



Best Practices for Effective Workplace Investigations An HR Attorney's Perspective

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Scenario 1: Social Media Meltdown

- » Manager Tim comes to you and is upset that after he had issued Amy a disciplinary action and 1 day suspension last week. He thinks Amy posted disparaging statements on Glassdoor about him (calling him “sexist pig” and using his first name). She then put something on Facebook He wants to immediately terminate Amy for insubordination and disparaging him – and the Company.
- » The Glassdoor comment is anonymous - complains of “men being treated better” at your company – and sexism being tolerated - posted three days ago.
- » Last night Amy posted several comments on Facebook page concerning Tim, including the following post/thread:
 - » “Looks like I’m getting some time off. Love how the company allows a dirt bag like Tiny Tim be a supervisor.”
 - » A current employee responded to the post: “What now?”
 - » Amy answered, “Tim just being an a-hole as always. Basic male insecurity.”
 - » A former employee next wrote “I’m so glad I left there!”
 - » Thread ended with the current employee telling Amy: “Chin up!”
- » Many of Amy’s coworkers and supervisors have access to her Facebook page and regularly use the site to communicate, including to criticize management.



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Scenario 1: Questions

1. What is the first thing you should do with this complaint?
2. Can you access the employees Facebook or Glassdoor account to see what was posted?
3. Once you have confirmed that the statements or postings were made, what should you do next?
4. Would it matter if nothing in her Facebook profile or posting mentions your company?
5. Would you support recommendation to terminate?
6. Can you tell persons not to make posts like this in the future?



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Scenario 2: Oh Snap...What to do?

- » Rochelle, a Black woman, works at an assisted living facility as a home health aide.
- » She alleges that two Black coworkers of Caribbean descent, Martina and Terri, subjected her to a hostile work environment based on national origin.
- » The investigation reveals that Martina's and Terri's harassing conduct included mocking Rochelle, blocking doorways, and interfering with her work, and that it culminated in an offensive post on the Facebook and Snapchat.
- » In the post, Martina and Terri included two images of Rochelle juxtaposed with an image of the fictional ape Cornelius from the movie *The Planet of the Apes*, along with text explicitly comparing Rochelle to Cornelius.
- » Rochelle learned about the post from another coworker, Jenna, who screenshotted it and texted it to her.



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Scenario 2: Questions

1. What is the first thing you should do with this complaint?
2. Can you access the employees Facebook or Snapchat accounts to see what was posted?
3. Once you have confirmed that the statements or postings were made, what should you do next?
4. Would it matter if nothing in profile or posting mentions your company?
5. Would you support recommendation to terminate?
6. Can you tell persons not to make posts like this in the future?



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Scenario 3: Investigating Your Boss 101

- » You are just back from break and the New Sales Director (Angel) asks to speak with you. She walks in and closes the door, and starts crying. She explains Harvey (long time CFO and your boss) and her had a brief affair (both married), but she broke it off – after her husband found out about it.
- » Angel told Harvey to stop contacting her and it's over – he keeps texting her and coming by her office.
- » Angel wants to initiate a harassment complaint, because she feels her job might be in jeopardy, but she's afraid others will find out (about the affair) – and/or that he might retaliate against her.
- » Last night Harvey e-mailed you at 8:30 PM that he wanted to talk with you about eliminating a couple of jobs when you were back, and included Angel on the list – claiming she had only been with us for six months and we need to make some cuts to make next quarter's numbers.
- » Harvey suggests paying Angel two months of severance. He asks you to look into cutting off her e-mail and access ASAP – he wants to get this taken care of so severance hits this quarter....



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Scenario 3: Questions

1. What is the first thing you should do with this request?
2. Can you investigate this – your boss?
3. Do you have to do what your boss tells you to do?
4. If Angel says – “nevermind – this is too embarrassing – forget I told you” – what do you do?
5. If Angel says “I just want to leave – if you all give me a good package, I am out of here” – do you still need to do anything or tell anyone?



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The slide is split into two panels. The left panel features a background of a city skyline with a semi-transparent grid. In the top left corner is the FH logo. Centered in the panel is the text "Make A Plan / Follow A Process" in a large, dark blue font. The right panel shows a close-up of a hand holding a blue pen over a white document titled "Workplace Harassment Investigation". The document has a checklist with three items: "Complainant(s)", "Respondent(s)", and "Witnesses", each preceded by an empty checkbox.

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Fundamental Steps for Effective Investigation

- » Get complaint in writing (if you can) – BUT do NOT insist
- » Develop investigation strategy at outset
- » Interview the complaining employee
- » Inform those with need to know
- » Interview the complaining employee's witnesses
- » Collect and preserve any physical evidence



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Fundamental Steps for Effective Investigation

- » Collect and preserve electronic evidence
- » Interview the alleged perpetrator
- » Interview the alleged perpetrator's witnesses
- » Conduct any necessary follow-up
- » Document, document, document



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Some Key Questions/Issues

- » What constitutes a “complaint”?
- » When do I have a duty to investigate?
- » Who should conduct the investigation?
- » How (and where) should the investigation be done?
- » Any safety precautions or considerations?
- » Should an investigative report be prepared?
- » Are there common mistakes to avoid?



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What Constitutes a Complaint

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Obvious Examples

- » Written or verbal communication from employee “specifically” complaining of discrimination, harassment or other objectionable conduct
- » Employee verbally states he/she has “generally” been treated badly or unfairly
- » Supervisor/manager reports that inappropriate acts or misconduct have occurred
- » Complaints submitted through published policy (Hotline)
- » EEOC/FCHR Charge of Discrimination/Lawsuit



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Less Obvious Examples

- » Subtle statements about workplace or supervisor
- » Offhand comment from employee directly to or overheard by supervisor about inappropriate conduct that has occurred in workplace
- » Comments made outside of workplace between “friends” (“just between us”, “off the record”)



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How to respond?

- » Train managers on how to respond!
- » Do not immediately go into defense mode
- » Be friendly and open to talk
- » If not a good time, offer specific time and place to meet (or time within 24 hours you will get back to person to schedule meeting)
- » Treat every complaint seriously
- » Be sincere



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How to respond?

- » Ask person to summarize the issue
- » Ask yourself: “Am I the right person to talk about . . . ?”
 - » If yes, continue
 - » If no, stop and identify to whom the person should take the concern/complaint
 - » If someone else is more appropriate, call that person right then and set up meeting time (or ask that person to join the ongoing meeting, if possible)



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How to respond?

Always remember . . .

- » You are not a “confidant”
- » You are an arm of the company
- » Information you learn may impute knowledge to company
- » You are not alone – escalate the issue to higher authority
- » Often the initial conversation is crucial



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How to respond?

- » First communication from you needs to be a concise and consistent message about your company practice:
 - » Open door
 - » No retaliation – strictly prohibited (emphasize)
 - » This is a safe place to share
 - » You will maintain confidentiality **to the extent reasonably possible**
 - » At any time person can go to next higher authority (specifically identify who and give contact number for that person)



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Duty to Investigate?

- » Federal and state harassment, discrimination and retaliation laws impose legal duty on employer to investigate employee-related complaints (defenses and mitigation)
- » False Claims Act (government contractor)
- » Obligations to shareholders (Sarbanes-Oxley/Dodd-Frank)
- » OSHA “General Duty” clause



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Duty to Investigate?

- » Handbook/Policy
- » “For Cause” terminations (in employment contracts or CBAs) require fair and thorough investigations
- » “Right Thing To Do”
 - » Ensure fairness and respect
 - » Remedy a wrong
 - » Retention
 - » Develop and preserve defenses if litigation arises



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The slide is split into two vertical panels. The left panel has a light gray background with a faint grid pattern and a city skyline. It features the 'FH' logo in the top left and the title 'Selecting the Investigator' in a large, dark blue font. The right panel has a solid blue background with a geometric pattern of white and red paper airplanes flying towards the right. The 'FH' logo is also present in the top left of this panel.

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Selecting the Investigator

- » Ability to understand **business** purpose of investigation and potential issues it may raise
- » Knowledge of policies and practices
- » Knowledge of applicable legal issues
- » Ability to take thorough, accurate notes which can be used as evidence
- » “Communication fit” with personalities and backgrounds of potential witnesses (intimidated easily?)



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Selecting the Investigator

- » Interviewing skills, including the ability to identify follow-up questions when new facts or issues arise during interviews
- » Ability to determine when and when not to maintain confidentiality
- » Ability to determine credibility of witness




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Selecting the Investigator


- » Manager or supervisor
- » HR professional
- » Private investigator or outside consultant
- » In-house counsel
- » Outside counsel



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Preparing to Conduct the Investigation



The slide features a split background. The left side is a light gray grid pattern with the FH logo in the top left. The right side is a solid blue background with a faint grid pattern. In the center, there is a photograph of a hand holding a pen over a document titled 'Workplace Harassment Investigation'. The document has three checkboxes: 'Complainant(s)', 'Respondent(s)', and 'Witnesses'.

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Developing An Investigation Strategy

1. Consider need for **preliminary action** “pending investigation”
2. Identify the **need** for an investigation (merit time and resources)
3. Determine the **goals** of the investigation
4. Assess any potential **risks or disadvantages (e.g., timing, availability of witnesses, etc.)**
5. Confirm have chosen the **appropriate investigator**



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Developing An Investigation Strategy

6. Identify potential **witnesses**
7. Identify/gather **evidence and documents**
8. Prepare an investigation **roadmap**
9. Consider **confidentiality and security**
10. Consider **legal privileges**



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Conducting the Investigation - Strategy

- » Prepare an outline of critical issues:
 - » Ensures all issues regarding each witness will be addressed
 - » Ensures a thorough and consistent line of questioning
 - » Allows investigator to compare similarly situated witnesses from a standardized approach
 - » Order of witnesses may be important
 - » Preservation implications



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Conducting the Investigation - Strategy

- » Consider preparing a timeline
- » Recognize that chronology and order of interviews can either contaminate or enhance success of investigation
 - » Witnesses talk/unfiltered facts
 - » New details to ask next witness
 - » Element of surprise



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Need for Immediate/Preliminary Action

- » Leave of absence
- » Temporarily transfer/reassign employees
- » Modify shifts, schedules
- » Change supervisory responsibilities
- » Address potential safety issues
- » Involve IT to secure electronic info/video
- » Consult with counsel



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Consider Confidentiality and Security

- » Determine how much you're going to tell witnesses
- » Determine who should be "in the loop" on progress and decisions
- » Secure files should be maintained for the investigator's records and evidence uncovered during the investigation



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Confidentiality and the NLRB

- » An employer's policy of ALWAYS instructing employees involved not to discuss the matter with co-workers may violate the NLRA
- » To justify a confidentiality mandate, determine in each case whether:
 - » any witnesses need protection
 - » testimony is in danger of being fabricated
 - » evidence is in danger of being destroyed
 - » there is a need to prevent cover up

(FH)

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Public Sector Considerations

Public Sector – Chapter 119 Exceptions (119.071(2)(g)):

- » All complaints and other records in the custody of any agency which relate to a complaint of discrimination relating to race, color, religion, sex, national origin, age, handicap, or marital status in connection with hiring practices, position classifications, salary, benefits, discipline, discharge, employee performance, evaluation, or other related activities are exempt ... until a finding is made relating to probable cause, the investigation of the complaint becomes inactive, or the complaint or other record is made part of the official record of any hearing or court proceeding.

(FH)

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Public Sector Considerations

Public Sector – Chapter 119 Exceptions (119.071(2)(k)):

- » (k) A **complaint of misconduct** filed with an agency against an agency employee and all information obtained pursuant to an investigation by the agency of the complaint of misconduct is confidential and exempt ... **until the investigation ceases to be active, or until the agency provides written notice to the employee who is the subject of the complaint, either personally or by mail, that the agency has either:**
 - » 1. Concluded the investigation with a finding not to proceed with disciplinary action or file charges; or
 - » 2. Concluded the investigation with a finding to proceed with disciplinary action or file charges.

(FH)

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Public Sector Considerations

Public Sector – Chapter 119 Exceptions (119.071(2)(n)):

(n) Personal identifying information of the alleged victim in an allegation of **sexual harassment** or the victim of sexual harassment is confidential and exempt ... if such information identifies that person as an alleged victim or as a victim of sexual harassment. Confidentiality may be waived in writing by the alleged victim or the victim. Such information may be disclosed to another governmental entity in the furtherance of its official duties and responsibilities.

(FH)

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Maintaining Legal Privilege

- » Generally, limited to investigations/reports undertaken
 - » For the purpose of obtaining legal advice
 - » At direction of counsel or a superior seeking legal advice
 - » Within the scope of the individual's corporate duties
 - » For limited review by those with legitimate need to know
- » Mark all investigatory documents ***Privileged and Confidential - Done at Request of Counsel*** (though perhaps not when emailing investigation witnesses)
- » Include legal counsel in all strategy meetings and copied on all written communications regarding the investigation and its results
- » Keep all investigative materials in private, secure file



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The slide features a light gray background on the left with a faint grid pattern and a blue background on the right with a faint geometric pattern. In the top left corner of the gray area is the FH logo. The main text, 'Any Safety Precautions or Considerations?', is centered in a large, dark blue font. On the right side, there is a black rectangular box containing three sticky notes: a yellow one labeled 'PAST', a pink one labeled 'NOW', and a green one labeled 'FUTURE'. A white arrow points from left to right across the bottom of these notes.

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Potential Warning Signs of Risk of Escalation or Violence

- » Past history of violence or temper issues
- » Substance abuse
- » Mental illness
- » Recent divorce, separation, loss of child custody
- » Financial or legal problems
- » Significant conflict with co-worker or supervisor
- » Unexplained increase in absenteeism
- » About to be terminated



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5 Key Elements to Prevent Workplace Violence

1. Management commitment and employee involvement
2. A worksite analysis of security
3. Hazard prevention and control
4. Safety and health training for employees and management
5. Recordkeeping and workplace violence prevention program evaluation



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Physical Security Measures

- » Do worksite analysis using OSHA guide
- » Schedule potentially volatile meetings in appropriate room and with appropriate personnel
- » Updated alarm system, panic button at front desk
- » Key-card access, photo badges
- » Arrange office space to notice unescorted visitors easily
- » Upgrade perimeter control systems with intercoms and closed circuit monitoring devices
- » Liaison with local law enforcement
- » Plan and practice for an emergency evacuation



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Essential Elements of a Workplace Violence Prevention Policy

- » **Zero-tolerance** for workplace violence and threats
 - » Zero tolerance means that **no threatening or violent behavior** will be ignored - not necessarily that every violation will necessarily result in termination (use language in policy that violation will result in discipline “up to and including termination”)
- » Sample definition of “threat” that may be violate policy:
 - » ***“Inappropriate verbal or nonverbal conduct that would lead to the reasonable belief that an act has occurred or may occur which may lead to physical or psychological harm to one’s person or property”***



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Essential Elements of a Workplace Violence Prevention Policy

- » Develop “**see something, say something**” culture via training and reminders
- » Tell employees what to report, when to report it, and to whom
 - » Supervisor, Human Resources, Risk Management, or someone else?
 - » Provide multiple avenues for reporting
 - » Larger organizations may want to consider a hotline or method for anonymous reporting



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Negligent Hiring

- » An employer can be found liable if it knew or should have known that an employee had violent tendencies, but the employer failed to take reasonable steps to protect others from the employee
- » Liability may be found even if there were no obvious indications that an employee might be dangerous if the employer failed to conduct a proper background check that would have put the employer on notice of the employee’s violent propensities



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Negligent Retention

An employer can be found liable for negligent retention when an employee shows violent tendencies during his employment, but the employer retains the employee anyway and the employee then causes harm to another



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Real Case Example #1

Tallahassee Furniture Co. v. Harrison, 583 So. 2d 744 (Fla. Dist. Ct. App. 1991).

- » **Facts:** A furniture deliveryman attacked a female customer in her home. The employer never conducted a background check which would have revealed a history of assaults.
- » **Outcome:** The court held that the employer could face trial for negligent hiring and negligent retention. **The employer had a duty to perform a background check because of the employee's foreseeable and routine contact with the public.**



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Real Case Example #2

Yunker v. Honeywell, Inc., 496 N.W.2d 419 (Minn. Ct. App. 1993).


- » **Facts**: An employee shot and killed a co-worker. Prior to the killing, the employee had threatened to kill another co-worker and scratched the words “one more day and you’re dead” on the locker of the ultimate victim.
- » **Outcome**: The court allowed the negligent retention action brought against the employer to proceed because **the employer knew about the employee’s propensity for abuse and violence toward co-workers but took no action to protect them.**



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Conducting the Interviews

A photograph showing a man and a woman in business attire sitting at a table, looking at a laptop screen. The man is pointing at the screen while the woman looks on attentively.

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Location and Logistics

- » Select location that is private and will not distract from normal business operations
- » Allot sufficient time between interviews to try to avoid witnesses overlapping or otherwise being able to discern the identify of other witnesses (if possible)
- » Schedule interviews/meetings at time least disruptive to business operations and with least amount of inconvenience to witnesses
- » Have someone with you (if practical)



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Documents To Consider Before Interview

- » Rules, policies, and procedures (at issue and implicated)
- » Personnel files (named individuals and “comparators”)
- » Memoranda or notes about incident
- » Complaints (internal or external)
- » Videotape (security)
- » E-mails, texts, IMs
- » Other potential information sources



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Interviews – Introductory Comments

- » Disclose nature and purpose of investigation at beginning
 - » Be candid when interviewing person who is focus of investigation
 - » Explain to witness that company takes complaints seriously and expects truth and candor
- » Make appropriate disclosures (e.g., who you are, who you represent, why you are there, etc.)
- » Explain no fear of retaliation
- » **Do not promise confidentiality!**



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Interviews – Conducting the Investigation

- » Stress voluntary nature of participation
- » Advise that no judgments have been made about any aspect of investigation, including validity of complaint
- » Take every complaint seriously and need all the facts- full candor and honesty needed and expected from those being interviewed



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Interviews – Conducting the Investigation

- » Begin with open-ended questions (**“Funnel Approach”**)
- » Transition to specific situation at issue
- » Give witness opportunity to provide additional information
- » Probe responses with follow-up questions



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Interviews – Conducting the Investigation

- » Inquire if witness is hostile/friendly to either complainant or alleged wrong-doer
- » Ask witness if he/she is aware of any others who might have relevant information or evidence (witnesses)
- » Ask witnesses for additional information and evidence (photos, e-mails, calendar entries, and other evidence)



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Interviews – Conducting the Investigation

- » Be an **active listener** and critical thinker
 - » “Does this make sense?”
 - » “Do I understand exactly what happened?”
 - » “Will the person reading my report understand exactly what happened?”
- » Use your **timeline** to identify discrepancies between witness’ own story and that of others - challenge facts



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Interviews – Conducting the Investigation

Take notes:

- » **Assume will be read to jury one day**
- » Avoid notes can be taken out of context
- » Records of consistent questions
- » Notes reflect complete thoughts
- » Review after the interview
- » Type-up at the time (especially if handwriting an issue)



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Interviews – Conducting the Investigation

- » Clarify basis for witness' knowledge of a "fact"
 - » How do they know?
 - » Saw it? Heard it? Touched it? Smelled it? Tasted it? Was involved in it?
 - » Distinguish between "no" and "I cannot recall"
 - » Document carefully for later review - generally don't tape record interviews (witnesses are less forthcoming)



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Interviews – Conducting the Investigation

- » Consider preparing formal witness statements or take notes, as close to verbatim as possible, of facts recounted to investigation and provide witness with written statement of his/her interview to verify accuracy and make any necessary changes
 - » Public sector – may need to record (firefighters)
 - » Witness should sign and date statement
 - » If this is not possible or practical, confirm accuracy of notes and obtain initials



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Interviews – Conducting the Investigation

Interviews Specific to Harassment Complaints

- » Was conduct **welcomed**?
- » Does alleged action have **purpose or effect** of creating a **hostile, offensive or intimidating environment**?
- » Is it sufficiently “**severe or pervasive**” to alter conditions of alleged victim’s employment?



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Interviews – Conducting the Investigation

Interviews Specific to Harassment Complaints

- » How often did alleged action occur?
- » How severe was alleged action?
- » Was alleged action physically threatening or humiliating?
- » Describe in detail (don’t accept “dirty talk” or “inappropriate language or conduct”)
- » Does alleged action unreasonably interfere with victim’s work performance?
- » Reasonable person standard (a jury of your employee’s peers)



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Interviews – Conducting the Investigation

- » Conclude interview
 - » Repeat significant points and ask interviewee to confirm information is complete and accurate
 - » Give witness opportunity to disclose anything else he/she thinks might be important
 - » Counsel witness to keep matters discussed confidential (NLRB?)
 - » Invite witness to contact you if he/she recalls or discovers any additional helpful information after interview concludes



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Interviews – Conducting Investigation Interviews (Credibility)

- » Demeanor - Body language
 - » How did witness react to allegations?
 - » Did witness appear credible overall?
- » Logic/consistency
 - » How much detail did witness offer?
 - » Did events differ from others interviewed?
 - » Did witness' version make sense?
- » Is there corroborating evidence?



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Interviews – Conducting the Investigation

Interviews (Recording/ Transcribing Interviews)

- » Witness may be uncomfortable and less forthcoming
- » Informed consent of witness required?
- » Once recorder is on, state date, time and place of interview, name of participants and have witness confirm on tape his/her knowledge of and consent of the recording
- » Repeat and re-verify consent at conclusion of interview



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Interviews – Conducting Investigation

Interview Problems

- » Remind them of obligation to cooperate
- » Assure them of obligations of confidentiality/non-retaliation
- » Confirm that company can take action based only on information it is able to obtain during investigation
- » Interviewer's notes should confirm refusal to cooperate and that disclosures were made to confirm consequences of refusal to cooperate ("delicate issue")



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Preparing the Investigative Report



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Preparing the Investigative Report

- » Were policies, guidelines, practices violated? If so, was violation serious or minor?
- » What has been done in the past with regard to similar violations (consistency)?
- » Are there mitigating or aggravating circumstances?



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Preparing the Investigative Report

- » May want to consult with legal counsel **before** start drafting
- » Write as though every word will be second-guessed (opposing counsel, judge, and jury)
 - » *New York Times* rule
 - » Re-read report from other side's perspective
- » Prepare summary of facts
 - » Include facts, not speculation or hearsay
 - » Where there are discrepancies, give all versions



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Preparing the Investigative Report

- » Include relevant background on complaint
- » Note factual findings
- » Reach a conclusion (even if “inconclusive”)
 - » Who do you believe and why
 - » Facts driving to conclusion
- » Possible recommendations for next steps (if appropriate/tasked with providing)



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Post-Investigation Measures

- » Inform participants of resolution
- » Encourage complaining employee to bring all issues forward in future
- » Take steps to ensure that no retaliation is taken
- » Continue monitoring situation
- » Train managers/ employees as needed
- » Give significant raises to HR professionals! 😊



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Common Investigation Mistakes to Avoid



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Common Mistakes to Avoid While Conducting a Workplace Investigation

» Taking sides

- » Investigator must remain neutral and conduct unbiased, objective investigation
- » Applies equally whether empathizing with complaining employee or defending conduct of alleged wrong-doer
- » Avoid appearance of bias or favoritism that taints process and conclusions



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Common Mistakes to Avoid While Conducting a Workplace Investigation

» Promising confidentiality

- » Must be sure to explain confidentiality is qualified/limited
- » Treat as sensitive information - share only with legitimate need-to-know



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Common Mistakes to Avoid While Conducting a Workplace Investigation

- » Failing to Document – or Sloppy Documentation
 - » “Minor” complaints often not documented
 - » Relevant documents must be properly dated and signed
 - » Update notes and report before finalizing
 - » Strike the right balance – stick to the facts
 - » Chose your words carefully: a jury may one day read your report...



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Common Mistakes to Avoid While Conducting a Workplace Investigation

- » Failure to Actually Investigate
 - » Do not simply ask witnesses to provide you with a written account of what happened
 - » Important to have interactive interviews to assess credibility and immediately follow-up on issues raised
 - » Prevents employees from improperly inserting their own subjective opinions and potentially biased beliefs into process



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Common Mistakes to Avoid While Conducting a Workplace Investigation

» Failure to Actually Investigate- IMPACT:

- » Problem grows worse: avoid awkward issues and having to be decisive now can blow up to bigger problem
- » Lack of accountability: emboldens more bad conduct
- » Morale: failure to address internal conflicts lead to discontent, lack of trust and a loss of loyalty by employees



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Common Mistakes to Avoid While Conducting a Workplace Investigation

» Failure to Make Conclusions

- » “He said - she said” type case, easy to simply state that no conclusion can be reached
- » Important to reach a conclusion based on best information available, credibility of witnesses, a determination of who is more likely to be telling the truth, etc.
- » Okay to determine “inappropriate conduct” without concluding “unlawful harassment” occurred



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Common Mistakes to Avoid While Conducting a Workplace Investigation

» Not following up after conclude investigation

- » Take time to sit down with employee and communicate findings and results
- » Even if answer is not what employee wants to hear, they will appreciate the effort
- » Follow-up periodically with complainant for at least six months, possibly longer



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Oh Yeah – the Legal Stuff...

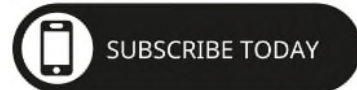
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Questions



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