

Navigating Your Responsibilities to Parentally-Placed Private School Children

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How are “parentally-placed private school children with disabilities” defined?

The federal regulations define parentally-placed private school children with disabilities as “children with disabilities enrolled by their parents in private, including religious, schools or facilities that meet the definition of elementary school in § 300.13 or secondary school in § 300.36, other than children with disabilities covered under §§ 300.145 through 300.147.” 34 C.F.R. § 300.130.

How are “elementary school” and “secondary school” defined?

- “Elementary school means a nonprofit institutional day or residential school, including a public elementary charter school, that provides elementary education, as determined under State law.” 34 C.F.R. § 300.13.
- “Secondary school means a nonprofit institutional day or residential school, including a public secondary charter school that provides secondary education, as determined under State law, except that it does not include any education beyond grade 12.” 34 C.F.R. § 300.36.

Are home-schooled children considered parentally-placed private school children?

According to OSERS:

“Whether home-schooled children with disabilities are considered parentally placed private school children with disabilities is determined under State law. If the State recognizes home-schools as private elementary schools and secondary schools, children with disabilities in those home-schools must be treated in the same way as other parentally placed private school children with disabilities.”

Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs., 111 LRP 32532 (OSERS 2011), Q/A #K-2.

Are pre-school children attending private preschools considered parentally-placed private school children?

OSERS explains:

“An LEA's obligation to serve children aged three through five under the equitable services provisions depends on whether a child is enrolled in a private school or facility that meets the definition of "elementary school" in the IDEA and the final regulations. ... Accordingly, three- through five-year-old children with disabilities who are enrolled by their parents in a private school or facility that meets the State's definition of 'elementary school' would be considered parentally placed and the equitable participation provisions would apply.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #K-2.

Are children attending a for-profit school considered parentally-placed private school children?

OSERS explains:

“The regulations in 34 CFR § 300.130 define parentally placed private school children with disabilities as children with disabilities enrolled by their parents in private, including religious, schools or facilities that meet the definition of elementary school in 34 CFR § 300.13 or secondary school in 34 CFR § 300.36. The definitions of elementary school in 34 CFR § 300.13 and secondary school in 34 CFR § 300.36 specify that the school must be nonprofit. Therefore, children attending for-profit private schools would not be included in the proportionate share calculation or be eligible for equitable services.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #O-1.

What is a school district's child find obligation?

34 C.F.R. § 300.131(a) states:

"General. Each LEA must locate, identify, and evaluate all children with disabilities who are enrolled by their parents in private, including religious, elementary schools and secondary schools located in the school district served by the LEA, in accordance with paragraphs (b) through (e) of this section, and §§ 300.111 and 300.201."

Can a parent request an evaluation by the public school where the child resides and the public school where the private school is located?

OSERS states:

"[B]ecause most States generally assign the responsibility for making FAPE available to the LEA in which the child's parents reside, and because that could be an LEA that is different from the LEA in which the child's private school is located, parents could ask two different LEAs to evaluate their child for different purposes at the same time. ...Although the Department discourages parents from requesting evaluations from two LEAs, if the parent chooses to request evaluations from the LEA responsible for providing the child FAPE and from another LEA that is responsible for considering the child for the provision of equitable services, both LEAs are required to conduct an evaluation." *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #B-4.

Can the public school who is conducting the evaluation contact the public school in which the child resides, to obtain information regarding the child?

"If a child is enrolled, or is going to enroll in a private school that is not located in the LEA of the parent's residence, parental consent must be obtained before any personally identifiable information about the child is released between officials in the LEA where the private school is located and officials in the LEA of the parent's residence." 34 C.F.R. § 300.622(b)(3).

Are there standards that must be satisfied when undertaking child find?

- The **design** must ensure equitable participation and an accurate count.
- The **activities** must be similar to the activities undertaken for public school children.
- The **cost** may not come out of the proportionate share.
- The **completion period** must be comparable to that of public school children.

See 34 C.F.R. § 300.131.

What if the child resides out-of-state?

- The child find obligation extends to children who reside out-of-state but attend a private school within the district. See 34 C.F.R. § 300.131(f).
- “OSEP’s longstanding position regarding equitable participation for children from other countries enrolled in private elementary schools and secondary schools by their parents is that the obligation to consider children with disabilities for equitable services extends to all children with disabilities in the State who are enrolled by their parents in private schools within each LEA’s jurisdiction, regardless of whether or not the parent resides in that State.” *Letter to Corwell*, 61 IDELR 82 (OSEP 2013).

Can the public school require the private school to implement response to intervention (RTI) before evaluating a child?

OSERS states:

“[A]lthough IDEA permits the use of RTI in evaluating children suspected of having learning disabilities, it does not require LEAs to use RTI. Even if a State’s criteria permit LEAs to use RTI in evaluating children suspected of having learning disabilities, IDEA does not require an LEA to use RTI for parentally placed children attending private schools located in its jurisdiction. It would be inconsistent with the IDEA evaluation provisions in 34 CFR §§ 300.301-300.311 for an LEA to delay the initial evaluation because a private school has not implemented an RTI process with a child suspected of having learning disabilities and has not reported the results of that process to the LEA.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #B-3.

If the child qualifies for special education services, is the public school where the private school is located responsible for offering a FAPE?

OSERS states:

“The LEA where a child attends private school is responsible for ensuring equitable participation. If a parentally placed private school child also resides in that LEA, then the LEA would be responsible for making FAPE available to the child, unless the parent makes clear his or her intent to keep the child enrolled in the private elementary or secondary school located in the LEA. If a parentally placed private school child resides in a different LEA, the district in which the private elementary or secondary school is located is not responsible for making FAPE available to that child...” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #B-5.

If the child qualifies for special education services, what is the responsibility of the public school in which the child resides?

OSERS states:

“[T]he LEA of the child’s residence would be responsible for making FAPE available to that child. If a determination is made through the child find process by the LEA where the private school is located that a child needs special education and related services and a parent makes clear his or her intent to keep the child enrolled in the private elementary or secondary school located in another LEA, the LEA where the child resides is not required to make FAPE available to the child. However, if the parents choose to accept the offer of FAPE and enroll the child in a public school, then the LEA where the child resides is obligated to make FAPE available to the child.”

Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs., 111 LRP 32532 (OSERS 2011), Q/A #B-5.

Which public school is responsible for reevaluation?

OSERS states:

“The LEA where the private elementary school or secondary school is located is responsible for conducting reevaluations of children with disabilities enrolled by their parents in the private elementary schools and secondary schools located in the LEA.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #B-8.

What about if the parent disagrees with the evaluation and wants an Independent Educational Evaluation (IEE)?

OSERS states:

“Parents would request an IEE from the LEA that conducted the evaluation with which the parents disagree.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #B-12.

Can the costs of evaluation and reevaluation be deducted from the proportionate share amounts?

OSERS states:

“The obligation to conduct child find, including individual evaluations, exists independently from the obligation to provide equitable services. The costs of child find activities, such as evaluations, may not be considered in determining whether the LEA has spent an appropriate amount on providing special education and related services to parentally placed private school children with disabilities.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #B-10.

What is the duty to provide services?

- Services must be provided to the extent consistent with the number and location of children with disabilities enrolled by their parents in private schools located in the school district.
- The public school must provide special education and related services, including direct services.

See 34 C.F.R. § 300.132(a).

Are there limits to the costs?

- There is a formula (proportionate share calculation).
- The public school must spend a proportionate amount of its IDEA-B funds.
- If the funds are not spent in one year, they can be carried over for one additional year.

See 34 C.F.R. § 300.133(a).

How are the dollar amounts calculated?

The public school must annually:

- “Timely and meaningfully” consult with representatives of private schools;
- Conduct a “thorough and complete child find process” to determine the number of children eligible to receive proportionate share services;
- Use the count to determine the amount to be expended on services.

See 34 C.F.R. § 300.133(b)-(c).

Are the children being counted the ones that receive the services?

“The number of parentally-placed private school children with disabilities is used to determine the amount that the LEA must spend on providing special education and related services to parentally-placed private school children with disabilities in the subsequent year. 34 CFR § 300.133(c)(2). For example, the LEA would calculate the proportionate share for funds received on July 1, 2012 based on its child count from December 1, 2011. This amount would be the proportionate share to be expended during the 2012-2013 school year (or during the carry-over year) for special education and related services to parentally-placed private school children with disabilities.” 34 CFR § 300.133(a)(3). *Letter to Apostle*, 60 IDELR 165 (OSEP 2012).

What about the children who come after the count and consultation?

“The consultation process must include discussion of how that process will operate throughout the school year to ensure that parentally-placed private school children with disabilities can meaningfully participate in special education and related services. 34 CFR § 300.134(c). The process could include conversations about changes that may need to be made based on fluctuations in the population of students to be served that would include the issue of children who are identified during the school year in which the expenditures are being made.” *Letter to Apostle*, 60 IDELR 165 (OSEP 2012).

What about the children who come after the count and consultation?

“[A]n LEA is not required to expend more than the proportionate share of funds on the provision of equitable services to children with disabilities. Thus, ongoing consultation and careful planning to account for fluctuations in the population of children to be served are critically important.” *Letter to Apostle*, 60 IDELR 165 (OSEP 2012).

What about State and local dollars?

- You may supplement but not supplant. See 34 C.F.R. § 300.133(d).
- “The IDEA does not prohibit a State or LEA from using additional State or local funds to provide special education or related services to parentally placed private school children with disabilities that are in addition to the services required in 34 CFR §§ 300.130 through 300.144, consistent with State law or local policy.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #D-3.

With whom must the public school consult?

The public school must consult with:

- Private school officials; and
- Representatives of parents of parentally-placed private school children.

See 34 C.F.R. § 300.134(c).

What is effective consultation?

According to OSERS:

“Effective consultation provides a genuine opportunity for all parties to express their views and to have those views considered by the LEA before the LEA makes any decision that has an impact on services to parentally placed private school children with disabilities. Timeliness is critical to effective consultation and requires collaboration between the LEA and private school officials in developing a timeline and selecting dates for consultation. Successful consultation establishes positive and productive working relationships that make planning easier and ensure that the services provided meet the needs of eligible parentally placed private school children with disabilities.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #A-1.

What issues must be addressed in the consultation?

#1

The child find process, including—

- (1) How parentally-placed private school children suspected of having a disability can participate equitably; and
- (2) How parents, teachers, and private school officials will be informed of the process.

See 34 C.F.R. § 300.134(a).

What issues must be addressed in the consultation?

#2

Proportionate share of funds, specifically –

The determination of the proportionate share of Federal funds available to serve parentally-placed private school children with disabilities under § 300.133(b), including the determination of how the proportionate share of those funds was calculated. 34 C.F.R. § 300.134(b).

What issues must be addressed in the consultation?

#3

Consultation process, specifically –

The consultation process among the LEA, private school officials, and representatives of parents of parentally-placed private school children with disabilities, including how the process will operate throughout the school year to ensure that parentally-placed children with disabilities identified through the child find process can meaningfully participate in special education and related services. 34 C.F.R. § 300.134(c).

What issues must be addressed in the consultation?

#4

Provision of special education and related services, specifically –

How, where, and by whom, special education and related services will be provided for parentally-placed private school children with disabilities, including a discussion of –

- (1) The types of services, including direct services and alternate service delivery mechanisms; and
- (2) How special education and related services will be apportioned if funds are insufficient to serve all parentally-placed private school children; and
- (3) How and when those decisions will be made;

34 C.F.R. § 300.134(d).

What issues must be addressed in the consultation?

#5

Written explanation by LEA regarding services, specifically –

“How, if the LEA disagrees with the views of the private school officials on the provision of services or the types of services (whether provided directly or through a contract), the LEA will provide to the private school officials a written explanation of the reasons why the LEA chose not to provide services directly or through a contract.” 34 C.F.R. § 300.134(e).

Must the consultation be documented?

- Public school must “obtain a written affirmation signed by the representatives of participating private schools.” 34 C.F.R. § 300.134(a).
- “If the representatives do not provide the affirmation within a reasonable period of time, the [public school] must forward the documentation of the consultation process to the SEA.” 34 C.F.R. § 300.134(b).

Is a sign-in sheet sufficient written affirmation of the consultation?

OSERS states:

“Though these attendance sheets provide an accounting of who has attended meetings, the sheets themselves do not provide evidence that ongoing consultation has occurred. Therefore, the written affirmation signed by the representatives of the participating private schools should reflect that those officials have indeed participated in timely and meaningful consultation that has continued throughout the school year.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #A-3.

What if a representative disagrees with the consultation?

A private school official can file a complaint with the State asserting that:

- The consultation was not timely;
- The consultation was not meaningful;
- The public school did not give due consideration to my views.

See 34 C.F.R. § 300.136(a).

This does not sound like an ordinary State complaint. Are there special procedures?

- ✓ The official must provide to the SEA the basis of the noncompliance with the applicable private school provisions.
- ✓ The public school must forward the appropriate documentation to the SEA.
- ✓ The SEA must make a decision.
- ✓ If the private school official is dissatisfied with the decision, the official may submit a complaint to the Secretary of Education.
- ✓ The SEA must forward the appropriate documentation to the Secretary of Education.

See 34 C.F.R. § 300.136(b).

Does each child have a right to receive his/her proportionate share?

- There is no **individual right** to special education and related services.
- “No parentally-placed private school child with a disability has an individual right to receive some or all of the special education and related services that the child would receive if enrolled in a public school.” 34 C.F.R. § 300.137(a).

Who decides what services an individual child will receive?

The public school “must make the final decisions with respect to the services to be provided to eligible parentally-placed private school children with disabilities.” 34 C.F.R. § 300.137(a)(2).

Can the decision be made prior to the consultation so that the decision can be announced at the consultation?

OSERS states:

“Timely and meaningful consultation must occur before any decisions are made that will affect the participation of parentally placed children in Part B programs. Thus, decisions about services may not be made in advance or in the absence of timely and meaningful consultation. After timely and meaningful consultation has occurred with private schools representatives and representatives of parents of parentally placed private school children with disabilities, the LEA is responsible for making final decisions about all aspects of the services to be provided to parentally placed private school children with disabilities.”
Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs., 111 LRP 32532 (OSERS 2011), Q/ A #D-1.

Can cost be a factor in the decision?

- “It is important that as part of the consultation process, the LEA, private school representatives, and representatives of parents of parentally-placed private school children with disabilities consider the size of the proportionate share of Part B funds (in other words, the amount the LEA is required to spend on services for parentally-placed private school children with disabilities) in determining what services will be provided in order to ensure the LEA has sufficient Part B funds to implement the services plan for each parentally-placed child with a disability who has been designated to receive services.”
Letter to Apostle, 60 IDELR 165 (OSEP 2012).

Must the proportionate amount be used only for direct services or can the funds be used on other services, such as consultative services, materials, equipment, or training?

OSERS states:

"IDEA does not require an LEA to spend the proportionate share only for direct services. ... Depending on the discussions during the consultation process, local circumstances, and the amount of funds available to expend on services for this population of children, an LEA could determine, after timely and meaningful consultation, that it will provide its population of parentally placed private school children with disabilities with indirect services. ... These services could include consultative services, equipment, or materials for eligible parentally placed children with disabilities or training for private school teachers and other private school personnel." *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #D-4.

Can the proportionate share of funds be spent on administrative costs?

OSERS states:

"[E]ach LEA is required to spend a proportionate share of Federal Part B funds on providing special education and related services to children with disabilities who are enrolled by their parents in private elementary schools and secondary schools in order for the LEA to meet its responsibility for providing equitable services. We interpret the reference to 'special education and related services' to mean that administrative costs could not be included in the amount each LEA must spend to meet this requirement. Thus, an LEA may not expend the proportionate share of Federal Part B funds on administrative costs." *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #H-9.

What if the public school disagrees with the views of the private school officials?

OSERS explains:

"If the LEA disagrees with the views of the private school officials on the provision of services or the types of services, whether provided directly or through a contract, the LEA must provide to the private school officials a written explanation of the reasons why the LEA chose not to accept the recommendations of the private school officials." *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #D-1.

Are services provided according to an IEP?

- No, the child receives a services plan.
- The services plan “must be developed and implemented for each private school child with a disability who has been designated by the LEA in which the private school is located to receive special education and related services...” 34 C.F.R. § 300.132(b).

Services Plan

For children who will receive services, the LEA must:

- (1) Initiate and conduct meetings to develop, review, and revise a services plan for the child, in accordance with §300.138(b); and
- (2) Ensure that a representative of the religious or other private school attends each meeting. If the representative cannot attend, the LEA shall use other methods to ensure participation by the religious or other private school, including individual or conference telephone calls.

34 C.F.R. § 300.132(c).

What does a Services Plan look like?

The Services Plan must, to the extent appropriate –

- ✓ Meet the requirements of § 300.320 [IEP], or for a child ages three through five, meet the requirements of § 300.323(b) [IEP or IFSP] with respect to the services provided to the child.
- ✓ Be developed, reviewed, and revised consistent with §§ 300.321 through 300.324 –
 - IEP Team
 - Parent Participation
 - When IEPs must be in effect
 - Development, review and revision of IEP.

See 34 C.F.R. § 300.138(b)(2).

What does a Services Plan look like?

OSERS states:

"[A] services plan should reflect only the services offered to a parentally placed private school child with a disability designated to receive services. In addition, a services plan is required to meet the IEP content requirements ..., or, when appropriate, for children aged three through five, the Individualized Family Service Plan (IFSP) requirements ..., to the extent appropriate, and only in relation to the services that are to be provided." *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #E-3.

What do equitable services look like from a personnel standpoint?

The provision of services under a Services Plan must be provided:

- (i) By employees of a public agency; or
- (ii) Through contract by the public agency with an individual, association, agency, organization, or other entity.

34 C.F.R. § 300.138(c).

What do equitable services look like from a personnel standpoint?

- Personnel delivering services under a Services Plan must meet the same standards as personnel providing services in the public schools unless it is the private school teachers who are providing the equitable services.
- Private school teachers providing services under a Services Plan do not have to be highly qualified.

34 C.F.R. § 300.138(a)(1).

What requirements apply if the public school contracts with private school teachers to deliver services under a Services Plan?

An LEA may use funds available under sections 611 and 619 of the Act to pay for the services of an employee of a private school to provide services under §§ 300.130 through 300.144 if –

- (1) The employee performs the services outside of his or her regular hours of duty; and
- (2) The employee performs the services under public supervision and control.

34 C.F.R. § 300.142(b).

May the public school use proportionate funds to make payments directly to a private school?

OSERS states:

“Part B funds for equitable services may not be paid directly to a private school. Under 34 CFR § 300.144(a), a public agency must control and administer the funds used to provide special education and related services to parentally placed private school children with disabilities.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #H-10.

What do equitable services look like from a quantity standpoint?

- “Parentally-placed private school children with disabilities may receive a different amount of services than children with disabilities in public schools.” 34 C.F.R. § 300.138(a)(2).
- “Decisions about which services and the amounts of services children with disabilities enrolled by their parents in private schools will receive are made during the consultation process and are based on the needs of the children designated to receive services. These children have no individual entitlement to receive some or all of the special education and related services they would receive if enrolled in a public school.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #D-2.

What do equitable services look like from a content standpoint?

- “Special education and related services provided to parentally-placed private school children with disabilities, including materials and equipment, must be secular, neutral, and nonideological.”

34 C.F.R. § 300.138(c)(2).

May the services be provided on the premises of the private school?

- “Services to parentally-placed private school children with disabilities may be provided on the premises of private, including religious, schools, to the extent consistent with law.” 34 C.F.R. § 300.139(a).
- “The Department generally believes that, unless there is a compelling rationale for these services to be provided off-site, LEAs should provide services on-site, at the child’s private school, so as not to unduly disrupt the child’s educational experience.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #F-1.

May the public school place equipment and supplies for equitable services in a private school?

OSERS explains:

“The public agency may place equipment and supplies in a private school, but only for the period of time needed to meet the equitable participation requirements for the Part B program. The public agency must ensure that equipment and supplies placed in a private school are used only for Part B purposes and can be removed from the private school without remodeling the private school facility. The public agency must remove equipment and supplies from a private school if the equipment and supplies are no longer needed for Part B purposes or if removal is necessary to avoid unauthorized use of the equipment and supplies for other than Part B purposes.” *Questions and Answers on Serving Children with Disabilities by their Parents in Private Schs.*, 111 LRP 32532 (OSERS 2011), Q/A #I-1.

If services are not provided on the premises of the private school, who is responsible for transportation?

- (1) General.
 - (i) If necessary for the child to benefit from or participate in the services provided under this part, a parentally-placed private school child with a disability must be provided transportation—
 - (A) From the child’s school or the child’s home to a site other than the private school; and
 - (B) From the service site to the private school, or to the child’s home, depending on the timing of the services.
 - (ii) LEAs are not required to provide transportation from the child’s home to the private school.
- (2) Cost of transportation. The cost of the transportation described in paragraph (b)(1)(i) of this section may be included in calculating whether the LEA has met the requirement of §300.133. 34 C.F.R. § 300.139(b); see also, *Letter to Luger and Weinberg*, 58 IDELR 199 (OSEP 2011).

Are there record keeping requirements?

Yes, the following records must be maintained:

- The number of children evaluated;
- The number of children determined to be children with disabilities; and
- The number of children served.

See 34 C.F.R. § 300.132(c).

Can a parent of a parentally-placed private school child request a due process hearing?

Due Process not applicable, except for child find.

See 34 C.F.R. § 300.140.

Additional Resource

U.S. Department of Education, Office of Innovation and Improvement, Office of Non-Public Education, *The Individuals with Disabilities Education Act (IDEA): Provisions Related to Children with Disabilities Enrolled by Their Parents in Private Schools*, Washington, D.C., 2008.

Available on-line at:
<http://www2.ed.gov/admins/lead/speced/privateschools/idea.pdf>

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