wisconsin Association of Legal Administrators  
Administrator, Melli Law, S.C.