



Public Adjusting: Unauthorized Practice of Law in Louisiana

By Steven G. “Buzz” Durio and Timothy A. Maragos

It is no secret that the miseries brought in the wake of Hurricanes Katrina and Rita were compounded by bureaucratic missteps and general ignorance of the scope of the problems. Now, four months since Katrina made landfall and caused a breach in the very fabric of our state, another threat to the security and well-being of our citizens looms. But harm from unregulated and illegal public adjusters can still be prevented.

“Adjusting” is an aspect of the insurance industry regulated state-by-state. Most often this is accomplished through the executive branch, frequently by a Department of Insurance. This department regulates insurance companies, agencies and other entities that provide adjusting services, either of their own claims, or independently for other insurance companies. Sometimes adjusting services are marketed to and on behalf of the general public. In these instances, the provision of adjusting is regarded as “public adjusting.”

Louisiana does not regulate public adjusting. However, this lack of regulation is not the result of legislative machinations; there is a more fundamental problem. In Louisiana, as a result of judicial decisions, public adjusting, which traditionally includes analyzing coverage, estimating the extent of damages, negotiating with the insurance company, and often handling client funds, is considered the practice of law. Therefore, public adjusters who are not lawyers are essentially engaged in the unauthorized practice of law – an activity which is illegal.

Despite *Louisiana Claims Adjustment Bureau, Inc. (LCAB) v. State Farm Ins. Co.*, No. 38,709-CA (La. App. 2 Cir. 6/23/04), 877 So.2d 294, which only last

year reaffirmed a long-standing series of court decisions holding public adjusting to be unlawful, public adjusters have become an all-too-common feature of the post-disaster landscape.¹ Because “public adjusters” from other states often migrate seasonally into Gulf states such as Louisiana after hurricanes, they are sometimes pejoratively referred to as “storm troopers.” The general public — and even most lawyers — are unaware that these are considered illegal contracts, and hurricane victims have signed agreements with out-of-state public adjusters without realizing that there is no real enforcement mechanism to protect the Louisiana citizen from being victimized a second time.

The practice of law in Louisiana is regulated by the Louisiana Supreme Court, which is assisted in enforcement of the Rules of Professional Conduct through its Disciplinary Board and Office of Disciplinary Counsel. These entities have no power to prohibit public adjusting by non-lawyers nor to take action against laymen who might be engaged in public adjusting, or any other form of the unauthorized practice of law. The resulting gap between the regulatory authority of the Commissioner of Insurance over laymen and the regulatory power of the Supreme Court over licensed lawyers means that there is no entity regulating the behavior of public adjusting by non-lawyers in Louisiana and no protection for the consumer of these services. The gap should be filled by enforcement of La. R.S. 37:212-213, which makes the unauthorized practice of law a “serious misdemeanor,” but prosecutions under that statute are infrequent.

The responsibility for enforcement of

criminal statutes rests primarily upon the district attorney for the parish in which an unauthorized practice of law incident, such as public adjusting, occurs. The Louisiana State Bar Association’s Public Access and Consumer Protection Committee (originally known as the Unauthorized Practice of Law Committee) has for many years fielded complaints, issued “cease and desist” letters, referred prosecutions, and assisted in the criminal and civil actions when citizens have been victimized by those in violation of the statute. Little has come of these efforts on the criminal side, but a consistent series of decisions in civil actions establishes that contracts for public adjusting are null and void and violations of the public policy prohibiting the unauthorized practice of law.²

Public Adjusting

According to the Web site of the National Association of Public Insurance Adjusters, a public adjuster is “an authority on loss adjustments who you can retain to assist you in preparing, filing, and adjusting your insurance claims.” This site maintains that public insurance adjusters are qualified to practice “in virtually all jurisdictions” and are “fully-qualified professionals.” They are compensated by “a percentage of the insurance company’s settlement” on the theory that this more closely aligns their interest with the insured’s. They do not represent insurers in order to represent insureds “exclusively and independently.” Their qualifications and licensing “varies from state to state.” Public adjusters assist in all types of first-party claims for property damage, but evidently do not get in-

volved in personal injury claims. Their brief 10-point Code of Ethics explicitly forbids “improper solicitation” and “engage[ing] in the unauthorized practice of law.”³

The Practice of Law

The practice of law in Louisiana is defined by many judicial decisions now codified at La. R.S. 37:212A:

- A. The practice of law means and includes:
- (1) In a representative capacity, the appearance as an advocate, or the drawing of papers, pleadings or documents, or the performance of any act in connection with pending or prospective proceedings before any court of record in this state; or
 - (2) For a consideration, reward, or pecuniary benefit, present or anticipated, direct or indirect,
 - (a) The advising or counseling of another as to secular law;
 - (b) In behalf of another, the drawing or procuring, or the assisting in the drawing or procuring of a paper, document, or instrument affecting or relating to secular rights;
 - (c) The doing of any act, in behalf of another, tending to obtain or secure for the other the prevention or the redress of a wrong or the enforcement or establishment of a right; or
 - (d) Certifying or giving opinions as to title to immovable property or any interest therein or as to the rank or priority or validity of a lien, privilege or mortgage as well as the preparation of acts of sale, mortgages, credit sales or any acts or other documents passing titles to or encumbering immovable property.

This statute was first enacted as Act 202 of 1932, and excepted in present paragraph A(2)(c):

except, without resort to court proceedings, the enforcing, securing, settling, *adjusting* or compromising of defaulted, controverted or disputed accounts, or claims. (emphasis added)

In *Meunier v. Bernich, et al*, 170 So.2d 67 (La. App. 1936), this exception was held unconstitutional on the theory that it violated the principle of separation of powers and only the judicial branch had the power to regulate the practice of law. *Meunier* was based on the inherent power of the judiciary and held:

this inherent power necessarily includes the right of the court to define the practice of law.

Meunier at 575. The remainder of the statute survived because it was “in aid” and not in derogation of the court’s powers. *Meunier* at 577-78.⁴

The court in *Meunier* recognized that the exception for public adjusting was “not only an encroachment upon the inherent judicial power but it tends to impede and destroy the court’s authority over the legal profession.” *Meunier* at 577. The court also identified “a stronger reason why the exception is unconstitutional” in Article 7, § 10 of the 1921 Constitution conferring original and exclusive jurisdiction in disbarment proceedings.⁵

The court found that *Meunier* “attempted to perform the services which only an attorney at law was entitled to render and for this reason the contract was illegal and against public policy.” *Meunier* at 577. This finding was based on the fact that:

Meunier does more than mere investigation . . . he undertook . . . to enforce, secure, settle, adjust, or compromise . . . it became necessary for him to examine the facts of the case and to advise . . . regarding

. . . liability . . . in the adjustment of claims he advises clients respecting their rights and liabilities as a matter of law. . . . Thus, in the performance of his contract, *Meunier* had to advise his client concerning the redress of a legal wrong, which advice he was not qualified to impart because he does not possess the legal training exacted by the Supreme Court.

Meunier at 573-74.

The Public Access and Consumer Protection Committee was involved as *amicus curiae* in *Louisiana Claims*, a recent civil case involving public adjusting and unauthorized practice. *Louisiana Claims* resulted in a decision reaffirming *Meunier*. In *Louisiana Claims*, a public adjuster sued State Farm for refusing to negotiate with public adjusters which State Farm claimed were engaged in unauthorized practice of law. The court began by noting its previous decision in *Duncan v. Gordon*, 476 So.2d 896 (La. App. 2 Cir. 1985), in which it was held that, when a person who is not an attorney represents another in the negotiation and settlement of a personal injury claim for consideration, pursuant to a contingency fee contract, that person has engaged in the unauthorized practice of law. State Farm contended that it was true that LCAB was engaged in unauthorized practice and this was an absolute defense to LCAB’s claim of defamation. The 2nd Circuit reasoned:

It is the unauthorized practice of law because the person must advise the client of issues concerning the redress of a legal wrong. In order to dispense the kind of legal advice to its clients necessary in this case . . . LCAB . . . would have had to perform the functions of a licensed attorney . . . evaluating a claim and determining whether it has merit or is instead frivolous must be done by a licensed attorney.

Louisiana Claims at 299.

The rationale of *Meunier* and *Louisiana*

ana Claims is that public adjusting inherently involves the giving of legal advice and is therefore unauthorized practice of law, without regard to whether or not the claim being “adjusted” is a first-party or third-party claim and without regard to the basis of the fee, whether contingency or hourly. *Meunier* recognized that allowing public adjusting by non-licensed laymen would undermine the Supreme Court’s ability to enforce discipline on attorneys at law. This difficulty is not limited to contingent fees and solicitation but, because of the increasingly complex ethical regulation of lawyers, extends to many other areas. If public adjusters are allowed to settle cases with third parties, receive their client’s check, make disbursements and the like, the rules, *e.g.*, regarding conflicts of interest, aggregate settlements, interest on trust accounts, overdrafts on trust accounts, handling of disputed fees and the like, will all be eviscerated.

All of these problems are realized in the aftermath of every significant hurricane, and there is great concern that they may reach epidemic proportions following Katrina and Rita. After Hurricane Andrew, for example, public adjusters involved in supervising reconstruction of public housing projects in Louisiana and Florida were involved in a scheme by which claims were inflated. These schemes involved multiple states and millions of dollars in damages, with substantial effects on the general public. When these practices were discovered, the reconstruction projects were halted for years. The net result was that many members of the general public were indefinitely displaced from their residences without recourse.

The civil process by which the public adjusters involved in the post-Andrew claims were prosecuted took years and was extraordinarily cumbersome, particularly when compared to the regulatory enforcement powers that would have been exercised against similarly unethical practices perpetrated by lawyers.⁶ Indeed, the Office of Disciplinary Counsel has virtually instantaneous emergency power to suspend licenses and recover

and administer client trust funds when lawyers are discovered to be involved in schemes like those perpetrated by public adjusters after Andrew.

Criminal Prosecution for Unauthorized Practice of Law

Since the 1922 decision in *State v. Rosborough*, 152 La. 945, 94 So. 858 (La. 1922), unauthorized practice has been prosecuted as a crime under various versions of a statute, now La. R.S. 37:213. Unauthorized practice of law, which is a “serious misdemeanor,” is defined in La. R.S. 37:213A:

- A. No natural person, who has not first been duly and regularly licensed and admitted to practice law by the supreme court of this state, no corporation or voluntary association except a professional law corporation organized pursuant to Chapter 8 of Title 12 of the Revised Statutes, and no partnership or limited liability company except one formed for the practice of law and composed of such natural persons, corporations, voluntary associations, or limited liability companies, all of whom are duly and regularly licensed and admitted to the practice of law, shall:
- (1) Practice law.
 - (2) Furnish attorneys or counsel or an attorney and counsel to render legal services.
 - (3) Hold himself or itself out to the public as being entitled to practice law.
 - (4) Render or furnish legal services or advice.
 - (5) Assume to be an attorney at law or counselor at law.
 - (6) Assume, use, or advertise the title of lawyer, attor-

ney, counselor, advocate or equivalent terms in any language, or any phrase containing any of these titles in such manner as to convey the impression that he is a practitioner of law.

- (7) In any manner advertise that he, either alone or together with any other person, has, owns, conducts, or maintains an office of any kind for the practice of law.

Despite the longevity of this statute, it is deficient in several respects. First, it explicitly prohibits only such activities as are defined in a separate statute to be the practice of law. As discussed above, this separate statute defining the practice of law was amended to except public adjusting in explicit terms. When the exception for public adjusting was subsequently declared unconstitutional, the statute was reenacted by simply omitting the offending language. This has left in the Revised Statutes no language explicitly prohibiting the activity of public adjusting, nor any language specifically identifying the work of public adjusters as the practice of law, with the result of potentially obscuring jurisprudence which has consistently held public adjusting to be the unauthorized practice of law.

Secondly, the wisdom of elevating the offense of unauthorized practice to “serious misdemeanor” criminal status might reasonably be questioned in several respects. Enforcement of such a statute, which affords the right to a jury trial, is subject to the resources and demands of the local district attorney. District attorneys often cannot devote scarce resources or give appropriate priority to make criminal enforcement of unauthorized practice effective. Also, attaching criminal consequences to an activity that is separately licensed in other states but is here criminally punished as unauthorized practice often makes successful prosecution more difficult.

Act 148 of 2003; La. R.S. 22:1476

This state of the law under La. R.S. 37:212-213, and *Meunier* through *Louisiana Claims*, was complicated in 2003 by the passage of Act 148, now La. R.S. 22:1476.⁷ Subsection 1476A defines “public adjusting” for the limited purpose of “this section.” Subsection 1476B prohibits contingent fee agreements for “public adjusting” by non-attorneys. No part of the statute authorizes or legalizes anything, much less “public adjusting.” A reading of La. R.S. 22:1476, consistent with *Meunier* and *Louisiana Claims*, would suggest that this statute’s purpose and effect is to augment existing law by statutorily condemning what is evidently perceived as an especially pernicious practice.⁸ Under this straightforward reading, the statute would be construed “in aid” of the exclusive judicial power to regulate the practice of law, and held to be constitutional.⁹

Unfortunately, La. R.S. 22:1476 has already been misconstrued by out-of-state public adjusters as impliedly legalizing public adjusting in Louisiana. This reading overlooks or purposefully ignores the language of La. R.S. 37:212-213, the *Meunier* holding that the practice of law cannot constitutionally be amended for this purpose by statute, and the broader context of the Louisiana jurisprudence by which public adjusting has uniformly been held illegal for almost 70 years.¹⁰ In the broader light of La. R.S. 37:212-213, *Meunier* and *Louisiana Claims*, in which adjusting by non-attorneys constitutes unauthorized practice (regardless of the basis of the fee), subsection 1476B cannot be read, merely by negative implication, to reverse the presumption of illegality which already extends beyond the specifically invalidated contract to the underlying activity.¹¹ Reading a negative implication of La. R.S. 22:1476 to positively authorize public adjusting by non-attorneys except by contingent fee agreement would undermine the exclusive judicial authority to regulate the practice of law and, under the *Meunier* analysis, render the statute unconstitutional.

Alternatives

Notwithstanding *Meunier*, the persistence of public adjusters, as evidenced by the situation described in *Louisiana Claims*, suggests that some alternative means of prohibiting or regulating this activity should be explored. This is particularly true when coupled with the consistent lack of criminal enforcement of La. R.S. 37:213. There is the potential for additional legislative or regulatory action, but many Louisiana State Bar Association members advocate the commencement of civil litigation which would place the question of regulatory responsibility directly before the courts.

Regulation by the Commissioner of Insurance

Last year, the commissioner’s office sponsored the introduction of a bill that would have provided for the licensing of public adjusters. This would have effectively removed the aspects of the practice of law inherent in public adjusting from the authority of the Supreme Court and permitted licensed laymen to undertake certain aspects of the practice of law. Such legislation would presumably have been unconstitutional under *Meunier*. More importantly, the *de facto* authorization of public adjusting through statutory licensing would have resulted in standards applicable to non-lawyers being different from standards applicable to lawyers, even if the two were performing the same functions on behalf of a client. Perhaps for these reasons, opposition materialized, and the commissioner’s bill was withdrawn.

Nevertheless, because of the persistent influx of foreign public adjusters to the state in the wake of Hurricanes Katrina and Rita, the commissioner exercised emergency authority to promulgate a regulation¹² requiring the registration of public adjusters with his office. While the commissioner’s desire to identify and track out-of-state adjusters who stormed into Louisiana was commendable, the emergency regulation only lent weight to

the misperception that such activity is legal.

Potential Legislation

Any attempt to amend La. R.S. 37:212 carries constitutional implications and jeopardizes 80 years of consistent interpretation by *Meunier*, *Duncan* and *Louisiana Claims*. Additional legislation in this area may unnecessarily “politicize” this issue and create an opportunity for lobbying by foreign interests. The broad definition of the practice of law serves an important prophylactic purpose, protects the public, and should not be impaired. It is the authors’ belief that wholesale legislative changes should not be considered until after exhausting all other efforts, *i.e.*, civil litigation under existing statutes and jurisprudence, or renewed criminal prosecution.

That said, many district attorneys, judges and others familiar with the penalty provisions of La. R.S. 37:213 favor tinkering with those provisions only. Among the ideas suggested are “staging” the offense by making a first offense a misdemeanor punishable by a fine and increasing penalties for second and third offenses to include more serious punishment. This would make a first offense much more likely to be prosecuted and would eliminate the present need for jury trial, which wastes scarce resources, until the offense level is sufficiently serious.

Should Civil Action Be Considered?

Other professions have had significant success in protecting the public from unlicensed practitioners by becoming the protagonists in civil litigation. In particular, *State of Louisiana, through the Louisiana State Board of Examiners of Psychologists of the Department of Health and Human Services v. Atterberry*, 95 CA 0391, 664 So.2d 1216 (1 Cir. 1995), has been suggested as a guide for civil action against public adjusting.

In *Atterberry*, the defendant was a licensed professional counselor in

Houma, La., with a master's degree in clinical psychology, who was apparently not licensed as a psychologist by the Board of Examiners of Psychologists of the State of Louisiana. *Atterberry*, at 1218. He was administering several tests in the course of his counseling practice which he claimed were authorized in his counseling practice by La. R.S. 27:1101, *et seq.* The board claimed that the administration or interpretation of these tests was within the practice of psychology as defined in La. R.S. 37:2352(5). *Atterberry*, at 1221-23. The appellate opinion in *Atterberry* did not clearly enunciate which position was correct, but determined that the trial court had not abused its discretion in issuing the injunction preventing *Atterberry* from using the tests. *Atterberry*, at 1224.

In the authors' view, the *Atterberry* decision appears to be an attractive alternative to referring public adjusters for criminal prosecution. It should be noted, however, that the Board of Examiners for Psychologists is specifically authorized by statute to prosecute actions for injunction. There is no similar specific grant of authority for injunctive actions in the authorizing statutes and organizational documents of the Louisiana State Bar Association. Moreover, there is no criminal statute outlawing the actions sought to be enjoined by the psychologists. Thus, there are questions as to whether the bar association would have standing to pursue injunctive relief and whether the existence of the criminal statute would preclude the right to seek civil recourse.

Yet, those questions do not survive serious scrutiny. Standing questions the interest and authority, or the existence of a right of action in favor of the plaintiff, and was not directly addressed in *Atterberry*. The issue was raised as to whether injunctive relief could be granted in the absence of irreparable harm. The court found so, based on La. R.S. 37: 2361B:

The board may apply for an injunction in any court of competent jurisdiction to enjoin any person from committing any act which is in violation of this Chapter.

While there is no precisely comparable provision in the authorizing statutes or organizational documents of the Louisiana State Bar Association, Article III § 2 of the articles does provide that the association shall have all the rights, powers and privileges of a nonprofit corporation, especially referencing La. R.S. 12:201, *et seq.* La. R.S. 12:207 B(3) provides the power to "sue and be sued" in corporate name.

The *Atterberry* court also found irreparable harm because: "By allowing *Atterberry* to practice psychology, there is the potential for erroneous assessments, which could cause irreparable injury to those persons the State and the Board are trying to protect." *Atterberry*, at 1224. This logic was not supported by any cited authority but appears equally applicable to unauthorized practice of law. The case against a public adjuster, who is not licensed or regulated in any way, would seem to be stronger than the case of the Board of Psychologists against *Atterberry*, a licensed and regulated professional counselor. Like the Board of Examiners of Psychologists, parts of the Louisiana State Bar Association charge is to protect the public.

The existence of the criminal provisions does not appear to be a significant obstacle to civil litigation. While some federal court decisions have held that the unauthorized practice of law is not an actionable tort because of the existence of the criminal statutes (*see Hickman v. Douglas*, 1996 WL 626330 (E.D. La. 1996), and *Domingue v. Salomon Smith Barney*, No. 6:00CV2745, on the docket of the United States District Court for the Western District of Louisiana), these decisions turn on implied private rights of action under federal law, and not principles of state law (*e.g.*, murder is a crime and also a tort). If the proper context is considered, these decisions should be inapplicable to injunctive actions under state law, which traditionally apply to a broader range of activities.

Thus, civil litigation against a recidivist "public adjuster" would seem to be available and, we suggest, well-warranted under *Atterberry*.

Conclusions

Our experiences during Hurricane Andrew have proven that unregulated public adjusting in Louisiana has allowed laymen from other states to perpetrate frauds and other injuries upon the general Louisiana public. The comprehensive, immediate and effective enforcement procedures of the Office of Disciplinary Counsel would have swiftly neutralized lawyers who had undertaken the same schemes, thereby protecting the public from greater injury. It is clear that the constitutional basis of the holdings in *Rosborough* and *Meunier* make it impossible for public adjusting to become a legitimate, legal activity within the state of Louisiana. Nevertheless, recent actions by the Legislature and the Commissioner of Insurance seem to have emboldened foreign public adjusters. We believe that enforcement of the existing criminal statutes, or the institution of civil injunctive action, is urgently necessary. Short of that, Louisiana practitioners should advise Louisiana clients that contracts with public adjusters are null, void, against public policy and unenforceable.¹³

FOOTNOTES

1. Discussed at page 315 *infra*.
2. See the decisions discussed in *Louisiana Claims Adjustment Bureau, Inc. v. State Farm Ins. Co.*, *supra*.
3. See *www.napia.com*. Public adjusters should be distinguished from independent adjusting firms which only represent insurers.
4. This broad and general legislative definition of the practice of law includes public adjusting in light of the judicial decision excising the language that clearly excepted it, but the lack of any specific reference to public adjusting undermines the deterrent purpose a more explicit statute might serve. The existence of the definitional statute also obscures the inherent and exclusive judicial authority to define the practice of law.
5. This provision is carried over in the Constitution of 1974 as Article 5, § 5(B).
6. See *Bacmonila Apartments, Ltd. v. Travelers Indemnity, et al*, No. 94-CV-01092 of the United States District Court for the Western District of Louisiana.
7. The full text of R.S. 22:1476 is as follows:

A. As used in this Section, “public adjuster” means an individual, except a duly licensed attorney at law, who, for compensation, acts on behalf of an insured or aids the insured in any manner in negotiating for or effecting the settlement of a claim for loss or damage resulting from an accident or other occurrence covered under an insurance policy that insures against loss or damage to property, or any person who advertises or solicits for employment as an adjuster of such claims.

B. Any contract or arrangement between an insured and a public adjuster which provides for payment of a fee to the public adjuster which is contingent upon, and calculated as a percentage of, the amount of any claim or claims paid to, or on behalf of an insured by the insurer shall be against public policy and is null and void.

8. La R.S. 22:1476 could in this sense be read to authorize additional actions against public adjusting, for example pursuant to regulation by the Commissioner of Insurance, or in addition to or in the event of non-prosecution pursuant to La. R.S. 37:213.

9. See Meunier at 577-78 as discussed in this article.

10. It is implausible to suggest that the Legislature would attempt to legalize by mere

negative implication of a narrow collateral statute an activity which it had previously and unsuccessfully attempted to legalize by explicit exception in a broader, more directly applicable and pre-existing statute. See Act 202, discussed in this article.

11. Any more than a statute specifically condemning “murder for hire” would negatively imply the legality of murder. The negative implication can only return us to the general context. Reading the statute inversely, to positively approve everything it does not explicitly condemn, is also highly questionable, both logically and legally.

12. Emergency Rule 16, Title 37, Part XI, Chapter 27.

13. The Public Access and Consumer Protection Committee has no objection to damage estimates provided by persons who have the requisite training or education. Insureds and third parties have a right to obtain appropriate expert assistance in determining the scope of their damage or loss. However, public adjusters do not limit their activities to merely providing an estimate of damage. Public adjusters interpret policy provisions, advise claimants as to their rights under insurance policies, advise claimants on the additional steps in prosecuting their claims and provide other similar advice to claimants. Without question, these additional services constitute the unauthorized practice of law. The public, in employing public adjusters, then relies on legal advice given by a non-lawyer without the protection afforded by the ethics system established for attorneys in Louisiana.

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