

1 Hon. Ann A. Scott Timmer, Chair
2 Attorney Regulation Advisory Committee
3 Arizona Supreme Court
4 1501 W. Washington St.
5 Phoenix, AZ 85007

6 **IN THE SUPREME COURT**
7 **STATE OF ARIZONA**

8 In the Matter of:

9 PETITION TO AMEND RULE 43,
10 ARIZ. R. SUP. CT.

11)
12) Supreme Court No. R-19-0030
13)
14) Comment of the Attorney
15) Regulation Advisory Committee
16)
17)
18)
19)

20 Pursuant to Rule 28, Rules of the Arizona Supreme Court, the Attorney
21 Regulation Advisory Committee (ARC) respectfully submits this comment
22 regarding the above-referenced proposed rule amendments.

23 In its review and discussion, it was noted by the Committee that any changes
24 to trust accounting requirements may have unintended effects or consequences.
25 Identifying those effects or consequences are beyond the Committee's expertise,
particularly given the time allotted for comment. ~~and~~ Therefore, the Committee
recommends that this issue be carefully studied before amending this or other rules
pertaining to trust accounting.

RESPECTFULLY SUBMITTED this ____ day of April, 2019.

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Attorney Regulation Advisory Committee

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