



presents

“Textual Harassment”: New Employer Risk From Text Messages, Email and Internet Communications

Avoiding, Investigating and Defending Employee Race, Sex and Disability Claims

A Live 90-Minute Teleconference/Webinar with Interactive Q&A

Today's panel features:

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Eric L. Barnum, Partner, **Schiff Hardin**, Atlanta

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Tuesday, January 19, 2010

The conference begins at:

1 pm Eastern

12 pm Central

11 am Mountain

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**“Textual Harassment”:
New Employer Risks From
Text Messages, Emails and
Internet Communication.**

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Today's Presentation

- Evolving harassment laws and new workplace communication technologies (e.g. Web 2.0): How do they interact with one another?
- What are the employer's obligations when these two worlds meet?
- Is there a real problem? True-life cases presented by a seasoned mediator confirm "Yes".
- What are the latest privacy and discovery issues in this Web 2.0 environment?
- What does Web 2.0 mean for workplace investigations?
- Are there some practical tips for the Web 2.0 workplace?

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The Perfect Storm: a Preview

- Harassment laws present a legal environment where employers are *charged with control* over the workplace.



- Meanwhile. . . rapid changes in communication technology and workforce demographics are creating *a loss of control* over the workplace.

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Harassment Law Evolves from the 1980s

- “An employer should take all steps necessary to prevent sexual harassment from occurring.” 29 CFR § 1604.11(f) (1985)
- No economic effect is necessary for harassment to be actionable. *Harris v. Forklift Systems, Inc.* (1993) 507 U.S. 959

Cyber-Harassment Starts to Take Shape



- *Rudas v. Nationwide Mutual Ins. Co.*, 1997 U.S. Dist. LEXIS 14988 (E.D. Pa. 1997)
- *Yamaguchi v. U.S. Department of Air Force*, 109 F.3d 1475 (9th Cir. 1997)

Harassment Law: a Continuing Evolution

- Notice of harassment need not come directly from the “victim” to impute liability to the employer. *Young v. Bayer* 123 F.3d 672,674 (7th Cir., 1997)
- Sexual harassment need not be motivated by sexual desire – any discriminatory treatment based on sex could qualify as sexual harassment. *Oncale v. Sundowner Offshore Services* (1998) 520 U.S. 1263

Harassment Law: a Continuing Evolution

- An employer's affirmative defense to harassment requires a showing of reasonable care to prevent AND promptly correct harassment. *Faragher v. City of Boca Raton* (1998) 524 US 775.
- A employer's policies and investigation are critical to the assertion of the defense. *Lindeman & Kadue*, "Sexual Harassment in Employment Law" (1999)
- A poor investigation can also create an inference of malice for punitive damages. *Cadena v. The Pacesetter Corp.* (10th Cir. 2000) 224 F.3d 1203

Employer “duties” Expand

- Statutes and judicial decisions have served as a springboard to argue the existence of a legal duty to prevent and correct unlawful discrimination and harassment.
- Employers must take all reasonable steps to prevent retaliation. *Taylor v. City of Los Angeles Dep’t of Water & Power* 144 Cal.App.4th 1216 (2006)

Web 2.0 Gains Notoriety

- In 2004, the term began its rise in popularity at the the first Web 2.0 conference.
- The conference hosts outlined their definition of the "Web as A Platform", where software applications are built upon the Web as opposed to upon the desktop.
- Web 2.0 contrasted with what the hosts called "Web 1.0".
- In 2006 Time Magazine named "You" the 2006 TIME magazine Person of The Year. TIME selected the masses of users who were participating in content creation on social networks, blogs, wikis, and media sharing sites.

Web 2.0 Goes Mainstream

I work down at the Pizza Pit
And I drive an old Hyundai
I still live with my mom and dad
I'm 5 foot 3 and overweight
I'm a sci-fi fanatic
A mild asthmatic
And I've never been to second base
But there's whole 'nother me
That you need to see
Go checkout MySpace



Brad Paisley, Country Singer
*"*Online" (#1, 2008)*

'Cause online I'm out in Hollywood
I'm 6 foot 5 and I look damn good
I drive a Maserati
I'm a black-belt in karate
And I love a good glass of wine
It turns girls on that I'm mysterious
I tell them I don't want nothing serious



Web 2.0: A Cultural Revolution at Work

- Is Web 2.0 a one-way or a two-way street?
- Who actually uses Web 2.0 services and sites at work?
- What are the five most popular web tools and how are they used in the workplace?
- What do Web 2.0 users communicate about at work?

Web 2.0: Survey Says Your Employees are Doing What?

- “My Job”, “My Work”
; “My Boss” OR Food,
Sex, Sports, Dating?
- Fifth most popular site
in the world is ...?
- Employees average 3
hours/week on
personal use of work
2.0 resources



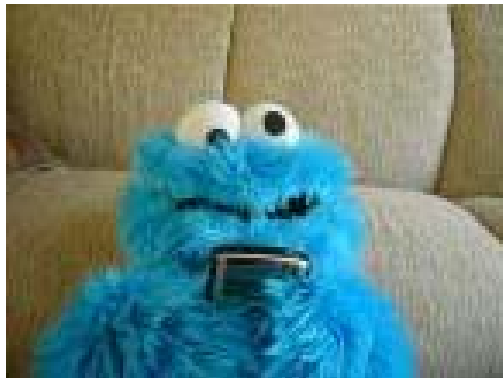
"IT'S SO EXHAUSTING TO FAKE WORK!..."

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Meanwhile. . . Email Gives Way to Texts

Texting becomes more commonplace than the internet and phone calls for personal use.



Texts Differ From Emails

- Texting is different than emailing in subtle ways.
 - First, text messages potentially can antagonize recipients in ways not easily ignored.
 - Second, texting feels even more casual than emailing because the nature of the messages easily leads to inappropriate or offensive comments.

DOJ Report – Text Harassment on the Rise

- A recent U.S. Justice Department report found that almost 25 percent of all stalking or harassment victims reported that the perpetrators had used some form of cyberstalking to harass, increasingly including text messaging.



New Text Harassment Suits

- **Central Michigan University.** Text messages were utilized by two female soccer players who accused their Central Michigan University coach Mr. DiTucci, of sexual harassment in securing a \$450,000 settlement.
- **Louisiana State Democratic Party.** The Party was sued by an employee alleging that her boss, a former executive director of the Party fondled her and refused to pay her wages unless she had sex with him. Much of that communication came from text messages.

New Text Harassment Suits

- **World Wrestling Entertainment.** The WWE's Global Licensing Coordinator alleged harassment by a Senior Director with whom she worked closely. The complaint alleges pursuit of an intimate relationship via text messages and a log of alleged emails.



The Perfect Storm Arrives

- The legal backdrop has evolved since the 1980s to include lowered notice standards, strict liability, employer prevention requirements and “tortification”.
- Meanwhile Web 2.0 technology marches on and new cases start to appear in the workplace.

Practical Hints: An Overview

- Web 2.0 policies: the essentials
- Email: policies, tips and evidence
- Social Networking: steps you can take
- Facebook: recent changes
- Blogging: workplace policy issues
- Texts: practical approaches to privacy
- Twitter, video and training

Web 2.0 Policies are Essential

- Web 2.0 will increasingly encompass more aspects of everyday life.
- Employers must shield themselves through Internet usage and communication policy that covers both at-work and out-of-work usage, including Web 2.0.
- But an internet usage and communication policy alone is not sufficient.

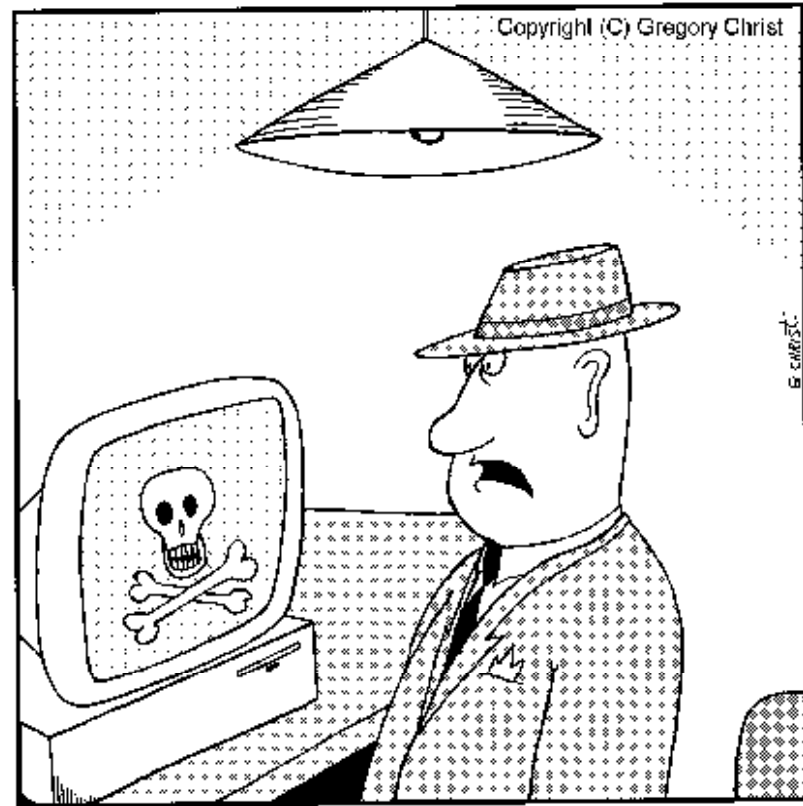
Policies Must be User Friendly

- It's critical to implement a "user friendly" policy which will permit a later finding that the plaintiff's failure to use it was unreasonable.
- This ties to the employer's affirmative defense.

What kind of policy?

Acceptable Use

- Employers should consider an acceptable use policy for employees.
- What should be forbidden?
- What should be warned against?

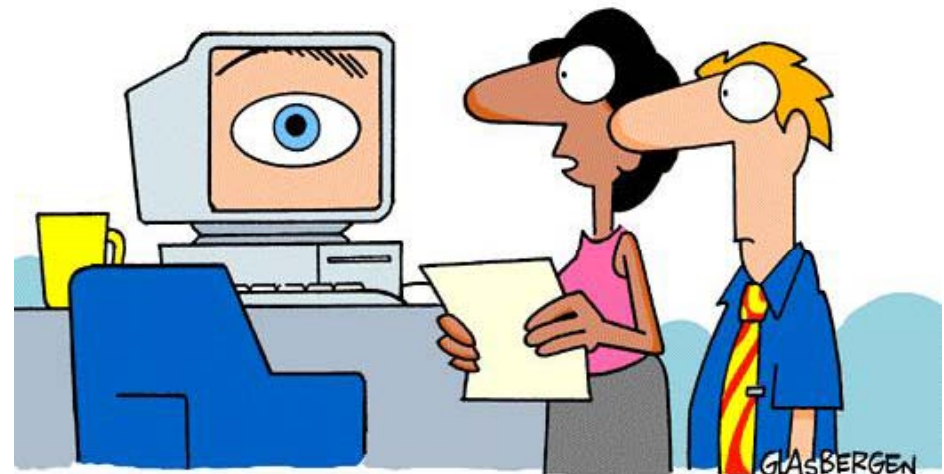


Hey boss! I think Larry The Shark just sent us an "e-threat"...

What Kind of Policy? Monitoring

- An employer should also inform employees that the employer may monitor employee communications through employer equipment.
- Warn employees they have no privacy in work equipment, and any suspicious information may be disclosed.

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**“When the boss isn’t around to watch us,
he loads up this screen saver.”**

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What Kind of Policy: Monitoring

- Communicate this information to employees multiple times.
- One way to repeat the policy might be to have it appear every time an employee logs onto a network or sends a message.

Electronic Use Policies: The Benefits

- Employer successfully defended sexual harassment suit because it had a policy expressly prohibiting use of email to send sexually inappropriate communications. *Schwenn v. Anheuser-Busch, Inc.*, 1998 WL 166845 (N.D. NY April 17, 1998)

Email Policies: Tips

- Policy should be as clear as possible to reduce an employee's expectation of privacy.
- Employer may choose to completely prohibit the use of e-mail for non-work purposes.
- Employer may prohibit e-mail for non-work purposes during work time, which would allow employees to use e-mail during breaks or after hours.
- Employer may allow personal use of email within certain boundaries (e.g., restrict certain websites).



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Email Policies: Application

- Conduct random and even-handed monitoring, as disclosed in the policy
- Otherwise plaintiff may allege email policies were applied in a discriminatory manner;
- *Wildberger v. Fed. Labor Relations Auth.*, 132 F.3d 784 (D.C. Cir. 1998);
Cochrane v. Houston Light & Power Co., 996 F. Supp. 657 (S.D. Tex. 1998)

Emails – Gathering Evidence



- *Be Careful How You Gather Evidence*
- Unauthorized collection of evidence from a third-party server could certainly be unlawful.
- *The SCA Applies to Former Employees Attempting to Access E-Mail Stored on the Employer's Server*

Social networking: Issues

- Employees need rules of the road: the employee manual.
- *Should my company allow social networking at work at all?*
- *Should our policy address Web. 2.0 activity at work and away from work?*
- *What are my monitoring options and considerations?*
- *What about negative portrayals of our company online?*
- *How will social networking intersect with my broader harassment, technology, and confidentiality policies?*

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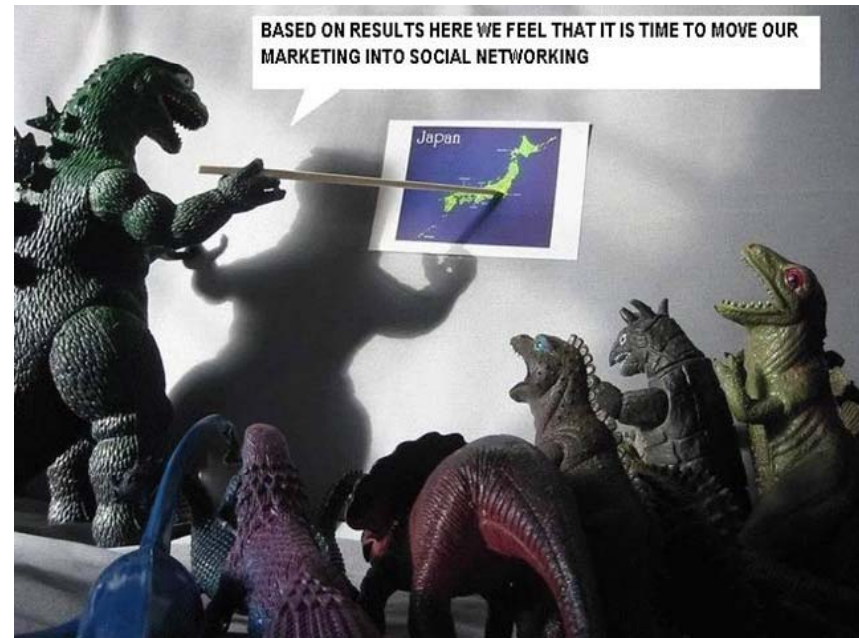
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Social Networking: Steps to Take

- Establishing a policy that provides easily understood guidelines for employees' social media activities whether authorized by the employer or not.
- Training also is very important. Employers need to train managers and employees on how to respond to and handle the many complicated issues raised by the intersection of work and social media activity.
- What if employees are using their cell phones for social networking, not utilizing company technology?

Social Networking: Steps to Take

- And what if they are doing it on their own times: breaks and lunch?
- First Amendment protections and Connecticut law.
- Can employees assume that because the company hasn't blocked a social site from being accessed that it must be okay for them to use it during the day?



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Facebook Changes

- Facebook recently asked each of its 350 million users whether they wanted to change their privacy settings to new settings offered by Facebook.
- Why might this matter to employers?
- What's the significance of this change in light of the harassment laws discussed today?



Blogging

- Consider the impact that employee blogging may have on your business.
- Consider a separate blogging policy to address off duty blogging on the employee's own time.
- If you don't endorse blogging, consider supplementing your electronic resources policy to prevent employees from using corporate communications resources to view or post to any blog not unrelated to work.

Text Messages: Tips

- Employers can prohibit employees from conducting any company business other than over the corporate network.
- Employers can limit company-issued electronic devices to those that can be configured to route all communications through the corporate network.
- Employers can defeat an employee's expectation of privacy by distributing a policy clearly stating that employees communications using corporate resources will be monitored and are not private.

Text Messages: Tips

- What if my company wants to review employees' text messages?
- Does my company store its messages with a service provider?
- Does the company really want to review the messages?
- What role should IT play?



Twitter

- Tweets are subject to misinterpretation due to their short length.
- Tweets create a “permanent” record on the internet.
- Tweets are generally not well thought out.

Training

- The greatest impact of recent court rulings is in the area of training.
- Historically, employers concentrated their training on supervisors and management-level employees.
- Training goals must be expanded. Now training rank and file employees in the use of the complaint procedure is as critical as training supervisors to refrain from engaging harassment.

Thank You for attending today!

- Dd we kep u wake? Typ “yes” if u lrnd somthn tdy.



Any Questions or Comments?

- Please contact: Clint Robison at crobison@hinshawlaw.com or (310) 909-8046
- You can also find us at www.twitter.com/EmployerLawyer



Textual Harassment: New Employer Risks From Text Messages, Email and Internet Communications

Privacy and Discovery Issues

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Legal Considerations and Certain Privacy Implications

Introduction

- European Union: Collection and Processing of Personal Information Highly Regulated
- U.S.: No General Restrictions on Collection and Processing of Personal Information
 - No “Uniform Employee Privacy Act”
 - No “Restatement of Employee Privacy”
 - Sectoral Approach to Privacy, with some protection for employees financial and health information, consumer report information

Stored Communications Act

- Intentionally access
- Without authorization
- Access of authorization
- Exception: *conduct authorized*

Computer Systems Protection Act

- Similar to Stored Communications Act
- Invasion of privacy – medical, employment, salary, credit
- Password disclosure

Electronic Communications Privacy Act

- No intentional interception of communications
- Designed to provide less protection to items in “storage” than “transmission”
- Exception: “provider”, OCOB, and consent

NLRA §§ 7 and 8(a)(1)

Employee blogging and social networking may be protected if

- Notified other employees
- Discussed terms/conditions
- Other employees responded
- **No surveillance!**

Legal Protections for Trade Secrets

- Criminal & Civil Protections
 - Criminal Laws
 - Computer Fraud & Abuse Act, 18 U.S.C. §1030 (federal)
 - Economic Espionage Act, 18 U.S.C. § 1831-39 (federal)
 - State Trade Secret Theft Laws
 - State General Theft Laws

Legal Protections for Trade Secrets (cont'd.)

Civil Laws

- Misappropriation of Trade Secrets
- Breach of Fiduciary Duty
- Breach of Contract
- Other State Laws
 - Tortious Interference with Contract
 - Virginia Civil Conspiracy Statute (treble damages and attorney's fees)

Example of Current Trade Secrets Case

- *Motorola, Inc. v. Lemko Corp.*, 609 F. Supp. 2d 760 (N.D. Ill. 2009)
 - In this case, Ms. Jin, an engineer at Motorola returned from an extended medical leave, during which, unbeknownst to Motorola, she had accepted a position with a competitor. After two days back in the office with access to secure information, she bought a one-way ticket to China.
 - At Chicago O'Hare Airport, Customs and Border Protection agents found her in possession of:
 - Several technical documents labeled "Motorola Confidential Proprietary"; a laptop computer; a thumb drive; four external hard drives; 29 CD-recordable discs; and a videotape.
 - The electronic devices were found to contain over 1,000 of Motorola's source code files.
 - Motorola estimates that Ms. Jin stole \$600 million in corporate intellectual property.
 - In addition to Motorola's civil case against Ms. Jin, the United States has indicted Ms. Jin under three counts of the Economic Espionage Act.



Biggest Risk

**You now know what is being said
and may be held accountable for it**



(Second) Biggest Risk

You could have known what was being said and may be held accountable for it

Employment Decisions

- Who created the website/posting/blog?
- Do you have the right person?
- Are you applying the practice uniformly?

Steingart v. Loving Care Agency

408 N.J. Super. 54 (June 26, 2009)

- Plaintiff was Executive Director of Nursing
- Loving Care provided a laptop to plaintiff
- Plaintiff communicated with her lawyers using the Company-issued computer, through her personal web-based, password-protected Yahoo!® e-mail account.
- The Company's lawyers read numerous communications between plaintiff and her counsel.
- The Company's policies reserved the right to review all e-mails.
- Held: The Company's policy was ambiguous as to whether personal e-mails were the Company's property.
- Held: Use of the Company's computer did not waive the attorney-client privilege.
- Held: The Company's counsel acted unethically by reviewing the privileged e-mails.

Quon v. Arch Wireless

529 F.3d 892 (9th Cir, 2008)*

- Arch Wireless provided 22 pagers to the City of Ontario for wireless text-messaging services
 - Text messages were transmitted over Arch's computer network, and archived.
 - The City had no specific policy regarding text-messaging on pagers.
 - The City's computer policy prohibited personal use of networks, and stated users have no expectation of privacy.
 - Quon paid overage fees for exceeding limits on text messages, in order to avoid auditing for personal messages.
 - The City obtained copies of Quon's text messages.
 - Held: The City violated the Stored Communications Act, Fourth Amendment, and the California constitutional right to privacy
-
- * Writ of certiorari granted: *City of Ontario v. Quon, et al.*, U.S. No. 08-1332 (12/14/09)

Pietrylo v. Hillstone Restaurant Group
2009 U.S. Dist. LEXIS 88702 (D.N.J. Sept., 29, 2009)

- Jury found that managers violated the Stored Communications Act by accessing a limited-access chat group on MySpace® where the Company was discussed.
- Employee testified that she felt coerced by her managers into discussing the password for the limited-access chat group.
- Jury awarded \$3,403, plus punitive damages of \$13,612.

Hernandez v. Hillsides, Inc. 47 Cal.4th 272 (August 2009)

- Hillsides was a residential facility for abused children.
- Plaintiffs did clerical work during the day in a closed office.
- Late at night, one of the plaintiffs' computers was used to visit pornographic websites by unknown person(s).
- Hillsides installed a hidden camera in plaintiffs' office for 21 days.
- The camera was operated three times at night, and plaintiffs were not taped.
- Held: Hillsides intruded upon the plaintiffs' reasonable expectation of privacy, but the intrusion was not highly offensive to a reasonable person.
- "Hence, no cause of action will lie for accidental, misguided, or excusable acts of overstepping upon legitimate privacy rights."

LVRC Holdings LLC v. Brekka **581 F.3d 1127 (9th Cir. Sept. 2009)**

- LVRC operates a residential treatment center for addicted persons.
- LVRC had no employment agreement with Brekka, and had no guidelines regarding employee computer usage.
- Brekka e-mailed LVRC documents from his Company-issued computer to his personally-owned computer.
- LVRC was aware that Brekka ran two consulting businesses related to rehabilitation services.
- Brekka considered purchasing an ownership interest in LVRC, but resigned when negotiations broke down.
- Held: Brekka's e-mailing of LVRC documents to his personally-owned computer did not constitute accessing LVRC's computers "without authorization" under the Computer Fraud and Abuse Act.
- Declines to follow *International Airport Centers, LLC v. Citrin* (7th Cir. 2006).

Hypothetical # 1

Patty Promotion is seeking a promotion from Hostess to Sales Manager. Sally Supervisor decides to search her Facebook® page, to see what type of friends she has and what types of activities she is engaged in, since the promotion will require more client contact.

“Dooched”

Patty's page says she enjoys “smokin” and “bustin caps” with the homies?

But what if?

Based on Patty's page, Sally learns that Patty may have a disability that will require a costly accommodation.

- Can Sally ignore that information and make the same decision she would have made had she not been privy to the information?
- How would Sally prove that she did not consider the disability?

Possible Solutions

- Non-decision maker conducts search
- Filter out protected information
- Determine criteria to be considered in advance

Hypothetical # 2

A few weeks later, Patty gets upset with Sally. She and other employees set up an account on Myspace® where they post derogatory information about the company. The company gains access to the account and terminates their employment.

- Does it matter if the account is password protected?
- What if the employer obtained the password by threatening the employee with an adverse employment Action?
- Invasion of privacy?
- Punitive damages?

Hypothetical # 3

CNN producer maintains a personal “blog”.
Not password protected and is accessible to the public. Can he be “dooxed” for his controversial views on:

- The war in Iraq
- The 2008 elections
- Gay marriage
- Octomom

Is this a real concern or is much ado about nothing?

- Dated information?
- So what if the employee lists an activity as “drinking”?
- What about “I like to blow things up”?
- Is there a line?

WHAT CAN YOU DO?



Questions?

A Mediator's Perspective: “Hard Evidence Rules the Day”



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Three Case Studies to Learn From:

1. Plaintiff's Attorney Nightmare:

So you thought you had the case of your career; until you saw the evidence.

2. Defense Counsel Can Learn Something Too:

Just because it's written doesn't make it true; make sure you know what you have before exposing it.

3. Employees Face Their Permanent Record:

If it's been on the Internet it can and will be found.

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CASE STUDY 1: There are Two Sides to Every Story-- Texts and Emails Tell the Whole Story



1. Plaintiff's Attorney: "Best Case I Ever Had, Just Look at the Evidence."
 - a) Plaintiff has copies of discriminatory and harassing texts
 - b) Plaintiff has copies of discriminatory and harassing e-mails
 - c) Plaintiff has a photograph of a Sombrero

CASE STUDY 1: There are Two Sides to Every Story-- Texts and Emails Tell the Whole Story



2. Defense Attorney: “ We Have a Defense, Just Look at the Evidence.”
 - a) Defense Has the Complete Text Strings
 - b) Defense Has the Complete Email Strings

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CASE STUDY 2: Social Networking: Do You Really Have the Evidence You Think You Do?



- I. Plaintiff's Case is Based On Her Credibility
 - a) Plaintiff's Allegation: Sexually Harassed by Older Top Executive
 - b) Plaintiff presents as Young, Religious, and Deeply Offended

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CASE STUDY 2: Social Networking: Do You Really Have the Evidence You Think You Do?



II. The Defense “got’ em”; or did they?

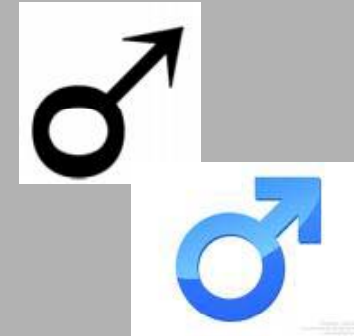
a) Plaintiff’s Facebook Page has Arguably Inappropriate Comments From Friends

b) Friends of Plaintiff Post Inappropriate Images and Comments

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CASE STUDY 3: I Was Harassed and Forced Out of the Closet. Really? Watch this YouTube Video.



I. Plaintiff Presents Well Articulated Male on Male Sexual Harassment Case

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CASE STUDY 3: I Was Harassed and Forced Out of the Closet. Really? Watch this YouTube Video.



II. Homework Pays Off

- a) Company Presents YouTube Video of Plaintiff Dancing Scantily Clad in Women's Clothing

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CASE STUDIES: Lessons Learned



Plaintiff: Can't Rely Solely on Your Client

Defense: Do Your Homework

Employees: Start Thinking of Your Future Early

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An Investigator's Perspective:

How Electronic Media and Communications Affects the Approach and Outcome of Workplace Investigations



- I. Preparation
- II. Witnesses
- III. The Report

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The Investigation

- I. PREPARATION: Obtaining Documents
 - A. Employers: Documents Such as Emails and Texts Create Headaches
 - 1) May Include Confidential and/or Proprietary Information
 - 2) How to Protect the High Level Employee
 - B. Employees: Evidence is Property of Employer
 - 1) Employee Argues of Access Issues to Critical Evidence
 - 2) Easy Claim of Destroyed Documents

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The Investigation

II. WITNESSES

A. Be Careful About How Evidence is Presented to Third Party Witnesses: Must Preserve the Integrity of the Process and Appearance of Neutrality

B. Difficulties When Evidence Implicates Third Party Witnesses

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The Investigation

III. THE REPORT

- A) What are Employers to do?
- B) What to do with the Documents?

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