JONES WALKER

E*ZINES
February 2003 Vol. 6

Environmental and Toxic Torts
www.joneswalker.com
environment@joneswalker.com

CHANGES EXPECTED IN ENVIRONMENTAL ENFORCEMENT IN LOUISIANA

Expect changes, some significant, in the way Louisiana enforces environmental laws and regulations. Also, expect those changes imminently!

EPA plans to open up a new criminal investigation office in New Orleans, a move that will effectively double EPA's criminal investigation strength in Louisiana. EPA is expected to make an official announcement soon. EPA currently operates an office in Baton Rouge staffed by four agents and an attorney dedicated to that office. The Baton Rouge office currently reports to EPA's criminal investigation office in Houston. Reportedly, EPA intends to expand its field offices to include New Orleans, adding four agents to staff the new office. The Baton Rouge and New Orleans offices would coordinate with one another to cover all of Louisiana and possibly Arkansas.

EPA criminal investigators in Louisiana will also be working with specially-assigned troopers from the Louisiana State Police as well as FBI agents and assistant U.S. attorneys. This coordination of efforts in Louisiana among federal and state law enforcement personnel is intended to build upon the expertise of the various agencies involved to combat environmental crimes.

It is also reported that the expanded staff will coordinate investigations involving homeland security. Environmental criminal agents may be assigned to investigate actual or potential threats to industrial facilities that may have environmental repercussions.

Meanwhile, LDEQ is under increased scrutiny by the U.S. EPA to beef up its enforcement efforts – to use more "stick" than "carrot" in its approach to enforcement. This results from two reviews of environmental enforcement in Louisiana, which cast both the state and federal environmental agencies in a poor light. First, the Louisiana Legislative Auditor panned LDEQ last year, claiming LDEQ failed to complete enforcement actions timely or collect the penalties it assessed. Second, the EPA Inspector General reported that EPA Region 6 failed to oversee adequately LDEQ's enforcement program. Consequently, EPA has demanded that Louisiana modify its enforcement approach or face the possibility of having its delegated environmental programs, particularly under the Clean Water Act, pulled. Louisiana reportedly has until the end of March 2003 to implement recom-

JONES WALKER

E*ZINES
February 2003 Vol. 6

Environmental and Toxic Torts
www.joneswalker.com
environment@joneswalker.com

mended changes to its enforcement program or risk losing its enforcement programs.

Given the increased focus on environmental enforcement in Louisiana -- both civil and criminal -- the regulated community is well-advised to consult with counsel and assess its compliance status.

By Michael A. Chernekoff

HIGH COURT UPHOLDS CLEAN WATER ACT REGULATION OF FARM ACTIVITIES

Borden Ranch Partnership v. U. S. Army Corps of Engineers, 2001 WL 914217 (9th Cir. 2001)

In a split decision issued without opinion, the U.S. Supreme Court affirmed the Ninth Circuit's decision that a landowner's use of a deep ripping procedure in protected wetlands constituted 358 separate violations of the Clean Water Act. The Court also affirmed the assessment of a $1,500,000 penalty against the landowner.

The landowner sought to convert his 8,400 acre ranch that contained vernal pools, swales and intermittent drainages into vineyards and orchards that could later be subdivided into smaller parcels for sale. As such, he needed to penetrate the pan of clay soil to accommodate the deep root systems of the vineyards and orchards he intended to plant.

Deep ripping entails dragging four to seven foot long metal prongs through the soil behind a tractor or bulldozer. The ripper gouges through the restrictive layer and disgorges soil that is dragged behind it. The court found that this procedure constituted the discharge or addition of a pollutant into wetlands from a point source under the Clean Water Act because the activity penetrated the restrictive layer or clay pan that prevented the surface water from then penetrating deep into the soil.

The court recognized that an activity that destroys the ecology of wetlands is not immune from the Clean Water Act merely because the activity does not involve the introduction of new material. Here, the churning up of soil that ultimately replaced it in its original location was unimportant because the vernal pools, swales and intermittent drainage depended upon

JONES WALKER

E*ZINES
February 2003 Vol. 6

Environmental and Toxic Torts
www.joneswalker.com
environment@joneswalker.com

the dense layer of soil that prevented surface water from penetrating deep into the soil.

The case also bears significance for other reasons. First, the case is significant in Louisiana because the court cited the Fifth Circuit's Avoyelles Sportsman League, Inc. v. March, 715 F.2d 897 (5th Cir. 1983) decision to support its holding that the addition of a pollutant includes any redeposit of excavated dirt. Second, the case is noteworthy because the government conceded that the Clean Water Act does not regulate isolated waters such as vernal pools that form during the rainy season but often are dry in the summer. The government obviously made this concession in light of the SWANCC case, 121 S.Ct. 675 (2001), which held the Corps of Engineers could not regulate isolated waters under the Clean Water Act. Third, the court liberally interpreted the phrases "point source," "discharge of pollutant" and "violations" of the Clean Water Act by concluding that bulldozers and tractors pulling the large metal prongs were "point sources" regulated under the Act. Finally, the Court found that the normal farming exception in the Clean Water Act (Section 1344(F)(1)(A)) did not apply because converting ranchland to orchards and vineyards constituted bringing land into a use to which it was not previously subject.

With regard to the penalty assessment, rather than measuring separate violations based on the number of days on which the deep ripping occurred, the court measured each pass of the ripper as a separate violation of the Clean Water Act. Hence, the Court found 358 violations of the Clean Water Act and imposed a penalty of up to $1,500,000.00, one million of which was suspended conditioned upon the landowner's performance of various restoration efforts.

By Stanley A. Millan

EPA AND CORPS ISSUE GUIDANCE ON MITIGATION, WETLANDS, AND GIVE ADVANCE NOTICE OF PROPOSED RULE MAKING

Section 404 of the Clean Water Act requires private parties to have federal permits to develop most "wetlands." Section 404 is run by the EPA, the Army Corps of Engineers and a couple of states.

On January 10, 2003, the EPA and the Corps took action

JONES WALKER

E*ZINES
February 2003 Vol. 6

Environmental and Toxic Torts
www.joneswalker.com
environment@joneswalker.com

to clarify wetlands regulation. They jointly issued a guidance document clarifying the scope of their authority over wetlands in light of the January, 2001, Supreme Court decision in Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers ("SWANCC"). The agencies announced their intention to publish an Advance Notice of Proposed Rule Making ("NPR") and to request data and information that they will consider in evaluating the scope of their regulatory jurisdiction. The NPR was published in the Federal Register on January 15, 2003.

SWANCC

The SWANCC guidance supersedes (and scales back) a previous guidance document issued by EPA and the Corps in January, 2001, immediately following the *SWANCC* decision. There are major differences between the two. The new guidance states that:

- field staff must seek Corps Headquarters approval before asserting jurisdiction over isolated, non-navigable intrastate waters;
- field staff may not exercise jurisdiction over isolated, non-navigable intrastate waters based upon the use of the migration bird rule;
- field staff should continue to assert jurisdiction over traditional navigable waters and adjacent wetlands and generally speaking, their tributary systems and adjacent wetlands.

The previous guidance allowed the Corps' field staff to regulate on a case-by-case basis certain types of isolated, non-navigable intrastate waters when a connection to intrastate commerce was found under 40 C.F.R. 328.3 (i)-(iii). Under the new guidance, field staff, standing alone, must decline to exercise jurisdiction for these types of isolated wetlands. If they seek to assert jurisdiction, the field staff must obtain approval from Corps headquarters.

Another difference is the addition of the "generally speaking" qualifier in the discussion of Corps jurisdiction over tributary systems (and their adjacent wetlands) of navigable waters. The previous guidance did not include a qualifier in reaffirming its jurisdictional authority over these waters.

Additionally, the guidance reflects agency confusion over critical terms like "isolated," "adjacent," "tributaries," and conflicting court deci-

sions over ditches and non-navigable ditches. The new guidance recognizes that the Fifth Circuit case of Rice v. Harken may indicate a narrowing of jurisdiction from non-navigable tributaries and wetlands that are not immediately adjacent to navigable waterways.

The new SWANCC guidance may signal a jurisdictional overhaul as the end product of the future rule making.

NOTICE OF PROPOSED RULE MAKING

The NPR requests (i) public input on issues associated with the Clean Water Act's definition of waters of the United States and (ii) information and data on the implications of SWANCC on jurisdictional determinations. Comments should be sent to: Water Docket, U.S. EPA, Mail Code 4101T, 1200 Penn. Ave. NW, Wash., D.C. 20460; attn: Docket id no. OW-2002-0050.

The interesting question presented is whether the Corps and EPA will use this clarification to limit their jurisdiction to only what they allude to as "traditional navigable waters." **This may be your chance to push for a change (or to try to maintain the status quo). Comments must be postmarked on or before March 3, 2003.**

MITIGATION

Earlier, on December 24, 2002, a new regulatory guidance was issued by the Corps on wetlands mitigation, and the EPA and Corps issued a mitigation action plan. Both actions attempt to overhaul the wetlands required to be created or reserved as compensatory mitigation for Section 404 wetlands permitting.

A new functional approach to wetland losses is apparently intended to limit mitigation ratios above 1:1. The agencies, however, want to use an unbridled watershed approach and to have more public involvement in permit mitigation planning. The mitigation action plan among several regulatory agencies itself will take several years to unfold, until 2005.

By Stanley A. Millan and Tara G. Richard

JONES WALKER

E*ZINES
February 2003 Vol. 6

Environmental and Toxic Torts
www.joneswalker.com
environment@joneswalker.com

EPA CLARIFIES "ALL APPROPRIATE INQUIRY" UNDER 2002 BROWNFIELD AMENDMENTS TO CERCLA

68 Fed. Reg. 3430 (January 24, 2003)

The EPA issued a final direct rule, on January 24, 2003, that more specifically defines the statutory standards by which a person can take advantage of the *innocent purchaser* defense or the new *"bona fide prospective purchaser*" defense under CERCLA (42 U.S.C. §9601(40)). 68 Fed. Reg. 3430 (January 24, 2003). CERCLA exempts from CERCLA clean-up liability innocent landowners that perform a Phase I study and find no recognizable concerns. The new bona fide prospective purchaser defense further allows purchasers that become aware of past contamination through a Phase I to escape clean-up liability, provided that they perform a Phase I study and exercise due diligence after the acquisition. Both defenses require landowners to make "all appropriate inquiry" concerning the contamination of the property.

The amended statute generally refers to standards set by American Society for Testing and Materials Standards (ASTM) and specifically refers to ASTM's standards in 1997 for Phase I's. These standards apply when doing environmental site assessments (frequently referred to as Phase I's) covered under ASTM Standard E 1527-97**.** ASTM superceded this standard in 2000 with a new Phase I standard.

Although the 1997 and 2000 ASTM Phase I standards are similar in substance, the 2000 ASTM standard is a more finished product than the 1997 standard. For the environmental professional, the 2000 standard adds certain duties and enhances the scope of the assessment, by requiring a "business risk" analysis and a new format. The 2000 standard also places new burdens on the user (buyer, etc.) of the environmental site assessment report, by requiring the user to report on any specialized knowledge he has of the site and on the reasons for conducting a Phase I study.

EPA has clarified which standard to use in the final regulation, to be incorporated in 40 C.F.R. Part 312, and states that innocent purchasers and bona fide prospective purchasers may rely on either the 1997 or the new 2000 ASTM standards. (In many cases since 2000, the older 1997 standard was not readily available to business users.)

JONES WALKER

E*ZINES
February 2003 Vol. 6

Environmental and Toxic Torts
www.joneswalker.com
environment@joneswalker.com

Although the new bona fide prospective purchaser defense is not recognized in all state laws, it is expected that some states will grant an exemption from cleanup liability to bona fide prospective purchasers that voluntarily agree to partially clean up the site to a risk-based level. The Brownfield amendments to CERCLA encourage such state voluntary cleanup programs.

By Stanley A. Millan

POLLUTION EXCLUSION NOT APPLICABLE IN DUMPING CASE

Estate of Patout v. City of New Iberia,
02-278 (La. App. 3 Cir. 12/27/02) ____ So.2d ____

The Louisiana Third Circuit Court of Appeal recently determined that a pollution exclusion clause did not apply to garbage pushed onto a landowner's property from a city dump. In an action for damages, private landowners sued the city of New Iberia and its liability insurers for damages due to trespass resulting from the operation of a municipal landfill from which garbage was pushed onto the landowner's land. The Court determined that the case was one in trespass and, therefore, did not view the city's dumping as pollution. Furthermore, the court noted that the defendant/insured failed to meet the factors necessary to apply a pollution exclusion clause.

The City of New Iberia operated a landfill adjacent to the landowner's property from the early 1970s until 1989. During the years of operation, the city pushed garbage beyond the borders of the property onto the landowner's property. The city acknowledged the problem and informed the landowner that it would remove the garbage. The city further executed a "Memorandum of Agreement," agreeing to certain corrective measures to clean up the landowner's property. Nevertheless, the city failed to clean up the property.

The landowner sued the city and its insurers for general damages for mental anguish and personal injury as well as property damages related to the diminution in value of their property, cost of restoration and remediation. Both the landowner and the city argued that the pollution exclusion clauses in the city's insurance policies did not exempt from coverage the negligent dumping of garbage on the landowner's property. The Third Circuit agreed.

In an earlier review of the case[1] the Third Circuit determined that the illegal dumping of garbage from 1972 to 1989 on the landowner's property constituted a continuing trespass. This earlier determination played an important role in the Court's conclusion that the pollution exclusion clauses did not apply. The court noted that the landowner never asserted claims of pollution against the city, instead maintaining that the action sounded in trespass. The Court further observed that, because the action was one in trespass, the pollution exclusions were irrelevant.

The Court took the analysis a step further and found that, even if the pollution exclusion clauses were relevant, the defendant/insured failed to satisfy the factors set forth in the Louisiana Supreme Court's decision *Doerr v. Mobil Oil Corporation.*[2] In *Doerr*, the supreme court determined that there are three factors that must be considered to determine the applicability of a pollution exclusion clause:

1. whether the insured is a polluter within the meaning of the exclusion;

2. whether the injury-causing substance is a pollutant within the meaning of the exclusion; and

3. whether there was a discharge, dispersal, seepage, migration, release, or escape of a pollutant by the insured within the meaning of the policy.

The Third Circuit found that the insurers failed on all three grounds to establish that the actions of the city from 1972 to 1989 warranted application of the pollution exclusion clauses. As a result, the court refused to find that the city was a polluter to which the exclusion applied, noting, as in *Doerr,* that "insurance policies are obtained to provide coverage, rather than deny it."

By Olivia S. Tomlinson

---

1 *Estate of Patout v. City of New Iberia,* 01-0151, (La.App. 3 Cir. 4/3/02), 813 So.2d 1248.

2 00-947 (La. 12/19/00); 774 So.2d 119.

JONES WALKER

E*ZINES
February 2003 Vol. 6

Environmental and Toxic Torts
www.joneswalker.com
environment@joneswalker.com

LA SUPREME COURT ADDRESSES INCREASED RISK, FEAR, PUNITIVES AND STIGMA CLAIMS IN ASBESTOS CASE

Bonnette v. Conoco, Inc., 01-C-2767 (La. 1/28/02), ___ So. 2d ___

The Louisiana Supreme Court provides needed guidance in the area of "intangible damages" in this case which arises out of exposure to soil containing small amounts of asbestos. The opinion was written by Justice Kimball and was subscribed to by all other members of the court save Justice Johnson who provided the lone dissent and Justice Knoll who did not sit on the case.

Conoco arranged for the demolition of some abandoned houses on its property in order to make way for a new hydrocracker unit. Following demolition, contractors removed soil from the project site and sold it in turn to plaintiffs who spread the soil on their lawns. Eventually it was discovered that the soil contained pieces of asbestos-containing transite from the demolition debris. Upon learning about the problem Conoco set up a hotline and offered to remediate lawns containing the soil.

143 individuals sued Conoco, and trial was held for four families whose lawns had been remediated. No person had sustained an immediate physical injury. Instead plaintiffs sought recovery for their claimed increased risk of contracting asbestos-related diseases in the future and fear of such diseases. Plaintiffs also asked for damages due to the alleged devaluation of their remediated properties. Last, plaintiffs asked for punitive damages.

The trial court awarded damages in all categories and the Third Circuit Court of Appeal affirmed.

Increased risk of future injury. The Supreme Court accepted the trial court's finding "that plaintiffs were exposed to an asbestos fiber count that slightly exceeded that of normal ambient air and that it is more probable than not that plaintiffs have suffered a slightly increased risk of developing an asbestos-related disease." However the Supreme Court found that this proof was insufficient to entitle plaintiffs to damages for increased risk.

The Court approached the issue in the context of its landmark decision in *Bourgeois v. A.P. Green Industries, Inc.,* 97-3188 (La. 7/8/98), 716

So.2d 355 – the case in which it recognized a cause of action for medical monitoring in absence of a present manifest physical injury. Having established a seven part test for medical monitoring recovery in *Bourgeois,* the Court here declared that "it would be nonsensical to allow a plaintiff to recover compensatory damages for an increased risk of developing an asbestos-related disease upon less proof than that required for recovery of medical monitoring expenses." While the Court did not affirmatively state the test that it would apply in future increased risk cases, it cited the majority view that when occurrence of future injury is "speculative" or "merely possible", there can be no compensation for increased risk. Based upon the court's discussion of *Bourgeois* we can also assume that the criteria for establishing a compensable increased future risk will be no lower than the *Bourgeois* criteria and may well be higher.

Fear of future disease. The court also reversed the award for fear of contracting an asbestos-related disease. The Court finally addressed and disposed of a problematic 1974 case in which it had found that a fear of cancer was compensable even though the possibility of contracting cancer was minimal. The court distinguished that case, *Anderson v. Welding Testing Laboratory, Inc.,* 304 So.2d 351 (La. 1974), on the ground that the fear there accompanied a manifest physical injury.

In case of a fear claim due to mere exposure without physical injury, the Court stated it would apply the rule of *Moresi v. State, Dept. of Wildlife & Fisheries,* 567 So.2d 1081 (La. 1990): the plaintiff must prove his claim is "not spurious by showing a particular likelihood of genuine and serious mental distress arising from special circumstances." Noting that there are particular problems in awarding mental distress damages where a plaintiff is exposed to asbestos, the Court held that the *Moresi* rule "must be stringently applied in asbestos cases due to their inherently speculative nature."

The Court cited cases from the U.S. Supreme Court and the Texas Supreme Court for the propositions that contacts with serious carcinogens are common in modern life; the evaluation of whether emotional problems are reasonable and serious is difficult; and suits for mental anguish that has not resulted from physical disease compete for resources with suits for current physical injuries. Interestingly, the Court once again drew medical monitoring into the analysis by relying on *Metro-North Commuter Railroad Co. v. Buckley,* 521 U.S. 424, 117 S.Ct. 2113, 138 L.Ed.2d 560 (1997), a case in which the United States Supreme Court refused to recognize a cause of action for monetary damages for asbestos medical monitoring under FELA.

The Court concluded by finding that neither the plaintiffs' generalized fear of contracting an asbestos-related disease nor their visits to a psychiatrist arranged by counsel in anticipation of trial demonstrated genuine and serious mental distress caused by the placement of asbestos-containing soil on their properties.

Punitive damages. The Court also reversed the award of punitive damages. The Court applied a *de novo* standard of review of punitive damages. Reviewing the evidence the Court found that while some of Conoco's actions left "much to be desired", Conoco did not violate DEQ regulations. "Because Conoco acted in compliance with DEQ regulations ... we cannot say that defendant's conduct was highly unreasonable or that it involved an extreme departure from ordinary care."

Stigma. After such a thoughtful analysis of these emerging issues of intangible damages, the final portion of the Court's opinion on property damages due to "stigma" comes as a disappointment. The Court affirmed an award of 10% property devaluation on the basis of the testimony of plaintiff's real estate appraisal expert. The expert termed the 10% diminution in value a "stigma adjustment" which he assessed even though he assumed as a predicate for his opinion that *all asbestos fibers had been cleaned from the properties.* He argued that even though the properties were remediated, potential buyers would be concerned because "the word 'asbestos' is frightening to people."

The Supreme Court found that the trial court's credibility call – accepting the testimony of plaintiffs' real estate appraiser and rejecting that of defendants' expert – was determinative and affirmed the property damage award. In so doing, the Supreme Court side-stepped the policy issue of whether "stigma" is compensable in the first place, and if so, under what circumstances. For example, should property owners be permitted stigma damages due to the existence of an adjoining hazardous waste facility – even when the facility is properly licensed and safely operated – merely because potential buyers might be less likely to buy in the area?

The Court's handling of the stigma claim is at odds with its analysis of the increased risk and fear claims. In the context of increased risk and fear in absence of current physical injury, the court essentially cautioned against giving in to asbestos hysteria in absence of hard evidence of significant risk and specific reasonable fear. Yet in the property damage arena, the Court allowed an award based upon public perception of a hazard which did not in fact exist in the remediated properties.

JONES WALKER

E*ZINES
February 2003 Vol. 6

Environmental and Toxic Torts
www.joneswalker.com
environment@joneswalker.com

Conclusion. In sum, this important opinion by the Louisiana Supreme Court sets limits for recovery of increased risk and fear damages when the plaintiff has been exposed to a hazardous substance but has sustained no physical injury. The case also affirms a *de novo* review standard for awards of punitive damages and suggests that they should not be awarded when no regulation has been violated. However, the portion of the opinion on stigma lends legitimacy to a heretofore uncertain cause of action and opens a Pandora's box for future litigation.

By Madeleine Fischer

$3M VERDICT AFFIRMED WITH BROAD ASBESTOS CAUSATION ANALYSIS

***Hennegan v. Cooper/T.Smith Stevedoring Co.*,**
No. 2002-0282 (La. App. 4 Cir. 12/30/02), ___ So.2d ___

The Louisiana Fourth Circuit Court of Appeal recently affirmed a $3,000,000+ verdict in this asbestos maritime products liability case. In this wrongful death action, the plaintiff claimed that her late husband contracted, and later died from, mesothelioma caused by exposure to asbestos during his work as a seaman/deckhand. Plaintiff sued numerous asbestos manufacturers. After several dismissals and settlements, Garlock, Inc., was the only defendant left to face trial. Garlock appealed the verdict primarily on the ground that plaintiff failed to prove that the decedent was exposed to asbestos from Garlock products or that any such exposure was substantial factor in causing his disease. The Fourth Circuit, however, disagreed and used broad standards to find sufficient causation to affirm the verdict against Garlock. The appellate court held that Hennegan's "small exposure" to friable asbestos fibers from Garlock product was sufficient to constitute a "substantial factor" in causing his mesothelioma over time.

The *Hennegan* decision also includes an important holding on solidary liability. Garlock contended that the trial court erred in holding it liable for all of Plaintiff's damages and failing to apportion an appropriate share of fault to the remaining defendants. The appellate court disagreed and held that, under maritime law, a tortfeasor can be held liable for more than its degree of fault. The trial court had found Garlock liable for all of Plaintiff's damages, but only reduced Plaintiff's recovery by the 20% of fault attributed to Cooper/T.Smith, the settling defendant. The solidary obliga-

tion thus puts the risk of the inability to collect from joint tortfeasors (*e.g.*, bankrupt parties) with the defendant. As a result, a trial judgment against a non-settling defendant in a maritime products liability case may include any fault attributable to immune or absent parties.

By Judith V. Windhorst

# # #

The following practice group members contributed to this issue:

Michael A. Chernekoff (Author and Editor)
Alida C. Hainkel (Editor)
Stanley A. Millan
Tara G. Richard
Olivia Tomlinson
Madeleine Fischer
Judith V. Windhorst

Please contact your Jones Walker's Environmental Toxic Tort Practice Group contact for additional information on or copies of any of the cited matters.

Remember that these legal principles may change and vary widely in their application to specific factual circumstances. You should consult with counsel about your individual circumstances. For further information regarding this E*Zine or this practice group, please contact:

Michael A. Chernekoff
Jones Walker
201 St. Charles Ave., 50th Fl.
New Orleans, LA 70170-5100
ph. 504.582.8264
fax 504.589.8264
email mchernekoff@joneswalker.com

Environmental and Toxic Torts Practice Group

MICHAEL A. CHERNEKOFF
MICHELE CROSBY
MADELEINE FISCHER
LEON GARY, JR.
JOHN G. GOMILA
ALIDA C. HAINKEL
HARRY S. HARDIN, III
PAULINE F. HARDIN
GRADY S. HURLEY
WILLIAM J. JOYCE
ROBERT T. LEMON
STANLEY A. MILLAN
THOMAS M. NOSEWICZ
JOSEPH S. PIACUN
JOHN C. REYNOLDS
TARA RICHARD
ROBERT W. SCHEFFY
M. RICHARD SCHROEDER
WILLIAM L. SCHUETTE
PAT VETERS
OLIVIA SMITH TOMLINSON
JUDITH V. WINDHORST
JAMES E. WRIGHT, III

To subscribe to other E*Zines, visit www.joneswalker.com/news/ezine.asp