LCW Liebert Cassidy Whitmore

Client Update

Monthly news and developments in employment law and labor relations for California Public Agencies.

MAY 2019

INDEX

LCW NEWS

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PUBLIC RECORDS ACT

Certain Peace Officer Personnel Records Created Before 2019 Are Also Public Records Under New California Law.

Senate Bill No. 1421 ("SB 1421"), which went into effect on January 1, 2019, allows the public to obtain certain peace officer personnel records by making a request under the California Public Records Act. Prior to SB 1421, these records were only available by court order and in narrow circumstances. The peace officer personnel records that are now public records include those relating to: a peace officer who shoots a firearm at a person; a peace officer's use of force that results in death or great injury; or a sustained finding that a peace officer either sexually assaulted another or was dishonest.

Since SB 1421 went into effect, numerous public agencies across California have been involved in lawsuits over whether the new law applies to records created before 2019.

In its first published decision addressing the issue, the California Court of Appeal held that applying SB 1421 to pre-2019 records does not make the new law impermissibly retroactive. The court noted that "[a]lthough the records may have been created prior to 2019, the event necessary to 'trigger application' of the new law – a request for records maintained by the agency – necessarily occurs after the law's effective date." The court reasoned that the new law "does not change the legal consequences for peace officer conduct described in pre-2019 records . . . Rather, the new law changes only the public's right to access peace officer records." Thus, SB 1421 allows the public to request certain peace officer personnel records that were created before January 1, 2019.

Walnut Creek Police Officers' Association v. City of Walnut Creek, 33 Cal.App.5th 940 (2019).

Note:

LCW previously reported on this case in a Special Bulletin published on April 1, 2019. LCW will continue to update public agencies as this area of law evolves.

LCW Welcomes Three New Associates!
See Page 8.

LABOR RELATIONS

Court of Appeal Declines to Invalidate Initiative Placed on Ballot in Violation of MMBA.

The City of San Diego's Mayor Jerry Sanders championed a citizens' initiative in 2010 that would eliminate traditional defined benefit pensions for most newly-hired City employees, and replace them with defined contribution plans. The affected unions argued that Mayor Sanders was acting in his official capacity to promote the initiative and, in doing so, was making a policy determination that required meeting and conferring with the unions under the Meyers-Milias-Brown Act ("MMBA"). The City's voters eventually adopted the initiative, without the City ever meeting and conferring with the unions.

In 2018, the California Supreme Court held that the City violated the MMBA because Mayor Sanders made a policy decision to advance a citizens' pension reform initiative without meeting and conferring with the affected employees' unions. The California Supreme Court then remanded the case to the Court of Appeal to determine the appropriate remedy for the City's violation of the MMBA.

On remand, the Court of Appeal declined to invalidate the citizens' pension reform initiative. The Court of Appeal concluded that because the voters adopted the initiative and the initiative has taken effect, the initiative can only be challenged in a special quo warranto proceeding. Thus, the validity of the initiative was beyond the scope of the court's review.

However, the Court of Appeal did order the City to meet and confer with the unions over the effects of the initiative and to pay the affected current and former employees the difference, including interest, between the compensation the employees would have received before the initiative went into effect, and the compensation the employees received after the initiative became effective. The court reasoned that this remedy reimburses the employees for the losses they incurred and reduces the City's financial incentive for refusing to bargain.

Additionally, the Court of Appeal ordered the City to cease and desist from refusing to meet and confer with the unions. Instead, the Court found that the City is required to meet and confer upon the unions' request before the City can place a measure on the ballot that affects employee pension benefits or other negotiable subjects. The Court noted that this remedy was appropriate because it "prevents the City from engaging in the same conduct that violated the [MMBA] in this case without impermissibly encroaching on matters more appropriately decided in a separate quo warranto proceeding."

Boling v. Public Employment Relations Bd., 245 Cal.Rptr.3d 78 (2019).

NOTE:

LCW previously reported on the California Supreme Court's decision in this case in the September 2018 Client Update and in a blog post available here: https://www.lcwlegal.com/news/voter-backed-pension-reform-is-dealt-a-blow-by-california-supreme-court.

RETIREMENT

Employee Who Settles a Pending Termination for Cause and Agrees Not to Seek Reemployment Is Not Eligible for Disability Retirement.

In 2001, Linda Martinez began working at the State Department of Social Services ("DSS") after working for the State since 1985. During this time, Martinez also served in various positions with her union.

In 2014, DSS sought to terminate Martinez's employment and provided her with a notice citing numerous grounds for her dismissal. Martinez challenged the dismissal, believing that her termination "was taken in retaliation for her union activities."

The parties later negotiated a settlement. DSS agreed to: pay Martinez $30,000; withdraw the notice for dismissal; and remove certain matters from her personnel file. In return, Martinez agreed

to voluntarily resign effective September 30, 2014. DSS also agreed to cooperate with any application for disability retirement filed by Martinez within the six months following her voluntarily resignation.

Martinez filed her disability retirement application on the grounds that she could longer function in her role at DSS because of various job-related conditions. The California Public Employees Retirement System ("CalPERS") cancelled her application. CalPERS notified Martinez that she was not eligible for disability retirement because she was "dismissed from employment for reasons which were not the result of a disabling medical condition" and that "the dismissal does not appear to be for the purpose of preventing a claim for disability retirement." Martinez appealed the denial to the Board of CalPERS, which denied Martinez's petition for reconsideration.

Martinez and her union then sued CalPERS, its Board, and DSS to request the court to order the Board to set aside and reverse its decision. The trial court denied Martinez's petition.

Ordinarily, governmental employees lose the right to apply for disability retirement if they are terminated for cause. However, prior decisions have carved out exceptions to this general rule. For example, in *Haywood v. American River Protection District*, 67 Cal.App.4th 1292 (1998), the court held that a terminated-for-cause employee can still qualify for disability retirement when the conduct which prompted the termination was the result of the employee's disability. In *Smith v. City of Napa*, 120 Cal.App.4th 194 (2004), the court concluded that a terminated employee may qualify for disability retirement if he or she had a "matured right" to a disability retirement prior to the conduct that prompted the termination.

Further, relying on *Haywood* and *Smith*, the CalPERS Board determined that an employee loses the right to apply for disability retirement when the employee settles a pending termination for cause and agrees not to seek reemployment. The CalPERS Board reasoned that such a situation is "tantamount to dismissal." (*In the Matter of Application for Disability Retirement of Vandergoot*, CalPERS Precedential Dec. No. 12-01 (2013).)

On appeal, Martinez argued that *Haywood* and *Smith* have been superseded by statute and that the Board's decision in *Vandergoot* is no longer precedential. Specifically, Martinez relied on a 2008 amendment to the retirement law that provides "[i]n determining whether a member is eligible to retire for disability, the board or governing body of the contracting agency shall make a determination on the basis of competent medical opinion and shall not use disability retirement as a substitute for the disciplinary process." Thus, Martinez argued that determinations of eligibility for disability retirement can only be made because of competent medical opinion.

However, the Court of Appeal disagreed. The court noted that the section Martinez relies on "is but a single sentence in a single statute, and cannot be examined to the exclusion" of the entire retirement law. The Court noted that because Martinez's voluntary resignation "constituted a complete severance of the employer-employee relationship, thus eliminating a necessary requisite for disability retirement." As a result, the Court said that the 2008 amendment to the retirement law did not supersede *Haywood* and *Smith*. Further, the Court concluded that the Board's decision that a settlement not to seek reemployment is "tantamount to dismissal" was "eminently logical." Thus, the precedent established in *Haywood*, *Smith*, and *Vandergoot* remains the law.

Martinez v. Public Employees' Retirement System, 2019 WL 1487326.

NOTE:

This case confirms that an employee who settles a pending termination for cause and agrees not to seek reemployment is precluded from applying for disability retirement. LCW attorneys specialize in advising public agencies regarding the complexities of retirement law.

BROWN ACT

Individuals Had Valid Claims Challenging the Adequacy of District's Meeting Agendas.

Roger Gifford and Kimberly Oslon sued the Hornbrook Community Services District regarding various issues with the District's posted agendas for three Board meetings. First, for the District's August 16, 2016 meeting, the agenda indicated that the District would be considering payment of the quarterly premium for the State Compensation Insurance Fund. The agenda indicated that the quarterly premium amounted to $285.75. However, when the item came up for discussion at the August meeting, the Board Secretary indicated that she had received additional communications from the State Compensation Insurance Fund and that the amount of the quarterly premium would be higher than the amount stated on the agenda. Without offering any explanation as to why the amount changed, the Secretary insisted the District approve the new demand for payment.

Second, for the District's September 20, 2016 meeting, the agenda indicated that the District would be approving and authorizing signatures for various bills listed on the agenda. The list included payment to an individual for his services for an unspecified amount, but did not include an AT&T bill. At the meeting, the Secretary announced that she had received a bill from AT&T that she wanted to add to the agenda. The Secretary also filled in the amount of the payment for the individual on the blank space of the agenda, without any motion or vote to do so.

Third, for the District's January 24, 2017 meeting, the agenda allowed for public comment at the start of the meeting "on any matter within the jurisdiction of the [District] that is NOT ON THE AGENDA . . . Any person wishing to address the [District] on an item ON THE AGENDA will be given opportunity at that time." The agenda also indicated that the District would be approving bills and authorizing signatures for District expenses received through January 24, 2017. Members of the public objected that the District was violating the Brown Act because individuals who wished to comment on agenda items were required to sit through the entire meeting until those items came up for discussion. The Secretary indicated that she did not believe the District's conduct was in violation of the Brown Act and that the District would continue with its practice regarding public comment.

Following each meeting, the individuals each sued the District for violating the Brown Act. They claimed that the District failed to adequately describe several items it acted on, and unreasonably limiting public comment. The trial court dismissed all of their claims, and they appealed.

The Brown Act guarantees the public's right to attend and participate in meetings of local legislative bodies. The Act requires that agendas for the meetings of legislative bodies contain a brief general description of each item of business to be discussed. The Act generally prohibits the legislative body from taking action or discussing any item that does not appear on the posted agenda. Further, the Brown Act requires that every agenda for regular meetings provide an opportunity for members of the public to address the legislative body on any item of interest to the public.

On appeal, the District argued that the Brown Act challenges to the three agendas must fail because the District provided a general description of the item the District was to act upon. The District also argued that even if the general description was not sufficient, it still substantially complied with the agenda requirements. Under the Brown Act, a legislative body's actions cannot be nullified if it "substantially complied" with the agenda requirements.

The Court of Appeal concluded that the individuals had valid claims as to the August and September 2016 agendas, but not as to the January 2017 agenda. For the January 2017 agenda, the court found that the description indicating that the District would be approving bills and authorizing signatures for District expenses received through January 24, 2017 "leaves no confusion as to the essential nature of the District's action" and because the District actually took the action it described.

Further, the Court of Appeal noted that nothing in the Brown Act prohibits the District from restricting comment on items appearing on the agenda until the items come up for discussion.

For the August 2016 agenda, the court reasoned that the District's agenda adequately communicated the essential nature of its action – to discuss and approve payment to the State Compensation Insurance Fund. The court noted that a difference in the amount of payment was insignificant because "[t]hose interested in the payment had notice that it was going to be discussed and acted upon … and could attend the meeting and participate in the Board's action regardless of the amount to be paid." However, the court determined that even though the agenda description was in compliance, the individuals could still pursue the allegation that the District took an action different from what it notified the public it would take when it authorized a higher payment for the State Compensation Insurance Fund premium. The court noted that while those interested in this item would know to attend the August 2016 meeting, "those interested in the particulars . . . may be persuaded not to attend the meeting in reliance on the [District's] assurance of the scope of the action it would take."

With regard to the September 2016 agenda, the Court found that the individuals could challenge the sufficiency of the agenda description because it specifically stated that the District would be approving a specific list of payments. The court reasoned that those interested in payments not listed would not know to attend the September 2016 meeting so they could comment on the subject.

Olson v. Hornbrook Community Services District, 33 Cal. App.5th 502 (2019).

Note:

Public agencies can fall out of compliance with the intricate requirements of the Brown Act. LCW attorneys can provide your agency a Brown Act compliance review.

DID YOU KNOW….?

Whether you are looking to impress your colleagues or just want to learn more about the law, LCW has your back! Use and share these fun legal facts about various topics in labor and employment law.

- Several California city attorneys and county counsels won a procedural victory in the Ninth Circuit involving numerous new California immigration laws that affect the employer-employee relationship. *United States v. State of California, et al, Case No. 18-16496.*
- Public employers are required to grant reasonable leaves for employees to serve as stewards or officers of the exclusive representative. Government Code Section 3505.3.
- An employer cannot request or consider an applicant's criminal history until **after** a conditional offer of employment has been made. Government Code Section 12952.

CONSORTIUM CALL OF THE MONTH

Members of Liebert Cassidy Whitmore's employment relations consortiums may speak directly to an LCW attorney free of charge regarding questions that are not related to ongoing legal matters that LCW is handling for the agency, or that do not require in-depth research, document review, or written opinions. Consortium call questions run the gamut of topics, from leaves of absence to employment applications, disciplinary concerns to disability accommodations, labor relations issues and more. This feature describes an interesting consortium call and how the question was answered. We will protect the confidentiality of client communications with LCW attorneys by changing or omitting details.

Question: A human resources manager contacted LCW to ask whether a public agency is required to payout an employee for unused, accrued vacation when the employee separates from the agency.

Answer: The attorney advised that the answer is "yes," unless a collective bargaining agreement says otherwise. Labor Code section 227.3 provides that "unless otherwise prohibited by a collective-bargaining agreement, whenever a contract of employment or employer policy provides for paid vacations, and an employee is terminated without having taken off his vested vacation time, all vested vacation shall be paid to him as wages at his final rate in accordance with such contract of employment or employer policy respecting eligibility or time served; provided, however, that an employment contract or employer policy shall not provide for forfeiture of vested vacation time upon termination."

BENEFITS CORNER

Mid-Year Election Changes Under a Section 125 Cafeteria Plan.

A Section 125 Cafeteria Plan is an arrangement that employers use to allow employees to make pre-tax contributions for qualified benefits such as health insurance. Employers must comply with a variety of rules to maintain the validity and tax advantages of their cafeteria plan. Among these rules are strict limitations on when the plan may permit participants to make changes to their benefit elections.

Typically, employees are entitled to make elections during an annual "open enrollment" period that precedes the plan year or, for new hires, during an initial enrollment period. In general, once made, these elections are irrevocable for the duration of the plan year. However, there are some exceptions.

A cafeteria plan may – but is not required to – permit participants to change or revoke an election for the remainder of a plan year upon the occurrence of a qualifying event, if the election change is consistent with that event.

The most common qualifying event is a change in status that affects eligibility for coverage, including:

- A change in legal marital status, including marriage, divorce, death of a spouse, legal separation, or annulment;
- A change in the number of dependents;
- A change in employment status which affects eligibility under the cafeteria plan or for an underlying benefit, including a termination or commencement of employment, a strike or lockout, a commencement of or return from an unpaid leave of absence, a change in worksite, or another employment-related change;
- A change in dependent eligibility status; or
- A change in the place of residence of the employee, spouse, or dependent.

Additionally, a cafeteria plan may allow an election change under an adoption assistance program when an employee begins or terminates adoption proceedings.

A cafeteria plan may also allow a mid-year election change, other than to a Health FSA, on account of any of the following:

- An increase or decrease in the cost to participants of a plan benefit during the coverage period;
- Significant coverage curtailment (with or without loss of coverage);
- A benefit option being added or significantly improved;
- A change in coverage under another employer plan; or
- A loss of group health coverage sponsored by a governmental or educational institution.

Certain mid-year elections may also be made (if allowed under the plan) to correspond with HIPAA special enrollment rights; COBRA eligibility; a court order requiring coverage for a participant's child or dependent foster child; Medicare/Medicaid entitlement status; or FMLA leave.

Finally, under IRS Notice 2014-55, a cafeteria plan may permit a participant to revoke an election for group health coverage (other than a Health FSA) where the participant's weekly hours of service are expected to drop below 30 (even if eligibility under the plan is not affected) or the participant intends to enroll in ACA Marketplace coverage.

Again, these are optional exceptions to the general prohibition on mid-year election changes. To be effective, they must be referenced in the employer's plan documents and the election change must be consistent with the applicable event. Additional conditions and restrictions apply for each qualifying event. The person drafting or updating the cafeteria plan documents should be familiar with relevant legal authorities to avoid potentially invalidating the plan.

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UPCOMING SEMINARS & WEBINARS

Throughout the year, we host a number of seminars and webinars on a variety of pressing legal topics. These presentations are designed to help our clients stay informed of the constant changes in law and be better prepared for any potential impact that may come their way.

Hot Topics in FLSA Litigation & Settlements

Tuesday, May 7, 2019 | Webinar

Public agencies are continuing to face wage and hour lawsuits or threats of litigation for violation of the Fair Labor Standards Act (FLSA). However, defending against FLSA litigation presents unique challenges as they often impact labor relations, human resources, finance and payroll. Join us for a webinar to learn about the latest trends in FLSA litigation and settlements to help you navigate through these lawsuits.

The Public Employment Relations Board (PERB) Academy

Thursday, May 16, 2019 | Fresno, CA

This workshop will help you understand unfair labor practices, PERB hearing procedures, representation matters, agency shop provisions, employer-employee relations resolutions, mediation services, fact-finding, and requests for injunctive relief - all subjects covered under PERB's jurisdiction. Join us as we share insights on PERB!

To register, please visit our website at www.lcwlegal.com/events-and-training/webinars-seminars.

NEW TO THE FIRM

Megan Atkinson joins our Los Angeles office where she represents public entities in labor and employment law matters. She regularly defends against claims of discrimination, harassment, retaliation, and wage and hour violations. She litigates in both state and federal court and has experience from pre-litigation through trial. In 2018, she served as second chair in a nine-week jury trial. Megan was selected as a 2019 Southern California Rising Star by Super Lawyers. She can be reached at 310.981.2058 or matkinson@lcwlegal.com.

Antwoin Wall joins our Los Angeles office where he assists and represents clients in matters pertaining to labor and employment law and litigation. His career background has a strong foundation in the public sector. Antwoin assists counties, cities, and public agencies in a full array of employment matters, including claims of discrimination, harassment, retaliation, wrongful termination, breach of contract, and wage and hour litigation. He can be reached at 310.981.2084 or awall@lcwlegal.com.

Sung (Sean) Kim joins our Los Angeles office where where he provides representation and counsel to clients in litigation matters. As an experienced litigator, Sean has extensive experience in all aspects of the litigation process, including trials. He can be reached at 310.981.2062 or skim@lcwlegal.com.

FIRM PUBLICATIONS

To view these articles and the most recent attorney-authored articles, please visit: **www.lcwlegal.com/news**

"State High Court Oks Legislature Rescinding Employee Benefit it Once Gave" quote by **Steven Berliner** of our Los Angeles office, appeared in the March 5, 2019 issue of the *Daily Journal.*

MANAGEMENT TRAINING WORKSHOPS

Firm Activities

Consortium Training

May 2 **"The Art of Writing the Performance Evaluation"** & **"Maximizing Performance Through Evaluation, Documentation and Corrective Action"**
Monterey Bay ERC | Santa Cruz | Che I. Johnson

May 9 **"Leaves, Leaves and More Leaves"** & **"Privacy Issues in the Workplace"**
East Inland Empire ERC | Fontana | Mark Meyerhoff

May 9 **"Public Service: Understanding the Roles and Responsibilities of Public Employees"**
Gateway Public ERC | Long Beach | Laura Drottz Kalty & Jolina A. Abrena

May 9 **"Legal Issues Regarding Hiring and Promotions"**
LA County HR Consortium | Los Angeles | Geoffrey S. Sheldon

May 9 **"Labor Negotiations From Beginning to End"** & **"Human Resources Academy II"**
North State ERC | Chico | Gage C. Dungy

May 9 **"Supervisor's Guide to Public Sector Employment Law"**
San Diego ERC | Coronado | Stephanie J. Lowe

May 15 **"Workers Compensation: Managing Employee Injuries, Disability and Occupational Safety"**
Sonoma/Marin ERC | Rohnert Park | Rick Goldman

May 16 **"Maximizing Performance Through Evaluation, Documentation and Corrective Action"** & **"Managing the Marginal Employee"**
Orange County Consortium | Tustin | Mark Meyerhoff

May 21 **"So You Want To Be A Supervisor"**
North San Diego County ERC | San Marcos | Kristi Recchia

May 22 **"Human Resources Academy I"** & **"The Future is Now - Embracing Generational Diversity and Succession Planning"**
NorCal ERC | Pittsburg | Lisa S. Charbonneau

May 23 **"Creating a Culture of Diversity in Hiring, Promotion and Supervision"** & **"Public Service: Understanding the Roles and Responsibilities of Public Employees"**
Coachella Valley ERC | Indio | Kristi Recchia

May 23 **"Difficult Conversations"**
San Mateo County ERC | San Mateo | Erin Kunze

May 23 **"Supervisor's Guide to Public Sector Employment Law"**
South Bay ERC | Torrance | Mark Meyerhoff

May 29 **"12 Steps to Avoiding Liability"** & **"Human Resources Academy II"**
Gold Country ERC | Elk Grove | Gage C. Dungy

May 30 **"Implicit Bias" & "Human Resources Academy II"**
Imperial Valley ERC | El Centro | Kristi Recchia

Customized Training

Our customized training programs can help improve workplace performance and reduce exposure to liability and costly litigation. For more information, please visit www.lcwlegal.com/events-and-training/training.

May 2 **"MOU's, Leaves and Accommodations"**
City of Santa Monica | Laura Drottz Kalty

May 6 **"Preventing Workplace Harassment, Discrimination and Retaliation"**
Town of Truckee | Jack Hughes

May 7 **"Nuts & Bolts: Navigating Common Legal Risks for the Front Line Supervisor"**
Sacramento Metropolitan Fire District | Mather | Gage C. Dungy

May 8,9 **"Performance Management and Evaluation Process"**
Mendocino County | Ukiah | Jack Hughes

May 9 **"Preventing Workplace Harassment, Discrimination and Retaliation"**
City of Glendale | Jenny Denny

May 9,10 **"Preventing Workplace Harassment, Discrimination and Retaliation"**
Merced County | Merced | Michael Youril

May 11 **"Harassment and Ethics"**
Pike City Fire | North San Juan | Donna Williamson

May 13 **"Workplace Bullying: A Growing Concern"**
City of Campbell | Casey Williams

May 14 **"Ethics in Public Service"**
City of Mission Viejo | Stephanie J. Lowe

May 22 **"Conducting Disciplinary Investigations: Who, What, When and How"**
City of Stockton | Gage C. Dungy

May 23 **"Preventing Workplace Harassment, Discrimination and Retaliation"**
City of Fremont | Jack Hughes

May 24 **"Preventing Harassment, Discrimination and Retaliation in the Private and Independent School Environment"**
Waldorf School of Orange County | Costa Mesa | Jenny Denny

May 28 **"Preventing Workplace Harassment, Discrimination and Retaliation"**
City of Glendale | Laura Drottz Kalty

May 29 **"Preventing Workplace Harassment, Discrimination and Retaliation"**
Joel R. Mogy Investment Counsel, Inc. | Beverly Hills | Jennifer Rosner

May 29,30 **"Preventing Workplace Harassment, Discrimination and Retaliation"**
Merced County | Merced | Che I. Johnson

May 30 **"Preventing Workplace Harassment, Discrimination and Retaliation"**
City of Morgan Hill | Casey Williams

Speaking Engagements

May 3 **"Civility, Communication, Conflict Management in the Workplace"**
Community College League of California (CCLC) Executive Assistants Workshop | Olympic Valley | Kristin D. Lindgren

May 7 **"Life After Retirement: Succession Planning and Hiring retired Annuitants"**
Association of California Water Districts (ACWA) 2019 Legal Briefing & CLE Workshop | Monterey | Michael Youril & Cyrus Torabi

May 7 **"Preventing Workplace Harassment, Discrimination and Retaliation"**
California Sanitaton Risk Management Authority (CSRMA) Conference | Oakland | Lisa S. Charbonneau

May 7 **"Guide to Lawful Termination"**
CSRMA Conference | Oakland | Casey Williams

May 7 **"Must Have Employment Polices"**
CSRMA Conference | Oakland | Lisa S. Charbonneau

May 7 **"Legal Issues Regarding Hiring and Promotions"**
CSRMA Conference | Oakland | Casey Williams

May 7 **"Maximizing Performance Through Evaluation, Documentation and Corrective Action"**
CSRMA Conference | Oakland | Casey Williams

May 9 **"Shots Fired! How to Respond to an Officer Involved Shooting"**
League of California Cities City Attorneys' Conference | Monterey | J. Scott Tiedemann & Jeb Brown

Seminars/Webinars

For more information and to register, please visit www.lcwlegal.com/events-and-training/webinars-seminars.

May 1 **"Mandated Reporter Training"**
Liebert Cassidy Whitmore | Webinar | Julie L. Strom

May 7 **"Hot Topics in FLSA Litigation & Settlements"**
Liebert Cassidy Whitmore | Webinar | Elizabeth T. Arce

May 14 **"Payroll Processing & Regular Rate of Pay Calculations"**
Liebert Cassidy Whitmore | Citrus Heights | Richard Bolanos & Lisa Charbonneau

May 16 **"The Public Employment Relations Board (PERB) Academy"**
Liebert Cassidy Whitmore | Fresno | Che I. Johnson & Kristi Recchia

The ***Client Update*** is available via e-mail. If you would like to be added to the e-mail distribution list, please visit https://www.lcwlegal.com/news. **Please note:** By adding your name to the e-mail distribution list, you will no longer receive a hard copy of the ***Client Update***.

If you have any questions, contact **Jaja Hsu** at 310.981.2000 or at info@lcwlegal.com.

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