EVANS & DIXON LLC
ATTORNEYS AT LAW

IL Newsletter

www.evans-dixon.com October 2021 Volume 1

OT OR NOT OT, THAT IS THE QUESTION

–Jesse Lanshe

The general rule in Illinois Workers' Compensation is that overtime (OT) at the straight rate is includable in the AWW calculation if the OT is regular or mandatory. A recent IWCC opinion held that Petitioner failed to meet his burden of proving that OT was mandatory or regular, based on his testimony and the evidence submitted at trial.

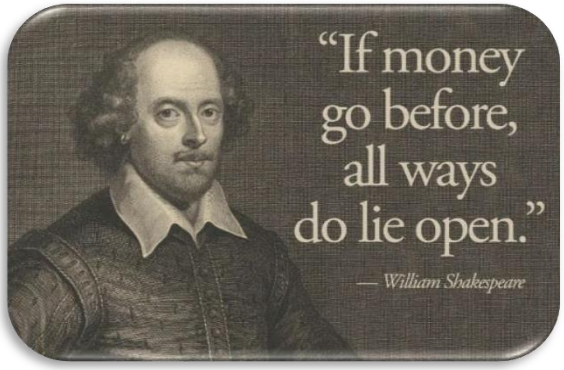
In *Tantillo vs. PTO Services, Inc.*, 21 IWCC 0165, Petitioner was a truck driver who sustained an injury while trying to open a truck door with a crowbar. Among the contested issues was the proper calculation of AWW. Petitioner testified that he was paid $17.90 per hour. He also submitted into evidence "compensation reports" showing earnings of $50,288.16 in the 52 weeks preceding the accident. During the 27 weeks immediately preceding the accident, Petitioner's "regular" pay was $18,615.80 and his "overtime" pay was $6,815.48. Petitioner testified, and those reports showed, that Petitioner worked overtime in 21 of the 27 weeks immediately preceding the accident.

Interestingly, Respondent did not have WC insurance and the trial proceeded ex parte (without Respondent's participation). As such, Respondent did not offer exhibits or testimony. A representative from the Injured Workers' Benefit Fund also appeared at trial.

The arbitrator determined that Petitioner's AWW was $967.08 (which was Petitioner's gross income divided by 52 weeks). The trial Decision is unclear as to why it appears that overtime was calculated at the full rate (time and a half), rather than the straight (regular hourly) rate. Nevertheless, the arbitrator indicated that this AWW was appropriate due to Petitioner's "unrebutted testimony and the wage statements."

On appeal, the Commission re-calculated the AWW downward (from $967.08 to $716.00), which had the effect of also reducing the TTD & PPD awards. In reasoning for a lower AWW, the Commission found that the arbitrator had been mistaken in finding that Petitioner had testified that OT was mandatory. Rather, per the trial transcript, Petitioner had only testified that he worked approximately 55 hours per week (no express testimony that it was "mandatory" vs. voluntary). Additionally, the compensation reports that were entered into evidence showed **"some overtime in 21 out of 27 pay periods, [but] the number of hours worked are not regular and vary significantly."** (Emphasis added).

The Commission explained that "[a]lthough Petitioner may have worked **some** overtime based on the evidence presented, the hours were not consistent and no evidence was presented that overtime was mandatory." (Emphasis in original).



As made clear from the Commission's Decision, and since Respondent had no representation, Petitioner never testified that OT was mandatory (despite the arbitrator's mistaken belief that he had). It remains an open question whether Petitioner's testimony alone on this issue would have been sufficient for a finding that OT was mandatory. Further, while Petitioner proved that he worked OT in 21 of 27 weeks, not only did the hours in those weeks vary significantly, the arbitrator did not address the fact that Petitioner only worked OT in 21 of 52 weeks, which is less than half the time. Based on the above, the Commission made clear that, based on the evidence presented, the arbitrator was mistaken in determining that OT was mandatory or regular.

Practice Tip: Make a point to always confirm the nature of OT (is it mandatory or regular?) when receiving and reviewing wage statements. If OT is confirmed to be mandatory or regular, remember to calculate all hours worked (regular and OT) at the straight rate, rather than the full rate.

NO SHORT-CUT TO BENEFITS

-Lilia Picazo

Comment: Fourth District Appellate Court denies employee's claim for workers' compensation benefits for injuries sustained after she took a shortcut at work.

Case: In *Purcell v Illinois Workers' Compensation Commission*, 2021 IL App (4th) 200359WC the Illinois Appellate Court, Fourth District, Workers' Compensation Commission Division affirmed the decision of the Illinois Workers' Compensation Commission, denying Petitioner's claim for benefits.

On September 9, 2016, Petitioner was working as an administrative assistant on a temporary basis when she sustained injuries to her right elbow. Her job duties mainly consisted of working inside of a library. At times, she was directed to work outside of the library. As part of her temporary employment status, Petitioner was required to complete and turn in timecards during non-work hours. She was not directed to take a specific route. A dropbox was also made available for employees to drop off timecards during closed hours. Temporary employees were not paid for the time it took to turn in the timecards.

On the morning of September 9, 2016, Petitioner walked in the opposite direction of her office to drop off her timecard when she approached a chain barrier. As she attempted to hop over the fence, Petitioner's heel became caught and she fell onto her right elbow. She eventually underwent surgery.

At trial, Petitioner admitted there was no defect in the fence or in the area surrounding the fence. Petitioner also admitted that 10-15 feet to the left of where she fell there was no fence or obstacle that would have prevented her from taking an alternative route that did not require her to hop over a fence. She further admitted it would have been safer to use an alternative route, and it would have only taken a few extra seconds of her time.



The arbitrator found Petitioner failed to establish her injuries arose out of and in the course of her employment and denied Petitioner's claim for workers' compensation benefits. The Commission slightly modified the Arbitrator's decision, but agreed Petitioner's accident did not arise out of her employment. On appeal to the circuit court, the court affirmed the Commission's decision and Petitioner's claim for workers' compensation benefits remained denied.

On further appeal to the appellate court, Petitioner argued her accident arose out of her employment as either a traveling employee or non-traveling employee. The appellate court affirmed the lower court's decision and denied Petitioner's claim for workers' compensation benefits. In reaching its decision, the appellate court first examined whether Petitioner satisfied the "arising out of" component as a non-traveling employee.

To satisfy the "arising out of" component, a petitioner must show her injuries originated from a risk connected with or incidental to her employment to create a causal connection between the injuries and employment. As a non-traveling employee, Petitioner needed to establish she was performing tasks that:

1. She was instructed to perform by her employer,

2. Had a common law or statutory duty to perform, or

3. An employee might have reasonably been expected to perform as part of his or her job duties.

The appellate court found Petitioner's decision to shave off a few extra seconds of her time by jumping over a fence to drop off her timecard did not arise out of her

employment as a non-traveling employee, as there was no obstruction in the surrounding area preventing her from taking an alternative route. Instead, Petitioner exposed herself to an unnecessary danger separate from her job duties and for her own convenience by jumping over the fence.

The appellate court also examined whether Petitioner's injury arose out of her employment as a traveling employee (where travel is an essential part of the employment and requires the employee to travel away from the employer's premises). The court found Petitioner failed to establish she was required to travel substantially as part of her employment. Accordingly, Petitioner's injuries also did not arise out of her employment as a traveling employee.

WELCOME TO THE NEW ILLINOIS WORKERS' COMPENSATION COMMISSION

–Paul Krauter

On March 13, 2020, I went to the Illinois Workers' Compensation Commission in Wheaton to appear on several cases that were set for trial. The Commission was packed that day with attorneys trying to get things done before the looming COVID shutdown went into effect. Most of us thought that it would be a short interruption of our daily practice as the country went about "bending the curve" for a few weeks. Little did we know that day would mark the end of an era.

For those unfamiliar with the daily life of an Illinois Workers' Comp lawyer prior to COVID, I will provide some background. A typical morning from 9:00 AM to 10:30 AM at the IWCC looked some sort of a trader's pit. There would be hundreds of attorneys huddled around tables, chatting in hallways, and waiting in lines before various Arbitrators. It would not be uncommon for an Arbitrator to have up to 50 cases set for trial on a particular date. This list would include petitions for immediate hearing (19b's), motions, above the line cases (cases that were more than three years old in filing), regular trials, and parties seeking pre-trials. Most Arbitrators would take care of motions and pre-trials first. Once everything was cleared they would move to the trials. There was no guarantee that a case would proceed to trial. Sometimes, the parties would sit around the Commission all morning and then come back in the afternoon waiting for their case to proceed.

There was a "hustle and bustle" to the process. We would often walk over to the Commission just to try and find an elusive petitioner's attorney that had not returned a phone call or email. One day, we might be in Chicago, the next day in Wheaton and the next day in Peoria. There would also be trips to physician's offices throughout the state for depositions.

Initially the shock of COVID brought the entire system to a halt. However, the Commission eventually found a way to open within the confines of COVID protocol. Cases still needed to be resolved and moved. In the summer of 2020 the Commission rolled out an emergency process to forge ahead. This involved holding all monthly status calls via phone through the WebEx application. The cases would be assigned pre-trial dates that would also be handled via WebEx. The parties could participate either by video or phone. Initially only urgent cases were allowed to proceed to trial. They first needed to be screened via a WebEx pre-trial and then certified by the Arbitrator.



As vaccinations became available and COVID cases went down, the Commission further modified their procedures. The Webex system for status calls and pre-trials continued. The Arbitrators were allowed to set up to 20 cases for trial per day (at their discretion). However, this was still subject to first having a mandatory pre-trial. The Commission further modified the procedure by having cases set for trial the month after they were pre-tried. For example, a case up for status on the November status call will receive a pre-trial date that month. If the Arbitrator sets the case for trial

it will be in December. Prior to COVID, cases were set for trial the same month as the status call.

As of November 1, 2021 the Commission will once again begin enforcing the red line which should help move older files.

The Commission also rolled out a new electronic filing and data base system known as compfile. All filings now take place electronically via this program. This includes things like settlement contracts. Parties no longer need to appear in person at the Commission for filings.

So what does the practice of workers' compensation law look like in the fall of 2021? The days of meeting and standing in long lines at the Commission are gone. Business is mostly conducted from our office as we appear for pre-trials via WebEx. There is no longer travel to attend status call or non-trial events. Even physician depositions are now largely being taken by Zoom. We used to see our fellow attorneys at the Commission on a daily basis. Now, it's rare that we see anyone in person outside of a video screen.

Most of these changes were probably long overdue. In many ways the Commission operated in a rather archaic fashion. COVID forced these changes on the practice in a time frame that might have otherwise taken years to achieve. Like anything in life, there are pros and cons of the new system.

AMONG THE PROS:

• There is no wasting our time in endless lines for a simple motion.

• For the most part, if a case is set for trial, we know that it will proceed on the date and time that it is set.

• The practice of setting a trial the month after the pre-trial provides us with more time to schedule witnesses.

• Travel has been significantly reduced.

• The practice can essentially be handled remotely from any location. There is far less reliance on a physical office or presence in a certain part of the state.

• Settlements can often be drafted and approved within the same day.

• Client's litigation costs should be significantly lower with the reduction in court time and travel time.

AMONG THE CONS:

• Many Arbitrator's run out of pre-trial dates quickly in the status calls. This makes it very difficult to get newer cases set for a pre-trial.

• There is no longer the opportunity to find attorneys that do not return phone calls and emails in attendance at the Commission.

• It will be a challenge to train the next generation of workers' compensation attorneys. They will not have the opportunity to meet their opponents in person or have daily interaction with them. Many of these long terms relationships would facilitate the movement of cases and open dialogue. This is especially true in a non-discovery state such as Illinois. It is far easier for people to be short sighted or petty via email when they do not ever have to meet opposing counsel in person. It was also common practice to send new attorneys to the Commission each day to check in on cases, wait in some of the long lines, etc. There was almost a process of "osmosis" whereby the new attorney would observe and listen to everything taking place around them.

As the saying goes, time waits for no one. Our practice will never be the same. Had I known what lay ahead, it would have been nice to take one last look around the Commission on March 13. But that is the now the past. We will adapt, move forward, and utilize these changes to better represent our clients in a more cost efficient manner.

EVANS & DIXON RECENT WINS

In *Smith v. Mid-America Heating*, 03 WC 27555, Francis O'Byrne received a decision from the Commission finding that petitioner owed the respondent money! This particular case had a long and twisted history with prior 19(b) decision and reviews going back to 2010. In November of 2017 Arbitrator Ory issued a final decision in the case that awarded the petitioner 25% person as a whole. Francis reviewed the decision to the Commission

and successfully argued the Arbitrator's decision did not properly interpret the medical records or prior court decisions. The Commission reduced the award to 7.5% person as a whole and applied a credit to the respondent against that award that resulted in a net overpayment of $207.67 owed to the Respondent.

In *Maroney v. Joe's Towing*, 2021 Ill.App.3d, 200213 WC, the Arbitrator awarded a total of $140,810 to petitioner based on medical, TTD and PPD. Using his outstanding deposition skills, Francis picked apart the treating doctor's theory of causation. On review he successfully convinced the Commission that the IME opinion was correct and that case involved nothing more than a lumbar strain. The Commission agreed and reduced the award to 5% person as a whole ($8,233.33). This case was argued all the way up to the Appellate Court, where the Commission decision was affirmed.

Bob Doherty had a big win at the Commission turning a significant Arbitrator award into a "zero" on review.

In *Calabrese v. US. Venture*, the petitioner alleged an injury to his right foot while unloading a van. The case was denied based on inconsistencies in the initial medical records, statements from co-workers, and an IME. Following a 19(b)/8(a) trial the Arbitrator awarded TTD, medical bills and prospective medical which totaled over $90,000.00. There remained significant additional exposure for ongoing medical treatment and TTD.



On review, the Commission overturned the Arbitrator's award finding that he was not credible based on the inconsistencies in the medical records. The Commission denied accident and found the case not compensable. Of significance the medical at the time of the Commission decision had increased to $175,000.00 based upon ongoing treatment. The case had potential exposure if found compensable of $300,000.00 to $350,000.00.

Michael Karr's win with *Mary Webster v. Walgreens* involved a compensable lumbar spine injury sustained when Petitioner bent over to pick up a case of lipstick. Petitioner's treating physician felt that while Petitioner was not a surgical candidate, she was not able to tolerate 8 hour days on hard concrete or long shifts involving bending or lifting. Petitioner was placed at MMI and the treating physician felt Petitioner was not capable of returning to her previous employment because of mechanically sensitive low back pain. We obtained an IME; the IME physician diagnosed Petitioner with a work related lumbar strain which he felt had reached MMI and did not require any restrictions. Petitioner had also been granted SSDI benefits on her first application.

Prior to trial, the Arbitrator had recommended settlement in the range of a loss of occupation at 35% to 40% of the body as a whole ($68,729.50 to $78,548) and we had attempted to discuss settlement in that range with opposing counsel; however, opposing counsel advised they were unwilling to settle in the range of the recommendation. Following the trial, opposing counsel wrote their proposed decision asking for permanent total disability benefits (valued at $640,552.02 lifetime); we wrote our proposed decision for 5% of the body ($9,818.50). In the end, the Arbitrator found Petitioner had established entitlement to a loss of trade award, but came down from her pre-trial recommendations to an award of 20% of the body, or $39,274. As a result, the Award is almost $40,000 less than we had considered offering in settlement, and is significantly less than the PTD award sought by Petitioner.

CASE LAW UPDATES

–Caroline French
–Monika Heater

Restrepo v. Elite Staffing Inc.
29 ILWCLB 61 (Ill. W.C. Comm. 2021)

Factual Background: At trial, Petitioner testified regarding an incident that occurred on September 29, 2015 with another co-worker. Petitioner was employed as a line cook. He stated after his shift on the date of

injury he began cleaning his station. Petitioner testified he grabbed buckets of water to make sure everything was rinsed properly. He started dropping water to rinse his station when he "accidentally" spilled water on the co-worker's shoes. Petitioner testified the co-worker verbally responded and tried to hit him with a deep fryer basket but The co-worker did not touch him while inside of the restaurant. Petitioner testified he went to a storage unit in an alley behind the restaurant and the co-worker followed him. Petitioner testified the co-worker hit him in the face causing him to fall down. The co-worker began to kick Petitioner and he sustained injury to his right ankle. Petitioner testified he never had any issues, arguments, or bad relationships with co-workers or supervisors during his time of employment with Employer; however, when questioned about a specific co-worker, "Arturo," Petitioner admitted he had incidents with Arturo in the past, but he would also always report them to his supervising Chef.

The co-worker testified at trial. He stated on the date of the accident Petitioner emptied a bucket of water on his shoes and then dumped two additional buckets of water on him. The co-worker further testified Petitioner's acts were intentional and he was trying to start a fight. He testified he asked Petitioner if he had a problem and Petitioner said he did and they agreed to go outside. It was the co-worker's impression Petitioner went outside to fight and he felt forced to go outside with Petitioner or else he would not stop throwing water on him. He testified in the alley he pushed Petitioner and Petitioner threw several punches at him. The co-worker punched Petitioner who fell to the ground, but he then stood up and continued to throw punches. The co-worker testified he hit Petitioner one more time and then the fighting stopped. A manager for the restaurant testified at trial that Petitioner told him immediately following the accident he purposely splashed water on The co-worker. He further testified Petitioner never mentioned the co-worker hit him with the fryer basket, but Petitioner did tell him he went outside in the alley to fight The co-worker. The manager also testified employees are not allowed to be in the alley.

Arbitrator's Decision: Petitioner's claim for compensation was denied. Arbitrator Harris concluded the claimed accident did not arise out of and in the course of employment because Petitioner was the aggressor of the altercation. The altercation negates all causal connection between the work and the injury and Petitioner took himself out of the scope of his employment by initiating the altercation on work premises. Additionally, the altercation was not proven to be based on a work-related reason. Arbitrator Harris relied on the 2004 Illinois Supreme Court decision *Franklin v. Industrial Comm'n*. The Court held that fights arising from a purely personal dispute do not arise out of employment. The Court further stated injuries to the aggressor in such a fight are not compensable. The Arbitrator found Petitioner was the aggressor and the basis of the dispute was not work related. He further noted the "aggressor defense' only applies when a petitioner's conduct negates the causal connection between the employment and the fight and the issue of who made the first contact is important, but not decisive. A petitioner's conduct must be judged in the light of the totality of the circumstances. Arbitrator Harris found Petitioner was less credible than The co-worker and the manager. He found Petitioner to be the aggressor for dumping water onto The co-worker and voluntarily entering the alley first to start the fight.

Eskridge v. Chicago Board of Education
29 ILWCLB 57 (Ill. W.C. Comm. 2021)

Arbitrator Harris also relied on the fact employees were not allowed to be in the alley and Petitioner left the employer's premises when he entered the alley.

Commission Decision: The Commission affirmed and adopted the decision of the Arbitrator.

Takeaway: When a Petitioner deliberately provokes and causes fights and/or trouble at work, and is injured as a result, he will likely be denied workers' compensation benefits.

Factual Background: The Petitioner sustained injuries after she fell on the second or third step of the employer's staircase. The stair were cement, worn, uneven, and lacked treading. There were 25 steps and the petitioner was required to traverse the stairs in order to sign in and out. She was initially recommended to undergo knee surgery but was unable to do so due to her uncontrolled hypertension.

Dr. Primus, Petitioner's treating physician, testified he continued to recommend surgery for her right knee pending medical clearance. Petitioner was also evaluated by Dr. Kornblatt pursuant to Section 12 of the Act and Dr. Kornblatt testified consistently with Dr. Primus such that Petitioner's fall caused injury to her right knee. However, unlike Dr. Primus, Dr. Kornblatt testified Petitioner sustained a contusion to her knee which had resolved and no further treatment was recommended.

Arbitrator's Decision: The Petitioner's claim for compensation was denied. Arbitrator Huebsch found Petitioner did not prove she sustained an accident which arose out of and in the course of her employment. Instead, Arbitrator Huebsch found she sustained a fall due to a syncopal episode and thus, denied the claim.

Commission Decision: The Commission reversed the Decision of the Arbitrator and awarded Petitioner benefits. The Commission relied on the 1996 Illinois Appellate Court decision *Stapleton v. Industrial Comm'n*. The Court held regarding falls, a claimant must present evidence supporting a reasonable inference that the fall stemmed from an employment-related risk. The Court further stated the 'arising out of' requirement contemplates a causal connection between the accidental injury and some risk incidental to or connected with the activity an employee must do to fulfill her duties The Commission also relied on the *Baldwin v. Illinois Workers' Compensation Comm'n* case which requires a petitioner to present evidence which supports a reasonable inference that the fall stemmed from a risk related to the employment. The act of walking up a staircase, by itself, does not expose an employee to a risk greater than that faced by the general public.

Consequently, the Commission found Petitioner presented such evidence. The Commission noted the stairs were not "average" stairs. The stairs were 25 steps in height and were made of cement, worn, uneven and lacked treading. Moreover, Petitioner was required to traverse the stairs in order to begin and end her workday. Thus, the Commission found the stairs increased her risk of injury from the fall. The Commission further noted an idiopathic fall is compensable if the employment significantly contributed to the injury by placing the employee in a position increasing the dangerous effects of the fall. Accordingly, the Commission found Petitioner sustained an accident which arose out of and occurred during the course of her employment.

In addition, the Commission found causal connections between Petitioner's right knee and lower back conditions.

Given the Commission's findings, the Commission awarded prospective medical care and temporary total disability benefits.

Takeaway: The fact that a claimant's fall on stairs may be related to a syncopal episode does not necessarily block a finding of compensability whereas here, the condition of the stairs increased the claimant's risk of injury and she was required to traverse such stairs daily.

WHEN A TRAVELING EMPLOYEE IS NOT A TRAVELING EMPLOYEE

–Christopher Tomczyk

We all know that when a traveling employee gets injured, the main litmus test of the Commission is that if the injury was "reasonably foreseeable" then it will be deemed compensable. However, a recent Commission decision has put forth the proposition that while that holds true when the employee is traveling for employment, it does not seem to hold true when an employee is at the physical office/ work site of the employer.

In the Case of *Cox v. State of Illinois*, 29 ILWCLB 69 (Ill. W.C. Comm. 2021) the Petitioner was employed as a personal assistant who provided care at client's homes. Part of her duties required her to turn in her time sheets for documentation of her work hours. This could be accomplished either by mailing them into the office or by submitting them in person. In order to submit the time sheets in person she needed to enter through the Public Aid office which only had a single entryway for both employees and the general public. Due to

reliability issues, the Petitioner choose to submit the timesheets in person and was performing this task on the morning of her injury. After she dropped off her time sheets, she slipped and fell on rock salt and gravel which had covered an area near the entrance/exit doors.

At the initial hearing the Arbitrator found Petitioner was a traveling employee and used the typical analysis that such a fall was reasonably foreseeable by the employer and awarded benefits. On review, however, the Commission took exception to the blanket viewing of Petitioner as a traveling employee. The Commission found that Petitioner was not in fact traveling for her employment at the time of her injury since she was on site at the time of the injury. Using the decision of *Pryor v. IWCC*, as a basis, the Commission held that since Petitioner was not traveling for work when injured the application of a traveling employee analysis was misplaced. Since Petitioner was on site when the injury occurred the Commission felt it was more appropriate to apply the standard "arising out of" analysis. Since she was on site to deliver her timesheets the Commission found the accident arose out of her employment and affirmed the award of benefits.



Should the Commission continue to follow this line of reasoning in the future? It can help limit some liability for employers with traveling employees. While this altered analysis will not give a large umbrella of defense options on disputed or questionable cases it will, however, allow employers to assert defenses available in any "arising out of" analysis. Given the recent trend of past Commission decisions finding claims compensable for various reasons, employers seem to finally be getting a small assist in being able to defend against new claims.

The only remaining question is if the Appellate court will take notice and apply the same reasoning in the future.

NOTES, EVENTS & VOLUNTEERS

-Jim Gallen is the Chair of the Planning Committee for the Commemoration of the Fiftieth Anniversary of the Report of the National Commission On State Workers' Compensation Laws. The events will be in 2022.

-Terry Mort successfully completed the Chicago Triathlon on August 29, 2021 in some very hot, humid and challenging conditions.

-On August 21, 2021 Jim Gallen took part in the Moonlight Ramble, which is the longest running nighttime bike ride in the US and a great source of pride for St. Louis. The ride that began with one rider has grown into an annual tradition with thousands of riders taking to the streets of St. Louis at night under the light of the moon.

-This year, Chris Tomczyk is teaching 4th grade Religious Ed at Holy Family Catholic Church in Shorewood.

-Paul Krauter is celebrating his one year anniversary as a volunteer with The Veterans Consortium. The TVC is a pro bono program that provides legal representation to our nations veterans before the United State Court of Veterans Appeal.

-We will be hosting a virtual Illinois workers' compensation seminar on Thursday, November 4, 2021. **Click here** for more details and to register!

-Our St. Louis team had a great time getting together for the Bizdash 5K. More than 130 teams throughout the St. Louis area came together for a night that celebrates community, team camaraderie, and living a healthy, active lifestyle.



GETTING TO KNOW: LILIA PICAZO

HOW LONG HAVE YOU BEEN WITH E&D?
I HAVE BEEN AN ASSOCIATE IN THE CHICAGO OFFICE FOR ONE YEAR AND 9 MONTHS (JANUARY 2020)

WHAT'S THE TOP DESTINATION ON YOUR MUST-VISIT LIST?
ANTARCTICA

IF YOU HAD TO TEACH A CLASS ON ONE THING WHAT WOULD IT BE?
TAP DANCE

WHAT ARE SOME OF YOUR HOBBIES & INTERESTS **OUTSIDE OF THE OFFICE?**
WORKING OUT, TRAVEL, VOLUNTEER WORK THROUGH WGIRLS

WHAT'S YOUR FAVORITE COLLEGE SPORTS TEAM TO ROOT FOR?
WISCONSIN BADGERS

WHAT IS SOMETHING ABOUT YOU THAT PEOPLE WOULD NEVER GUESS?
I AM FLUENT IN SPANISH AND LEARNED HOW TO SPEAK ENGLISH IN KINDERGARTEN



Chicago, IL
303 W. Madison St., Ste.1900
Chicago, IL 60606
Phone: (312) 645-0606
Fax: (312) 645-0033

St. Louis, MO
211 N. Broadway, Ste. 2500
St. Louis, MO 63102
Phone: (314) 621-7755
Fax: (314) 621-3136

Columbia, MO
501 Cherry St., Ste. 200
Columbia, MO 65201
Phone: (573) 777-8823
Fax: (314) 884-4542

Kansas City, MO
1100 Main St., Ste. 2000
Kansas City, MO 64105
Phone: (816) 472-4600
Fax (816) 472-4013

Springfield, MO
4905 S National Ave., Bldg B
Springfield, MO 65810
Phone: (417) 882-4700
Fax: (417) 882-4927

Overland Park, KS
10851 Mastin Blvd., Ste. 900
Overland Park, KS 66210
Phone: (913) 693-0900
Fax: (913) 341-2293

Omaha, NE
11422 Miracle Hills Dr., Ste. 400
Omaha, NE 68154
Phone: (402) 397-0800
Fax: (402) 397-0807

www.evas-dixon.com