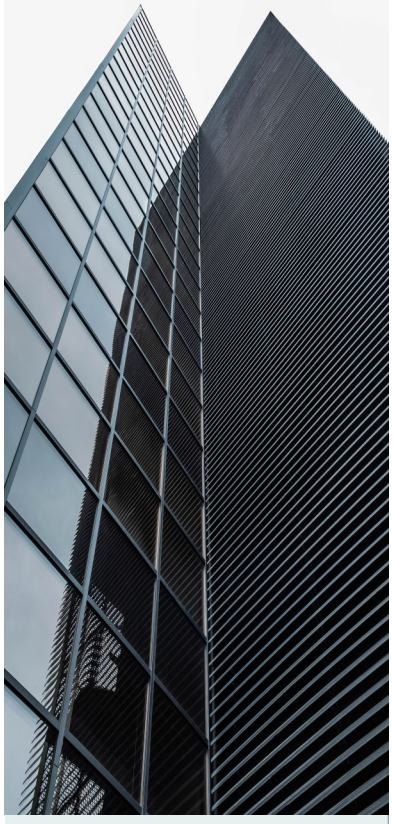
October 2020

Association of Corporate Counsel
MOUNTAIN WEST



NEWSLETTER

PRESIDENT MESSAGE

Heading into the fourth quarter of the year, many companies are developing their corporate strategies for the upcoming year(s). Similarly, now is a good time to evaluate and switch-up the strategy for your legal department (or develop a new strategy if you don't have one). Having a good legal strategy can help you and your colleagues focus on initiatives that will move your department and company forward.

In-house counsel know it can be a tremendous challenge to stay focused, especially in an environment where new and unexpected issues frequently pop-up and require immediate attention. Having a good legal strategy can help bring focus to critically important issues that might otherwise get pushed to the back burner. Without a solid legal strategy and clearly defined goals within your department, you might find yourself floundering and struggling to complete important tasks and accomplish large scale projects. Take the time to craft a legal strategy for your company. Measure your progress, and recognize your achievements throughout the year.

We invite you to utilize resources offered by the Association of Corporate Counsel as you undertake the important step of developing a legal strategy for your company. Good luck to you in your efforts!

Abby Barraclough
Mountain West Chapter President

INSIDE THIS ISSUE

ACC MOUNTAIN WEST IN REVIEW

In spite of current COVID restrictions, our chapter has been busy offering quality CLE's. One of the great benefits of webinars is that they are available to all ACC Mountain West members— and you don't even have to get out of your pajamas!

1. **Best Practices Club**

When: August 4, 6, 11, 13

Attended by: 44 members on average

Sponsored by: Parsons Behle & Latimerr

Topics Covered: Professionalism & Civility, Managing Your Workforce in the COVID-19 Era, Corporate Governance Roundtable, Diversity and Inclusion Initiatives

2. **Negotiations Series**

When: August 27, October 1, and November 5

Attended by: 22 members on average

Sponsored by: Dunn Carney

Topics Covered: Essentials of Negotiation, Developing Your Negotiation Style, Establishing Trust

3. **Patent Infringement**

When: September 16

Attended by: 26 members

Sponsored by: Denton Durham Jones & Pinegar

Topics Covered: Practical ways to protect your company from infringement

4. **Hot Topics in Employment Law**

When: September 23

Attended by: 27 members

Sponsored by: Holland & Hart

Topics Covered: WARN Act, Employee Furloughs, Protecting Trade Secrets

5. **COVID-19 and the Impact on Cybersecurity**

When: October 7

Attended by: 25 members

Sponsored by: Hawley Troxell

Topics Covered: Cybersecurity Overview, COVID Impact, and Best Practices

We have more great webinars coming up in the next few months. Hope to see you there!

MEMBER SPOTLIGHT: WILL FLETCHER

Position/Company:

General Counsel, Zasio Enterprises, Inc. We develop records management software and have a consulting arm dedicated to information governance issues.

Location: Boise, Idaho

Undergrad/Law School:

BS in Environmental Science from Northern Arizona University; JD from the University of Idaho.

How long have you been in your current position?

Since June this year. I came from being a defense litigator so managing contracts and in-house risks has been a big transition, although it's been a lot of fun.

What do you enjoy most about working as in-house counsel?

Having the space to think about what are the biggest risks to the enterprise that we've maybe not been paying enough attention to and coming up with solutions to these. It's also nice to have a hand in making Zasio a great place for people to work and a company that provides excellent products and services.

How do you define success?

I've long been inspired by the quote "success is the measure of your relationships." In the end, the things you've accumulated and positions you've achieved mean little if you haven't been able to surround yourself with great people to do fun stuff with.

Who inspires you?

Most recently, it definitely has been our school teachers. They have a whole lot to teach us about hard work, dedication, and overcoming challenges.

What's one thing (either industry-related or not) you have learned in the last month?

I just got a copy of Ken Adam's Manual of Style for Contract Drafting and have been devouring it.

What are your hobbies?

In my past life, I was a U.S. Navy photographer stationed aboard an aircraft carrier. These days my photography mostly is trying to capture my kids in their cute moments. I also really like snowboarding, mt. biking, and yoga.

What's the first concert you ever attended?

The first concert I'll admit to attending was Jimmy Page and Robert Plant at the Memphis Pyramid in 1995. Fourth row seats! The Memphis Symphony came out for Kashmir and it was awesome.

What do you look forward to doing once the COVID restrictions are over?

My wife wants to take the kids to Disney Land. I want to get a place near the beach in Baja and just chill for a couple of weeks. Maybe we'll have to find a way to do both.

PLEASE STOP CALLING IT NETWORKING

By Stephanie Wilkins Puglsey, ACC Mountain West Board of Directors

Recently I was asked to present to my company's global women's group on networking, tips and tricks. Maybe it is just me, but whenever I see a networking event on an agenda, the subtext seems to scream: you may skip this event. I am finally able to publicly admit I completely dislike the very concept of "networking". Yet, I was still being asked to present as someone who apparently gave off the air of either liking it or being good at it. So, I pulled on my big kid pants, dug deep and agreed to share some thoughts on how I built my group of friends, colleagues and other professional and personal relationships – with one caveat – just as long as I did not have to use the "n-word" because I prefer to use the "c-word: Connect" instead.

I believe there is a false premise that to successfully build professional connections, there is only one elusive way to do it involving nametags and cocktail parties. As a result, due to any number of factors, many do not know how or where to start, may not have time to fit it into their life at present, or may not have the personality perceived necessary for success – thus they simply do nothing.

If I may suggest one thing as a take away, it is to just start. Do something. Do anything. For example, make a conscious decision you want to increase your connections. Talk to someone new, ask them leading question both personally and professionally. Please note I intentionally did not say anything about nametags or signing up for an event of prospective target individuals. Professional "networking" opportunities can be a great way to meet others in your industry. Although I personally dislike them, I have challenged myself to not only attend, but I have given myself an out. I have the "Rule of One" which, for me, means once I have made one good connection, I give myself permission to leave if I so choose. By so doing, I am more likely to invest in the time to make a real connection, rather than just circulate around the periphery and leave.

There are also other places I find where connecting is more comfortable and organic, including exercise classes, on the sides of the fields at my kids' sporting events, at neighborhood and other non-work events. I find that my conversations are natural and flow better because I am actually building relationships that are deeper than just a business connection. Over my career, I have ended up working with many individuals that have been connections from other times in my life. It is likely that the people you spend time with are not all in your industry, however, it is also likely that there may be ways that those connections are of value, if not now at some time in the future. Ask yourself, what works better for you? How can you further connect and deepen the relationships you have? Sometimes, I find the most interesting potential work conversations happen on sidelines, at non-work dinners, or any number of other social type events if you are open to just being present.

When those conversations happen, my practice is to send an invitation to further connect on an appropriate social media (LinkedIn, Facebook, Instagram or Twitter) with a personalized message.

My final thought is when we recognize that the goal of connecting is to build a personal relationship with someone else, rather than just score a business card, we may approach people and the act of connecting differently. I value my connections as friends, colleagues, and family members - some of whom are new and some I have known literally my whole life. Connecting can be a wonderful part of the practice of law that helps remove the distance in the time of social distancing.

Stephanie Wilkins Pugsley is Senior Corporate Counsel at Teleperformance USA in Salt Lake City.

EMPLOYMENT LAW PITFALLS IN THE SOCIAL MEDIA AGE

By James Moss and Matthew Lewis, Payne & Fears

I. INTRODUCTION

Twitter founder Jack Dorsey once explained that its name was chosen because its definition, "a short burst of inconsequential information," exactly described the product. Five years after its founding in 2006, users were sending 140 million Tweets per day, and the use of Facebook, Twitter and other social media platforms had expanded far beyond "inconsequential" information to include significant announcements and arguments at every level of commerce and politics. In early August of 2020, highlighting the significance and contentiousness of these communication platforms, both Twitter and Facebook removed a post shared by President Trump related to COVID-19, and Twitter temporarily blocked the Trump election campaign account from Tweeting until it removed a post. This article will alert employers to some of the dangers posed by social media activity of employers and employees and provide suggestions for avoiding liability.

As social media has become ubiquitous across American society, legal issues raised by "posts" and "Tweets" have also become pervasive in the workplace. State legislatures, courts and federal agencies have struggled to apply existing legal principles in this rapidly developing field. As the U.S. Chamber of Commerce pointed out in 2014, "[T]he void in federal statutory law is filled by a hodgepodge of social media statutes in many (but not all) states that set inconsistent standards for multi-state and national employers. Worse still, the National Labor Relations Board (NLRB or Board) has rapidly developed a body of law composed of a series of individual case rulings that limit companies' rights vis-à-vis their employees with respect to social media in the workplace."

Recent statutes and decisions have addressed issues arising from employers' use of social media in the hiring process, employees' use of social media for employment actions that may constitute discrimination or harassment, the disclosure of trade secrets or violation of non-disclosure agreements through social media, and employers' access and use of information posted by employees or applicants on social media which may intrude on employees' privacy rights.

II. EQUAL OPPORTUNITY / DISCRIMINATION ISSUES IN SOCIAL MEDIA.

A. Social Media Issues in the Hiring Process

Social media is a potential source of valuable information about candidates for employment. However, reviewing social media accounts can also violate laws governing employee background checks, or reveal applicants' protected characteristics such as their religion, national origin, or disabilities.

A recent CareerBuilder social media recruitment survey revealed several pitfalls:

· 60 percent of employers used social media to research job candidates in 2016, up from 52 percent in 2015, 22 percent in 2008, and 11 percent in 2006.

· Of 59 percent of hiring managers using search engines to research candidates, 49 percent found social media information that caused them not to hire a candidate. Types of information that had a negative effect included provocative or inappropriate photographs, videos, or information (46%);information about the candidate drinking or using drugs (49%); negative comments about a former employer (34%); and discriminatory comments related to race, religion, or gender (29%).

· 32 percent of employers who screened candidates through social media found information that caused them to hire a candidate, including background information that supported job qualifications (44%); a candidate's site conveying a "professional image" (44%); a candidate's personality coming across as a "good fit" with company culture (43%); a candidate being well-rounded and showing a wide range of interests (40%); and having great communication skills (36%).

While such information can reveal much about an applicant, it can also influence hiring decisions in impermissible ways:

Discrimination. Declining to interview or hire because of an applicant's "inappropriate" photos, if applied disproportionately to one protected group, may demonstrate racial bias. Examples of discrimination claims based on social media information include a Kentucky case in which an employer learned of an applicant's strong conservative religious beliefs through online screening, precluding dismissal of his claim for failure to hire based on religious discrimination. Gaskell v. University of Kentucky, Case No. 09-244-KSF, 2010 WL 4867630 (E.D.Ky. Nov. 23, 2010). Similarly, in an Illinois case, the court refused to dismiss a plaintiff's claim for age discrimination because it found the employer could have determined that the employee was over the age of 40 from his LinkedIn profile. Nieman v. Grange Mut. Cas. Co., Case No. 11-3404, 2012 WL 1467562 (C.D.Ill. Apr. 27, 2012). On the other hand, a positive judgment regarding one employee's "professional image," if applied unevenly, may suggest discrimination based on race or other protected categories.

Fair Credit Reporting Act (FCRA): The Fair Credit Reporting Act (FCRA) requires employers to obtain the written consent of a candidate before obtaining a background screening through a third party, to disclose to the candidate what the background screening is, what information it includes, and how they intend to use it. The act also requires the employer to provide written notice about the effect of any information gathered on the hiring or rejection decision. See, e.g., 15 U.S.C § 1681 et. seq. Social media accounts are increasingly used in third-party background checks; disclosing the use of information that reveals a protected trait can create a high risk of liability.

"Ban the Box" laws. Reviewing an applicant's social media accounts may reveal a past criminal conviction, circumventing recent "ban the box" laws which prohibit inquiring about convictions before an applicant is interviewed. In Utah, asking about criminal conviction prior to interviewing the candidate is prohibited for government entities. See Utah Code Ann. § 34-52-201(1) – (2). In many states such as California, all employers are prohibited from asking about criminal convictions before providing a conditional job offer to an applicant. See,https://www.paynefears.com/insights/ban-box-law-expanded-private-employers

B. Discrimination and Harassment Issues Based on Current Employees' Social Media Activity

Current employees' conduct on social media sites can also give rise to claims of discriminatory and hostile work environment by other employees. Many cases involve allegations of social media being used as a vehicle for harassing a coworker or other individual. Facebook and other posts may also be evidence of unlawful intent by managers:

Racial Harassment / Retaliation. A federal court in Oklahoma found comments lamenting that a "___ing Indian" was promoted to department chair, and other racist Facebook posts by two professors who were allowed to vote on an employee's tenure (which was denied), demonstrated prevalent racial hostility in the department. The court also allowed a retaliation claim to advance, because the Facebook posts provided a causal link between the denial of tenure and prior complaints of race discrimination. Hannah v. Northeastern State Univ., 2015 WL 501933, (E.D.Okla., Feb. 05, 2015), rev'd Hannah v. Cowlishaw, 628 Fed.Appx. 629 (10th Cir. 2016).

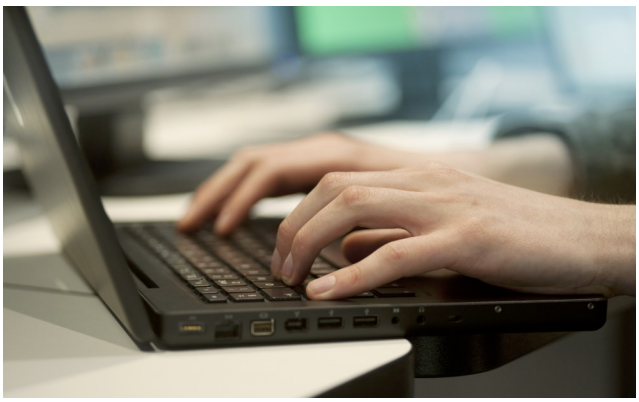
Sexual Harassment. A federal court in Illinois found that a food service director, who complained that graphic sexual images of her drawn on a bathroom wall had been a topic of social network sharing for a month, and lost her job soon after complaining, had alleged harassment severe enough to create a hostile environment. The court found it significant that the supervisor knew workers were passing around cell phones to view Facebook posts. Meng v. Aramark Corp., 2015 WL 1396253 (N.D.Ill. Mar. 24, 2015).

Disability Discrimination. A California court found an employer liable to an employee for disability harassment where his coworkers had posted offensive social media blogs about his "claw" hand (a birth defect by which he had only two fingers). On appeal, the employer argued that it did not maintain the blog site at issue and that it could not determine that the postings (which were made anonymously) actually came from its employees during the investigation into plaintiff's internal complaint. The court found sufficient evidence for the jury to impute

responsibility to the employer for the offensive posts because the harassing employees had accessed the blog site using the employer's computers, and their blogs discussed workplace issues. Espinoza v. Cnty. of Orange, 2012 WL 420149 (2012).

Family and Medical Leave Act (FMLA) Retaliation. Finally, employers must be wary of using information learned through social media as the basis for decision making. Courts have upheld terminations that were based on information learned by employers through social media postings. E.g. Lineberry v. Richards et al., No. 11-13752, 2013 WL 438689 (E.D.Mich. Feb. 5, 2013)(approving termination of an employee on Family and Medical Leave Act (FMLA) leave after the employer discovered photos on Facebook of the employee on a vacation and performing physical activities she had reported she could not perform). But a recent 11th Circuit FMLA retaliation claim was allowed to proceed despite the employer's presentation of photos of a plaintiff at an amusement park and a beach, when the employee claimed to be recovering on FMLA leave. The employer claimed that the employee was terminated for posting Facebook photos that violated the company's social media policy prohibiting postings that would harm morale. But the employer was not able to show that the policy was the reason for the firing, as it was not mentioned during his discharge and there were contradictory reasons for his firing. Jones v. Gulf Coast Health Care of Delaware LLC, 854 F.3d 1261 (11th Cir. 2017)

III. PROTECTING TRADE SECRETS / NON-COMPETITION AGREEMENTS / DEFAMATION



Courts and the NLBR during the Obama administration clamped down on employers' attempts to restrict employees' social media commentary about their workplaces; but employers can still protect their trade secrets and reputation from improper disclosure through new social media channels, and social media information may also itself constitute protectable trade secrets. However, employers must also guard against retaliation claims based on an overly aggressive response to potential disclosure or defamation.

Trade Secrets in Social Media. Social media contacts, and control of groups linking professionals together based on a common interest, might be considered trade secrets .

· In an Illinois case, a former employee's refusal to allow control of a professional LinkedIn group - with membership restricted to 679 of the employer's current and potential customers - supported a former employer's breach of non-competition, Trade Secrets Act, and common law misappropriation claims, finding that the names of group members would be "extremely valuable" information to competitors. CDM Media USA, Inc. v. Simms, 2015 WL 3484277 (N.D. Ill. June 01, 2015).

· In a California case, a court held that disputes about whether an employee misappropriated trade secrets by maintaining LinkedIn contacts with a company's clients after his termination precluded summary judgment for the employee, despite the employee's argument that LinkedIn contacts do not constitute a trade secret, because the employer encouraged employees to use LinkedIn, and the contacts were viewable by any other contact. Cellular Accessories For Less, Inc. v. Trinitas LLC, 65 F.Supp.3d 909 (C.D.Cal., Nov. 5, 2014).

Defamation. Finally, an Alabama federal court found sufficient evidence that an employer improperly suspended, fired, and then sued an employee for defamation because she spoke to the media, was featured on Facebook by the media, and complained to OSHA about workplace exposure to chemicals linked to breathing problems, holding that the employee was likely to succeed on a retaliation claim. The employer was enjoined from taking adverse actions against employees who exercised their rights under OSHA. Perez v. Lear Corp. Eeds and Interiors and Renosol Seating, LLC, 2015 WL 2131282 (S.D.Ala. May 7, 2015).

IV. EMPLOYER SOCIAL MEDIA REGULATION BY THE NLRB

Faced with a dramatic decline from its industrial-era membership peak, the NLRB in recent years has reasserted itself in one of the most current and cutting-edge areas of employment law, regulating

the social media policies and practices of non-unionized employers across the country. The NLRB's decisions have resulted in reinstatement of employees, nullification of employer policies, and payment of penalties. In July of 2017, the NRLB held that an employer violated the National Labor Relations Act ("NLRA") when it discharged an employee because of comments he posted on Facebook in response to a coworker's complaint that she had been unjustly terminated. The Board found that the employer violated the NLRA by discharging the employee pursuant to its unlawful overbroad social media policy. On the other hand, the Board found the employer did not unlawfully discharge a second employee under its unlawful social media policy, because his posts were maliciously false. Butler Med. Transport, LLC and Michael Rice and William Lewis Norvell, 365 NLRB No. 112 (N.L.R.B. July 27, 2017).

The Trump administration has scaled back the Board's more aggressive positions pursued under the Obama administration, but employers are still advised to carefully review their polices for compliance.

A. Background of National Labor Relations Act

NLRB and its administrative law judges enforce the National Labor Relations Act, 29 USC §§151–16 by investigating allegations of wrongdoing brought by workers, unions, or employers; conducting elections; and deciding and resolving cases.

Section 7 of the NLRA protects private-sector employees' right to "self-organization, to form, join, or assist labor organizations, to bargain collectively through representatives of their own choosing, and to engage in other concerted activities for the purpose of collective bargaining or other mutual aid or protection." 29 U.S.C.A. § 157 (emphasis added).

Section 8 of the NLRA makes it an "unfair labor practice" for an employer "to interfere with, restrain, or coerce employees in the exercise of the rights guaranteed in Section 7 of this Act." An employer violates Section 8(a)(1) not only by disciplining or firing employees for engaging in "concerted activity," but also through the maintenance of a work rule if that rule "would reasonably tend to chill employees in the exercise of their Section 7 rights." Lafayette Park Hotel, 326 NLRB 824, 825 (1998), enfd. 203 F. 3d 52 (D.C. Cir. 1999) (emph. added).

Courts and the NLRB have established that Section 7 protects not only the right to organize a union for the purpose of collective bargaining, but the right of two or more employees to act together to improve wages or working conditions. Courts have held that the action of even a single employee may be considered "concerted" if he or she acts "with or on the authority of other employees, and not solely by and on behalf of the employee himself," where the improvement sought by the employee would benefit more than just the employee taking action.

B. NLRB's Regulation of Social Media for Non-Unionized Employers

The NLRB has recently taken a much more active role in applying the NLRA to non-union employers, creating uncertainty for employers who have followed the Board's actions and catching many employers completely unaware. The NLRB has targeted employers large and small across various industries, limiting employers' use of at-will policies, arbitration agreements, and other policies found to infringe on "concerted activity." Policies that chill Section 7 rights may be impermissible even when not enforced.

Beginning in 2011, employers' social media policies have been the most frequent subject of the NRLB's intervention in the non-union workplace. Many employers have policies restricting what employees can say about the company and coworkers to avoid workplace disruption or damage to customer relations. NLRB has held some policies impermissibly restrict, or unreasonably "chill," employees' Section 7 rights. After handling a number of social media complaints, the NLRB's Acting General Counsel issued three reports during 2011 and 2012 outlining the NLRA's application to employee social media postings and employers' policies. Taken together, the Reports established these general principles:

a. Employer policies should not be so sweeping that they prohibit the kinds of activity protected by federal labor law, such as the discussion of wages or working conditions among employees.

b. However, an employee's comments on social media are generally not protected if they are merely personal gripes not made in relation to group activity among employees, such that employer discipline or termination may be permissible.

Generally, the more expansive a social media policy's prohibitions, the more likely it will be considered unlawfully overbroad. The Trump Administration has recently issued clarifying guidance suggesting that a more limited set of policies will be deemed presumptively invalid:

· Blanket rules prohibiting employees from making disparaging or negative remarks about the company;

· Blanket rules prohibiting employees from criticizing the employer;

· Blanket rules prohibiting employees from making false or inaccurate statements;

· Blanket rules providing that wages, benefits, or working conditions are confidential or preventing employees from discussing them; and

· Blanket rules prohibiting employees from joining outside organizations.

C. Avoiding NLRA Violation in Employee Termination

When an employee is terminated for conduct found to be "concerted activity" protected by Section 7, the NLRB has ordered that employees be reinstated to their old jobs with full back pay and interest.

· In August of 2016, the NLRB struck down Chipotle's "Social Media Code of Conduct," which prohibited employees from spreading "confidential" information and making "disparaging" statements about the company. The NLRB held the "confidential" language was too

vague, and could prohibit statements protected by Section 7. The NLRB concluded that prohibitions against making "false or misleading" statements were also too broad; under the NLRA, such statements are protected unless made with a malicious motive. The NLRB also found a provision restricting the use of the company's name and logo went too far because employees may need to identify their employer when discussing protected, concerted activity.

Employers should review their social media policies to avoid Section 7 violations, and avoid discipline or termination of employees for violation of non-compliant policies.

V. REGULATION OF SOCIAL MEDIA ACCESS UNDER UTAH LAW

Under the 2013 Utah Internet Employment Privacy Act ("IEPA), Utah employers may not request employees or applicants to disclose information related to their personal Internet accounts. A majority of states have now passed similar laws. When an employer believes its employee has emailed proprietary documents to a personal email account, or that an employee has sent sexually harassing messages to a co-worker, and wants to demand that the employee disclose his account password to its IT department for review, the employer must proceed with caution.

Employers may not penalize or discriminate against an employee or applicant for failing to disclose a username or password. A similar restriction applies to higher educational institutions through passage of the Internet Postsecondary Institution Privacy Act. Utah Code 34-48-201.

IEPA only restricts employer access to personal online accounts that are used by an employee or applicant exclusively for personal communications unrelated to any business purpose of the employer. The act does not restrict access to accounts created, maintained, used, or accessed by an employee or applicant for business- related communications or for a business purpose of the employer. When an employee uses a personal account for work-related communication, including improper communication, the act may not apply.

IEPA allows disciplining or discharging an employee for transferring the employer's confidential information to an employee's personal Internet account without the employer's authorization. §34048 -202(1)(b).

IEPA allows an employer to require cooperation in an investigation based on specific information about activity on the employee's personal account that involves workplace misconduct such as theft of trade secrets or harassment.

However, the statute does not allow the employer to demand the employee's password, only to require the disclosure of the content that is at issue. §34-48-202(1)(c), (2). If the employee refuses, the employer may need to take action against the employee and seek court intervention to obtain the necessary information.

Employees have also successfully brought claims under the federal Stored Communications Act, and for common law invasion of privacy, against employers that unlawfully access electronically stored personal communications.

Utah House Bill 13, passed in 2017, allows a social medial owner to decide who inherits "digital assets" such as Facebook, Twitter, YouTube, email, or other accounts. Digital assets will be treated like physical property in the eyes of the courts. The bill allows heirs to an estate to take control of the accounts, raising concerns for employers if the heirs post information regarding the employer of the deceased employee. Similar legislation has been passed in other states.

IV. LOOKING AHEAD, TAKING ACTION

Employers cannot assume the company's or their employees' social media activity, including off-hours posting and Tweeting, will not have an impact on the workplace. Employers are advised to:

· Avoid using information shared on social media that employers are barred from using as a factor in hiring or employment decisions, including protected traits.

· Carefully review accusations of harassment or discrimination using social media to determine whether the company may be liable for acting or failing to take action.

· Review possible classification of social media information, including customer contact information, as trade secrets and ensure that appropriate restrictions are placed on the use of that information to preserve its trade secret status.

· Carefully review employer policies to avoid impermissible restrictions on employees' use of social media to discuss work-related issues.

Additional issues will undoubtedly arise as social media continues to expand in use and importance in society and in the workplace. As the short, but groundbreaking, history of Twitter shows, seemingly "insignificant" words can quickly become sources of conflict and liability.

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UPCOMING EVENTS

October 29: *What Successful Companies Are Doing in the Current Economy* Webinar sponsored by Kirton McConkie in Salt Lake City. All Mountain West Chapter members are invited to attend.

November 5: *Essentials of Negotiation Part 3: Establishing Trust* Webinar sponsored by Dunn Carney in Boise. All Mountain West Chapter members are invited to attend.

November 18: *Remote Workforce Landmines to Avoid* sponsored by Payne & Fears in Salt Lake City. All Mountain West Chapter members are invited to attend.

Visit our website at https://www.acc.com/chapters-networks/chapters/mountain-west/events to register.

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