

A LITTLER PRESENTATION

# Navigating Mental Health Accommodations in the Evolving Workplace Landscape

ACC National Capital Region

**Littler**<sup>®</sup>

**ACC** Association of  
Corporate Counsel  
— NATIONAL CAPITAL REGION —

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# Agenda

- Mental Health and Employment
  - ADA
  - Legal Profession
- Pregnant Workers Fairness Act
- Religious Accommodations
- Questions

# Mental Health and Employment



# What is Mental Health?

## IMPACTS WELLBEING

- Emotional, Psychological, and Social

## COMMON EFFECTS

- Impacts 1 out of 5 adults
- Impacts more than 1 out of 5 youth
- 1 out of 25 adults suffer serious mental illness

## COMMON CAUSES

- Experiences
- Biology
- Drug and alcohol use
- Isolation/loneliness



# Depression and Anxiety

- **Depression**

- Being overly critical of self
- Feeling tired often
- Trouble paying attention
- Sadness or irritability
- Eating too much or too little
- Socially isolating

- **Anxiety**

- Being overly critical of self
- Picking at skin/nail biting
- Fatigue
- Frequent stomach aches
- Socially isolating
- Panic attacks or anxiety attacks

# What is Neurodiversity?

“Neurodiversity is the idea that neurological differences like autism and ADHD are the result of normal, natural variation in the human genome. . .indeed, many individuals who embrace the concept of neurodiversity believe that people with differences do not need to be cured; they need help and accommodation instead.”

John Elder Robison, Co-chair of the Neurodiversity Working Group at the College of William & Mary and member of the Interagency Autism Coordinating Committee of the U.S. Department of Health and Human Services

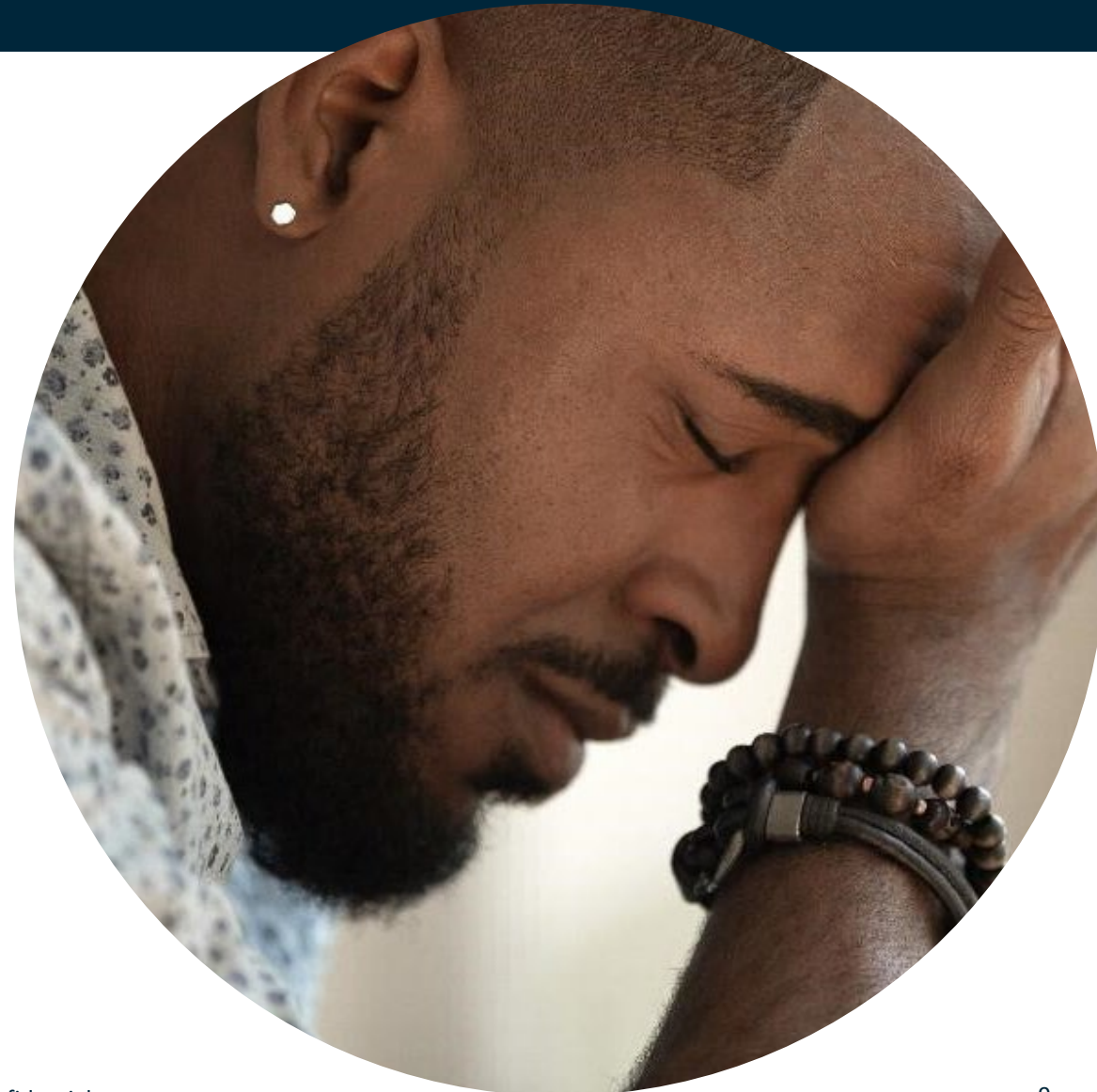
# Examples of Neurodiverse Conditions

- Attention Deficit Hyperactivity Disorder (ADHD)
- Autism Spectrum Disorder
  - Asperger's syndrome
- Learning disabilities
  - Dyslexia
  - Dyscalculia
  - Dysgraphia
- Intellectual disabilities
- Sensory Processing Disorder
- Tourette Syndrome
- Acquired neurological conditions
  - Traumatic brain injury
  - Alzheimer's or dementia
  - Migraines
- Mental health or psychiatric disabilities



# Myths About Mental Health Issues

- It's rare
- It's always obvious
- It's not really a problem
- It's nowhere near me
- There's not much you can do
- Mental health and workplace violence



# More Recent Statistics Nationwide

According to a recent survey of 1,000 American workers:

- 80% would consider quitting for job focused more on employees' mental health
- 75% have struggled at work due to anxiety caused by pandemic and world events
- 4 out of 5 find it hard to “shut off” in the evenings
- 50%+ have taken “mental health day” due to pandemic
- 97% say vacation days while working from home are important for “recharging”
- 50% say sleep patterns have been interrupted due to COVID-19
- 45% say they feel less healthy mentally while working from home

# What Does This Mean for the Workplace?

- Increased EEOC charges and litigation stemming from mental health issues
- EEOC Charge data: In FY 2021, nearly 30% of ADA charges alleging discrimination based on mental health impairments

## ADA CHARGE DATA by IMPAIRMENTS/BASES – MERIT FACTOR RESOLUTIONS (Charges filed with EEOC) FY 1997 – FY 2021

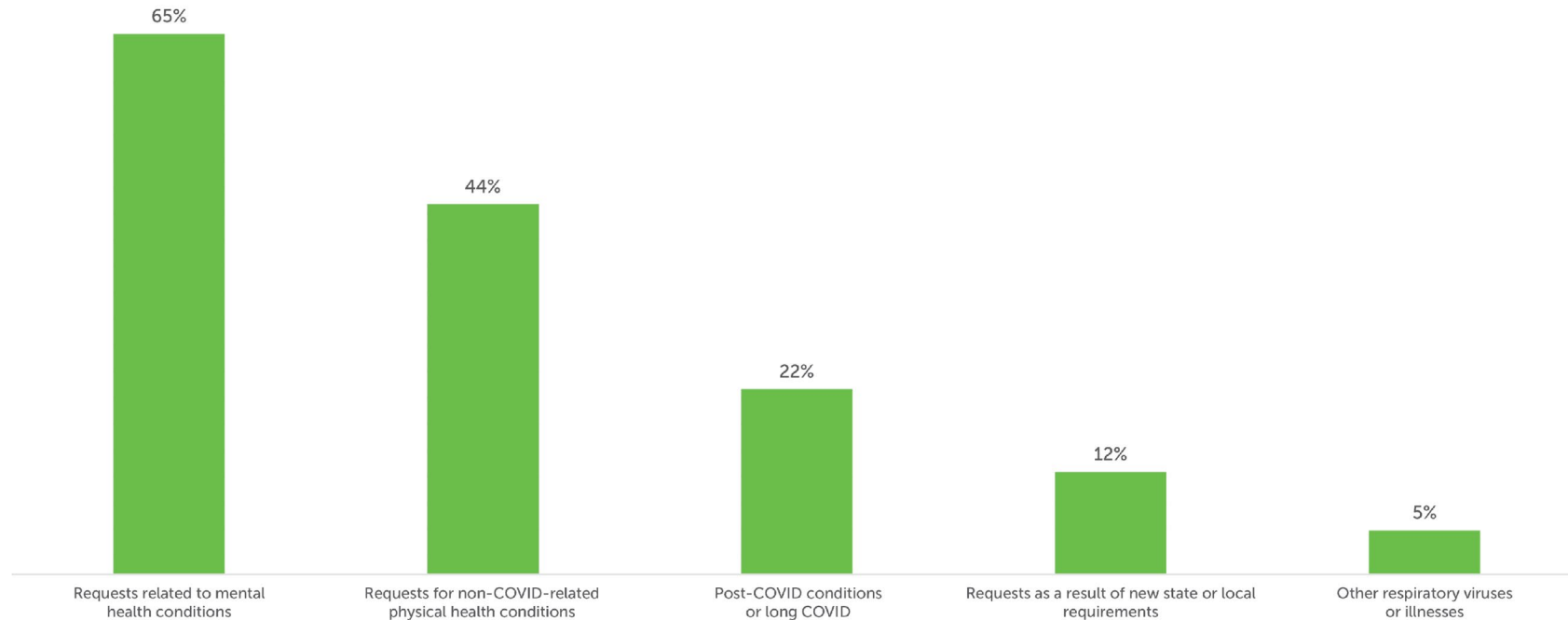
The data are compiled by the Office of Enterprise Data and Analytics from data reported via the quarterly reconciled Data Summary Reports and compiled from EEOC's Charge Data System and, from FY 2004 forward, EEOC's Integrated Mission System.

This does not include charges filed with state or local Fair Employment Practices Agencies.

FY 2015		FY 2016		FY 2017		FY 2018		FY 2019		FY 2020		FY 2021		IMPAIRMENT BASIS*
#	%	#	%	#	%	#	%	#	%	#	%	#	%	
31	0.5%	27	0.5%	36	0.5%	36	0.7%	22	0.4%	28	0.6%	24	0.5%	ALCOHOLISM
29	0.5%	20	0.4%	35	0.5%	26	0.5%	32	0.6%	34	0.7%	30	0.6%	ALLERGIES
0	0.0%	1	0.0%	1	0.0%	0	0.0%	0	0.0%	1	0.0%	1	0.0%	ALZHEIMERS
350	5.8%	383	6.7%	426	6.4%	419	7.7%	371	7.4%	441	9.0%	467	9.7%	ANXIETY DISORDER
78	1.3%	83	1.5%	73	1.1%	68	1.3%	57	1.1%	85	1.7%	146	3.0%	ASTHMA
14	0.2%	20	0.4%	31	0.5%	26	0.5%	25	0.5%	32	0.7%	39	0.8%	AUTISM
0	0.0%	0	0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	BRAIN-HEAD IMPAIRMENT
														BRAIN-HEAD INJURY - TRAUMATIC
77	1.3%	58	1.0%	49	0.7%	59	1.1%	56	1.1%	60	1.2%	50	1.0%	CANCER
249	4.1%	241	4.2%	219	3.3%	219	4.0%	203	4.1%	174	3.5%	187	3.9%	CEREBRAL PALSY
23	0.4%	15	0.3%	12	0.2%	17	0.3%	18	0.4%	12	0.2%	12	0.2%	CHEMICAL SENSITIVITY
12	0.2%	8	0.1%	7	0.1%	9	0.2%	12	0.2%	16	0.3%	13	0.3%	CUMULATIVE TRAUMA DISORDER
4	0.1%	4	0.1%	7	0.1%	6	0.1%	4	0.1%	3	0.1%	2	0.0%	CYSTIC FIBROSIS
2	0.0%	3	0.1%	5	0.1%	1	0.0%	2	0.0%	4	0.1%	0	0.0%	

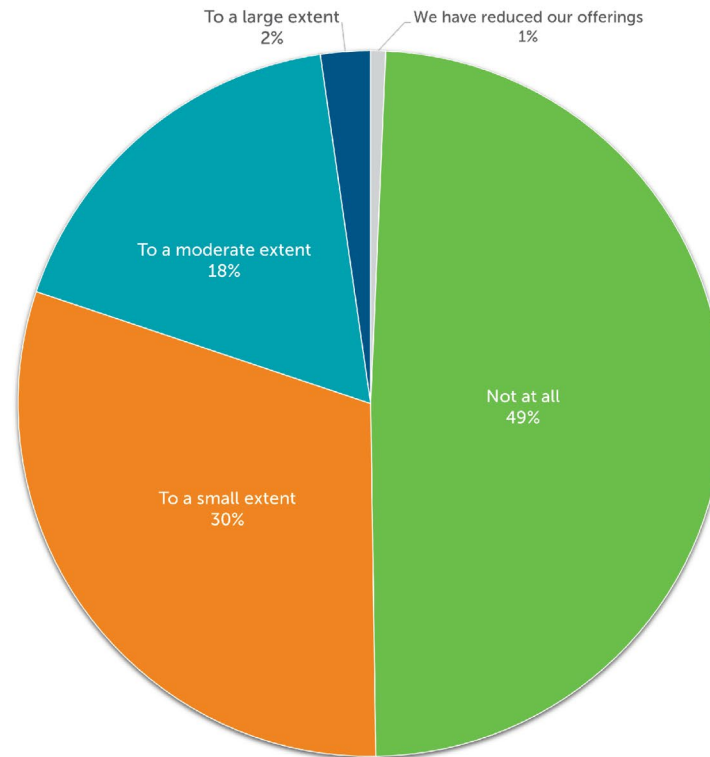
# The Littler Annual Employer Survey Report - 2023

In which of the following areas has your organization received increased requests for disability accommodations and/or leaves of absence since the start of 2022? (Select all that apply)



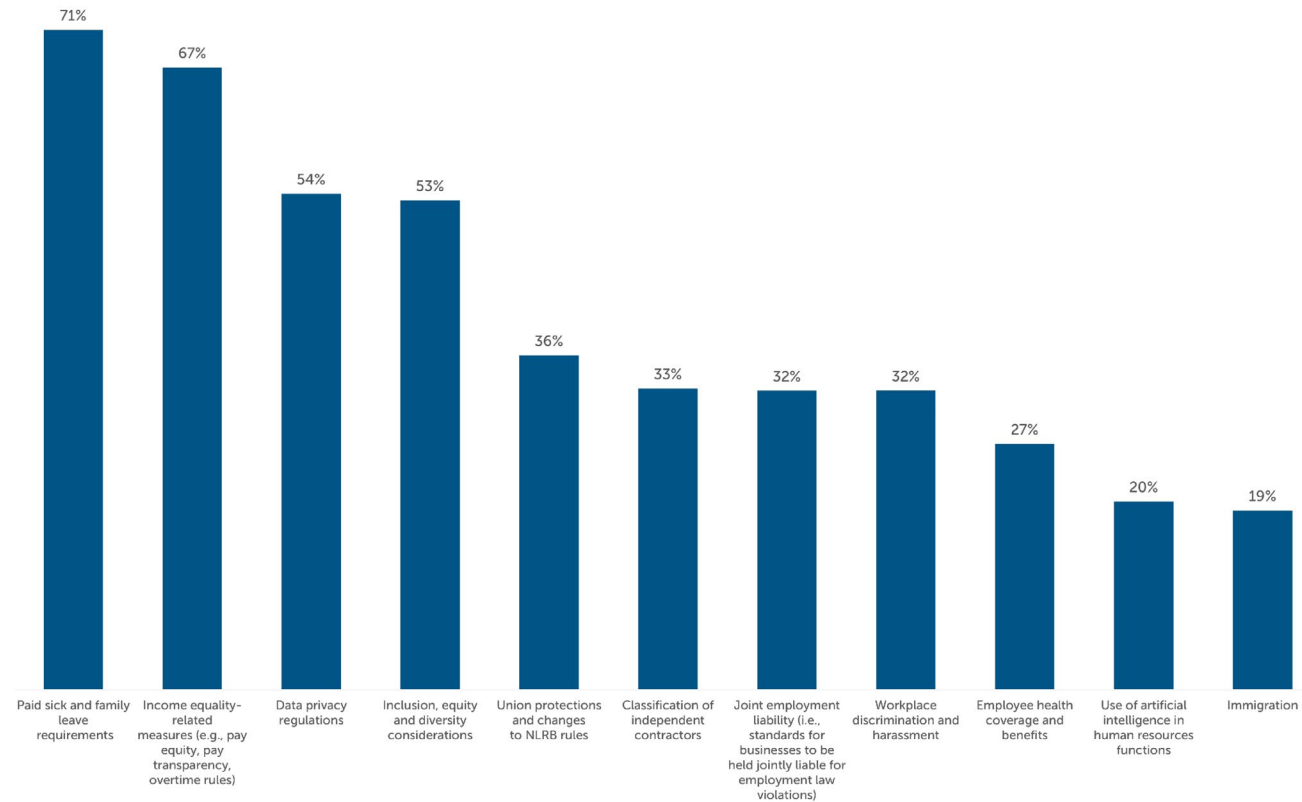
# The Littler Annual Employer Survey Report - 2023

To what extent has your organization expanded its policies for disability accommodations and/or employee leaves of absence since the start of the pandemic?



# The Littler Annual Employer Survey Report - 2023

In which of the following areas do you expect employment law-related changes that will impact your business over the next 12 months? (Select all that apply)



# Disability and Accommodations

- The ADA

- The term ‘disability means, with respect to an individual – a physical or mental impairment that substantially limits one or more major life activities of such individual.’ ”42 U.S.C. § 12102(1)(A). “For purposes of paragraph (1), major life activities include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.” *Id.* § 12102(2)(A).

# Proper Focus in ADA Not on “Disability”

- When an applicant or employee requests an accommodation, “the primary focus” should be on the interactive process and identifying a reasonable accommodation, not on “whether the individual meets the definition of disability” – that should be left to the legal department
  - EEOC specifically says that focus should be on whether the company: (1) has fulfilled its obligation to provide a reasonable accommodation and (2) met its responsibilities with respect to the “interactive process”





# Obligation to Make Reasonable Accommodation

- An employer must make reasonable accommodations to a qualified employee or applicant with a disability:
  - To enable the disabled employee or applicant to perform the essential functions of the job.
  - To enjoy equal benefits and privileges of employment.
- Analysis must be individualized and flexible. It is difficult to defend absolute rules that X is reasonable and Y is not in every circumstance.
- Unless doing so would cause an undue hardship.

# What is a “Reasonable Accommodation”?

- “Any change in the work environment or in the way things are customarily done that enables an individual with a disability to enjoy equal employment opportunities.”
- A reasonable accommodation “**removes workplace barriers** for individuals with disabilities”
  - Examples of barriers disabled individuals face:
    - **Physical obstacles**, such as inaccessible equipment and job location
    - **Modes of communication**, such as instructions in only written or oral form
    - **Procedures or rules** about how to perform work
- A modification or adjustment to the work environment satisfies the reasonable accommodation requirement so long as it is effective.
- When there are multiple effective accommodations, the **employer** may choose the accommodation it prefers.

# Consider: Undue Hardship

- Undue hardship - “an action requiring significant difficulty or expense” by the employer – i.e., unduly costly, extensive, substantial, disruptive, or would fundamentally change nature or operation.
  - Often very difficult for an employer of significant size or scale to establish, and inconvenience lands far from meeting this standard.
- Factors in determining include:
  - Nature and cost of the accommodation (note cost is hard to rely on for large organizations)
  - Overall financial resources
  - The effect on the employer’s expenses and resources, or other operational impact
  - The type of business, including the composition, structure and functions of the workforce



# The Interactive Process

# So, what do we do? ENGAGE!

- Once employee asks for a reasonable accommodation, or employer recognizes employee needs an accommodation but is unable to request one, employer is obligated to initiate an interactive process (i.e., you learn employee is missing work due to health issue or has obvious signs of impairment).
- Aimed at determining employee's limitations and ways of accommodating them.
- INTERACTIVE is the key – dialogue and exchange of ideas/proposals where possible.
- Documentation of the process is critical – (sometimes more than outcome).
- Bad faith/examples that could be found unlawful:
  - Unreasonable delay
  - “Take it or leave it”
  - Stonewalling
  - Not considering a proposed accommodation or exploring alternatives
  - No individualized inquiry/hard and fast rules

# Fact Gathering– Requesting Documentation

- Employer may require documentation from the employee’s healthcare provider about the accommodation request if:
  - The disability or need for accommodation is not obvious
  - The information provided is not sufficient to show the individual has a disability and needs a reasonable accommodation
  - The employer has “reasonable concerns” employee is not fit to perform essential functions
- Requests for documentation are limited to information relevant to (i) ability to perform job; or (ii) ability to work without posing a direct threat

# Fact Gathering– Medical Examination

- ADA Rules Regarding Medical Examinations or Inquiries:
  - For current employees, any mental health examination or inquiry must be both job-related and consistent with business necessity.
  - What’s “job-related and consistent with business necessity”?
    - When an employer has a reasonable belief, based on objective evidence, that: (1) an employee’s ability to perform essential job functions will be impaired by a medical condition; or (2) an employee will pose a direct threat due to a medical condition.

# Question for the Audience

- An employee contacts their manager and says they need to take a day off for a “mental health day.” The employee has sufficient sick leave to use for this day. How should the organization respond to this request?
  - Option A: approve the day off
  - Option B: require the person use PTO instead because this isn’t a proper use of “sick leave”
  - Option C: Deny the request
- Does your analysis change if the employee does ***not*** have any sick leave left in the bank?



# Drawing the Line Again – Reasonable or Not?

## Typically Reasonable

- Leaves of absence (including unpaid)
- Job restructuring/part-time or modified work schedules
- Making existing facilities accessible or acquiring or modifying equipment
- Providing qualified readers or interpreters
- Reassignment to a vacant position/transfer

## Typically Not Reasonable

- Indefinite leave
- A job with less stress
- Providing new manager or creating new job
- Bump another employee from their position
- Reduce conduct or performance expectations when the employee is at work
- Excuse misconduct, even if caused by the disability
- Reassign/eliminate essential job duties

# Reasonably Accommodating Mental Health Conditions

- Accommodations to Consider:
  - Altered work breaks & schedules
  - Physical changes to the workplace or equipment
  - Quiet office space or devices that create a quiet work environment
  - Changes in methods of supervision (e.g., form of communication, additional training, more/better feedback and guidance)
  - Specific shift assignments
  - Work from home
  - Changes to workplace policies, procedures, or practices
  - Providing additional time off or leave for rest or treatment

# Responding to Mental Health Accommodation Requests

- Every “request” for an accommodation based on medical conditions must be taken seriously
- Supervisors should never accept or reject an accommodation request
  - Supervisors should always partner with Human Resources, who will engage in the “interactive” process
  - Identify essential duties
  - Brainstorm solutions and alternatives
- Train supervisors not to express displeasure or skepticism with an accommodation request
  - What seems uncommon now could seem routine tomorrow (i.e., remote work)
  - No formal request or magic words needed

# FMLA Implications

- “An eligible employee may take FMLA leave for their own serious health condition, or to care for a spouse, child, or parent because of a serious health condition. ***A serious health condition can include a mental health condition.***”
- A serious health condition includes one requiring continuous treatment – i.e., inpatient treatment or chronic conditions
- Duty to notify employee of FMLA rights when employer knows of need for qualifying leave.



# Mental Health in the Legal Profession

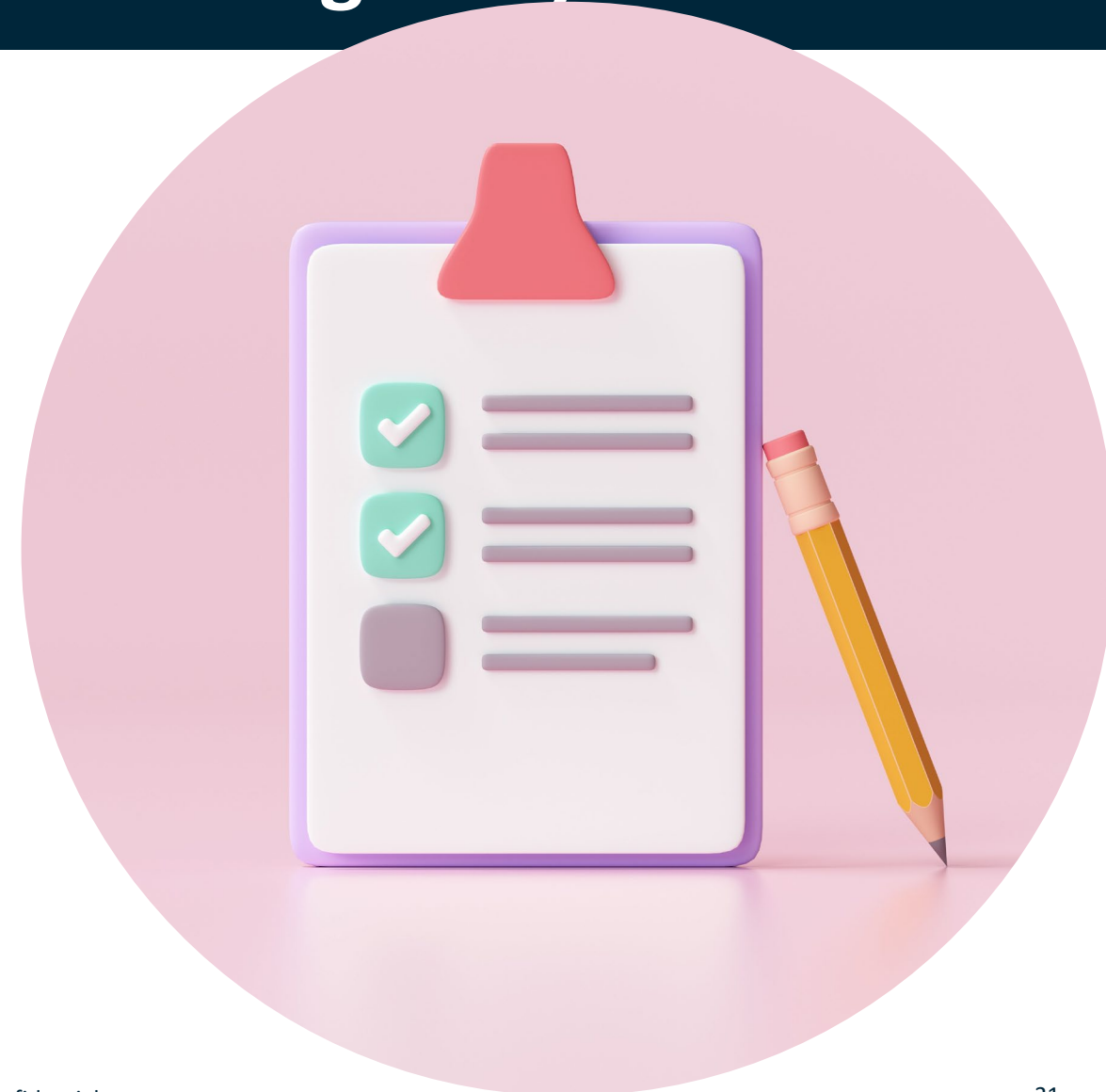
# Mental Wellbeing in the Legal Profession

- Studies by the ABA have found that lawyers have higher rates of substance abuse, depression, anxiety, and thoughts of suicide or self harm than the general public.
- Why?
  - Nature of the work is inherently stressful
  - Long hours can impact physical wellbeing
- Help isn't sought due to fear of stigma and traits common to lawyers such as perfectionism and need to feel in control.



# 2016 ABA Study Reveals Prevalence Of Mental Health Conditions And Neurodivergence Among Lawyers

- A sample of 12,825 licensed, employed attorneys completed surveys, assessing alcohol use, drug use, and symptoms of depression, anxiety, and stress
- Participants self-reported past mental health concerns over the course of their legal career
- The most common mental health conditions reported were:
  - anxiety (61.1%),
  - depression (45.7%)
  - social anxiety (16.1%)
  - ADHD (12.5%)
  - panic disorder (8.0%)
  - bipolar disorder (2.4%)



# Spotlight: ADHD Among Lawyers

- Study revealed that 12.5% of lawyers self-reported having ADHD
- National Institute of Mental Health estimates that between 4% to 8% of adults may have ADHD
- Takeaway: ADHD is much more prevalent among lawyers than the general population





# What Is ADHD?

- Brain-based, biological disorder which likely is genetic
- Irregularity of dopamine, a chemical that controls brain's ability to maintain regular and consistent attention
- ADHD has nothing to do with intellect
- ADHD and high intelligence are not mutually exclusive
- Attention “deficit” is a misnomer
  - People with ADHD have an abundance of attention – often fluctuating between periods of little to no productivity to periods of hyper-productivity
  - The challenge is controlling it, e.g., selecting the appropriate task to focus on

# What Are The Main Symptoms Of ADHD?

- Short attention span, especially for non-preferred tasks
- Hyperactivity, which may be physical, verbal, and/or emotional
- Impulsivity, which may manifest as recklessness
- Fidgeting or restlessness
- Disorganization and difficulty prioritizing tasks
- Poor time management and time blindness
- Frequent mood swings and emotional dysregulation
- Forgetfulness and poor working memory
- Trouble multitasking and executive dysfunction
- Inability to control anger or frustration
- Trouble completing tasks and frequent procrastination
- Distractibility
- Difficulty awaiting turn

## ***Three subtypes:***

- *Hyperactive*
- *Inattentive*
- *Combined subtypes*

Source: [Additudemag.com](http://Additudemag.com): *ADHD Symptoms Checklist: Signs of Hyperactive, Inattentive, Combined Subtypes*

# Reasons The Law May Attract Neurodivergent Individuals

- Perfectionism
- Intellectual stimulation
- Learning about different industries and jobs within them
- High stress environment
- Hyperfocus
- Structure of rules and procedures
- Word and logic problems
- Identifying patterns
- Issue-spotting
- Adversarial nature
- Anticipate the other side's arguments
- Playing devil's advocate
- Advocacy and defying the status quo

# Pregnancy & The Accommodations Process

- Pregnant Workers Fairness Act - June 2023
- Pregnancy is not, but can be, a disability
  - Physical disabilities
  - Mental disabilities – e.g., post-partum depression, post-partum anxiety
  - Requirements to go off other mental-health related medication during the pregnancy (e.g., medication for depression, ADHD, etc.)
- Still requires own accommodation analysis.
- Can follow same process as ADA
- Separately required to accommodate those who are similarly unable to work.

# PWFA – New Regulations issued

- EEOC issued Final Rule on April 15, 2024 – Expected effective date June 18, 2024
- Definition of applicability to “pregnancy, childbirth, and related conditions” is broad
  - includes current and past pregnancy, potential pregnancy, lactation (including breastfeeding and pumping), use of contraception, menstruation, infertility and fertility treatments, endometriosis, miscarriage, stillbirth, having or choosing not to have an abortion, among other conditions.
  - “related medical conditions” can be pre-existing conditions that are exacerbated by pregnancy or childbirth.
- As characterized by one dissenting EEOC Commissioner, this regulation “extends the new accommodation requirement to reach virtually every condition, circumstance, or procedure that relates to any aspect of the female reproductive system.”

# PWFA – New Regulations issued - Cont'd

- Broader applicability than the ADA
  - Does not need to be a severe condition! Modest, minor, or episodic conditions are covered. This is specifically designed to cover conditions that do NOT rise to the level of a disability under the ADA
  - Applies to people who *cannot* perform an essential function of the job for a temporary period, *if* the person is or is expected to be able to perform the essential function “in the near future,” *and* the inability to perform the essential function can be reasonably accommodated.
    - Most often applicable to the period of pregnancy, and so “in the near future” means “generally 40 weeks from the start of the temporary suspension of an essential function”
    - The 40-week definition of “in the near future” does *not* apply when the suspension of an essential function stems from childbirth or a related medical condition; instead, a case-by-case evaluation needs to be done, but cannot last indefinitely.
    - Does NOT include the time on post-partum leave in the calculus for any suspension of an essential duty
    - Employer’s ability to reasonably accommodate the person’s inability to perform the essential function must be reassessed when the employee returns to work from pregnancy or childbirth, regardless of whether the employer provided the same or a different accommodation either prior to or during the employee’s pregnancy.
    - Will not apply if the temporary suspension causes an undue hardship

# PWFA – New Regulations issued – Cont’d

- Interactive Process under the PWFA
  - Interactive process is supposed to be a “simple process” - The individual, or their representative, must only identify the relevant limitation and their need for an adjustment at work to trigger an employer’s obligation to engage in the interactive process.
  - The EEOC strongly encourages employers to respond quickly to accommodation requests given the temporary nature of pregnancy-related conditions, and while not required, also encourages employers to grant interim accommodations even if the employer believes it needs additional information.
  - The EEOC cautions that in many instances, the appropriate accommodation should be “obvious” to the employer and/or employee and that requiring an employee to take leave as an interim accommodation may violate the PWFA, depending on the circumstances.
  - Examples of accommodations include (but are not limited to) - Frequent breaks; Sitting/standing; Schedule changes, part-time work, and paid and unpaid leave; Telework or remote work; Reserved parking; Light duty; Making existing facilities accessible or modifying work environment; Job restructuring; Temporarily suspending one or more essential functions; Acquiring or modifying equipment, uniforms or devices; Adjusting or modifying examinations or policies.
- List of four “de facto” reasonable accommodations: allowing employee (1) to carry or keep water and drink, as needed, in or nearby the employee’s work area; (2) to take additional restroom breaks, as needed; (3) when work requires standing to sit, and vice versa, as needed; (4) to take breaks, as needed, to eat and drink.

# PWFA – New Regulations issued – Cont’d

- Includes several blanket prohibitions:
  - Employer CANNOT ask for supporting documentation: (1) when the limitation and need for a reasonable accommodation is obvious; (2) when the employer already has sufficient information to support a known limitation related to pregnancy; (3) when the request is for one of the four “predictable assessment” accommodations; (4) when the request is for a lactation accommodation (unless the request is full-time remote work); and (5) when employees without known limitations under the PWFA receive the requested modification under the employer’s policy or practice without submitting supporting documentation. In such circumstances, an employee’s self-confirmation is the only thing an employer may seek.
  - Employers MAY NOT request or require an employee to be examined by a healthcare provider of the employer’s choosing.
  - Five prohibited practices under the PWFA: (1) failure to provide reasonable accommodations; (2) requiring an employee or applicant to accept an accommodation; (3) denying equal employment opportunities; (4) requiring the employee to take leave when other accommodations are available; and (5) taking adverse action against a worker for seeking or using a reasonable accommodation.



# Question for the Audience

- An employee is disciplined for poor performance. In response, he says “it’s because I have depression and I can’t concentrate with all these distractions.”
  - Is this an accommodation request?

# Religious Accommodations post *Groff*

- *Groff v. Dejoy* (U.S. Sup. Ct., June 29, 2023): Key decision regarding religious accommodation under Title VII
- Ruling upended nearly 50 years of precedent by “clarifying” the undue hardship standard in religious accommodation claims under Title VII.
- Dismantled “de minimis” framework from S.Ct. decision in *Trans World Airlines v Hardison*, 432 U.S. 63 (1977) and created a new, and much higher, standard.
- Requires employers in assessing religious accommodations requests to deny such requests only if there is evidence that providing the accommodation would result in “substantial increased cost in relation to the conduct of [an employer’s] particular business.”
- This will required case-by-case factual analysis in dealing with reasonable accommodation requests, creating challenges for employers moving forward
- Courts “must apply the test in a manner that takes into account al relevant factors in the case at hand, including the particular accommodations at issue and their practical impact in light of the nature, “size and operating costs of [an] employer.”
- Must at a minimum determine how other employees are impacted, how that impact affects the “conduct of its business,” and whether such impact constitutes a “substantial increased cost.” At present, best option , if not granting the employee request, is to at least consider offering some type of accommodation, even if it is not what the employee requested.

# Question for the Audience

- Under which of the following scenarios can you require the employee to undergo a fitness for duty examination?
  - During her job interview, you provide Ann with the essential functions of the job, including the requirement that employees work mandatory overtime. Ann tells you that she can perform those functions without issue. You hire Ann. During her second week on the job, Ann presents you with a doctor's note indicating that, due to her depression, she cannot work overtime.
  - Paul has just returned from medical leave following back surgery. His healthcare provider released him without any restrictions. Paul's job requires that he regularly and repeatedly lift boxes weighing anywhere from 10 to 50 pounds. Paul's supervisor notices that he is unable to lift the boxes and has asked his co-workers to do so. Paul insists he is fine and that he does not need any accommodations.
  - Peter is a long-tenured employee with no prior performance or disciplinary issues. Over the past two weeks, three employees report to you that Peter is acting "weird." He claims that he is having difficulty sleeping, that people are spying on him on his way to work and that he thinks his manager is "out to get him."

# Case Study #1

- District manager of fast-food chain has severe stress and anxiety
- Physician-ordered Restrictions: 40-hour workweek; no weekend work
- Normally, managers are expected to work 40+ hours/week, the time needed to get the job done
  - **What issue(s) are presented here?**
  - **How do we respond?**

# Case Study #2

- Sam has worked for the company as an administrative assistant to Joe, the leader, for 17 years. Last year, Joe retired. Sam began reporting to a new leader. The new leader has much higher expectations for his employees than Joe had.
- Sam notifies you that he suffers from depression which has been aggravated by repeated criticisms from his new leader. He requests a leave of absence, which is granted.
- Upon his return, he requests an accommodation of no contact whatsoever with the new leader
  - **Do we need to accommodate Sam?**
  - **Other options/discussions with Sam?**

# Case Study #3

- Johnny, a retail associate with a checkered performance history, calls in sick on Mondays and Fridays, and in conjunction with regular days off.
- He recently came to his manager asking for a reduced schedule to come in late because of ongoing sleep issues. Often has trouble getting to work on time as a result.
- He wants to work an adjusted schedule
  - **Do we need to accommodate Johnny?**

# KEY TAKEAWAYS



# If You Remember Anything

- Mental health issues are major challenge for employers in ADA compliance and accommodation.
- Need to be flexible and consider new ways of accommodation.
- Be careful of unlawful perceptions, and look at objective, reliable evidence.
- Interactive dialogue and process is crucial.
- Interactive process for accommodating mental health just as important as process for accommodating physical conditions.
- Compliance success and focusing on work environment that addresses mental health concerns results in better employee retention, morale, and other benefits.

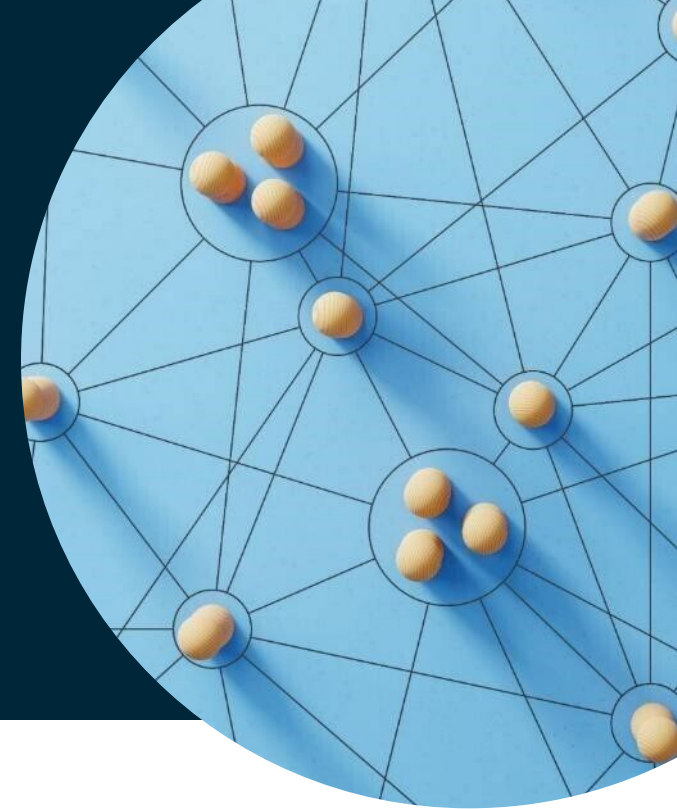




# Questions?

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# Thank You

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