LABOR & EMPLOYMENT NEWS

Volume 08 - 01 | Spring 2007

EFFICIENT. EFFECTIVE. EXPERIENCED.

THOMPSON COE

CONTENTS

If you would like to receive this newsletter in the future by e-mail, please contact us at Newsletters@thompsoncoe.com.

The "Iceman" Cometh (Maybe)

You've probably seen the footage on the nightly news or heard the "ICE-breaking" reports on radio. ICE — Immigration & Customs Enforcement, the investigative and enforcement branch of the Department of Homeland Security (DHS) which was created in 2003 when the Immigration & Naturalization Service (INS) was abolished after 9/11 — has been stepping up its enforcement efforts during the past year, including raiding job sites to round up undocumented workers, auditing I-9 compliance, and charging employers with immigration law violations. A recent ICE press release boasts, "During federal fiscal year 2006, ICE arrested 718 individuals on criminal charges in worksite investigations and apprehended another 3,667 illegal workers on immigration violations, a more than three-fold increase compared to 2005."

The Immigration Reform And Control Act of 1986 (IRCA) made it unlawful to hire or retain workers who cannot document their legal rights to work in the United States, with potential fines of up to $10,000 per violation, criminal charges, and seizure of assets and personal property "illegally derived" from employment/exploitation of undocumented workers. IRCA imposed completion of I-9s as a hiring requirement. However, IRCA also prohibited discrimination in hiring based on citizenship, thereby creating an "immigration-related unfair employment practice" remedy that could be pursued by job applicants against employers with as few as four employees. Historically, the enforcement efforts of INS were directed just as much at enforcing prohibitions against discrimination by employers as they were at enforcing prohibitions against employment of undocumented workers. 9/11 changed all that. With a mission "to protect America and uphold public safety," ICE focuses on enforcement of IRCA's prohibition on employment of undocumented workers as one means of eliminating potential threats to national security.

What might all this mean for you, and how can your company best protect itself against both discrimination claims and from immigration law violations or ICE raids?

I-9 Compliance Procedure

The first line of defense is to have proper I-9 compliance procedures. These procedures are summarized in DHS's "The Form I-9 Process in a Nutshell," available on-line at http://www.uscis.gov/files/article/EIB102.pdf, and include: (1) completing an I-9 at the time of hiring; (2) uniformly applying document verification requirements, *i.e.*, not requiring an applicant to produce more than the minimum required documentation; and (3) maintaining a copy of the I-9 and supporting documentation for three years after the date of hire or one year after termination, *whichever is later*.

The "Iceman" Cometh (Maybe), cont'd

Dealing With "No Match" Letters

"No match" letters are letters employers sometimes receive from the Social Security Administration (SSA) informing an employer that the wage and tax statements the employer has submitted to SSA do not match SSA's records, *i.e.*, social security numbers and purported names of employees on whom withholdings are being made do not match. What do you do if you receive such a letter? First, don't panic. Second, don't summarily discharge the affected employees. Last year ICE issued proposed regulations, 71 Fed. Reg. 34281, not yet final, which provide for the following protocol:

- Within 14 days, check your own records to make sure there hasn't been a clerical mistake, *e.g.*, make sure you have correctly recorded and reported the employee's social security number;
- If there has been no clerical mistake, direct the employee to go to the local SSA office to resolve the problem — put the onus on the employee;
- If the employee has been unable to satisfactorily resolve the discrepancy within 60 days, complete a new I-9 without using documentation containing the social security number that is the subject of the no-match letter.

Improving Your "Image"

In July 2006, DHS initiated a new program, ICE Mutual Agreement between Government and Employers (IMAGE), intended to build a cooperative relationship between DHS and employers. The IMAGE program sets forth standards by which an employer can become "IMAGE certified" — creating a presumption the employer is in IRCA compliance and is not knowingly employing illegal aliens. There are three requirements:

- The employer must agree to an ICE audit of its I-9s;
- The employer must agree to use the Basic Employment Eligibility Verification Program (BEEVP), a program operated by SSA and the U. S. Citizenship and Immigration Service (USCIS) which allows employers to check social security numbers and verify employment eligibility *at the time of hiring* — employers may register on-line at https://www.vis-dhs.com/Employer Registration;
- The employer must adopt DHS's list of "best practices," which includes, *e.g.*, establishing an internal training program for completion of I-9s, allowing I-9s to be completed only by persons who have completed the training, establishing a tip line by which employees can report suspected employment of illegal aliens, and submitting an annual report to ICE on compliance.

A full list of the "Best Hiring Practices" is contained at http://www.ice.gov/partners/opaimage/index.htm.

John L. Ross
jross@thompsoncoe.com
214.871.8206

QuickTips

- It is a good idea for employers to conduct a yearly audit of their job descriptions and employee classifications in order to avoid a claim under the Fair Labor Standards Act. Talk to supervisors in each division of your company to ensure that employees are properly classified and are actually performing the tasks listed in their job descriptions.
- Provide training to all of your employees regarding your policy prohibiting discrimination, harassment, and retaliation in the workplace. Separate training sessions may be appropriate for supervisors and non-supervisors. After a charge of discrimination or a lawsuit is filed, it is invaluable for the company to be able to report that training is required for all employees.
- In completing written disciplinary forms, do not inadvertently create an expectation of continued employment. If you provide an employee with a certain amount of time to improve his or her work performance, it is wise to state in the form that employment with the company remains at will and that nothing in the improvement plan guarantees employment for any specific time period.

U.S. Supreme Court Clarifies "Original Source" under the False Claims Act

The False Claims Act, found at 31 U.S.C. §§ 3729–3733, is a federal statute prohibiting false or fraudulent claims for payment to the United States. The Act authorizes the Attorney General or private individuals to bring civil actions to remedy such fraud, to the extent it occurs, but section 3730 provides that "[n]o court shall have jurisdiction over an action under this section based upon the public disclosure of allegations or transactions . . . from the public news media, unless the action is brought by the Attorney General or the person bringing the action is an original source of the information." The Act defines an "original source" as "an individual who has direct and independent knowledge of the information on which the allegations are based and has voluntarily provided the information to the Government before filing an action under this section which is based on the information."

In the case at hand, James Stone, a former engineer for Rockwell International Corp., filed a *qui tam* action in July 1989 against Rockwell under the False Claims Act. Rockwell had been under a management and operating contract with the Department of Energy (DOE) from 1975 to 1989 to run the Rocky Flats nuclear weapons plant in Colorado, which involved the payment of a semi-annual "award fee" as a large part of Rockwell's compensation. The amount of the "award fee" depended on the DOE's evaluation of Rockwell's performance in several areas, including environmental, safety, and health concerns. *See United States ex rel. Stone v. Rockwell Int'l, Corp.*, 92 Fed. Appx. 708, 714 (10th Cir. 2004). Stone took issue at the time with several of the Company's environmental practices, and he predicted the failure of Rockwell's plan to dispose of toxic pond sludge by mixing it with cement and forming solidified rectangular "pondcrete" blocks, which Rockwell planned to store permanently in solid form either at the facility or offsite. In particular, Stone envisioned the ultimate deterioration of the pondcrete blocks, and in 1982 he provided the Federal Bureau of Investigation (FBI) with 2,300 pages of documents showing what he alleged to be a multitude of environmental crimes at Rocky Flats that took place during the time of his employment. Among these documents was a report Stone authored in 1982 stating that the design of the pondcrete system was defective; however, Stone never specifically discussed with the FBI his claims regarding the ultimate failure of the pondcrete system.

Based in part on the information submitted by Stone, the FBI in 1989 obtained a search warrant for Rocky Flats, and the FBI and Environmental Protection Agency (EPA) raided the facility. Shortly thereafter, newspapers published the allegations contained within the FBI's warrant, which stated that (1) pondcrete blocks were insolid "due to an inadequate waste-concrete mixture," (2) Rockwell obtained award fees based upon its alleged "excellent" management of Rocky Flats, and (3) Rockwell made false statements and concealed material facts in violation of the Resource Conservation and Recovery Act of 1976 (RCRA). In 1992, Rockwell pleaded guilty to ten environmental violations, and it agreed to pay $18.5 million in fines, in part for the knowing storage of non-solid pondcrete blocks in violation of the RCRA.

In 1989, when Stone filed his *qui tam* lawsuit, he alleged that Rockwell (1) failed to comply with the RCRA and other environmental laws and regulations and committed numerous violations of these laws in the 1980s, and (2) knowingly presented false and fraudulent claims to the government in violation of the False Claims Act. Only one of the 26 environmental and safety issues Stone described in the confidential disclosure statement he delivered to the Government with his complaint involved pondcrete. With respect to his pondcrete allegations, Stone claimed that the piping mechanism Rockwell used to remove the toxic sludge would not function properly, thus leading to an inadequate mixture of sludge and cement.

The Government eventually intervened in Stone's *qui tam* action in November 1996, and it subsequently filed a joint amended complaint with Stone, in which Stone and the Government alleged that pondcrete's insolidity was not due to any defect in the piping system (as predicted by Stone), but was instead the result of an incorrect cement-to-sludge ratio, as well as an inadequate control and inspection process. At a 1999 trial against Rockwell, none of the witnesses Stone identified during discovery testified, none of the 2,300 documents Stone provided to the Government were introduced in evidence, and Stone and the Government argued that the pondcrete failed only because of an incorrect cement-to-sludge ratio. With respect to their pondcrete allegations, the jury found in favor of Stone and the Government for the April 1, 1987 to September 30, 1988 time frame only, whereas Stone's employment with Rockwell ended a year earlier in March 1986. Rockwell promptly moved to dismiss Stone's claims post-verdict, arguing that they were based on publicly-disclosed information and that he was not an original source.

The U.S. Supreme Court, after several lower court decisions, first held that original-source status under the

Continued on page 6

Do You Really Know Your Employees?

On March 7, 2007, NASA terminated Lisa Nowak's astronaut detail and arranged for her return to the U. S. Navy after her highly publicized attempted kidnapping of a "romantic rival" Air Force captain. On March 28, 2007, vocational nurse Misty Ann Weaver set a deadly office building fire in Houston, killing three. Weaver admitted to setting the fire in order to distract a supervisor from a work deadline. Would either of these fact scenarios support claims for negligent hiring against the employers?

Fortunately for employers, liability for negligent hiring is not based on unforeseeable danger caused by employees who have no prior history of such conduct. Employers can still attempt to protect themselves from legal accountability associated with employee conduct by implementing certain safeguards in the hiring process. At hiring time, many employers focus solely on the positive aspects of adding a new, productive member to the team. It is equally important, however, to assess whether a new hire could create potential problems or dangers for the business down the line.

Overview of the Law

An employer who negligently hires an incompetent or unfit individual may be directly liable to a third party whose injury was proximately caused by the employee's negligent or intentional act. *Golden Spread Council, Inc. v. Akins*, 926 S.W.2d 287, 294 (Tex. 1996). Although this article will focus on negligent hiring, other legal theories for asserting liability against an employer (for the acts or omissions of their employees) include *respondeat superior* and negligent entrustment. Under the doctrine of *respondeat superior*, an employer may be held vicariously liable for the negligent acts of its employee. The careless employee's actions are imputed to the employer "vicariously" – meaning that the employer may be held to answer for the negligence of its employee, even though there has been no negligence on the part of the employer. The employee's acts must be committed within the course and scope of his or her employment.

Similarly, under the negligent entrustment theory, an employer may be held liable for entrusting an employee with personal property, if the employer knew, or should have known, the employee was unfit or incompetent in operating the property. Employers are most commonly accused of negligent entrustment when an employee gets into an accident while driving a business-owned automobile. To establish a claim for negligent entrustment, the plaintiff must show (1) there was entrustment of a vehicle by the owner; (2) the driver was unlicensed, incompetent, or reckless; (3) the owner knew or should have known the driver to be unlicensed, incompetent, or reckless; (4) the driver was negligent on the occasion in question; and (5) the driver's negligence proximately caused the accident. *Schneider v. Esperanza Transmission Co.*, 744 S.W.2d 595, 596 (Tex. 1987). Unlike *respondeat superior*, the employee does not need to be acting within the scope of employment for an employer to be found liable in a negligent entrustment case.

Negligent hiring, on the other hand, is based on an employer's *direct negligence*, rather than the employer's vicarious liability for the torts of its employee. *Doe v. Boys Clubs of Greater Dallas, Inc.* 868 S.W.2d 942, 950 (Tex. App.—Amarillo 1994), *aff'd*, 907 S.W.2d 472 (Tex. 1995). Although an employee's conduct is at issue in a negligent hiring claim, the focus is on the employer's failure to use due care when hiring that particular employee.

Reasonable Care in the Selection of Employees

An employer may avoid liability for negligent hiring by exercising reasonable care in the selection of its employees. Employers should obtain a full and complete work application from all applicants and should then verify the applicant's previous employment and education history. Additionally, the employers should check references and, if relevant, review an applicant's criminal background and credit history. Because many negligent hiring cases involve assault (sexual and non-sexual), conducting criminal background checks on applicants is one of the most significant methods of exercising reasonable care.

Under Texas law, in-home service companies or residential delivery companies are *required* to obtain all criminal history records relating to an officer, employee, or prospective employee of the company whose job duties require or will require entry into another person's residence. Tex. Civ. Prac. Rem. Code §145.002. Any such employer who fails to comply with this requirement is presumed to be negligent in hiring. There are also specific requirements for individuals who care for children, health care workers, and commercial drivers.

Do You Really Know Your Employees?, cont'd

If an employer obtains an employee's criminal record and it does not reveal any information that would alert the employer to the employee's propensities, then an employer has a potential defense to a claim of negligent hiring. For example, in *Doe*, a volunteer working for the Club sexually molested three boys who were members of the Boys Club. *Doe*, 907 S.W.2d 475. The boys then sued the Club, claiming the Club failed to investigate its volunteers. *Id*. at 476. Although the volunteer's record disclosed convictions for driving while intoxicated, the prior DWI convictions did not indicate criminal conduct in any way akin to sexual assault of young boys. *Id*. at 478. The Club, arguably, could not have foreseen that the employee would sexually assault young children. The employee's acts must be *foreseeable*, and an employer should not be expected to guard against unpredictable behavior.

Consider Anti-Discrimination and Privacy Laws

Before implementing a background check policy, an employer should ensure that the policy is applied uniformly and consistently to all applicants, regardless of protected class status. Title VII prohibits not only intentional discrimination, but also neutral job policies that disparately impact or disproportionately affect protected class members. According to the EEOC's *Questions and Answers about Race and Color Discrimination in Employment*, using arrest or conviction records as an absolute bar to employment disproportionately excludes certain racial groups from the workplace. (*See* www.eeoc.gov/policy/docs/qanda_race_color.html).

Before turning down a particular applicant as the result of findings from a criminal history or credit check, employers should ascertain whether the decision could raise a potential discrimination-in-hiring issue. To defend against such a claim, it is the employer's burden to demonstrate that the information obtained raised specific job-related concerns. Failure to consider each applicant's conviction record individually could create claims of discriminatory hiring practices.

Employers should also review and understand the requirements of the Fair Credit Reporting Act (FCRA). The FCRA requires an employer to give notice to the applicant that a consumer report (which may include a variety of background reports, credit history, and other information) will be obtained from a consumer-reporting agency. An employer must obtain the applicant's *written authorization* to conduct such a search. A release allowing the employer to obtain information is also prudent, even if a consumer report is not sought. The Texas Workforce Commission provides a sample form on its website (www.twc.state.tx.us/news/efte/job_references.html). An employer may require the applicant to sign the authorization as a condition of submitting an application for employment.

Once information is obtained, if an employer uses the information obtained as a basis for denying employment, the employer is required to inform the unsuccessful applicant (or a discharged employee) of the reason for the adverse action. The employer must also provide a copy of the report to the individual, the consumer reporting agency's contact information, and a copy of the "Summary of Your Rights under the Fair Credit Reporting Act."

An employer who fails to take steps to investigate an applicant's background may be more likely to face a claim of negligent hiring.

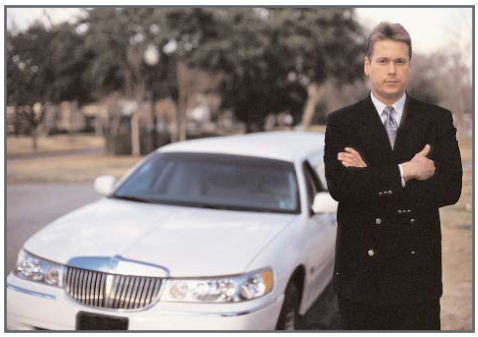
Conclusion

An employer who fails to take steps to investigate an applicant's background may be more likely to face a claim of negligent hiring. With regard to Misty Ann Weaver, if a background search had disclosed information that would have made her acts foreseeable, a claim for negligent hiring could potentially be supportable. Although Lisa Nowak enjoys certain procedural protections in her public sector job, a private employer would most likely have a legitimate business interest in terminating her employment for her bizarre "off-duty" conduct based on its violent nature and harm to the employer's reputation.

Audrey Lewis Juranek
ajuranek@thompsoncoe.com
713.403.8382

Is Your Employee "Engaged in Interstate Commerce"?

Recently, the Fifth Circuit Court of Appeals – the federal appellate court covering Texas – in *Sobrinio v. Medical Center Visitor's Lodge, Inc.*, addressed the issue of whether an employee was engaged in interstate commerce and covered under the Fair Labor Standards Act (FLSA) when he performed his job duties. The plaintiff, Gregorio Chavez Sobrinio, was a full-time employee of Medical Center Visitor's Lodge, Inc. (MCVL), an 18-room motel that houses patients (mostly from out of town) seeking treatment at the Texas Medical Center in Houston, TX. Sobrinio acted as a janitor, security guard, and a driver for MCVL's guests.



Sobrinio's role as a driver for the motel's guests only entailed transporting the guests to and from the Texas Medical Center and nearby stores. At no time did Sobrinio ever transport the guests to or from any airport or other interstate transportation center. Subsequently, Sobrinio filed suit against MCVL alleging that he was: (1) paid below minimum wage and (2) not properly compensated for overtime, in violation of the FLSA.

Accordingly, the Fifth Circuit affirmed the district court's decision, holding that Sobrinio was not "engaged in interstate commerce" when performing his job duties; and, thus, he was not covered by the FLSA. Sobrinio's sole argument was that he was "engaged in interstate commerce," which left him with a relatively difficult argument. In fact, the United States Supreme Court stated in *Armour & Co. v. Wantock*, that "the test of whether one is in commerce is obviously more exacting than the test of whether his occupation is necessary to production for commerce."

Sobrinio was not entitled to the FLSA's protections based on his allegations. The fact that many of the motel guests were out-of-state did not alter the fact that Sobrinio was merely providing local transportation for motel patrons. This ruling would probably have been different if Sobrino had transported motel guests across state lines and/or to airports.

Derrick G. Parker
dparker@thompsoncoe.com
214.871.8231

"Original Source"

Continued from page 3

False Claims Act is jurisdictional, meaning that a court is deprived of the power to rule on a party's claims where he is not an original source, regardless of when the determination of the lack of status is made. The Court next determined that Stone was not an original source, because he did not meet Section 3730(e)(4)(B)'s requirement that he have "direct and independent knowledge of the information on which the allegations are based," for the following reasons:

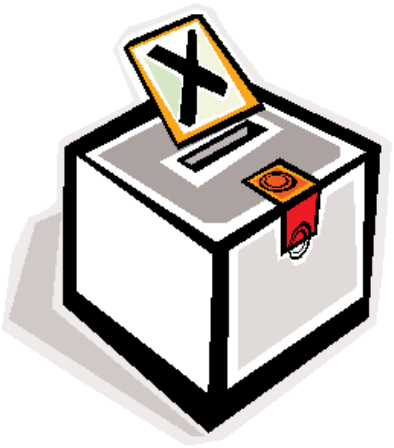
1. The "information" referred to in this provision is the information upon which the individuals' allegations are based, rather than the publicly-disclosed allegations; and
2. The term "allegations" as used in this provision is not limited to the allegations of the original complaint, meaning that Stone must have satisfied the original source exception throughout *all* stages of the litigation, rather than only in the initial allegations contained in his original complaint.

The Court noted that the only false claims found by the jury involved insolid pondcrete discovered after Stone left his employment at Rockwell. Accordingly, the Court held that Stone's prediction that the pondcrete would be insolid because of a flaw in the piping system did not qualify as "direct and independent knowledge" of the pondcrete defect. Stone did not *know* that the pondcrete failed; rather, he *predicted* it. The Court found that "[e]ven if a prediction can qualify as direct and independent knowledge in some cases..., it assuredly does not do so when its premise of cause and effect is wrong. Stone's prediction was a failed prediction, disproved by Stone's own [amended] allegations." The Court also held that the Government's intervention in the lawsuit did not provide Stone with an independent basis of jurisdiction. Ultimately, the Supreme Court found that the Government's judgment against Rockwell could stand, because the action converted into one brought by the Attorney General once it was determined that Stone failed to meet the jurisdictional prerequisites for suit.

Stephanie Rojo
srojo@thomsoncoe.com
713.403.8291

"Free Choice" Or Free Elections?

Congressional elections do make a difference. For a number of years, unions — which have been on a decline in the United States for decades — have tried unsuccessfully to modify the procedures by which workers can seek to form unions, making it easier for unions to organize employees. Now, with a Democratically-controlled Congress, unions are poised to alter radically nearly three quarters of a century of labor management relations. Ever since the National Labor Relations Act (NLRA) was enacted in the Roosevelt administration, the issue of whether workers would be represented by a union has been determined by secret ballot voting of the affected workers in an election supervised by the National Labor Relations Board (NLRB). However, under proposed legislation, sponsored by Senator Ted Kennedy — euphemistically called the "Employee Free Choice Act" — bargaining units could be certified *without any elections whatsoever* and collective bargaining agreements imposed upon employers through binding arbitration. Here is how the proposed legislation would radically alter the labor-management relations landscape:



- If a union collects signatures on 50% + 1 authorization cards, the NLRB would be *required* to certify a bargaining unit — *there would be no government-supervised, secret-ballot election*;
- After a union is certified, if no collective bargaining agreement is reached within 90 days, the company and the union would be required to participate in mediation with the Federal Mediation and Conciliation Service. In contrast, under current law, if a bargaining unit is certified, the parties are left to the economic weapons of the marketplace, *i.e.*, strikes and lockouts, to determine whether an agreement will be reached; and, although parties are required to bargain in good faith, there is no requirement to reach an agreement;
- If, after 30 days of mediation, the parties are unable to reach a collective bargaining agreement, the parties would be required to submit to *binding arbitration*;
- The resulting collective bargaining agreement would be binding for *two years*.

Additionally, the proposed legislation provides for other significant remedies targeted against employers, including:

- The NLRB would be required to seek a federal court injunction against employers to prevent unfair labor practices during organization or contract drives;
- A fine of up to *$20,000* for "willful" unfair labor practices allegedly committed by an employer during an organization or contract drive;
- *Treble back pay damages* in favor of any employee found to have been discharged as a result of an unfair labor practice committed during an organization or contract drive.

Text of the legislation can be found at http://edlabor. house.gov/bills/efca_billtext.pdf.

The legislation was approved by the House of Representatives on March 1, 2007, http://edlabor.house.gov/micro/efca.shtml; and hearings were initiated in the Senate Health, Education, Labor and Pensions Subcommittee on March 27, 2007. Understandably, the legislation is being heavily promoted on Democratic, liberal, and union Web sites, *e.g.*, Teamsters: http://www.teamster.org/action/political/EFCA.asp; UAW: http://www.uaw.org/solidarity/07/0207/uf02.cfm; Working for Us Political Action Committee: http://workingforuspac.org/pages/the_employee_free_choice_act; AFL-CIO: http://www.massaflcio.org/node/1556; IBEW: http://www.ibew.org/articles/06daily/0612/ 061211_freechoice.htm; The Nation: http://www.thenation. com/doc/20060206/miller; United Nursing Association: http://www.unionvoice.org/campaign/EmployeeFreeChoiceAct_Senate; UFCW: http://ufcwaction.org/campaign/free_choice; APWU: http://www.apwu.org/news/webart/2007/webart-0727-efca-070330.htm; the Democratic Party: http://www.democrats.org/a/2007/02/ employee_free_c_3.php; *etc*.

What can you do? Contact your Congressional representatives and Senators or pro-employer groups, such as the Coalition for a Democratic Workplace, http://www.myprivateballot.com/.

John L. Ross
jross@thompsoncoe.com
214.871.8206

Thompson Coe Labor & Employment Law Section

Partners

- John L. Ross :: 214.871.8206 | jross@thompsoncoe.com
  Board Certified in Labor & Employment Law and Civil Trial Law, Texas Board of Legal Specialization
- Elizabeth M. Marsh :: 512.703.5047 | emarsh@thompsoncoe.com
  Board Certified in Labor & Employment Law and Civil Trial Law, Texas Board of Legal Specialization

Associates

- Eric J. Hansum :: 512.703.5076 | ehansum@thompsoncoe.com
  Board Certified in Labor & Employment Law, Texas Board of Legal Specialization
- Stephanie S. Rojo :: 713.403.8291 | srojo@thompsoncoe.com
- Audrey Lewis Juranek :: 713.403.8382 | ajuranek@thompsoncoe.com
- Derrick G. Parker :: 214.871.8231 | dparker@thompsoncoe.com

The Attorneys in the Labor & Employment Section of Thompson Coe counsel public and private sector management in connection with all federal, state and local laws regulating employment. Our experienced attorneys can help clients by simplifying the employment law maze, resolving sensitive employment-related issues and reducing the risk of costly lawsuits.

700 North Pearl
25th Floor
Plaza of the Americas
Dallas, TX 75201
214.871.8200 - Tel
214.871.8209 - Fax
www.thompsoncoe.com

FIRST CLASS MAIL
U.S. POSTAGE
PAID
DALLAS, TX
PERMIT NO. 4209

THOMPSON COE

Austin
Dallas
Houston
Saint Paul

How to Reach Us

If you would like more information about the issues discussed in this newsletter, or you have a suggestion for a future article, please contact Landa Miller at lmiller@thompsoncoe.com or 214.880.2608.

Labor & Employment News may also be found online at www.thompsoncoe.com.