

1.15A

**Bausch, Lisa**

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**From:** Sara Zier [szier@ejc.org]  
**Sent:** Friday, April 29, 2005 1:49 PM  
**To:** Bausch, Lisa  
**Subject:** comment on rule change to RPC 1.15

Hi Lisa,

I would like to comment on the proposed rule change that amends RPC 1.15 (formerly RPC 1.14 - the IOLTA rule). First, I would like to thank the Ethics 2003 Committee and the WSBA for their diligent and thoughtful review of all of the Rules of Professional Conduct. I support the clear instructions to lawyers contained in RPC 1.15A on how to safely hold client funds, and I support Comment 15 which clarifies that lawyers may not receive earnings credits from banks based on trust account balances.

The Washington Supreme Court's *Civil Legal Needs Study* and the Task Force on Civil Equal Justice Funding Final Report clearly indicate that there is a great need for increased civil legal aid services in Washington state. Currently, an overwhelming majority of low-income people are forced to live with injustices because they cannot access any legal assistance when facing serious civil legal problems. This rule change will have a positive impact on civil equal justice in our state. The clarity of the rule will likely result in increased interest, which will provide increased civil legal aid services.

Many thanks,  
Sara

Sara Zier  
WA State Equal Justice Coalition  
P.O. Box 21026  
Seattle, WA 98111  
Phone: (206) 447-8168  
Fax: (206) 382-3396  
[szier@ejc.org](mailto:szier@ejc.org)  
<http://www.ejc.org>