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gtlaw.com

http://immigration.gtlaw.com

gtabogados.com

info@gtlaw.com

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GT Immigration Newsletter

GT Business Immigration News

We at Greenberg Traurig join the rest of the world in expressing our deepest sympathies to the families and loved ones of the victims of the tragic events of September 11, 2001. As we pull together as a nation to rescue and heal each other and to find the perpetrators, we may feel a backlash against immigrants and those foreign born living in our country. As proud Americans we need to stand against the potential for retribution against minorities in the U.S. America is a nation of immigrants – loyal people committed to the rights and freedoms we all value and cherish. We cannot lose sight of this during these challenging times. There is much discussion in the media at this time concerning proposed changes to the procedures of the government agencies charged with regulation of air travel and immigration. At this time, no formal policy changes have been announced by the U.S. Immigration and Naturalization Service nor the U.S. State Department with regard to the processing of immigrant and nonimmigrant visas or restrictions to admission to the U.S. However, as a precautionary measure, many U.S. Embassies and Consulates abroad and many INS District offices in the U.S. have been closed temporarily, and at this time there is no indication of when they will be re-opened. Others have had to reduce services temporarily. If you are planning to apply for a visa abroad or if you have an interview scheduled at an INS District Office, we strongly advise you to contact your immigration attorney in order to receive the latest information and assistance with the process.

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ALERT breaking news

NEWS FLASH – NEWS FLASH – NEWS FLASH – NEWS FLASH

It is once again time for the INS's annual end of fiscal year internal audit. The INS has announced that this year there will be a national, inter-office file freeze beginning on September 21 and an intra-office freeze beginning on September 28. The audit period is from October 1 to October 5. Files will be frozen at each location until the auditors inform the Service-wide Inventory Coordinator that the freeze can be lifted and he gives the approval to do so.

The INS has indicated that it will not halt adjudication of cases during this two week period. However, case processing will be delayed by the diversion of resources and the restriction on file movement. If you have concerns about any pending immigration matters which could potentially be impacted, please contact your immigration attorney.

FEATURED IN THIS NEWSLETTER:

Practice Areas:

- Access to Capital Markets and Venture Capital
- Alternative Dispute Resolution and Mediation
- Americans with Disabilities Act
- Antitrust and Trade Regulation
- Appellate Counseling and Appeals
- Aviation
- Business Immigration
- Commercial Litigation
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- Telecommunications
- Wealth Preservation

Immigration news

MEXICO'S PRESIDENTIAL VISIT SHINES SPOTLIGHT ON IMMIGRATION

On President Fox's recent U.S. trip, he made several high-profile statements expressing his hopes that the U.S. would create a program to "legalize" the status of several million undocumented Mexicans currently living in the U.S. and create a "guest worker" program to allow for temporary workers in agriculture and other service industries.

Creation of a "guest worker" program to meet the U.S. economy's need for "essential" workers has been the goal of The Essential Worker Immigration Coalition ("EWIC"). EWIC is a coalition of businesses, trade associations, and other organizations in the U.S. which was formed to address concerns about the shortage of semi-skilled and unskilled labor ("essential workers") in the U.S. economy.

The Bureau of Labor Statistics projections predict that by 2008 the U.S. will have 161 million jobs but only 154 million in the workforce. Companies are currently aggressively recruiting U.S. workers through programs such as welfare-to-work, school-to-work, and retraining programs, but it is not enough. U.S. businesses are already curtailing expansion plans because of a lack of available, qualified workers.

As President Vicente Fox pointed out on several occasions during his U.S. visit, due to economic conditions, Mexican workers are going to keep coming to the U.S. to fill semi-skilled and unskilled worker positions. Creation of a guest worker program would help regulate the flow of people across the border, would allow U.S. companies to continue to expand without worry of hiring undocumented workers, and would also allow the U.S. government to maximize income tax revenue from individuals employed in the U.S.

Laura Reiff, a Shareholder in the Business Immigration Group at Greenberg Traurig and a Co-Chair of EWIC, recently spoke as a panel member at the Greenberg Traurig sponsored " Americas Conference" held in September in Miami, Florida. As a panel speaker, Ms. Reiff highlighted the importance of creating a program for essential workers which would strengthen both the U.S. and Mexican economy and help regulate the flow of people across the U.S./ Mexico border. President Fox was one of the keynote speakers at this prestigious event. In his address, President Fox spoke eloquently on the need to create a program for essential workers in the U.S. He pointed out that this type of program would assist in both strengthening the economy of both countries and in creating a relationship of trust between the two countries which would serve as a springboard for solving many trans-border issues.

Immigration news

SIGNFICANT CHANGES TO H-1B PROGRAM

In the past year there have been significant changes to the H-1B visa program. The highlights are:

The Department of Labor published Interim Final H-1B Regulations which became effective on January 19, 2000. These are complex, detailed regulations, but the most important aspects are:

- Created and defined "H-1B Dependent Employers" and subjected these employers to additional attestation requirements.
- Defined willful violators of the H-1B program.
- Added to the list of documents required to be kept by an employer in the Public Access File.

On October 17, 2000, President Clinton signed into law the "American Competitiveness in the Twenty-First Century Act" ("AC21"). There were many changes to the H-1B program brought about by passage of this legislation, but the most salient are:

- Increases in the H-1B fiscal year cap for FY 2001-2003. For this period, the annual number of H-1Bs available increases from 65,000 to 195,000. In FY 2004, the cap decreases back to 65,000.
- Provides for extensions beyond the maximum six year period of authorized stay in certain instances of lengthy adjudication of permanent residence cases.
- Allows for "portability" of H-1Bs by allowing an employee in valid H-1B status to commence working for a new employer in the U.S. as soon as the new employer has filed a nonfrivolous H-1B petition on behalf of the employee and that petition has been received by the INS.
- Allows for "portability" of adjustment of status applications by allowing an individual whose adjustment of status has been pending for 180 days or more to change employers without jeopardizing his adjustment of status application as long as the new position is in the same or a similar occupation.

On October 17, the H-1B Treasury fee was increased by legislation from $500 to $1,000. As with the original $500 fee, the employer cannot require the foreign national employee to pay any part of this fee.

On October 30, 2000, Public Law 106-396 became effective. This legislation states that amended H-1B petitions do not have to be filed for employees if the employer is involved in corporate restructuring where: 1) the new corporate entity succeeds to the interests and obligations of the original petitioning employer and 2) the terms and conditions of employment remain the same, but for the identity of the employer.

Immigration news

PREMIUM PROCESSING BEGINS AT INS

The INS implemented the first stage of its Premium Processing Service on June 1,2001. Under Premium Processing, U.S. businesses can take advantage of faster processing times by completion of a Form I-907 (Request for Premium Processing Service) and payment of a $1,000 Premium Processing Fee. This Fee must be paid by separate check and cannot be combined in a check for payment of other filing fees.

Under its Premium Processing Service, the INS guarantees that within 15 calendar days, the agency will issue either an approval notice, a notice of intent to deny, a request for evidence or a notice of investigation for fraud or misrepresentation. This expedited service was initially only available to petitioners in the following categories:

- E-1, Treaty Trader; E-2, Treaty Investor;
- H-2A, Agricultural Worker;
- H-2B Temporary Worker;
- H-3 Trainee;
- L-1 Intracompany Transferees;
- O-1 and O-2 Aliens of Extraordinary Ability or Achievement;
- P-1, P-2, and P-3 Athletes and Entertainers;
- Q-1, International Cultural Exchange Aliens.

On July 30, 2001, the INS added the following categories to those eligible for the Premium Processing Service:

- H-1B Temporary Workers in Specialty Occupations;
- R-1 Temporary Workers in Religions Occupations;
- TN, NAFTA Professionals.

It is possible to request Premium Processing Service for a pending case filed before implementation of the Premium Processing Service. To do so, the employer must file the $1,000 filing fee along with a new Form G-28, Form I-907 and a copy of the INS receipt notice, or a copy of a Federal Express or Express Mail receipt.

Immigration news

OVERSEAS TRANSFERS OF U.S. PERMANENT RESIDENTS

With the downturn in the economy, multinational companies are restructuring to maximize efficiency and to maintain their best and brightest employees. In some cases, companies will reassign essential personnel to subsidiaries outside the United States as part of their reorganization strategy. Transferees who are lawful permanent residents should take precautionary measures to avoid their losing permanent resident status in the United States due to a lengthy absence.

An overseas assignment raises multiple issues for companies and their employees who have obtained permanent residence.[1] First, when the employee is abroad for more than one year, an issue can arise concerning the validity of the alien registration card (i.e. "green card" or Form I-551) . Second, permanent resident status may be "lost" if it is deemed abandoned by the Immigration & Naturalization Service (INS). As explained below, obtaining an INS issued Reentry Permit will help permanent residents avoid both problems.

Permanent residents may travel to and be employed in the United States by presenting their alien registration card, also known as a "green card." It is valid as a travel document for absences of up to one year. This means that permanent residents who plan to be outside the United States for periods greater than one year should apply for a Reentry Permit prior to their departure. This permit, in essence, extends the validity of the green card as a travel document for two years, instead of one year. The Reentry Permit cannot be extended beyond two years if an individual continues to be absent from the United States. However, a permanent resident may return to the United States and file another Reentry Permit application near the end of the two years abroad. Although a permanent resident must be physically present in the United States at the time of filing the Reentry Permit application, the INS will forward it to a foreign address.

There is no limit to the number of Reentry Permits a permanent resident can have. However, the regulations state that individuals who have been out of the U.S. for four years in the aggregate within the past five years, or since becoming an LPR, may be issued Reentry Permits with one-year validity instead of two-year. The INS has authority to deny applications in the exercise of discretion. If an individual is outside the United States over many years, except for short periods of time during which s/he applies for a Reentry Permit, the INS could deny the application based on the fact that the applicant has abandoned his or her permanent residence.

A permanent resident must also maintain ties to the United States or else risk an INS allegation of abandonment of permanent resident status. Significantly, permanent residents returning after an absence of six (6) months or more are treated as "applicants for admission," and thus, if an INS inspector at entry challenges their admissibility or makes an allegation of abandonment, these individuals might not be permitted entry and would not be entitled to a hearing before an Immigration Judge. Therefore, it is essential that employees maintain careful records of their ties to the United States, including for example:

1. evidence of filing U.S. tax returns (not as a "non-resident alien");
2. evidence of real estate and/or personal property in the U.S.;
3. U.S. bank accounts, credit cards, and on-going financial obligations;
4. membership in U.S. clubs, professional organizations;
5. evidence of continued employment with a U.S. employer, or a U.S. subsidiary or affiliate;
6. evidence of family ties to the U.S.; and
7. obtaining a Reentry Permit.

Maintaining such evidence is critical in view of the INS presumption that residency has been abandoned when a permanent resident is out of the U.S. continuously for more than one year. Notably, however, abandonment may occur even in the case of an absence of less than one year, or in rare circumstances, of less than six months.

Given the lengthy processing delays that applicants for permanent residence endure, they and their employers are well served by applying for a Reentry Permit prior to departure. By applying for and obtaining a Reentry Permit and maintaining ties to the United States, permanent residents on assignment overseas have taken the necessary precautions to preserve their status and the validity of their travel documents.

[1] This article addresses residence requirements to maintain permanent resident status. The residence requirements necessary to establish eligibility for citizenship are different.

Immigration news

NEW DOL REGULATIONS ADD FLEXIBILITY TO LABOR CERTIFICATION PROCESS

The Department of Labor has finally published its long-awaited regulations governing changes to the permanent alien employment certification program, commonly known as the labor certification program. Up until the publication of these regulations, an employer was required to select one method for filing a labor certification application and the employer was not allowed to change filing methods at any time in the process without having to withdraw the initial application, and losing the priority date.

Traditionally, when a labor certification application was filed at the state's employment agency, the company would then wait for the Department of Labor ("DOL") to direct the advertising to be done for the case, which included specific instructions on the text and placement of the ad and specific direction on which applicants had to be interviewed. The traditional method gave the company very little control over the process and took anywhere from one and a half years to three years, depending on the state in which it is filed.

In recognition of the lengthy adjudication times, the DOL created an additional filing option known as Reduction in Recruitment ("RIR"). This option was designed to streamline the process for employers who could demonstrate that they had engaged in a "pattern of recruitment" for the position in the previous six months. On average, adjudication of an RIR application takes only about six months, depending on which state the position is in.

The DOL's final rule, published on August 3, 2001, allows an employer to file a case under the traditional method, and then later select to "convert" the case to an RIR application, *without losing the priority date from the initial application*, by filing evidence of the "pattern of recruitment" in the six month period prior to the request for conversion. However, in order to qualify for the conversion option, the initial labor certification application must have been filed on or before August 3, 2001, and the request for conversion must occur before the state employment agency has placed a job order in order to commence the directed advertising.

Immigration news

NEW VISA CATEGORIES CREATED TO PROMOTE FAMILY UNITY

The "V" visa

Congress created this category to attempt to alleviate some of the hardships created by the lengthy backlogs in immigrant visa processing. The "V" visa category allows for the admission of spouses and unmarried minor children of permanent residents. It also provides for employment authorization for those individuals, and also waives certain grounds of inadmissibility. Moreover, the new law allows eligible individuals already in the U.S. to obtain V visa status, even though they may be present unlawfully. Applicants should be aware, however, that certain grounds of inadmissibility may apply in the context of an application for lawful permanent resident status, and they should consult an attorney if they have been present unlawfully for any time in the U.S., prior to applying for a V visa.

To qualify for a "V" visa, the foreign national must:

- Be a spouse or unmarried child under 21 of a lawful permanent resident
- Be the beneficiary of a petition filed before December 21, 2000 in the family-sponsored 2A immigrant visa category
- Have been waiting for at least three years. This mandatory three-year waiting period can be met several ways:
  - If an individual's petition for immigrant visa classification has been pending for three years or more, the requirement is met.
  - If an immigrant visa petition has been approved, and three years have elapsed since that date, and either 1) an immigrant visa is not immediately available to the alien because of backlogs in the family 2A priority date, or 2) the foreign national's application for an immigrant visa or for adjustment of status remains pending, then the requirement is met.

The K3/K4 Visa Category

The K3 and K4 visas are additions to the K visa category. Previously, K visas were available only to fiance(e)s of U.S. citizens. The K3 and K4 visas will help eliminate the burden frequently placed on families separated by lengthy processing times for immigrant visas at U.S. Embassies and Consulates. The new K3 visa is for the spouse of a U.S. citizen who is waiting abroad for an immigrant visa, and the K4 category includes the spouse's children. This new category allows foreign nationals to enter the U.S. as non-immigrants, re-unite with their families in the U.S., and then apply for immigrant status while in the country. Employment authorization is also available with K3 and K4 visas. Unlike the V visa, K3 and K4 visas may be obtained only through a U.S. Consulate. Furthermore, the new K status is available to aliens who are the beneficiaries of immigrant petitions filed at any time.

In order to be eligible for a K3 visa, a foreign national must:

- Be the spouse of a U.S. citizen
- Have a pending Form I-130 (Petition for Alien Relative)
- Have a Form I-129F (Petition for Alien Fiance(e)) filed at the INS
- Submit a completed form I-693 (Medical Examination) when he/she applies at the consulate for the K-3 visa

In order to be eligible for a K4 visa, a foreign national must:

- Be an unmarried child (under 21 years of age) of a K-3 visa applicant or holder
- Submit a completed Form I-693 (Medical Examination) when he/she applies at the consulate for the K-4 visa

Immigration news

HOUSE PASSES BILL TO PROVIDE WORK AUTHORIZATION TO SPOUSES OF INTERNATIONAL TRANSFEREES

On September 5, 2001, the U.S. House of Representatives passed H.R. 2277 and H.R. 2278, which would provide work authorization for spouses of international transferees in the U.S. in L and E visa status. The legislation would also reduce the one year pre-employment requirement for the L visa category to a six-month period.

IMMIGRATION DUE DILIGENCE CHECKLIST FOR CORPORATE RESTRUCTURING

Human resource managers and corporate legal counsel are often called upon to evaluate the immigration consequences of mergers, acquisitions and other corporate changes. When such concerns arise, it is crucial to involve immigration professionals from the beginning, since immigration issues are an important part of the due diligence necessary for any corporate restructuring. For that reason, before any corporate change occurs, the successor employer should take the following steps to ensure full compliance with immigration laws:

First, the acquiring company should carefully review and evaluate the target company's current compliance procedures and verification systems under the Immigration Reform and Control Act of 1986 ("IRCA").

More specifically, the successor company should determine whether the company to be acquired: (i) has a standard, written IRCA compliance policy that is followed by all managers with hiring authority; and (ii) has appointed someone in charge of the centralized oversight of the compliance program. If the acquired company does not have a formal IRCA compliance or program, the acquiring company should conduct an in-depth review of the acquired company's immigration practices and assess the potential liability that could result from IRCA violations.

Second, the successor organization should review any previous I-9 audit reports or IRCA citations and then conduct its own audit of the merged, acquired, or reorganized entity's I-9 records.

IRCA prohibits an employer from hiring aliens who cannot present documentation evidencing their employment eligibility in the U.S. In order to facilitate a corporation's compliance, IRCA imposes a variety of paperwork requirements on employers. Specifically, the regulations require that within three days of hire, an employer must attest, on INS Form I-9, under penalty of perjury, that it has been presented with and has reviewed facially valid documents evidencing both the person's identity and employment eligibility. Substantial fines can be imposed if these requirements are violated, even if only technical violations are at issue. Moreover, in cases of a merger or acquisition, the new, resulting employer is responsible for the adequacy of the I-9 records maintained by the predecessor employer.

In cases where prior staff is retained by a related, merged, successor or reorganized employer, for purposes of I-9 compliance, the successor company is usually not deemed to have "hired" the employees if they "continue in employment."[1] Consequently, a new I-9 would not, typically, be required of these employees. The same can be said within the context of stock or asset acquisitions, because the INS regulations dealing with successor or related entities relieve the acquiring company of the burden of doing I-9 reverification. However, the same provision does not exonerate the acquiring company, if, in the course of its due diligence, it discovers that the acquired entity had been employing people without valid work authorization. As a result, we strongly advise that acquiring companies audit the I-9 records of companies they have acquired. (continued on next page)

CORPORATE RESTRUCTURING (CONTINUED FROM PREVIOUS PAGE)

We also recommend that the new employer complete the following steps when conducting a new I-9 audit. First, one should prepare a list of all employees hired since November 6, 1986, to include the date of hiring and termination. Second, the new employer should check the adequacy of all I-9 records by verifying current employees. Third, the employer should establish a procedure to re-verify employees with time-limited employment authorization. Since it is important that the acquiring company re-verify all of its I-9s, as opposed to selectively choosing among them, it should discontinue any verification procedures that might appear to be discriminatory based on national origin. Finally, it should take all necessary corrective actions initialing and dating any corrections.

If re-verification is not feasible, the acquiring company should include an Indemnity Clause in the Acquisition Agreement, which would cover some of its potential exposure to liability. In the Indemnity Clause, the acquiring company should first carefully eliminate its potential liability for defective I-9s and other violations, and second, provide within the Agreement that the owners of the acquired company will indemnify the acquiring company for IRCA-related violations that are inherited from the acquired company.

Rather than going through the re-verification process, the acquiring company may want to use the acquisition as an opportunity to prepare *new* I-9s for all of the acquired company's payroll to avoid liability. In such instances, so long as the acquiring company has prepared new I-9s with their employees; avoided procedures that could be considered discriminatory; and terminated or refused to hire the people who are without proper documentation, the acquiring company can start with a "clean slate." However, the acquiring company should be prepared to lose the services of any unauthorized workers who might be "grandfathered" (per 1986 hires) in under the acquired company because when it elects to do new I-9s, the new company shall be deemed to be hiring those workers anew. This change breaks the continuity of employment that is required in order to maintain their grandfathered status.

Third, the new corporation should review the acquired company's Employment Application Form to determine whether or not the anti-discrimination provisions of the immigration laws have been met.

IRCA protects all citizens and work-authorized aliens from national origin discrimination and "document abuse." The successor employer may be subject to stiff penalties from the acquired company's unfair immigration-related employment practices and therefore should take every step possible to prevent such violations.

Finally, it should review other personnel files with regard to its nonimmigrant and foreign national employees in the process of pursuing U.S. permanent residence.

With respect to work-authorized nonimmigrants, changes in the corporate ownership structure of a U.S. employer may have an impact on the visa status of a new company's nonimmigrant workers — particularly if those changes result in the creation of a new legal entity and require a new IRS-assigned Tax Identification Number. As a result, the successor employer should be sure to assess the impact with its immigration counsel on a case-by-case basis.

More specifically, the successor employer needs to review the acquired employer's valid nonimmigrant petitions and determine whether amended nonimmigrant petitions are required. The immigration status of aliens temporarily working for the acquired company will usually <u>not</u> carry over to the new employer, and employing of these individuals without first obtaining new immigration status' for them may violate IRCA rules.

Furthermore, with respect to aliens in the process of pursuing U.S. permanent residence, the acquiring company should first, review the records of previous and pending immigrant petitions and labor certification applications. After this review, the employer should be careful to determine whether or not to continue to pursue U.S. permanent residence on behalf of those foreign employees. Finally, the new employer should file the appropriate, *amended* immigrant petitions and filings for pending labor certification applications, if necessary.

Similar steps must be taken in the case of divestitures. In such cases, to improve its bargaining position with the buyer, the seller should audit and correct its existing I-9s before divestiture. Nevertheless, it is possible that once divestiture is complete, the seller may want to formally withdraw its support of the nonimmigrant petitions, labor certification applications, and immigrant petitions for the employees of the divested company.

Given these complex employment considerations, it is wise corporate policy to make immigration issues a part of the due diligence checklist prior to the completion of any corporate merger, acquisition or divestiture. In fact, failure to take necessary corrective actions can result in severe consequences. Such risks include, though are not limited to: (i) the potential revocation of nonimmigrant petitions by the INS; (ii) being charged with violations of the nonimmigrant status of an alien; (iii) being charged with, and penalized for, violations of IRCA; and (iv) (in some cases) the employer's debarment from filing employment-based immigrant and nonimmigrant petitions for at least one year. Consequently, in order to best protect the interests of the emerging corporation, human resources managers and corporate counsel should consult with their immigration counsel to evaluate the potential immigration consequences of any proposed merger, acquisition or divestiture before its completion.

[1] I-9 regulations define employees to be "continuing in employment" where they have a *reasonable* expectation that such employment would continue.

Immigration news

Please contact one of the following attorneys for more details:

James Alexander 617.310.6031	Boston alexanderj@gtlaw.com	**Mary Pivec** 202.452.4883	Washington pivecm@gtlaw.com
Mahsa Aliaskari 703.749.1385	Tysons Corner aliaskarim@gtlaw.com	**Laura Foote Reiff** 703.749.1372	Tysons Corner reiffl@gtlaw.com
Efrain Brito 703.749.1300	Tysons Corner britoe@gtlaw.com	**John Scalia** 703.749.1380	Tysons Corner scaliaj@gtlaw.com
Kristina Carty-Pratt 703.749.1345	Tysons Corner prattk@gtlaw.com	**Elliot Scherker** 305.579.0579	Miami scherkere@gtlaw.com
Craig A. Etter 703.749.1315	Tysons Corner etterc@gtlaw.com	**Martha Schoonover** 703.749.1374	Tysons Corner schoonovermgtlaw.com
Marti Hyland 703.749.1386	Tysons Corner hylandm@gtlaw.com	**Brenda Supple** 305.579.0734	Miami suppleb@gtlaw.com
Oscar Levin 305.579.0880	Miami levino@gtlaw.com	**Cora Tekach** 703.749.1391	Tysons Corner tekachc@gtlaw.com
Elizabeth Lewis 703.749.1321	Tysons Corner lewise@gtlaw.com	**Shana Tesler** 202.331.3144	Washington, D.C. teslers@gtlaw.com
Dawn Lurie 703.903.7527	Tysons Corner luried@gtlaw.com	**Carol Williams** 703.749.1376	Tysons Corner williamsc@gtlaw.com
Elissa McGovern 703.749.1343	Tysons Corner mcgoverne@gtlaw.com		