

impermissibly investigating their private sexual conduct or by taking adverse employment action on the basis of such private conduct.” It found that the Department’s investigation did not violate this standard, given that the initiating complaint alleged on-duty sexual conduct. However, the Ninth Circuit held that termination based on an off-duty extramarital affair was unconstitutional unless “such conduct either adversely affected the officer’s on-the-job performance or violated a constitutionally permissible, narrowly tailored department policy.”

On the question of whether Perez’s release from probation was motivated, at least in part, by her constitutionally protected off-duty conduct, the court held this was for a jury to decide. The court also found that there was a genuine factual dispute for a jury to resolve on whether reasons the Department had given for releasing Perez, unrelated to her sexual conduct, were pretextual.

Perez v. City of Roseville (9th Cir. 2018) 882 F.3d 843.

NOTE:

In addressing off-duty conduct, public employers should consider whether the conduct has any negative impact on the public employee’s on-duty performance. Agencies are encouraged to consult with counsel early in the process of investigating potential misconduct in order to avoid violating employee rights.

DUE PROCESS

Reference to “Fire Chief” in Firefighter’s Bill of Rights Means “Lead” Fire Chief of the Jurisdiction.

A former Battalion Chief who was terminated by a Fire Protection District sued the District for age discrimination and prevailed after a jury trial. On appeal, the District sought to reverse the judgment, contending that the trial court judge improperly failed to instruct the jury pursuant to a provision in the Firefighter’s Procedural Bill of Rights Act (FBOR).

The provision in question, Government Code section 3254, subdivision (c), states:

“A fire chief shall not be removed by a public agency or appointing authority without providing that person with written notice, the reason or reasons

for removal, and an opportunity for administrative appeal.

The removal of a fire chief by a public agency or appointing authority, for the purpose of implementing the goals or policies, or both, of the public agency or appointing authority, or for reasons including, but not limited to incompatibility of management styles or as a result of a change in administration, shall be sufficient to constitute ‘reason or reasons.’”

The District asserted that instructing the jury on this provision was appropriate because the Battalion Chief was terminated due to a change in administration and incompatibility of management styles. The court rejected this argument, holding that the provision applies only to the “lead” fire chief of a jurisdiction, and not a Battalion Chief.

In reaching its conclusion, the court observed that the FBOR provision specifically refers to “a fire chief,” and not other classifications of chiefs such as “deputy chiefs,” “assistant chiefs,” or “division chiefs.” The court also noted that the FBOR does not define the term “fire chief,” which would be expected if the statute was intended to “apply to any position with the word ‘chief’ in it.”

In addition, the court referenced the Public Safety Officers Procedural Bill of Rights Act (POBR), on which the FBOR is modeled, and which contains a virtually identical provision that applies to a “chief of police.” Relying primarily on the legislative history of this POBR provision, which includes a reference to a Chief of Police reaching the “apex of his or her law enforcement career,” the appellate court determined that the provision applied solely to a jurisdiction’s actual “Chief of Police.” This, the court found, supported its conclusion on the equivalent FBOR provision.

Thus, the Court of Appeal found there was no legal error and affirmed the trial court’s judgment in favor of Corley.

Corley v. San Bernardino County Fire Protection District (2018) 21 Cal.App.5th 390.

NOTE:

This decision provides important clarification that the term “fire chief,” as used in the FBOR, applies exclusively to the agency’s lead fire chief.

DISCRIMINATION

Termination of Employee Due to Transgender and Transitioning Status Violates Title VII.

The U.S. Court of Appeals for the Sixth Circuit (which covers Michigan and nearby states) has ruled that transgender status is a protected classification under Title VII. The court found that an employer discriminated on the basis of sex when it terminated a transgender woman because she wished to identify as female and wear a uniform designated for women.

Aimee Stephens is a transgender woman who was born biologically male. After several years of presenting as a male to her employer, Stephens notified the employer that she had “a gender identity disorder,” would begin identifying and dressing as a woman, and intended to have sex reassignment surgery.

Two weeks later, Stephens’ employer terminated her, citing concern that customers would not be accepting of Stephens’ transition. The employer expressed no concerns regarding Stephens’ work performance.

Stephens filed a discrimination complaint with the U.S. Equal Employment Opportunity Commission (EEOC) asserting that she was terminated because she was transitioning from the male to the female gender and her employer believed the public would not be accepting of her transition. The EEOC investigated and ultimately brought a lawsuit against the employer. The federal trial court found that transgender status was not a protected characteristic under Title VII and ruled that the EEOC could not sue for discrimination based solely on transgender and/or transitioning status. Stephens appealed.

On appeal, the Sixth Circuit became the first federal appellate court to expressly rule that an employee’s transgender or transitioning status are protected under Title VII, and that taking adverse action against an employee because of that protected status is unlawful discrimination on the basis of sex. The court reasoned that “it is analytically impossible to fire an employee based on that employee’s status as a transgender person without being motivated, at least in part, by the employee’s sex. ... [D]iscrimination ‘because of sex’ inherently includes discrimination against employees because of a change in their sex.” The court also held that discrimination

based on transgender status constitutes unlawful sex stereotyping because “an employer cannot discriminate on the basis of transgender status without imposing its stereotypical notions of how sexual organs and gender identity ought to align.”

The Sixth Circuit rejected the employer’s argument that Stephens’ transition and use of a female uniform would be a “distraction” for customers. The court relied on the Ninth Circuit’s decision in *Fernandez v. Wynn Oil Co.*, which found that customer preferences or biases are not legally valid justifications for taking adverse employment actions against employees on the basis of sex, even in the presence of evidence that the employer’s business would suffer. The court also rejected the employer’s argument that its decision to terminate Stephens was rooted in its owner’s religious beliefs and was therefore a protected exercise of religion.

California employers should take note that the state’s Fair Employment and Housing Act (FEHA) includes “transgender” and “transitioning” statuses as protected categories, and prohibits discrimination and harassment based on sex, gender identity and gender expression. As of January 1, 2018, California employers with 50 or more employees must post information about the rights of transgender employees in the workplace, and must provide training on the prevention of sexual harassment and abusive conduct, including the prevention of harassment based on gender identity and expression.

Equal Employment Opportunity Commission v. R.G. & G.R. Harris Funeral Homes, Inc. (6th Cir. 2018) 884 F.3d 560.

NOTE:

Employers should ensure that agency policies, handbooks, training sessions, hiring protocols and other personnel procedures reflect California law and these evolving standards. More information about the rights of transgender employees under the FEHA is available here: https://www.dfeh.ca.gov/wp-content/uploads/sites/32/2017/11/DFEH_E04P-ENG-2017Nov.pdf

ADMINISTRATIVE REMEDIES

Employee's Failure to Exhaust Internal Agency Process Bars Lawsuit.

After being laid off by the County of Santa Barbara, Shawn Terris requested placement in another County position. The County denied the request because it determined Terris was not qualified. Terris sued the County, alleging, among other things, that she was unlawfully discriminated and retaliated against in violation of Labor Code sections 1101, 1102, and 1102.5. The County moved for summary judgment because Terris had failed to file a complaint with the County's Equal Employment Opportunity Office (EEO) prior to bringing a lawsuit, as required under the County's rules. The County EEO investigates employment discrimination based on violations of sections 1101, 1102, and 1102.5. If Terris had filed a complaint with the EEO and disagreed with the EEO's report, she could have then filed an appeal with the County's Civil Service Commission.

The trial court agreed with the County and granted summary judgment in its favor. Terris appealed and the Court of Appeal affirmed. The Court of Appeal rejected Terris' argument that exhaustion was not necessary under California Labor Code section 244, which states that an individual is not required to exhaust "administrative remedies or procedures" in order to bring a civil action against his or her employer. The court found that section 244 applies only to exhaustion of claims before the California Labor Commissioner, and thus does not relieve a public employee from having to exhaust internal administrative remedies before filing a civil lawsuit.

Shawn Terris v. County of Santa Barbara (2018) 20 Cal.App.5th 551.

NOTE:

This case emphasizes the importance of internal public agency grievance and complaint procedures, which may assist your agency in preventing unnecessary civil litigation. A more in depth discussion of the decision is available here: <https://www.lcwlegal.com/news/agency-policy-bars-lawsuit-employee-must-first-exhaust-internal-agency-process>. It is important to note, however, that for claims brought under the Fair Employment and Housing Act (FEHA), special exhaustion rules apply.

HIRING

Hiring Do's and Don'ts.

Public agencies should be aware of the legal risks associated with the hiring process, and use best practices to avoid common pitfalls. While not exhaustive, the following list provides a general framework for trouble-shooting your agency's hiring process.

Utilize Accurate Job Descriptions:

At the very outset of the hiring process, it is critical to develop accurate and sufficiently detailed job descriptions. An accurate job description will help the agency focus questions on job applications and during interviews so that the hiring process elicits only those facts that are job-related. Also, to prevent disability discrimination in both the hiring process and during employment, an agency's identification of and focus on the "essential functions of the job" is critical. Courts generally treat the job description the employer prepares prior to advertising or interviewing for the job as evidence of the job's essential functions.

Establish a Uniform Screening Process for Applications:

The next phase to consider is the initial "screening" of applications for those who are not qualified or not competitive in light of the quality and experience of other applicants. As a general matter, an employer's initial "screening" must be conducted in a neutral manner that does not result in an unjustifiable disproportionate impact with regard to a protected characteristic, such as race, gender, religion, or age over 40. Accordingly, the agency should establish a set of job-related screening criteria which include all individuals who have the qualifications for the job. The agency should also have a process in place to: review the fairness and appropriateness of screening criteria; make sure the screening guidelines are followed uniformly; and confirm that the screening decisions were not influenced by improper considerations.

Focus Interviews on Job-Related Questions:

Questions should focus on qualifications for the job in question, and not pertain to protected characteristics. Some unlawful questions may be obvious, such as asking about an applicant's race, age, religion, or other protected characteristics. But questions may indirectly relate to protected categories, such as

questions about: the date of completion of school (age); religious days the applicant observes (religion); or the applicant's birthplace (national origin).

However, questions can be phrased to request job-related information the employer legitimately needs without creating an impression of bias. For example, it would be appropriate to ask which languages an applicant speaks, if multi-language fluency is relevant to the job at issue. It is vital that agencies ensure that those employees conducting interviews are trained to know what categories or statuses are protected, and what questions are prohibited.

Restrictions on Asking About Prior Salary:

Effective January 1, 2018, California employers may not inquire into an applicant's prior salary history, except in a few limited circumstances. First, an employer may seek and use salary history that is disclosable under federal or state law, including the Public Records Act. Second, if the applicant voluntarily supplies the information, the agency may use that information to decide what salary to offer, but should avoid using it in deciding whether to hire the candidate.

Limitations on Background Investigations, Including Reference Checks:

To fill some positions such as police officer, a public agency is required by law to conduct a background investigation. However, peace officer applicants have state and federal constitutional privacy rights that may limit the information an agency can seek and in what manner the information may be sought. An important step in the background investigation process is obtaining a signed waiver and authorization from each selected applicant. Beginning in 2018, a public agency employer cannot conduct a criminal history background for non-police applicants without first giving an offer of employment that is conditioned upon the successful completion of the criminal history check. The employer must carefully analyze any convictions

to determine if they have a direct and adverse relationship with the specific duties of the job. If the employer makes a preliminary determination that the conviction history is disqualifying because of the nature and gravity of the offense, when the offense occurred, and the nature of the job, the employer must notify the applicant in writing and allow the applicant five business days to respond. An employer's right to receive a consumer credit report is also limited to certain types of positions.

Generally, under both federal and state law, employers cannot ask questions about disabilities or require medical examinations prior to making a conditional offer of employment. The EEOC has described that a "conditional offer of employment" is a real job offer that is made after the employer has evaluated all relevant and lawful non-medical information which could reasonably have been obtained and analyzed prior to making the offer. As a result, the medical examination condition should be the final condition to any job offer, and occur after any condition related to passing a criminal history check. Any medical examination must be directly related to job performance and be justified by the agency's business necessity.

Rejection of Applicants Based on Results of Medical Examination:

If an agency rejects an applicant based on the results of a medical examination, it must be prepared to present evidence that the decision comports with state and federal laws prohibiting discrimination on the basis of disability. Considerations include whether a reasonable accommodation was available that would not impose an undue hardship, an interactive process with the applicant, the extent to which the applicant's holding the position would pose a direct threat to health or safety of the applicant or others that could not be eliminated by reasonable accommodation, and others.

§



Fire Watch, is available via email. If you would like to be added to the email distribution list or if you know someone who would benefit from this publication, please visit www.lcwlegal.com/subscribe.aspx.

Please note: By adding your name to the e-mail distribution list, you will no longer receive a hard copy of **Fire Watch**. If you have any questions, call Morgan Favors at 310.981.2087.

LCW WEBINAR: REDUCING THE CHANCES OF AN OFF-THE- CLOCK WAGE CLAIM

**Wednesday May 9, 2018 |
10 AM - 11 AM**

Employers are obligated under the Fair Labor Standards Act (FLSA) to compensate non-exempt employees for all hours that they are “suffered or permitted to work”. This can include so called “off-the-clock” work outside an employee’s regularly scheduled work time, which can lead to unnecessary overtime costs and liability for unpaid wages. The webinar will provide supervisors, managers, and human resources staff information on how to identify potential off-the-clock issues, including: employees staying late or leaving early, telephone calls/emails/text messages outside of normal work hours, improper tracking of time, “volunteer” work, and pre- and post-shift work such as donning and doffing, setting up facilities, and maintaining agency equipment. The webinar will also address how to utilize time clocks and rounding of work time to properly account for time worked and effective strategies your agency can implement to otherwise avoid off-the-clock wage claims.

Presented by:



[Gage Dungy](#)

Who Should Attend?

Managers, Supervisors, Department Heads, and Resources Staff

Workshop Fee:

Consortium Members: \$70

Non-Members: \$100



Register Today:

www.lcwlegal.com/events-and-training/webinars-seminars

LCW WEBINAR: MANDATED REPORTING

Tuesday, May 1, 2018 | 10 AM - 12 PM

Presented by:



Employees whose duties require contact with and/or supervision of children are considered “mandated reporters.” This workshop provides mandated reporters with the training that is suggested and encouraged by the California Penal Code to help them understand their obligations. It is essential that mandated reporters understand their legal duties not only to help ensure the safety and welfare of children, but because the duty to report is imposed on individual employees, not their agencies. Moreover, a lack of training does not

relieve mandated reporters of this important duty.

This workshop, designed for any employee who is a mandated reporter, or who supervises mandated reporters, explains this complex area of the law, including: what constitutes child abuse and neglect; the specific reporting obligations of mandated reporters; how to file a report; protections for reporters; the consequences for failing to file a report; and appropriate employer reporting policies. This practical workshop includes an interactive discussion of typical scenarios that could trigger a duty to report suspected abuse or neglect.



[Lee T. Patajo](#)

Who Should Attend?

Department of Parks and Recreation Administrators and Employees, Athletic Coaches, Support Staff, Day Camp Administrators and Employees, Youth Program Administrators and Employees

Workshop Fee: Consortium Members: \$100, Non-Members: \$125

Register Today: www.lcwlegal.com/events-and-training

NEW TO THE FIRM



Kelsey joins our San Francisco office after most recently working with public agencies in southern California. In addition to providing advice and counsel to clients, Kelsey is a litigator with experience researching, drafting pleadings, conducting discovery and preparing witnesses. Kelsey can be reached 415-512-3026 or kcropper@lcwlegal.com.

MANAGEMENT TRAINING WORKSHOPS

Firm Activities

Consortium Training

- Apr. 25 **“Issues and Challenges Regarding Drugs and Alcohol in the Workplace”**
Humboldt County ERC | Eureka | Gage C. Dungy
- Apr. 25 **“Iron Fists or Kid Gloves: Retaliation in the Workplace”**
Los Angeles County Human Resources Consortium | Los Angeles | Geoffrey S. Sheldon
- Apr. 25 **“Technology and Employee Privacy” and “Disaster Service Workers – If You Call Them, Will They Come?”**
Monterey Bay ERC | Seaside | Lisa S. Charbonneau
- Apr. 25 **“Maximizing Supervisory Skills for the First Line Supervisor”**
NorCal ERC | Dublin | Kelly Tuffo
- Apr. 26 **“Navigating the Crossroads of Discipline and Disability Accommodation”**
Humboldt County ERC | Eureka | Gage C. Dungy
- May 1 **“Technology and Employee Privacy” and “So You Want To Be A Supervisor”**
North San Diego County ERC | San Marcos | Elizabeth Tom Arce
- May 2 **“Public Service: Understanding the Roles and Responsibilities of Public Employees” and “Disaster Service Workers - If You Call Them, Will They Come?”**
Sonoma/Marin ERC | Rohnert Park | Morin I. Jacob
- May 3 **“Moving Into The Future”**
Los Angeles County Human Resources Consortium | Los Angeles | T. Oliver Yee & Alysha Stein-Manes
- May 9 **“Workplace Bullying: A Growing Concern”**
Gateway Public ERC | Long Beach | Alison R. Kalinski & Elizabeth Tom Arce
- May 10 **“Introduction to the FLSA” and “Public Sector Employment Law Update”**
Coachella Valley ERC | Indio | Geoffrey S. Sheldon
- May 10 **“Moving Into the Future” and “12 Steps to Avoiding Liability”**
East Inland Empire ERC | Fontana | T. Oliver Yee & Alysha Stein-Manes
- May 10 **“Advanced Investigations of Workplace Complaints”**
North State ERC | Chico | Gage C. Dungy
- May 10 **“Inclusive Leadership”**
San Diego ERC | La Mesa | Kristi Recchia
- May 10 **“Managing the Marginal Employee” and “A Guide to Implementing Public Employee Discipline”**
San Mateo County ERC | Burlingame | Erin Kunze
- May 16 **“Leaves, Leaves and More Leaves” and “Navigating the Crossroads of Discipline and Disability Accommodation”**
Gold Country ERC | Elk Grove | Jack Hughes
- May 10 **“Inclusive Leadership”**
San Diego ERC | La Mesa | Kristi Recchia

May 10	“Managing the Marginal Employee” and “A Guide to Implementing Public Employee Discipline” San Mateo County ERC Burlingame Erin Kunze
May 16	“Leaves, Leaves and More Leaves” and “Navigating the Crossroads of Discipline and Disability Accommodation” Gold Country ERC Elk Grove Jack Hughes
May 16	“Managing the Marginal Employee” and “Navigating the Crossroads of Discipline and Disability Accommodation” Ventura/Santa Barbara ERC Camarillo Kevin J. Chicas
May 17	“Issues and Challenges Regarding Drugs and Alcohol in the Workplace” and “Principles for Public Safety Employment” Imperial Valley ERC Brawley Mark Meyerhoff
May 17	“Preventing Workplace Harassment, Discrimination and Retaliation” Orange County Consortium Tustin Christopher S. Frederick
May 17	“Public Sector Employment Law Update” and “Maximizing Performance Through Evaluation, Documentation and Discipline” West Inland Empire ERC San Dimas Geoffrey S. Sheldon
May 23	“Difficult Conversations” and “Disaster Service Workers If You Call Them, Will They Come?” NorCal ERC Oakland Jack Hughes
May 24	“Workplace Bullying: A Growing Concern” Monterey Bay ERC Webinar Joy J. Chen
May 24	“Moving Into The Future” South Bay ERC Redondo Beach Alysha Stein-Manes

Customized Training

Apr. 25	“Introduction to the FLSA and Prevention and Control of Absenteeism and Abuse of Leave” City of Riverside Jennifer Rosner
Apr. 25	“Retaliation in the Workplace” ERMA San Ramon Erin Kunze
Apr. 26	“The Brown Act and Grievance Procedure” County of Imperial El Centro Stefanie K. Vaudreuil
Apr. 27	“Preventing Workplace Harassment, Discrimination and Retaliation” County of San Luis Obispo San Luis Obispo Christopher S. Frederick
Apr. 27	“Harassment Prevention: Train the Trainer” Liebert Cassidy Whitmore Fresno Shelline Bennett
Apr. 28	“Preventing Workplace Harassment, Discrimination and Retaliation in the Workplace” City of Newport Beach Christopher S. Frederick
May 2	“The Art of Writing the Performance Evaluation” Imperial Irrigation District El Centro Stefanie K. Vaudreuil
May 2	“Preventing Workplace Harassment, Discrimination and Retaliation” REMIF Fortuna Joy J. Chen

- May 3 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
City of Fairfield | Gage C. Dungy
- May 3 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
City of Irvine | Christopher S. Frederick
- May 3 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
City of San Bernardino | Joung H. Yim
- May 8 **“Mandated Reporting”**
East Bay Regional Park District | Oakland | Erin Kunze
- May 8 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
ERMA | Rancho Santa Margarita | James E. Oldendorph
- May 9 **“Mandated Reporting”**
City of Stockton | Kristin D. Lindgren
- May 9 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
REMIF | Healdsburg | Morin I. Jacob
- May 14 **“A Guide to Implementing Public Employee Discipline”**
ERMA | Chowchilla | Kimberly A. Horiuchi
- May 16 **“Leaves, Leaves and More Leaves”**
City of Fountain Valley | Jennifer Rosner
- May 16 **“A Guide to Implementing Public Employee Discipline”**
ERMA | Novato | Suzanne Solomon
- May 17 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
Housing Authority of the City of Alameda | Alameda | Joy J. Chen
- May 21 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
Contra Costa Mosquito and Vector Control District | Concord | Joy J. Chen
- May 24 **“Preventing Workplace Harassment, Discrimination and Retaliation”**
City of Manhattan Beach | Laura Kalty
- May 24 **“Risk Management Skills for the Front Line Supervisor”**
ERMA | Shafter | Kimberly A. Horiuchi
- May 31 **“MOU’s, Leaves and Accommodations”**
City of Santa Monica | Laura Kalty

Speaking Engagements]

- Apr. 25 **“An Ounce of Prevention is Worth its Weight in Gold: Workplace Bullying”**
Western Region IPMA-HR Annual Training Conference | Sacramento | Kristin D. Lindgren
- Apr. 25 **“The New Frontier of Meet and Confer Strategies for Success at the Table”**
Western Region IPMA-HR Annual Training Conference | Sacramento | Jack Hughes
- Apr. 26 **“Labor Relations and the Pending Pension Challenges”**
California Society of Municipal Finance Officers (CSMFO) Luncheon | Paramount |
Steven M. Berliner
- Apr. 27 **“A Nugget of Knowledge about Workplace Investigations”**
Western Region IPMA-HR Annual Training Conference | Sacramento | Kristin D. Lindgren

- May 9 **“Free Speech and the Rapidly Changing Discipline Issues in the Digital Era”**
Channel Islands Public Management Association for Human Resources (CIPMA-HR) |
Oxnard | Jennifer Rosner
- May 17 **“Courageous Authenticity - Do You Care Enough to have critical Conversations?”**
Southern California Public Labor Relations Council (SCPLRC) Monthly Meeting |
Kristi Recchia
- May 23 **“Special District Legislative Days”**
California Special Districts Association (CSDA) Special District Legislative Days |
Sacramento | Gage C. Dungy
- May 25 **“Labor Relations Training”**
California State Association of Counties (CSAC) Labor Relations Class | Sacramento |
Richard S. Whitmore & Richard Bolanos & Gage C. Dungy
- May 29 **“Employment Law and the Interactive Process”**
Judicial Branch Workers’ Compensation Program (JBWCP) | Jennifer Rosner

Seminars/Webinars

- Apr. 26 **“Collective Bargaining – The Grievance & Disciplinary Appeals”**
Liebert Cassidy Whitmore | Webinar | Laura Kalty
- Apr. 27 **“Harassment Prevention: Train the Trainer”**
Liebert Cassidy Whitmore | Fresno | Shelline Bennett
- May 1 **“Mandated Reporter”**
Liebert Cassidy Whitmore | Webinar | Lee T. Patajo
- May 9 **“Reducing the Chances of an Off-the-Clock Wage Claim”**
Liebert Cassidy Whitmore | Webinar | Gage C. Dungy
- May 21 **“Preparing for a Strike: How to Ensure Effective Coordination for Your Agency”**
Liebert Cassidy Whitmore | Webinar | Che I. Johnson
- May 23 **“Cafeteria Plans: ACA, Flores and PEMHCA Webinar”**
Liebert Cassidy Whitmore | Webinar | Heather DeBlanc & Stephanie J. Lowe
- May 30,31 **“FLSA Academy”**
Liebert Cassidy Whitmore Seminar | Buena Park | Peter J. Brown

LCW LIEBERT CASSIDY WHITMORE

6033 West Century Blvd., 5th Floor | Los Angeles, CA 90045

 CalPublicAgencyLaborEmploymentBlog.com |  @lcwlegal

Copyright © 2017 **LCW** LIEBERT CASSIDY WHITMORE

Requests for permission to reproduce all or part of this publication should be addressed to Cynthia Weldon, Director of Marketing and Training at 310.981.2000.

Fire Watch is published monthly for the benefit of the clients of Liebert Cassidy Whitmore. The information in *Fire Watch* should not be acted on without professional advice. To contact us, please call 310.981.2000, 415.512.3000, 559.256.7800, 619.481.5900 or 916.584.7000 or e-mail info@lcwlegal.com.