



Monday, October 25
9:00am-10:30am

104 - How and Why to Take your Records Program Global

Maura Dunn

Director

Duff & Phelps, LLC

Jacqueline Hatter

Assistant General Counsel

Heidrick & Struggles International, Inc.

Carol Helliker

Vice President, Deputy General Counsel & Corporate Compliance Officer

CenterPoint Energy, Inc.

Cheryl Solomon

Gucci Group General Counsel

Gucci Group Services Ltd.

Faculty Biographies

Maura Dunn

Maura Dunn, CRM, PMP, is a director in Duff & Phelps, LLC's Legal Management Consulting Group. She leads the enterprise information management/records strategies practice for Duff & Phelps, counting among her clients worldwide leaders in media/internet advertising and content, entertainment, luxury goods, and professional services firms. Her experience spans the full lifecycle of records management program implementations including assessment, strategy, policy development, technology implementations, training and operations.

Ms. Dunn has over twenty years of records and information management experience as a consultant in both the private and public sectors. Prior to joining Duff & Phelps, she led Booz Allen Hamilton's national practice in records management, serving clients in the defense, civil and intelligence sectors of the federal government.

She is active in ARMA International, at both the local and international levels, and is a frequent speaker on records and information management topics.

Ms. Dunn received her Bachelor's degree from Georgetown University. She holds a Masters from the University of Maryland. Ms. Dunn is a Certified Records Manager with the Institute of Certified Records Managers and a Certified Project Management Professional with the Project Management Institute.

Jacqueline Hatter

Jacqueline Hatter is the associate general counsel for Heidrick & Struggles, Inc. in Chicago, Illinois. Her responsibilities include legal counsel to the organization, litigation management, overseeing the immigration program, and development of a comprehensive records management program.

Prior to joining Heidrick & Struggles, Ms. Hatter served as in-house with Sears, Roebuck & Co, in Hoffman Estates, Illinois. Prior to joining Sears, Roebuck & Co., Ms. Hatter was in-house with American Family Mutual Insurance Company in Madison, Wisconsin.

She currently serves as a mentor and sponsor for LINK Unlimited.

Ms. Hatter received a BA from Marquette University and is a graduate of the University of Wisconsin -Madison School of Law.

Carol Helliker

Carol Helliker is the senior vice president, deputy general counsel and chief ethics and compliance officer for CenterPoint Energy, Inc. in Houston, Texas. Her responsibilities

include overseeing all litigation, the ethics and compliance department, the claims department and the corporate records management and information department.

Prior to joining CenterPoint Energy, Inc., Ms. Helliker spent five years working in the litigation department for the Baker Botts law firm primarily representing clients on employment law and union issues at the state and federal level.

She is a member of the Houston, Texas and American Bar Associations, the National Association of Professional Women, Texas general Counsel Forum, the Ethics and Compliance Officer Association and is life Fellow of the Houston Bar Foundation. Through the Houston Bar Association, the Houston Volunteer Lawyers Program and Texas Accountants and Lawyers for the Arts, Ms. Helliker provides pro bono legal services to impoverished clients. She is a member of the Leadership Houston Class XXIX, she serves on the Governance Committee for the Susan G. Komen Foundation and she was chosen as one of the 50 most influential women in Houston in 2009 by Houston Woman magazine.

Ms. Helliker attended the University of Texas at Austin, receiving a BA. She also participated in a joint degree program where she received a Masters of Public Affairs from the LBJ School of Public Affairs and a JD from the University of Texas law school.

Cheryl Solomon

Cheryl Solomon is the general counsel of the Gucci Group, based in London. In that role, she oversees the global legal department for Gucci Group and its brands. Ms. Solomon is actively involved in strategic planning and implementation relating to a variety of compliance-related issues, such as deploying an ethical code effectively, developing compliance programs for areas including data protection and privacy and records retention. She also advises the company and its board of directors on a wide variety of legal issues including corporate governance, employment, intellectual property, M&A, commercial contracts including licensing, franchise, and distribution agreements, and litigation.

Prior to joining the Gucci Group, Ms. Solomon was of counsel at an international law firm in New York, where she was a member of the litigation group. Immediately after graduating from law school, Ms. Solomon served as a law clerk to the Honorable Marjorie O. Rendell in Philadelphia, Pennsylvania.

She currently serves as an advisory board member for the Harper's Bazaar Anti-Counterfeiting Alliance. She is also a country representative for the United Kingdom for ACC and an advisory board member for the Corporate Counsel Forum of the International Bar Association.

Ms. Solomon received her JD cum laude from the University of Pennsylvania Law School where she was selected to the Order of the Coif and was on the Law Review, and she received her BA from Brandeis University.

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A typical 21st century corporation?

- Based in the US? Based in the EU? Based in APAC? Based in LATAM? Operations in one region or many?
- Centralized control with a strong corporate vision?
- Historic company with a strong sense of its image and brand?
- Newly formed company in a new industry, embracing technology but operating in less developed countries where the infrastructure is still immature?
- Quick growth through acquisition resulting in multiple corporate cultures co-existing uneasily?
- Slow, organic growth over time, now poised for change?

In other words, there is no typical corporation anymore

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Companies today face a number of risks in the course of normal operations; a robust RIM program can help mitigate these risks

Risk Dimension	Impact
Audit/Investigation	<ul style="list-style-type: none"> • Potential for fines for failure to produce (particularly in US) • Potential for damaging information found that could have been destroyed • Likely significant costs to respond to requests for information
Business Resilience	<ul style="list-style-type: none"> • If vital information (defined as both emergency response and fiscal/legal rights and interests) is not identified, located and protected proactively, it is unlikely to be readily available in the event of large-scale event, on either a global or local scale (the size and extent of impact is different but the implication is the same) • Potential for increased costs associated with the development of cold or hot site backup facilities and training for the staff
Litigation	<ul style="list-style-type: none"> • Requires increased vigilance over email and storage processes • Potential for fines, sanctions for spoliation, failure to produce (particularly in US jurisdiction) • Potential for damaging information found that could have been destroyed • Likely significant costs to respond to discovery requests
Privacy	<ul style="list-style-type: none"> • Increased security surrounding consumer, customer and employee data • Increased concerns about protecting employee data in order not to precipitate any harm to them
Regulatory	<ul style="list-style-type: none"> • Increasing requirements for records creation and retention • Potential for fines, operational impact due to an inability to demonstrate compliance with relevant regulations

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In addition, there are a number of factors which can increase the complexity of managing your records and information and increase the impact of each risk

- **3rd Party Involvement:** *The loss of direct control over company information increases the likelihood of early or late destruction, inadvertent release*
- **Global Presence:** *As legal and regulatory requirements vary and conflict from country to country, full compliance becomes difficult*
- **Technology Explosion:** *The widespread use of desktop and portable technology provides convenience but also represents additional challenges*
 - exponential growth in the volume of data
 - increased likelihood of duplicate copies
 - increased chance of inappropriate release of proprietary information
 - possible loss of information integrity

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Regardless of your company's placement or location, you most likely face similar challenges

- **Information technology**
 - collaborative tools create complex and dynamic rather than static documents
 - volume of information increasing exponentially
 - multiple opportunities to distribute information worldwide in a matter of moments
- **Litigation/ediscovery**
 - increasing expectations surrounding the availability of electronically stored information (ESI)
 - requirement to identify, preserve and produce on demand
 - costs increase with volume of information to be processed, reviewed at each level
 - risk of adverse information being maintained longer than required
- **Efficiency**
 - paper to electronic storage
 - fewer administrative and clerical staff
 - lack of consistency/discipline/structure
 - inconsistent or missing policies, procedures and approaches to managing information resulting in inconsistent storage, retention and disposition
- **Cost**
 - paper and electronic information backfiles

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Recent Cases Demonstrate the Risk

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Failure to Preserve
In re NTL, Inc. Sec. Litig., 244 F.R.D. 179 (S.D.N.Y. 2007)

- Typical "duty to preserve" difficulties are exacerbated with mergers, reorganizations and other changes in corporate organizational structure.
- *In re NTL, Inc. Sec. Litig.*, 244 F.R.D. 179 (S.D.N.Y. 2007) - Plaintiffs filed a federal securities lawsuit against NTL, Inc., a company that filed for Chapter 11 a few months after suit was commenced. Two companies emerged from the bankruptcy: (1) NTL Europe, the successor company responsible for selling off unprofitable assets, and against whom the lawsuits would proceed; and (2) NTL, Inc. ("New NTL"), the operational company with control of European telecom assets (a "non-party" to the suit).
- The two new companies entered into an agreement that contained a document sharing provision, allowing each company access to "all documents, records or other materials" that might be necessary to comply with legal, regulatory and other obligations or needs.
- Plaintiffs moved for discovery sanctions against both companies for hindering and delaying document discovery and allowing the destruction of potentially important documents and ESI.

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In re NTL, Inc. Sec. Litig., 244 F.R.D. 179 (S.D.N.Y. 2007)

- Duty to preserve attached when litigation was first anticipated;
- Defendants failed to instill proper litigation hold and reminders to ensure that documents and ESI maintained by the defendant company and the non-party company after emergence from bankruptcy were preserved as required under the duty to preserve – spoliation of the emails of approximately 44 key players resulted;
- Despite "information sharing" provisions of agreement, defendant failed to collect and produce data;
- Even without information sharing provisions of agreement, defendant had "control" over the predecessor company's responsive documents and ESI possessed by non-party company – it had the "legal right" and practical ability "to obtain responsive documents";
- This conduct as a whole demonstrated a "culpable state of mind" that warranted spoliation sanctions;
- Additionally, the court held that defendant was "at a minimum grossly negligent," and plaintiffs were entitled to an adverse inference spoliation instruction;
- Finally, the court awarded plaintiffs costs and attorneys' fees associated with bringing the motion for sanctions.

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Morgan Stanley & Co., Inc.,
 NYSE HBD 07-66 (May 9, 2007)

- Failure to make and preserve record of customer order receipts and executions - violation of § 17(a) of Securities Exchange Act of 1934, Rules 17a-3 and 17a-4, NYSE Rules 410 and 440
- Failure to review and maintain e-mails sent and received from employee's personal laptop – violation of § 17(a) of Exchange Act, Rule 17a-4(b)(4), NYSE Rules 440 and 342.16
- Censure, \$500,000 fine, undertaking

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**Morgan Stanley & Co.,
 NYSE HBD 06-80 (May 5, 2006)**

- Firm paid \$2.5 million to NYSE Regulation as part of total payment of \$15 million to SEC, NYSE regulation and NASD for allegedly failing to provide a timely response to an e-mail request
 - Omitted tens of thousands of e-mails from production
 - Copied over back-up tapes with relevant e-mails after receiving request
 - Untimely review of e-mails
 - Misstated e-mail production efforts

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In the Matter of David Aufhauser, Assurance No. 08-135 (October 7, 2008)

- UBS General Counsel – Insider Trading Settlement - \$6.5 Million
- Consent decree stated that GC sold off holdings based on receipt of e-mail from a colleague stating that the market was falling
- E-mail was sent by GC to broker immediately after receiving insider information with instructions to sell
- Settlement avoided the potential of lengthy litigation
- Recognizes and reinforces impact of discovery and production of electronic information, especially e-mail

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**In the Matter of Merrill Lynch, Pierce, Fenner & Smith, Inc.,
 SEC Release No. 53473 (March 13, 2006)**

- Failure to furnish e-mails promptly to SEC staff: Violation of § 17(a) of Securities Exchange Act of 1934, Rule 17a-4(j)
- Failure to retain e-mails related to its business: Violation of § 17(a) of Exchange Act, Rule 17a-4(b)(4)
- Cease and desist, censure, undertaking, \$2.5 million fine

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Recent case law reinforces the need to proactively manage your records and information to avoid sanctions, fines and adverse inferences – and being outside the US is no protection

- *Cooper Indus., Inc. v. British Aerospace, Inc.*, 102 F.R.D. 918 (S.D.N.Y. 1984) (foreign affiliate of party was required to produce documents pursuant to the Federal Rules of Civil Procedure, and there was no obligation to proceed through the Hague Convention)
- *In re Flag Telecom Holdings Ltd. Sec. Litig.*, 236 F.R.D. 177 (S.D.N.Y. 2006) (executive can be compelled to produce employer's documents located abroad under the Federal Rules of Civil Procedure, so long as executive has "practical ability" to access the documents, even if confidentiality of documents is confirmed by employee handbook)
- *Tequila Centinela, S.A. de C.V. v. Bacardi & Co. Ltd.*, 242 F.R.D. 1 (D.D.C. 2007) (holding that so long as documents are under control of party, their production can be compelled, even if located outside the U.S., and that the mere fact that foreign law prohibits production does not necessarily exempt party from producing documents)

Control of and access to information, rather than physical storage location, generally take precedence in the obligation to preserve and produce

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Our Panel Face Some Unique Challenges

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Case study 1: US-based regional utility, century-old core company affected by de-regulation and acquisition of complementary companies

Goals

- Align RIM policies and processes across the business units and corporate functions
- Develop an overarching RIM Framework to support ongoing operations and regulatory/legal compliance
- Optimize costs
- Ensure access and timely retrieval of information
- Ensure timely responses to discovery requests and reduce costs of production
- Protect and preserve information in accordance with information security and classification requirements and litigation/regulatory holds
- Enhance business continuity and disaster preparedness and recovery

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Case study 2: global executive recruiting firm, based in the US; growth and compression tightly linked to current economic pressures

Goals

- Protect the brand by protecting confidential and sensitive information
- Create a legally defensible foundation for a future enterprise-wide records program
- Protect high risk records in paper and electronic form
- Find the right information at the right time
- Prepare the organization for cost effective litigation response
- Increase organizational efficiency by increasing access to needed information
- Optimize costs through increased storage efficiency and timely destruction of unneeded information

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Case study 3: global luxury goods manufacturer, based in the EU; century-old core company combined with rapid growth through acquisition over the last decade

Goals

- Implement an enterprise-wide RIM program
- Ensuring the company, brands have a complete historical record of designs and assets available for the future
- Increase organizational efficiency by increasing access to needed information
- Optimize costs through increased storage efficiency and timely destruction of unneeded information
- Cause minimal impact on staff, automating capture and deletion of information wherever possible
- Effect a culturally aware program taking into account multi-national nature of the company
- Allow 'freedom within a framework'

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Creating a Global RIM Program

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A comprehensive records and information management program enhances your company's ability to leverage information assets and facilitate regulatory compliance in a highly visible, consistent fashion

- A successful records and information management program addresses governance, policy, processes, data, applications, and infrastructure
- Building comprehensive global records and information management programs includes assessment, analysis, and solution development in each of these areas

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Governance: Establishes program sponsorship; roles, responsibility, accountability across the organization; effective collaboration, coordination and communication

Elicit support from key executives across the organization; bring them together to develop a shared vision for the program – and to build a culture of shared responsibility

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Policy: Defines overall goals and sets the framework for prioritizing existing policy and creating new policies

Review existing policies – IT, security, records management, litigation hold, etc.; identify gaps, conflicts and overlaps among them; develop a policy framework and the needed policies to protect your information and ensure you're meeting your legal and regulatory obligations

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Process: Defines consistent methods, approaches and activities to ensure accurate storage and retrieval of records every time

Document current business processes, identifying records creation and capture points; embed records management into new, efficient business processes

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Data: Identifies company information, linked to business processes and managed to ensure quick identification and retrieval when needed

Develop an enterprise information map or an ESI data map to identify your company's data types

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Applications: Identifies the appropriate tools necessary for creating, circulating, storing and disposing of company records

Enhance your enterprise information map to link each business application to the records it contains and to the processes it supports

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Infrastructure: Establishes the structure and operation of business applications as well as specific toolsets; addresses the use of storage – online, nearline, offline; onsite, offsite

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    graph TD
      G[Governance] --- P[Policy]
      G --- PR[Process]
      G --- D[Data]
      G --- AP[Applications]
      P --- I[Infrastructure]
      PR --- I
      D --- I
      AP --- I
    
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Identify your backfile of information (paper and electronic) and develop a defensible, practical strategy for systematically destroying unneeded information over time to reduce costs and risk

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A number of factors impact the timing, staffing, cost and approach to developing and implementing an effective records management program

- Geographic dispersion
 - Offices worldwide, distributed throughout Europe, Asia, Latin America and the US
 - Key corporate functions distributed across the company
 - Back-office operations in multiple locations, using multiple systems
 - Records stored in multiple warehouses across the globe; largely uninventoried
 - Regulatory requirements differ from country to country and industry to industry
- Multiple, disparate business units
 - In many cases, recent acquisitions still operate largely as independent businesses
 - Records and records management systems transferred from these acquisitions are likely inconsistent and at varying levels of comprehensiveness
 - Paper and electronic information
 - Age of records and information varies but may go back more than 20 years
 - Goal to allow flexibility within a framework
- Multiple, disparate functions
 - Highly distinct functions resulting in distinct records and information requirements
 - 'One size fits all' is not the answer

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With all these variations, there are some key themes that lead to success

- Executive sponsorship, collaboration – to support the required behavior change
- Enterprise information mapping – linking business processes to critical information
- Backfile characterization – cost effective disposition of out-of-date, out-of-control information
- Enterprise content management – taxonomies, schedules, technology to manage information

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Records Program Implementation Approaches

Automation

- Internal Resources**
 - Director of Corporate Records - sets strategic direction, develops policy
 - Core staff of 3 to 7 - implements policy, support business units, manage storage
 - IT staff - support RM initiatives with technology
 - Business unit liaisons - implement policy, manage disposition (cleanup days)
- Hybrid**
 - Director of Corporate Records - sets strategic direction, develops policy
 - Core staff - implement policy, support business units
 - Expert consultants support specific initiatives
 - IT staff - support RM initiatives
- Outsourced**
 - Procurement official - selects vendor, negotiates contract, oversees contract execution
 - Contractor project manager - sets strategic direction, develops policy
 - Contractor staff - collect information (paper and electronic) from business units, implement policy, manage storage
 - Contract IT staff - support RM initiatives

Full implementation of a RIM program takes 3 - 5 years.

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There are several steps that you can take, all at once or in phases over time, to develop your program

- Assess the current state of information management in your organization by reviewing policies and procedures and interviewing staff representing all business units and corporate functions
- Bring together a group of key executives to review the findings of the assessment and develop a vision for your records management program
- Develop a strategy and roadmap for implementation
 - Policy framework
 - Taxonomy
 - Records Retention Schedule
 - Enterprise Information Map
 - Backfile Characterization
- Develop a governance structure that clearly defines roles, responsibility and accountability for managing information across the organization
- Communicate with staff, provide training and gather feedback to gauge the success and effectiveness of the program
- Be willing to change over time as operational, regulatory and legal requirements evolve

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 Amsterdam, The Netherlands
- Maura L. Dunn, CRM, PMP
 Director, Duff & Phelps, LLC
 Bethesda, Maryland



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We are providing you with an index of all our InfoPAKs, Leading Practices Profiles, QuickCounsels and Top Tens, by substantive areas. We have also indexed for you those resources that are applicable to Canada and Europe.

Click on the link to index above or visit <http://www.acc.com/annualmeetingextras>.

The resources listed are just the tip of the iceberg! We have many more, including ACC Docket articles, sample forms and policies, and webcasts at <http://www.acc.com/LegalResources>.