A Litigator's Look at CRISIS MANAGEMENT

Corporate Management's WORST nightmares play out daily on the front pages of U.S. newspapers: workers gassed in an industrial accident; a train transporting hazardous chemicals derails; a product defect triggers a nationwide recall; and people fall ill and die because of product tampering.

When such a media intensive event occurs, some company—and its in-house counsel—has a crisis.

Not every crisis is as dramatic, or as newsworthy, as fatalities resulting from pyramidal-laced 'Tylex' capsules or from a lethal gas leak at an industrial plant. Corporate crises also arise from government investigations of company employees; damaging documents revealed in pending civil lawsuits; adverse regulatory actions; studies pronouncing products unsafe; and large jury verdicts.

These crises require an integrated forward-thinking corporate response. This article, written from the litigator's perspective, will focus on the three stages of crisis management: the immediate stage, when you manage short-term effects; the intermediate stage, when you manage litigation and other collateral consequences; and the final stage, when you evaluate long-term effects and put the crisis behind you.

While the immediate stage passes quickly, the collateral effects of a crisis can drain corporate energy and resources, and linger for months or years. Beyond negative press coverage, you can expect possible regulatory actions, criminal investigations, and civil litigation, ranging from individual lawsuits filed in state and federal courts by numerous injured parties to nationwide class actions. You also should be aware of the possibility of satellite litigation, including shareholder litigation, and insurance coverage suits. Your company may need to recall products from the marketplace, thus adversely affecting sales. Crisis have effects on corporate governance and financial reporting, too.
IN THE IMMEDIATE STAGE, THE FOCUS IS GATHERING THE FACTS AND GETTING INFORMATION OUT TO THE PUBLIC.

In short, while a corporate crisis can have profound effects on your company, it does not have to spiral out of control. Steps can be taken in advance to prepare for a crisis. The crisis can be managed to minimize the risks to the company and address the company's primary constituencies—customers, shareholders, and employees—as well as other stakeholders, such as suppliers, regulators, the local community, media, the financial world, and the general public.

Legal counsel with experience in litigation should be among the key players in crisis management. As your company progresses through the three stages of a crisis, its risks and your role change. In the immediate stage, the focus is on gathering the facts and getting information out to the public.

Counsel's job is to be sure these early steps are done in a way that addresses the company's short-term needs in responding to the crisis and prepares a solid foundation for the litigation that may soon follow. During the second or intermediate stage, the focus shifts to litigation and other collateral effects. You will oversee internal investigations, evidence gathering, document management, and litigation management. The final stage is your opportunity to look back at the crisis and its aftermath to evaluate whether changes should be made to avoid or to deal better with the next crisis.

THE IMMEDIATE STAGE—DEcisively managing SHORT-TERM EFFECTS

Your opportunity for minimizing damaging, long-range effects of a crisis is probably greatest during the immediate stage. Just after the disastrous event has occurred. You seize this opportunity when you take prompt and decisive action. Indecision only prolongs the crisis, allowing the event to remain a focus of unwelcome media attention. As soon as the event occurs, a crisis management team should be mobilized.

Instead of running from the press and the public, your crisis management team should be prepared to address both squarely, providing information through a designated company spokesperson and issuing public statements that acknowledge known facts—favorable and unfavorable—and detail actions the company intends to take. A litigator generally prefers to defer public statement or public action until more facts—plunished through a thorough investigation—are known. This means interviewing witnesses, reviewing relevant documentation, and completing appropriate tests. A public relations specialist, on the other hand, recognizes the need to be proactive and answer questions about a crisis as quickly as possible. The crisis team must strike a proper balance between these two postures by having the lawyer and the media specialist work together in preparing all public statements. Your company could be adversely affected in future litigation by prematurely taking a position on a disastrous incident before all of the facts are in. The overly cautious approach to crisis communications advocated by many legal counsel, however, can in the long run prove equally damaging to the company. Enough information will be available from the outset of a crisis to enable you to make a public statement, appropriately qualified to allow for further factual developments—and you should.

As early as possible, your company should issue a statement saying in essence: "This is what we know so far. It's too early to determine the cause, but we are investigating it and are devoting all necessary resources to it. Reasonable and proper safety precautions have been taken, and there is no continuing danger to employees or the public. We are cooperating with authorities. We will provide updates as we get more information." You are thus pledging to investigate the incident fully and promptly, to work with public authorities, and to provide further updates as more information becomes available.

Media inquiries should be referred to a company spokesperson trained in crisis communications. You should provide some basic guidance to the company spokesperson on appropriate qualifiers ("Based on the best information available...") and language having legal ramifications ("liability" and "responsibility"). At the same time, you should inform employees in writing about all of the known facts.

Your company's first order of business is to investigate the causes of the disaster. This investigation should be overseen by counsel with assistance from other members of the crisis management team. The
A dedication to service that exceeds all expectations.
THE INTERMEDIATE STAGE—DECISIVELY MANAGING LITIGATION

After the immediate stage—and the initial cries (s)laughter by the news media—your company’s crisis will persist primarily in the form of continuing investigation and litigation. During the intermediate stage, as counsel you are the central and most active member of the crisis management team. Your job is to finish the internal legal investigation; to advise the company on locating and preserving any relevant physical evidence and documents; to inform employees about the legal status of their communications; and to assemble and direct the litigation team.

Handling Records

Being proactive, you should advise your company to suspend routine records destruction under its retention policy and ensure that a written directive to this effect is communicated throughout the organization. Generally speaking, a party on notice of pending or reasonably anticipated litigation has a duty to preserve relevant documents, including electronic mail. In a recent deceptive sales practices lawsuit against Prudential, a federal court fined the insurance corporation $1 million for allowing business records to be destroyed during litigation, and strongly criticized it for taking insufficient steps to preserve records. You should inform your employees that any documents they generate—including notes and email—may have to be produced to adversaries in litigation. With recent trends in electronic discovery, you should review your company’s sources of electronic media, including email and other internal databases where recent records may be stored electronically, and take steps to preserve them.

Outside investigators may request or subpoena your company’s records. When documents are provided to such parties, you should ensure that your company keeps duplicates. You also should prepare relevant company documents for production in any future litigation. This step sounds simple, but a large volume of documents can make it a very lengthy process. Also, if government investigators take evidence samples, consider taking split samples for independent testing.

Preserving Privileges

It is very important at this stage that employees know how the company expects them to respond in both internal and external investigations. If litigation policies or guidelines were not in place before your company’s crisis, you should draft and circulate instructions to employees now. In them, you should explain the pretrial discovery process, the attorney-client privilege, and work product protection. You also should advise employees to avoid speculation and premature opinions, and explain the risks involved in “casual” email communications. If you are acting in a business advisory role, your communications with company personnel may not be confidential. On the other hand, if you are acting in an investigatory role, communicating with personnel in anticipation of litigation, certain privileges may attach. You should be mindful of clearly separating your functions to minimize confusion later.

Investigating Facts

The company should designate a team to conduct the internal investigation. The team should be led by counsel. Your participation on the team is important because you know your company’s people, processes, and business best. Designating outside counsel as the official lead of this team strengthens the argument that the team’s work is protected by privilege.

You should nail down the facts of the event as quickly as possible. Promptly locate and study relevant company documents and interview witnesses, both inside and outside of the company. You will need to decide if a report of your findings should be written and disclosed outside of the company. Disclosing the results of your investigation to government agencies—for example, in an effort to avoid adverse regulatory action—would likely constitute a waiver of any privileges in future civil litigation. But you may not wish to assert privileges or you may consider structuring the report to include only nonprivileged information.

Setting Litigation Strategy

Once you assemble the facts, you should develop your litigation defense strategy. You can then identify and begin preparing, the key company witnesses. It is often desirable to have one central witness, “Mr. or Ms. Company,” whom you prepare to tell the company’s story at trial. You should also determine the necessity for expert witnesses to support your defense. Locating the right experts on your issues and preparing them for testifying takes time.

Selecting the Outside Counsel Team

Your company should consider retaining national coordinating counsel and outside trial counsel in geographic areas where litigation is anticipated. As the most knowledgeable person about the event from its very beginning, you should begin educating these lawyers, even before lawsuits are filed.

THE FINAL STAGE—DECISIVELY MANAGING LONG-TERM CONSEQUENCES

To put the crisis behind your corporation—to have closure—you should thoroughly examine how the crisis began and what changes must be made to prevent another similar crisis from occurring. As part of this effort, you should conduct a review of the just concluded crisis to evaluate its long-term effects and to repair any long-term damage.

Your review should include:

• analyzing your company’s structure and staff to be sure you have clear lines of authority and accountability for the business processes that caused the event (and the right people in the right positions), and making any necessary adjustments;

• determining if the crisis will be a trigger for ongoing additional litigation and creating a plan to preserve your company’s story for use in such litigation;

• calculating the impact of the crisis on corporate finances; examining the effects of the crisis on corporate insurance coverage and filling any gaps in coverage;

• considering whether public relations efforts or advertising should be used to improve or restate your company’s image;

• assembling a “lessons learned” statement about the crisis and its management; and

• creating a crisis response plan (or reviewing the existing plan) and making any adjustments. After repairing any damage, you should decisively move forward with methods for both forecasting and averting future disasters. You should start by educating corporate management and other employees about crisis prevention. You should anticipate that a crisis will occur again and again, and that the nature of the client’s business, and should conduct a crisis management audit to ensure the company has tools in place to deal with, even prevent, future crises. Some basic precautionary steps may effectively avoid a crisis or at least minimize its effects.

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Developing a Crisis Response Plan

A crisis response plan provides a basic framework for responding to the crisis. It should spell out who will be on the company’s crisis management team, who will have responsibility for handling press inquiries and formulating company positions, and how the team will be notified when a crisis breaks. In addition, the plan should include contact names and phone numbers for local, state, and federal agencies and emergency relief organizations that may need to get involved. The plan should also provide basic guidance to plant managers and line management on responding to the immediate events on the scene.

The crisis response team should be cross-functional and include members from top corporate management, line management, public affairs, legal, and finance. While the CEO may head up the high-level corporate crisis, in any crisis of a protracted nature the CEO and key managers should delegate the crisis management function to trusted senior level managers. Once the immediate stage of the crisis has passed and a process is in place to manage the problem, the CEO should leave implementation to senior level managers.

The primary objective of the crisis response plan is to set up a structure that is capable of responding to any type of crisis quickly, decisively, and in a coordinated manner. The plan may provide for differing levels of response, varying with the nature and severity of the crisis. Once the plan is in place, the company should schedule periodic drills to test the organization’s response and to fine-tune the plan.

Addressing Product Recalls

Either in conjunction with the crisis response plan or as a stand-alone policy, counsel should prepare a plan for product recalls. Product recalls have all the hallmarks of a corporate crisis. They raise fundamental questions about product quality, performance, or safety; they are likely to generate claims and lawsuits; they will result in media attention; and they require a coordinated corporate response. Keep in mind that premature or unnecessary recalls—or improperly implemented recalls—needlessly expose the corporation to additional liability. Your crisis response plan should provide for a process whereby appropriate company officials can make an informed recall decision. Recalls should not be conducted on an ad hoc basis, but rather should be done pursuant to a preplanned recall policy that identifies the individuals who will make the recall decision and sets forth broad guidelines for the decision-making process. Counsel should play an integral part in the decision.

Reviewing the Compliance Program

Corporate compliance programs should be reviewed by counsel for two reasons. First, statutory penalties can often be mitigated by proof of effective compliance programs. Second, courts today appear more willing than in the past to impose duties on boards of directors to supervise corporate compliance. An effective compliance program can prevent crises from happening in the first place. Counsel should review the company’s compliance policies relating to antitrust, antitrust cooperation, equal opportunity, sexual harassment, occupational health and safety, and environmental regulation. The compliance policies should be more than window dressing. They should be disseminated routinely and reinforced by top management, and they should be enforced internally. Key employees should be required to periodically certify that they have read and complied with them.

Assessing the Company’s Liability Risks

Counsel should periodically review the company’s liability risks in light of the nature of its business and in light of changing legal developments. Consider conducting an audit of the high-risk products or businesses to address any safety, health, or environmental issues. You should ensure—that rather than assume—that business management is fully aware of the risks it is undertaking. Other areas that you may

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want to periodically look into are:

- Insurance policies and coverage: where are the policies maintained; is the coverage adequate;
- Product labeling and warnings: are they current;
- Product testing and recent medical literature affecting your company’s products;
- Customer or product complaints: are there discernible trends;
- Contractual provisions relating to indemnification, disclaimers, limitations of liability, and insurance;
- Procedures for statutory incident reporting (for example, OSHA, TSCA, or FIFRA);
- Mergers and acquisitions procedures (avoid buying into a mass tort or other large liability); and
- Availability of legal defenses such as the raw material/bulk supplier defense, the component parts rule, or the learned intermediary rule.

Consider holding workshops aimed at instructing key nonmanagerial employees about legal issues arising from what they do on a daily basis. For example, you could organize a session on how to write business documents or a refresher course on the company’s document retention policy with emphasis on the importance of following its mandates. You could also establish a system whereby these employees serve as regular consultants to the company’s business managers. By getting more involved in business decision making, you enhance your opportunity to prevent situations that may result in liability.

Increasingly, companies are enlisting public relations firms for both advice on crisis management and actual crisis intervention. A public relations expert can assist in preventing or ameliorating negative publicity that might instigate and accelerate costly litigation. You should consider whether hiring outside consultants in the immediate aftermath of your crisis would have benefited your company, and whether, now that the crisis has passed, a consultant’s objective assessment of your company’s policies would be helpful.

After your company has completed final stage actions, you should declare the crisis at an end. Such closure allows relief to employees who have managed, and otherwise been involved, in the crisis. While the conduct of company business should change as a result of the lessons learned and the organizational improvements made during the crisis, people’s energies finally can be devoted to other business needs.

LEARNING FROM THE CRISIS

Your successful navigation of a crisis depends on two key things: being prepared before the crisis hits and taking prompt and decisive action after the crisis is upon you. You can do these things more effectively if you keep in mind counsel’s shifting focus as a crisis evolves. In the immediate stage, you deal with the press and the public. Litigation demands are at the center of the intermediate stage: the counsel team, documents, witnesses, and courts. And finally, you put the crisis behind your company and circle back to prepare for the next one.

In each of these stages, counsel is at the center of the team informing your company of its legal rights and obligations and protecting it from the big hit.

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Notes:
5. See Wagner, Choosing Ignorance in the Manufacture of Toxic Products, 82 CORNELL L. REV. 775, 821 (1997) (accusing manufacturers of the Dalkon Shield and other products of refusing to conduct long-term safety studies so that they could defend those products in litigation by arguing that existing scientific research was insufficient to prove they caused harm).
6. A mass jury award, a finding of punitive damages, or an adverse verdict in a bellwether case will receive press coverage and attract the interest of other prospective plaintiffs and lawyers, and may provoke a market reaction or governmental inquiry. At minimum, these events should prompt an informed assessment by top legal and business management. See, e.g., Combs, Florida Jury Finds Tobacco Companies at Fault—Verdict Could Spark Wave of Smoking Litigation, BOSTON HERALD, July 8, 1998, at A1 (discussing the proliferation of tobacco lawsuits in light of large jury awards). See also Sessor, ASIAN WALL ST. J., July 12, 1999, at A10; Defense Opines, SAN DIEGO UNION-TRIBUNE, July 7, 1999, at B7, B9 (explaining that, after large verdicts in individual

7. In the case of publicly traded companies, the investment community may closely monitor the crisis. See, for example, The WALL STREET JOURNAL, BUSINESS AND FINANCIAL SECTION (March 14, 1997) ("A major tobacco lawsuit was given the go-ahead by the Mississippi Supreme Court. The decision, coupled with a buoyant market and comments by a lawyer at a litigation conference in Atlanta, pounded tobacco stocks."); and The New York Times, April 12, 2000: Headline: Arkansas Seizes Texas Suit Over Doctors’ Cost Rules, Section C, Page 2, Column 5, Business/Financial Desk; ("Artemis shares dropped sharply when the lawsuits were filed."); and USA Today, August 20, 1997 Section: Money, page 3B, Headline: Columbia/HCA Lawsuits Plague Stock Holdings; and 40 Execs L.J. 1113, 1115 (Summer, 1997)("One way in which buyers and sellers of corporate stock respond to variations in corporate law compliance norms is by shifting their evaluations of corporate worth up or down.")
to either prevent these crises or at least diminish their impact.1" Harvey L. Pitt and Karl A. Gorkansnamite, When Bad Things Happen to Good Companies: A Crisis Management Primer, 15 CARDozo L. REV. 4, January, 1994, pp. 951-969.

9 Sources on the development of corporate disaster plans include: Flannery, Anne C. and Zelens, Kristine, Diam-ond Direct: Managing the Inevitable Corporate Crisis, 1121 P&L Corp. 423 (1999); Franchising Business & Law Alert, supra note 7, at 5; John F. Schmetz, What to Do Before, What to Do After, 5 Res. L. TRoE 19 (May/June 1996); Epstein, supra note 1, at 1383.


11 "The challenge of the crisis manager is to balance public relations and legal considerations and determine where the organization’s greatest exposure lies.” Kathy R. Fitzpatrick, Ten Guidelines for Reducing Risks in Crisis Management, PUB. RELATIONS QUARTET, Vol. 40, no. 2, page 33 (June 22, 1995); or see Steven Fink, Door County’s Moral Evacuations, N.Y. Times, Feb. 16, 1992, § 3 at 13 ("Lawyers in product liability crises often take the view that everything revolves around the law and its loopholes. What becomes obscured is the ultimate crisis management objective: to have a company left to manage after—or if—the crisis passes."); and Lawyer A. Beurer, Michael X. Imbrocos, and Brian D. Smith, Legal Trends, April 17, 2000 at p. 44 ("Lawyers must be increasingly sensitive to the public relations dimensions of a client in crisis without forsaking their considered judgment of traditional legal risks ... by handling crisis management responsibilities to lawyers trained in finding that balance, companies can develop effective public relations strategies while simultaneously minimizing legal risks.")

12 At minimum, you should be made aware of employees involved in the incident on the need to preserve privileges, on the need to avoid causing damaging documents, on the company’s position on the incident, and to refer any media inquiries to the company spokesperson.

13 Experts on crisis management agree that Tenaco’s management handled the crisis "in the correct manner. See supra note 5. "Take a lesson from the way Tenaco handled the crisis regarding the arising of race discrimination charges. The company spoke quickly and with a consistent theme: What happened here was wrong. It does not represent what Tenaco is about, and the company will deal with it in the right way. Communications Specialists Help with Damage Control, U.S. BUSINESS LITIGATION, Vol. 2, No. 7, p. 20 (February 1997).

14 The duty to preserve records is a complex area of law with sometimes conflicting judicial decisions. See, generally, Wm. I. Thompson Co. v. Gen. Nutrition Corp., 995 F. Supp. 1445 (D.C. Cal. 1994) (prolifigation correspondence provided notice of claim and duty to preserve relevant evidence). As recent cases involving Tenaco and Prudential Ins. Co. indicate, companies must be especially sensitive to document retention issues when a "notice of order" or "preservation order" has been issued. See, Rovella, supra note 3; McCann, supra note 5. See also, in re Prudential Ins. Co. Sales Practices Litigation, 169 F.R.D. 508 (D.N.J. 1997); MANUAL FOR COMPLEX LITIGATION (third ed.) § 21.442 & Forms 41.34 1995.

15 The Prudential and Tenaco cases underscore the importance of issuing legal hold orders within your company to suspend routine records destruction—including the destruction of email—while litigation is pending. See, In re Prudential, supra note 14, at 615. Auditors of Tenaco officials discussing withholding documents and "purging" files— all in violation of legal hold orders issued by management—prompted Tenaco to settle a race discrimination lawsuit for a reported $170 million. See Rovella, supra note 2; McCann, supra note 3.

16 In re Prudential, supra note 14, at 616. Although the company sent electronic mail to some employees instructing them to hold records, the court found this communication inadequate to properly advise all necessary employees.


18 See, e.g., In re Steinhardt Partners, L.P., 9 F.3d 230 (2d Cir. 1993); Westinghouse Elec. Corp. v. Republic of the Philippines, 951 F.2d 1414 (3d Cir. 1992); In re Solyznas Docu Texans (Fulbright & Jaworski), 738 F.2d 1367 (D.C. Cir. 1984) (privilege waived by disclosure to SEC, notwithstanding reservation in testimonial letter). But see, Diversified Indus. v. Meredith, 372 F.2d 590 (6th Cir 1967) (disclosure of a privileged corporate report to the SEC amounted to only a "limited" or "selective" waiver of the attorney-client privilege). If disclosure to a government agency is necessary as a last resort to avoid adverse regulatory action, steps can be taken to increase the chances that applicable privileges will later be sustained in civil litigation. See, Mulvey & Thering, Confidentiality Concerns in Internal Corporate Investigations, 25 Tower & L. INs. J. 48 (1988).

19 The "lessons learned" statement should be positive and forward looking. It should not be used to second guesses or cast blame.

20 There is a positive correlation between recalls and lawsuits. See Rovella, supra note 1, at 721. According to the Restatement of Tort, Products Liability, a manufacturer may be held liable for the negligent recall of a product. See Restatement (third ed.) of Torts, Product Liability § 11 (1988).

21 The Organizational Sentencing Guidelines, adopted by the United States Sentencing Commission in 1991, provide a clear incentive for companies to adopt "an effective program to prevent and detect violations of law" by allowing for reduced fines, under certain conditions, if an effective occurs despite the existence of such a program. (U.S.S.G. § 8B2.13(1) and § 8B2.6.)

22 See, e.g. In re Cinnmark International Inc. Derivative Litigation, 908 A.2d 959 (Del. Ch. 1998), (the Delaware Chancery Court held that directors have a duty to "act in good faith to assure that a corporate information and reporting system, which the board concludes is adequate, exists and is adequate to do so, . . . in theory at least, render a director liable for losses caused by noncompliance with legal standards.

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