

## Inside this issue

### CONTENTS:

DOL Clarification Expands the FMLA to Include the Care of Children of Same Sex Partners and Others Caring for a Child.....1

Health Care Reform Regulations Just Keep Coming.....2

Supreme Court Ruling to Cause Nearly 600 National Labor Relations Board Cases to Be Re-opened and Reviewed.....2

U.S. Supreme Court Issues Groundbreaking Decision on Employee Texting.....3

Illinois Court Hammers Subcontractor Under the Illinois Prevailing Wage Act.....4

Fee Hikes: DOS Increases Fees for Nonimmigrant Visa Applications and USCIS Proposes a 10% Filing Fee Increase.....4

U.S. Supreme Court Effectively Eviscerates 300-Day Limit for Disparate Impact Claim Holding That an Employment Practice Can Be Challenged After Every Application, Not Just After Adoption of the Practice.....5

Seminar and Events.....6

### CONTRIBUTORS:

- Rebecca L. Dobbs, Editor
- Jill A. Cheskes
- Jonathon D. Hoag
- Jacqueline Lentini McCullough
- Julie A. Proscia
- Jeffrey A. Risch

### LABOR & EMPLOYMENT ATTORNEYS:

- Molly A. Arranz
- Heather A. Bailey
- Jill A. Cheskes
- Rebecca L. Dobbs
- Terry A. Fox
- Jonathon D. Hoag
- Anita S. Johnson
- Jacqueline Lentini McCullough
- Christina Lopez-Nutzman
- Julie A. Proscia
- Jennifer M. Reddien
- Jeffrey A. Risch
- Lawrence R. Smith
- Ronald S. Stadler
- Sara M. Stertz
- Neil G. Wolf

*This newsletter is intended to provide information of general interest in a summary manner and should not be construed as providing legal advice. Readers should consult with counsel before acting on the information contained in this publication. All rights reserved. Please feel free to share this publication with your colleagues. To be added to the mailing list, contact us at [smithamundsen@salawus.com](mailto:smithamundsen@salawus.com).*

## DOL Clarification Expands the FMLA to Include the Care of Children of Same Sex Partners and Others Caring for a Child

By Julie A. Proscia

On June 22, 2010, the U.S. Department of Labor (DOL) issued an Administrator Interpretation or Opinion clarifying the definition of “*in loco parentis*” under the FMLA. The Opinion clarifies the interpretation of son or daughter to ensure that an employee who seeks time off work to care for a child receives FMLA leave regardless of whether the employee is the legal or biological parent of the child. Although the interpretation does not directly expand the FMLA, it clarifies the confusion surrounding the definition of *in loco parentis*, and thus gives additional employees (including familial caretakers and same sex partners) access to the FMLA to care for the serious health condition of a child or to establish a bond during the birth or adoption of a child.

Under the FMLA, an eligible employee may take up to 12 weeks of unpaid leave during any 12-month period for the birth or placement of a son or daughter, to bond with a newborn or newly placed son or daughter, or to care for a son or daughter with a serious health condition. The definition of “son or daughter” under the FMLA includes not only a biological, adopted, or foster child, but also a “stepchild, a legal ward, or a child of a person standing in loco parentis.” The FMLA does not define the Latin term “*in loco parentis*,” in which the individual assumes the obligations of a parent without the existence of a legal or biological relationship. This interpretation does so under the June 22 interpretation in which the DOL states that an otherwise eligible employee is entitled to FMLA leave under the same circumstances as a biological or legal parent if that individual has assumed parental responsibilities for the child.

The interpretation further provides specific examples of when a parental relationship is sufficient to confer FMLA leave rights, despite the absence of a biological or legal relationship between the parent and child. The following are some examples listed by the DOL:

- where an employee who will share equally in the raising of an adopted child with a same sex partner, but who does not have a legal relationship with the child, would be entitled to bond with the child following placement, or to care for the child if the child had a serious health condition, because the employee stands *in loco parentis* to the child
- where an employee provides day-to-day care for his or her unmarried partner’s child (with whom there is no legal or biological relationship) but does not financially support the child
- where an employee who will share equally in the raising of a child with the child’s biological parent would be entitled to leave for the child’s birth

So what does this mean for employers? It means that we need to be more diligent in distributing FMLA applications and administering FMLA to ensure that we do not neglect an individual who is the caretaker of a child just because he or she is not the legal or biological parent. This can be a grandmother who assumes ongoing responsibility for her grandchild because the parents are incapable of providing care, or even an aunt or uncle who cares for an adolescent nephew when his single parent has been called to military duty, as well as a same sex partner who is raising a child.

How do we know if a parental relationship exists? According to the DOL interpretation, an employer may question whether the employee's relationship to the child is covered under the FMLA, and

may require the employee to provide "reasonable documentation or a statement of the family relationship." However, this documentation can be as little as a "simple statement" from the employee asserting that a family relationship exists. While there is some debate as to whether or not the DOL interpretation will hold up in court, it is prudent at this juncture to amend policies accordingly to avoid being the "test case."

In order to adapt to this changing venue, we have modified our FMLA policies to include a more expansive definition of "*in loco parentis*," and set forth examples of the same. The revised policy has been distributed to Frontline clients already.

*If you have any questions regarding the Frontline Program or would like clarification on the new policies, please contact Julie Proscia at 630.587.7911 or [jproscia@salawus.com](mailto:jproscia@salawus.com).*

## Health Care Reform Regulations Just Keep Coming

By Rebecca L. Dobbs

As you may have heard by now, The Patient Protection and Affordable Care Act (referred to as "PPACA" or "Health Care Reform") contains a multitude of ambiguities and uncertainties. The Department of Labor, Internal Revenue Service, and the Department of Health and Human Services were charged with issuing various regulations as guidance for those of us stuck trying to interpret and administer the voluminous requirements under the Act.

During the previous month, these agencies were especially busy. Regulations were published in June offering further guidance on how a health plan can lose "grandfather" status for purposes of Health Care Reform. In addition, regulations were also issued offering guidance regarding the restrictions on pre-existing condition exclusions, lifetime and annual limits, rescissions, and patient protections. Prior to these regulations being issued, regulations regarding the extension of dependent coverage to age 26 were published as well.

For further assistance, the Department of Labor has published the following model notices on their Web site:

- Model disclosure language regarding grandfather status is available at: <http://www.dol.gov/ebsa/grandfatherregmodelnotice.doc>
- Model Notice on Patient Protections is available at: <http://www.dol.gov/ebsa/patientprotectionmodelnotice.doc>
- Model Notice on Lifetime Limits No Longer Applying and Enrollment Opportunity is available at: <http://www.dol.gov/ebsa/lifetimelimitsmodelnotice.doc>
- Model Notice of Opportunity to Enroll in Connection with Extension of Dependent Coverage to Age 26 is available at: <http://www.dol.gov/ebsa/dependentsmodelnotice.doc>

Remember, Health Care Reform requires revised summary plan descriptions to be distributed sixty (60) days in advance of the plan year during which those changes will occur. Employers should take steps now to make all necessary changes to written plan documents in order to ensure that these new disclosure requirements are met in a timely fashion.

*If you have any questions about this or any other employee benefit related matter, please contact Rebecca Dobbs at 630.587.7928 or [rdobbs@salawus.com](mailto:rdobbs@salawus.com).*

## Supreme Court Ruling to Cause Nearly 600 National Labor Relations Board Cases to be Re-opened and Reviewed

By Christina Lopez-Nutzman

On June 17, 2010, the Supreme Court ruled (*New Process Steel LP v NLRB*, U.S., No. 08-1457, 6/17/10) that nearly 600 decisions issued in union organizing cases and unfair labor practices cases combined should not have been issued because they were decided by a two-member panel. The National Labor Relations Board (NLRB) is an independent federal agency solely responsible for administering the National Labor Relations Act (NLRA), the primary law governing relations between unions and employers. Up to five NLRB members are nominated to five-year terms by the President and must be confirmed by the Senate.

According to the Supreme Court, a two-member panel does not satisfy the NLRA's (Sec. 3(b)) requirement that "three members of the Board shall, at all times, constitute a quorum of the Board," in other words three Board members are required to issue decisions. Section 3(b) of the NLRA allows the NLRB to delegate its authority to groups of at least three members (Sec. 153(b)). For a period of 27 months (Jan. 2008-Mar. 2010), a two-member panel issued decisions until early 2010 when two additional Board members were appointed. New Process Steel challenged the authority of a two-member panel in the Seventh Circuit Court of Appeals when it received an adverse

decision by the NLRB in two unfair labor practice complaints issued against the company. The Seventh Circuit did not rule in favor of the company by concluding that two members constituted a quorum and that two members could continue to issue decisions. The Supreme Court disagreed with the Seventh Circuit's interpretation of the relevant provisions of the NLRA and specifically noted that "had Congress intended to authorize two members to act on an ongoing basis, it could have used straight-forward language." The Supreme Court also stated that "if Congress wishes to allow the Board to decide cases with only two members, it can easily do so. But until it does, Congress' decision to require that the Board's full power be delegated to no fewer than three members, and to provide for a Board quorum of three, must be given a practical effect rather swept aside in the face of admittedly difficult circumstances."

What does this mean for employers? While it is not entirely clear at the present moment how the NLRB and Regional Offices will handle the re-opening of cases, it is expected that closed cases will be re-opened and re-decided. Any employer that was involved in a trial with a Regional Office of the NLRB, decided by an ALJ, and reviewed by the two-member NLRB panel should consult with labor counsel to determine the impact of the Supreme Court's ruling. Any employer that received a decision and order from the NLRB between Jan. 2008 and Mar. 2010 is encouraged to review its options with labor counsel during this "re-opening" period.

*If you have any questions regarding the National Labor Relations Act, please contact Christina Lopez-Nutzman at 312.894.3371 or at [cnutzman@salawus.com](mailto:cnutzman@salawus.com).*

## U.S. Supreme Court Issues Groundbreaking Decision on Employee Texting

By Julie A. Proscia and Jonathon D. Hoag

On June 16, 2010, the U.S. Supreme Court issued its first ruling on workplace texting and unanimously held that a city audit of an employee's messages on a city-owned pager was a reasonable search under the Fourth Amendment.

The unanimous ruling in *City of Ontario, California v. Quon* sidestepped whether police Sergeant Jeff Quon, had a reasonable expectation of privacy in his text messages, some of which turned out to be sexually explicit in nature, but upheld the search and the legitimacy of the same.

The City of Ontario provided pagers to police officers on the SWAT team for business use. The city required the officers, including Quon, to sign a "Computer Usage, Internet and E-Mail Policy," which stated that the City "reserves the right to monitor and log all network activity...with or without notice." While the policy did not include text messages, the City announced to employees, both verbally and in writing, that text messages would be treated the same way as e-mails, and that they too could be audited. Unfortunately, the city had an "informal policy" that it wouldn't audit text messages as long as the employees who went over their monthly text messaging limit reimbursed the City for overcharges. Quon proceeded to exceed his minutes on multiple occasions drawing the ire of fellow officers who did not want to serve as collections agents and the suspicion of supervisors. Consequently, after Sgt. Quon again exceeded his allotted usage limit, the City acquired transcripts from the provider and discovered that Quon had used the pager during working hours for personal texts, some of which were sexually explicit.

Quon sued the City for invasion of privacy under the Fourth Amendment and the Federal Stored Communications Act. During arguments, the City stated that the purpose of the audit was to determine if the character limit was too low and should be increased for employees' business needs. The trial court held that the officers had a reasonable expectation of privacy in the text messages, but that the search did not violate the Fourth amendment. The Ninth Circuit

reversed, holding that the search was unreasonable as matter of law. *Quon v. Arch Wireless, U.S. Court of Appeals for the 9th Circuit, No. 07-55282 (6/18/08).*

The U.S. Supreme Court reversed, holding that the search of Quon's text messages was reasonable and did not violate the Fourth amendment. The Court found that the search was motivated by a legitimate work-related purpose, and was not excessive in scope. The court further reasoned that the audit was an efficient way to determine if overages were work-related or personal in nature.

While this ruling is an affirmation of an employer's right to audit its employees, it is also a warning that the failure to implement policies and procedures that clearly designate the parameters of electronic searches could create an expectation of privacy and an opposite result. As such, it is a perfect opportunity to review your electronic policies and procedures and ensure that you have the authority to review, audit and search electronic communications. In addition, employers should be sure that management and human resources personnel are highly trained in handling privacy issues because it is critically important that employers act in a "reasonable" fashion. For example, in the *Quon* case, the Court noted that the employer immediately redacted all messages that occurred when Quon was off-duty to limit any intrusion into Quon's private affairs.

Although this case dealt with privacy issues applicable only to the public sector (i.e. constitutional protections), the principles announced in *Quon* are instructive for all employers. Employers that issue or provide access to electronic communications devices (covering most employers in this day and age) must have policies and practices in place to clearly permit the employer to monitor and review communications made through such devices.

*If you have any questions about this case or your own policies and procedures, please contact Julie A. Proscia at [jproscia@salawus.com](mailto:jproscia@salawus.com) or Jonathon D. Hoag at [jhoag@salawus.com](mailto:jhoag@salawus.com).*

# Illinois Court Hammers Subcontractor Under the Illinois Prevailing Wage Act: All Contractors, Subcontractors, and Developers Must Proceed with Caution

By Jeffrey A. Rish and Jonathon D. Hoag

The lower court's ruling in *The Department of Labor v. Sackville Construction, Inc.* gave hope to owners, developers, contractors, and subcontractors throughout Illinois that the unjust enforcement of the Illinois Prevailing Wage Act was going to come to an end. The circuit court found that it was unfair to require the subcontractor (Sackville) to pay prevailing wages when it had no notice whatsoever that the project might be subject to the Illinois Prevailing Wage Act. Unfortunately, the Illinois Third Appellate District recently reversed that decision and replaced it with one that gives the Department broad powers to define private entities as "public bodies" and collect prevailing wages from those entities and others that might have no awareness that public funds are loosely connected to the project. In light of this decision, all owners, developers, contractors, and subcontractors doing work in Illinois must proceed with caution.

In the *Sackville* case, a private developer entered into a private contract with Hy-Brand Contractors to build a 45,000-square-foot industrial complex on a vacant lot in downtown Rock Island. The developer later signed a contract with the City of Rock Island to construct the project. The City conveyed title of the project site for \$1.00 and agreed to contribute \$150,000 for use in the project and \$57,000 for site clearance and demolition. The developer had committed to invest \$1.5 million into the project.

The Contractor in turn entered into an oral subcontract with Sackville Construction, Inc. to provide some of the labor for the project. The Contractor did not inform Sackville that the City contributed some of the funds for the project or anything else that

would communicate that the project was covered by the Prevailing Wage Act. The Department subsequently received a complaint that Sackville was not paying prevailing wages and determined that the total underpayment came to approximately \$20,000. Sackville refused to pay the back wages, so the Department filed suit against Sackville alleging a violation of the Act.

Sackville prevailed at the lower court level. The circuit court rightfully concluded that it was unfair to require payment of prevailing wages when Sackville had no reason to believe the project was covered by the Prevailing Wage Act. The circuit court recognized that slapping the subcontractor with back wages under the Act in such circumstances would grant a windfall to the contractor that violated the Act by not giving proper notice (i.e. the subcontractor bid the project lower than it would have if it knew about prevailing wage requirements). The appellate court abandoned the circuit court's practical application and instead performed a review of the statutory language to conclude that although the Act contains a notice requirement, the Act does not state that the notice requirement is a condition precedent to paying the prevailing wages.

All private entities performing work for public bodies or work that might be loosely connected to a public body or public funding must take active steps to protect its interests.

*If you have any questions on how the Illinois Prevailing Wage Act might apply to you or your company, please contact Jeffrey A. Risch at [jrisch@salawus.com](mailto:jrisch@salawus.com) or Jonathon D. Hoag at [jhoag@salawus.com](mailto:jhoag@salawus.com).*

# Fee Hikes: DOS Increases Fees for Nonimmigrant Visa Applications and USCIS Proposes a 10% Filing Fee Increase

By Jacqueline Lentini McCullough

The Department of State ("DOS") issued a fee increase effective June 4, 2010 for most nonimmigrant visa categories. The amount of increase depends on the visa category. Most nonimmigrant visas have been increased to \$140, such as the B-1/B-2 visa and Border Crossing Cards. Petition-based visa categories such as the H-1B, L-1, O-1, P, Q, and R visas have increased to \$150, and applicants for E visas pay \$390, which is a significant fee increase from the previous fee of \$131. K fiancé visa applicants pay \$350. DOS rounded the fee increases to the nearest \$10 for the ease of converting to foreign currencies, which are most often used to pay the fee.

The U.S. Citizenship and Immigration Services ("USCIS"), a fee-based organization, recently issued a proposed regulation which

would increase many filing fees by approximately 10%. The USCIS fee revenue in fiscal years 2008 and 2009 were much lower than expected, and fee revenue in fiscal year 2010 also remains low. USCIS asserts that a fee increase is necessary to ensure that it recovers the costs of its operations while also meeting its application processing goals. The proposed fee structure would establish three new fees, including a fee for regional center designations under the Immigrant Investor Pilot Program (\$6,230), a fee for individuals seeking civil surgeon designation (\$615), and a fee to recover USCIS's cost of processing immigrant visas granted by the Department of State (\$165). The comment period on the proposed rule will end on July 26, 2010, with the new fee schedule implementation slated for the Fall of 2010.

The following is a comparison of the current and proposed immigration fees for some common applications and petitions:

Application/Petition Description	Current Fees	Proposed Fees
I-90 Application to Replace Permanent Resident Card	\$290	\$365
I-102 Application for Replacement/Initial Nonimmigrant Arrival-Departure Document	\$320	\$330
I-129 Petition for a Nonimmigrant worker	\$320	\$325
I-130 Petition for Alien Relative	\$355	\$420
I-131 Application for Travel Document	\$305	\$360
I-140 Immigrant Petition for Alien Worker	\$475	\$580
I-485 Application to Register Permanent Residence or Adjust Status	\$930	\$985
I-526 Immigrant Petition by Alien Entrepreneur	\$1,435	\$1,500
I-539 Application to Extend/Change Nonimmigrant Status	\$300	\$290
I-751 Petition to Remove Conditions on Residence	\$465	\$505
I-765 Application for Employment Authorization	\$340	\$380
I-824 Application for Action on an Approved Application or Petition	\$340	\$405
I-829 Petition by Entrepreneur to Remove Conditions	\$2,850	\$3,750
Civil Surgeon Designation	\$0	\$615
I-924 Application for Regional Center Under the Immigrant Investor Pilot Program	\$0	\$6,230
N-400 Application for Naturalization	\$595	\$595
N-600/N-600K Naturalization Certificate Applications	\$460	\$600
Immigrant Visa	\$0	\$165
Biometric Services	\$80	\$85

Some fees will actually decrease as a result of lower processing costs, such as form I-539, Application to Extend/Change Nonimmigrant Status (\$300 currently decreasing to \$290). Other applications and petitions to decrease filing fees include the following: form I-129F, Petition for Alien Fiance, form I-698, Application to Adjust Status from Temporary to Permanent Resident, form I-817, Application

for Family Unity Benefits, and form N-565, Application for Replacement Naturalization/Citizenship Document.

*If you have any questions relating to the DOS fee changes or the USCIS proposed fee increases, please contact Jacqueline Lentini McCullough at 630.262.1435 or jlentini@salawus.com.*

## U.S. Supreme Court Effectively Eviscerates 300-Day Limit for Disparate Impact Claim Holding that an Employment Practice Can Be Challenged After Every Application, Not Just After Adoption of the Practice

By Jill A. Cheskes

On May 24, 2010, the United States Supreme Court revived a race bias suit brought by a class of African-American firefighters against the City of Chicago. *Lewis v. City of Chicago*. At issue was a testing and scoring employment practice that the City introduced in an effort to hire firefighters based upon objective criteria. Over 26,000 firefighter applicants took a written examination. The City created a hiring eligibility list based on the scores and grouped applicants into categories of “well-qualified,” “qualified,” and “not-qualified.” In 1996, the City announced that it would randomly draw those “well-qualified” candidates from the hiring eligibility list to proceed to the second phase. Those designated as “qualified” were told that they passed the test but that it was unlikely, based on the City’s needs and the number of “well-qualified” applicants, that they would be selected

to proceed. The first round of selection was done in 1996 and then the City repeated this process nine times over the next six years. In all but the final round of selection, only “well-qualified” candidates were selected.

Over 300 days after the City’s first round of selection of “well-qualified” candidates, Crawford M. Smith, an African-American candidate, filed a charge against the City alleging that the practice of selecting for advancement only “well-qualified” candidates had a disparate impact on African-Americans. Others soon followed and eventually suit was filed and a class was certified. The City filed a motion for summary judgment, which was denied, and the class of plaintiffs prevailed at trial. The Seventh Circuit reversed, finding the charge was filed within 300 days

of the City's discriminatory act – sorting the scores into “well-qualified,” “qualified,” and “not-qualified.” The Seventh Circuit found that the later selection decisions were not independent, actionable discriminatory acts but were automatic consequences of the original discrimination. The United States Supreme Court, in a 9-0 decision, reversed.

In an opinion written by Justice Scalia, the Court held that a “plaintiff who does not file a timely charge challenging the adoption of a practice may assert a disparate impact claim in a timely charge challenging the employer’s later application of that practice as long as he alleges each of the elements of a disparate-impact claim.”

The City argued that the only actionable discrimination that could have occurred was in 1996 when it created the eligibility list based upon the scores. However, since that practice was not challenged, it was a lawful decision. The City argued that the later rounds of selecting from that list followed inevitably from the earlier decision regarding the cut-off scores.

The Supreme Court found that although the sorting was a lawful act since it was not challenged, it did not follow that the later application of the practice could not be a new violation. The Court found that if the petitioners could prove that the practice created a disparate impact, then later application could be actionable. The Court focused on the fact that a disparate impact claim, unlike disparate treatment, does not require discriminatory intent within the limitations periods. Thus, prior cases in which the Court held that “present effects of prior actions cannot lead to Title VII liability” had no bearing since they were all disparate treatment cases.

Only time will tell what practical effects this case will have on employers, but it is absolutely clear that disparate impact claims can, in certain circumstances, be brought up many years after an employment practice is adopted and employers should evaluate their practices in an effort to avoid any potential problems with this troubling decision.

*If you have any questions regarding this topic, please contact Jill Cheskes at 312.894.3367 or [jcheskes@salawus.com](mailto:jcheskes@salawus.com).*



## CALENDAR OF EVENTS - JULY 2010

### WAGE HOUR REVOLUTION: IS YOUR BUSINESS READY?

Presenter: Jeffrey Risch

Per the U.S. DOL's Official Press Release, Solis' announcement marked the beginning of the “We Can Help” nationwide campaign. The effort, which is being spearheaded by the department's Wage and Hour Division, will push employees towards the U.S. Department of Labor. The campaign places a special focus on reaching employees in such industries as construction, janitorial work, hotel/motel services, food services and home health care. It also will address such topics as rights in the workplace and how to file a complaint with the Wage and Hour Division to recover wages owed. Similarly, the Illinois Department of Labor is in full force pursuing employers for wage/hour violations throughout Illinois. The government's new crackdown on employers is coming at a time when employee wage/hour lawsuits and the dreaded Class Action are at an all time high. Employers of all shapes, sizes, backgrounds and industries must prepare for this growing onslaught of wage/hour enforcement and litigation.

■ Date: July 8, 2010 (Springfield, IL)

■ Time: 8:30 am - 1:00 pm

■ For additional information and to register, please click here.

### HEALTH CARE REFORM: WHAT IT MEANS FOR EMPLOYERS

Presenter: Carmel Cosgrave, Jeffrey Risch, and Rebecca Dobbs

After months of debate, Congress pushed through the most significant health care reform legislation since the creation of the Medicare program in the 1960s. Register now and learn what this legislation means for you. This is an opportunity for employers to assess best-practice programs and begin relationships with key partners. This seminar is designed to give you, the employer, the information you need to move forward in addressing the high costs associated with health care and to give you some insight into the health care movement and what it means for employers.

■ Date: July 9, 2010 (Naperville, IL)

■ Time: 8:30 am - 4:30 pm

■ For additional information and to register, please click here.

### HOW TO AVOID WORKPLACE VIOLENCE/BULLYING

Presenter: Rebecca Dobbs

With the economic climate uncertain, companies are facing a rapidly changing work environment that is faced with uncertainty, hostility, and violence. Julie Proscia will discuss the rise in violence, workplace bullying, and discrimination in the workplace by examining counseling strategies and policies, which are procedures that can save companies thousands of dollars in litigation after an incident erupts.

■ Date: July 14, 2010

■ Time: 9:00 am - 10:00 am

■ Webinar

■ For additional information and to register, please contact Emily Lempa at [elempa@salawus.com](mailto:elempa@salawus.com).

### ILLINOIS BANKERS ASSOCIATION HEALTH CARE REFORM

Presenter: Jeffrey Risch and Rebecca Dobbs

■ Date: July 22, 2010

■ Webinar

■ For additional information and to register, please contact Emily Lempa at [elempa@salawus.com](mailto:elempa@salawus.com).

### DO YOU WANT TO STAY A 501(c)(3) ORGANIZATION? M

Presenter: Julie Proscia

Learn the legal requirements of retaining your tax status and surviving a state audit! For additional information and to register, please visit [www.aurorachamber.com](http://www.aurorachamber.com) or contact Sally Rutledge-Ott at [srutledgeott@aurorachamber.com](mailto:srutledgeott@aurorachamber.com).

■ Date: July 30, 2010

■ Time: 9:00 am - 11:00 am

■ Webinar