

NONQUALIFIED DEFERRED COMPENSATION PLANS

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By

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Washington, DC



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2024-2025 Edition Highlights

By Bruce J. McNeil

This unique work provides step-by-step guidance to draft accurate and complete nonqualified retirement plans. It offers expert analysis of the law as well as discussion of specific points of law on nonqualified deferred compensation plans.

The author, an expert in this area, walks you through this particularly complex area of practice, providing insightful practical guidance while covering such relevant topical areas as:

- Assignment of income doctrine
- Cash equivalency doctrine
- Participant-directed investments
- Securities law
- Expanded coverage of Section 457(f) of the Internal Revenue Code
- Determination of normal retirement age
- Deferral of additional amounts
- Expanded coverage of shadow or nonqualified 401(k) plans
- Other recent amendments and private letter rulings

Highlights in this Edition include:

- *Newly revised* Chapter 2 Section 83
- *Newly revised* Chapter 4 An Excess Benefit Plan
- *Newly revised* Chapter 8 Split-Dollar Life Insurance
- *Newly revised* Chapter 11 Section 457 Plans
- *Newly revised* Chapter 13 Securities Law
- *Newly revised* Chapter 15 International Employee Benefits
- *Newly revised* Chapter 17 A Profits or Carried Interest

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ABOUT THE AUTHOR

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Bruce J. McNeil is a Partner with Leech Tishman and a member of the Employment & Labor Practice Group where he leads the ERISA, Employee Benefits and Executive Compensation Group. Bruce is based in the firm's Washington, D.C. office, where he focuses his practice on assisting clients in a variety of employee benefits matters including tax-qualified plans, executive and nonqualified deferred compensation arrangements, employee benefits litigation, and the tax aspects of equity arrangements and phantom equity arrangements.

Bruce is a Fellow of the American College of Employee Benefits Counsel. He is one of the few lawyers in the country who is listed in "Best Lawyers in America" in two employee benefit categories – ERISA Law and ERISA Litigation. He was appointed to serve on the U.S. Department of Labor's Advisory Council on Employee Welfare and Pension Benefit Plans by the Cabinet Secretary of Labor, Elaine Chao, and he is considered one of the country's foremost authorities on executive and deferred compensation.

Bruce regularly advises clients on a wide variety of issues with respect to tax-qualified retirement plans, including 401(k) plans, 403(b) plans, 457 plans, nonqualified deferred compensation arrangements, equity arrangements, split-dollar life insurance arrangements, corporate owned life insurance, and other forms of executive compensation. Bruce counsels clients on all aspects of tax-qualified and executive and nonqualified deferred compensation plans and arrangements for taxable and tax-exempt employers, employee benefit issues in mergers and acquisitions, fiduciary responsibility and prohibited transaction

issues.

Bruce also has experience in practicing before the Internal Revenue Service, the U.S. Department of Labor and the Pension Benefit Guaranty Corporation in examinations, correction programs, and ruling requests.

Bruce has served as an expert in federal hearings and investigations, including:

- Testifying before the U.S. Senate Committee on Finance as an expert witness in the hearings on the collapse of the Enron Corporation and its nonqualified deferred compensation plans.
- Testifying before the U.S. Department of Labor ERISA Advisory Council on executive compensation, nonqualified deferred compensation plans and other employee benefits matters.
- Participating in several investigations by the U.S. Government Accountability Office (the “GAO”) on the impact of mergers and acquisitions on employee benefits, cybersecurity and employee benefit plans, reporting and disclosure for nonqualified deferred compensation plans at the request of U.S. Senator Patty Murray (D-WA), U.S. Representative Robert Scott (D-VA), and other members of Congress.
- Participating in an investigation by the GAO on nonqualified deferred compensation plans at the request of U.S. Senator Bernie Sanders (D-VT).

As a leader in employee benefits law, Bruce has served on the Board of Directors of the Plan Sponsor Council of America and was the chair of its Nonqualified Deferred Compensation Plan Committee. He serves on the Board of Directors and he is the president-elect of the Western Pension & Benefits Council – Seattle Chapter, and serves as a member of the Western Pension & Benefits Council Governing Board of Directors. He is a past president and the Chair of the Board of Directors of the Joint TE/GE Council national organization.

Bruce is the Editor-in-Chief of both the *Journal of Pension Planning & Compliance* and the *Journal of Deferred Compensation: Nonqualified Plans and Executive Compensation*, quarterly publications published by Wolters Kluwer, and nationally distributed. He is also a Contributing Editor of the *401(k) Advisor*, a monthly publication published by Wolters Kluwer. Bruce is also the author of more than 45 books on various employee benefits matters including 30 annual editions of *Nonqualified Deferred Compensation Plans*, published by Thomson Reuters; the co-author of the *Individual Retirement Account Answer Book*, published by Wolters Kluwer, the author of several editions of *Tax-Sheltered Annuities Under § 403(b) and Nonqualified § 457 Plans*, published by the RIA Group; and several editions of the *401(k) Plans: A Comprehensive Guide*, published by John Wiley & Sons, Inc. He is also the author or co-author of over

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200 articles on employee benefit matters.

Bruce has a B.A. from Concordia College, an M.A. in English from Georgetown University, a J.D. from Drake University Law School, and an LL.M. from the Georgetown University Law Center.

Bruce is admitted to the District of Columbia Bar, the Minnesota State Bar, the Connecticut State Bar, the Washington State Bar, the Iowa State Bar, the North Dakota State Bar, the U.S. Supreme Court, the U.S. Tax Court, the U.S. Court of Appeals, District of Columbia, and the U.S. Court of Appeals, Eighth Circuit.

In addition, Bruce has been an adjunct professor at the University of Minnesota Law School, Drake University Law School, and the University of Iowa College of Law and is a frequent lecturer on employee benefits matters at other law schools and conferences.

PREFACE

The President of the United States can grant a pardon to a person who was convicted in a United States District Court, the Superior Court of the District of Columbia, or a military court-martial and create an opportunity for a new chapter for the person pardoned. In this edition of “Nonqualified Deferred Compensation Plans,” the Setting Every Community Up for Retirement Enhancement (SECURE) 2.0 Act of 2022 impacted several chapters: Chapter 2, Section 83; Chapter 4, Excess Benefit Plans; Chapter 8, Split-Dollar Life Insurance; Chapter 11, Section 457 Plans; Chapter 13, Securities Law; Chapter 15, International Employee Benefits; and Chapter 17, A Profits or Carried Interest were revised to take into account new guidance issued by the Internal Revenue Service and the Department of Labor, and recent judicial decisions affecting those chapters.

One of the most significant events in the recent history of the United States was the resignation of President Richard M. Nixon from the office of the President of the United States on August 9, 1974. The thirty-seventh President of the United States announced, during his thirty-seventh Oval Office address to the nation, on August 9, 1974, that he was resigning from the office of the President of the United States.

President Nixon became the thirty-seventh President of the United States on January 20, 1969, and was re-elected in 1972 for a second term in a landslide victory over Senator George McGovern carrying forty-nine of the fifty states and receiving 520 of 537 electoral votes. “His term in office continued until his resignation on August 9, 1974.”¹

A series of extraordinary events led to an even more extraordinary act, the resignation of President Nixon from the office of the President of the United States, the assumption of the office of the President of the United States by a person who never ran for national office before, and a decision by President Gerald R. Ford to grant a pardon to President Nixon that was widely criticized but was later recognized as a courageous decision with a Profile in Courage Award by the John F. Kennedy Library in Boston.

¹ Ford, Gerald (September 8, 1974). “President Gerald R. Ford’s Proclamation 4311, Granting a Pardon to Richard Nixon.”

NONQUALIFIED DEFERRED COMPENSATION PLANS

Gerald R. Ford was the minority leader of the House of Representatives when President Nixon asked him to be the Vice President of the United States. Vice President Spiro Agnew, the Governor of Maryland before he was selected to be Vice President by President Nixon, had agreed to resign from the office of the Vice President of the United States, effective on October 10, 1973, becoming the first United States Vice President to resign for the commission of a felony, federal income tax evasion, in return for a plea of *nolo contendere* to a charge of income tax evasion. He was being investigated for political corruption and receiving cash payments in Maryland, the government agreed not to put Mr. Agnew on trial, but, instead fined him \$10,000 and placed him on probation for three years to resolve the entire matter believing the resignation from office was already a substantial penalty.

On October 12, 1973, President Nixon called Mr. Ford to a private meeting to let him know he was nominating Mr. Ford for Vice President of the United States. Later that day, President Nixon announced Mr. Ford's nomination to be the Vice President of the United States from the East Room of the White House. Mr. Ford began receiving foreign policy briefings from Henry Kissinger, then the National Security Advisor and United States Secretary of State for President Nixon, recognizing the importance of the nomination and the circumstances surrounding the presidency. Mr. Ford may have been an easy choice for President Nixon, since he was in a leadership position in the House of Representatives and would be easily approved by Congress.

Mr. Ford's nomination was subject to confirmation in both the Senate and the House of Representatives, where the Democrats had significant majorities. Because of the expanding legal issues surrounding a break-in at the Democratic National Committee Headquarters in the Watergate Hotel, the Democrats were concerned that the person they confirmed as Vice President could become the next President. Then, on October 20, 1973, President Nixon ordered Special Prosecutor Archibald Cox to be fired, which led to the resignation of Attorney General Elliot Richardson and Deputy Attorney General William Ruckelshaus on October 20, 1973, and the eventual firing by Solicitor General of the United States Robert Bork, as acting head of the Justice Department, in defiance of his attempts to subpoena the recordings of White House conversations, an event commonly referred to as the White House conversations, an event commonly referred to as the "Saturday Night Massacre."

The confirmation of Mr. Ford as Vice President moved to a fast track. On November 27, 1973, the Senate confirmed Mr.

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Ford's nomination by a large margin, a vote of 92 to 3. Later, on December 6, 1973, the House of Representatives also confirmed Mr. Ford's nomination by a large margin, a vote of 387 to 35 (with Mr. Ford voting "present"). Mr. Ford was then sworn in as the fortieth Vice President on December 6, 1973.

A June 20, 1972, taped conversation between President Nixon and his Chief of Staff, H.R. Haldeman had an unusual 18½ minute gap that was caused by five separate manual erasures according to technical experts who examined the tape. This unusual gap in the tape seemed to suggest an obstruction of justice. Rosemary Woods, the personal secretary for President Nixon, who had been with him since 1951 when President Nixon was a member of Congress, claimed responsibility for inadvertently erasing a portion of the 18½ minute gap during her 1974 grand jury testimony. What was said during the 18½ minutes is still a mystery.

In April 1974, it was clear that the 1972 break-in at the Democratic National Committee Headquarters in the Watergate Hotel, the arrest of five men for breaking and entering into the Democratic National Committee headquarters, and the discovery by the FBI of a connection between cash found on the burglars and a fund used by the Committee for the Re-Election of the President (frequently referred to as "CREP" or "creep"), the official organization of President Nixon's campaign for re-election, caused increasing focus on President Nixon and his involvement in the Watergate Hotel break-in. The rising tide of the burglary at the Watergate Hotel, the prosecution of those involved in the Nixon administration, and the gap in the tape of the conversation between Mr. Haldeman and President Nixon created a flood of criticism of President Nixon's administration leading to a conclusion that there was an obstruction of justice related to the break-in at the Watergate Hotel, and President Nixon was involved.

On June 5, 1974, a federal grand jury in Washington, D.C. voted 19 to 0 to name President Nixon as an unindicted co-conspirator in a cover up of the Watergate Hotel break-in. And, on July 30, 1974, the House Judiciary Committee passed the third and final article of impeachment. Impeachment is the process by which the House of Representatives issues a formal statement of charges, like an indictment in criminal law, a first step in the removal of a government official. This vote meant that the impeachment proceedings could begin in the House of Representatives. If President Nixon were impeached, he would then have to face the possibility of conviction in a trial before the United States Senate. (Two Presidents, Andrew Johnson and Bill

Clinton, were impeached, but both were later acquitted.)

The questions regarding immunity for President Nixon or a pardon for President Nixon were being raised by many top governmental officials, including Alexander Haig, a retired four star general and, at the time, Chief of Staff for President Nixon. These questions raised even more questions. If either could be considered, then when could they be considered? Could either be considered before or after an indictment or after an indictment and before or after a conviction? Would a pardon need to be specific as to an offense or general as to any offense?

In the United States, the power to grant a pardon for a federal crime is granted to the President of the United States under Article II, Section 2 of the United States Constitution, which provides that the President “shall have power to grant reprieves and pardons for offenses against the United States, except in cases of impeachment.” The interpretation of this provision of the Constitution became the subject of litigation when a pardon was granted to George Wilson for offenses regarding the United States mail.

Chief Justice John Marshall of the United States Supreme Court in the case, *United States v. Wilson*, 32 U.S. (7 Pet. 150) 150, 160-61 (1833), speaking on behalf of the Court, said:

The constitution gives to the president, in general terms, ‘the power to grant reprieves and pardons for offences against the United States.’ As this power had been exercised, from time immemorial, by the executive of that nation whose language is our language, and to whose judicial institutions ours bear a close resemblance; we adopt their principles respecting the operation and effect of a pardon, and look into their books for the rules prescribing the manner in which it is to be used by the person who would avail himself of it.²

Chief Justice Marshall continued to describe the act of a presidential pardon and the benefit of a pardon to the person to whom a pardon is granted:

A pardon is an act of grace, proceeding from the power entrusted with the execution of the laws, which exempts the individual on whom it is bestowed from the punishment the law inflicts for a crime he has committed. It is the private, though official, act of the executive magistrate, delivered to the individual for whose benefit it is intended, and not communicated officially to the court. It is a

² *United States v. Wilson*, 32 U.S. 150 (1833).

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constituent part of the judicial system, that the judge sees only with judicial eyes, and knows nothing respecting any particular case, of which he is not informed judicially. A private deed, not communicated to him, whatever may be its character, whether a pardon or release, is totally unknown, and cannot be acted on.³

Chief Justice Marshall then explained the elements of a pardon, a presidential pardon must be granted to a person for an offense committed by the person, it had to be delivered to the person with respect to the offense committed, and the pardon had to be accepted by the person for the offense committed. Without an acceptance of the pardon, there could be no delivery of a pardon. Chief Justice Marshall said,

A pardon is a deed, to the validity of which, delivery is essential, and delivery is not complete, without acceptance. It may then be rejected by the person to whom it is tendered; and if it be rejected, we have discovered no power in a court to force it on him.⁴

In September 1974, President Ford was considering a pardon for President Nixon, and decided to discuss his thoughts with some Congressional leaders. Of the leaders with whom he spoke – Senators. Mike Mansfield, the Senate Majority Leader, Hugh Scott, the Minority Leader, and Barry Goldwater; Representatives, Carl Albert, the 46th Speaker of the House of Representatives, House Minority leader John Rhodes, Thomas (“Tip”) O’Neill, the Democratic Majority Leader, and John J. McFall , the House Whip, – none opposed the decision in response to the proposition. None argued with President Ford about moving forward with the decision, but they may have been a little surprised. Representative Tip O’Neill’s reaction was likely to have been typical of those involved in the meeting, “Jesus,” he said, “Don’t you think it’s kind of early?”⁵

President Ford responded, “[w]ell, there’s doubt he could get a fair trial... and it would take a year to a year and a half to try him. I just can’t run the office of the President and have this thing running on day after day when there are so many important things for me to spend my time on. It’s for the good of the country.”⁶

³ United States v. Wilson, 32 U.S. 150 (1833).

⁴ United States v. Wilson, 32 U.S. 150 (1833).

⁵ Ford, Gerald R. (1979). “A Time to Heal: the Autobiography of Gerald R. Ford.” San Francisco: Harper & Row. p. 175. ISBN 0-06-011297-2.

⁶ Ford (1979), p.175.

Tip O'Neill responded simply, "Okay, Mr. President," and the conversation between the President and the Congressional leaders was over.

President Ford sent Benton Becker, a close aide to President Ford, as a personal emissary on behalf of President Ford to San Clemente, California, where President Nixon lived, to meet with Ron Ziegler, President Nixon's former press secretary and his then close assistant, to discuss President Nixon's papers, the Oval Office tapes, and a pardon. President Ford believed that a pardon had to be delivered to a person for an offense committed by the person and that the person had to accept the pardon for the offense committed. The initial drafts of a response from President Nixon accepting responsibility for any involvement in the Watergate break-in and cover-up were not helpful.⁷ After several drafts of a response, the final response from President Nixon read,

I have been informed that President Ford has granted me a full and absolute pardon for any charges which might be brought against me for actions taken during the time I was President of the United States. In accepting this pardon, I hope that his compassionate act will contribute to lifting the burden of Watergate from our country.

Here in California, my perspective on Watergate is quite different than it was while I was embattled in the midst of the controversy and while I was still subject to the unrelenting daily demands of the Presidency itself.

Looking back on what is still in my mind a complex and confusing maze of events, decisions, pressures and personalities, one thing I can see clearly now is that I was wrong in not acting more decisively and more forthrightly in dealing with Watergate, particularly when it reached the stage of judicial proceedings and grew from a political scandal into a national tragedy.

No words can describe the depth of my regret and pain at the anguish my mistakes over Watergate have caused the nation and the Presidency – a nation I so deeply love and an institution I so greatly respect.

I know that many fair-minded people believe that my motivations and actions in the Watergate affair were intentionally self-serving

⁷ Ford (1979), p. 169.

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and illegal. I now understand how my own mistakes and misjudgments have contributed to that belief and seemed to support it. This burden is the heaviest one of all to bear.

That the way I tried to deal with Watergate was the wrong way is a burden I shall bear for every day of the life that is left to me.⁸

President Nixon had seen a draft of the proposed pardon from President Ford and seemed to recognize the importance of a pardon, and while President Ford recognized that President Nixon may not have been as “forthcoming as [he] had hoped. He didn’t admit guilt and it was a good deal less than a full confession.”⁹ President Ford expected more, but it seemed to be enough of a response to be an acceptance of a pardon.

On September 8, 1974, President Ford announced on national television that he decided to grant a pardon to President Nixon for any and all offenses related to the break-in at the Watergate Hotel. After some introductory remarks, President Ford said,

As we are a nation under God, so I am sworn to uphold our laws with the help of God. And I have sought such guidance and searched my own conscience with special diligence to determine the right thing for me to do with respect to my predecessor in this place, Richard Nixon, and his loyal wife and family.

Theirs is an American tragedy in which we all have played a part. It could go on and on and on, or someone must write the end to it. I have concluded that only I can do that, and if I can I must.

There are no historic or legal precedents to which I can turn in this matter, none that precisely fit the circumstances of a private citizen who has resigned the Presidency of the United States. But it is common knowledge that serious allegations and accusations hang like a sword over our former President’s head, threatening his health as he tries to reshape his life, a great part of which was spent in the service of this country and by the mandate of its people.

After years of bitter controversy and divisive national debate, I have been advised and I am compelled to conclude that many months and perhaps more years will have to pass before Richard Nixon could obtain a fair trial by jury in any jurisdiction of the United States under governing decisions of the Supreme Court.

⁸ Ford (1979), pp. 169-170.

⁹ Ford (1979), p. 172.

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During this long period of delay and protracted litigation, ugly passions would again be aroused. And our people would again be polarized in their opinions. And the credibility of our free institutions of government would again be challenged at home and abroad.

As President, my primary concern must always be the greatest good of all the people of the United States whose servant I am. As a man my first consideration is to be true to my own convictions and my own conscience.

My conscience tells me clearly and certainly that I cannot prolong the bad dreams that continue to reopen a chapter that is closed. My conscience tells me that only I, as President, have the constitutional power to firmly shut and seal this book. My conscience tells me it is my duty not merely to proclaim domestic tranquility but to use every means that I have to ensure it...."¹⁰

With that, President Ford read from his Proclamation 4311, granting a pardon to President Nixon, which was received by the Office of the Pardon Attorney, Department of Justice on September 11, 1974.

Proclamation 4311 provides, in part:

Pursuant to resolutions of the House of Representatives, its Committee on the Judiciary conducted an inquiry and investigation on the impeachment of the President extending over more than eight months. The hearings of the Committee and its deliberations, which received wide national publicity over television, radio, and in printed media, resulted in votes adverse to Richard Nixon on recommended Articles of Impeachment.

As a result of certain acts or omissions occurring before his resignation from the Office of President, Richard Nixon has become liable to possible indictment and trial for offenses against the United States. Whether or not he shall be so prosecuted depends on the findings of the appropriate grand jury and on the discretion of the authorized prosecutor. Should an indictment ensue, the accused shall then be entitled to a fair trial by an impartial jury, as guaranteed to every individual by the Constitution.

It is believed that a trial of Richard Nixon, if it became necessary, could not fairly begin until a year or more has elapsed. In the meantime, the tranquility to which this nation has been restored by the events of recent weeks could be irreparably lost by the prospects

¹⁰ Ford (1979), pp. 177-178.

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of bringing to trial a former President of the United States. The prospects of such trial will cause prolonged and divisive debate over the propriety of exposing to further punishment and degradation a man who has already paid the unprecedented penalty of relinquishing the highest elective office of the United States.

NOW, THEREFORE, I, Gerald R. Ford, President of the United States, pursuant to the pardon power conferred upon me by Article II, Section 2, of the Constitution, have granted and by these presents do grant a full, free, and absolute pardon unto Richard Nixon for all offenses against the United States which he, Richard Nixon, has committed or may have committed or taken part in during the period from January 20, 1969, through August 9, 1974.

With that, the pardon to President Nixon was granted. A question remained, did President Nixon fully accept the pardon to receive the full, free, and absolute pardon or could the pardon be granted unilaterally.¹¹



¹¹ Ford, Gerald (September 8, 1974). "Presidential Proclamation 4311 by President Gerald R. Ford granting a pardon to Richard M. Nixon."

FOREWORD

As I contemplated the labyrinth of references and cross-references among those sections of the Internal Revenue Code and the Employee Retirement Income Security Act of 1974 that are involved in the rules pertaining to non-qualified deferred compensation plans, I was reminded of the following comments by Judge Learned Hand:

[T]he words of such an act as the Income Tax, for example, merely dance before my eyes in a meaningless procession: cross-reference to cross-reference, exception upon exception—couched in abstract terms that offer no handle to seize hold of—leave in my mind only a confused sense of some vitally important, but successfully concealed, purport, which it is my duty to extract, but which is within my power, if at all, only after the most inordinate expenditure of time. I know that these monsters are the result of fabulous industry and ingenuity, plugging up this hole and casting out that net, against all possible evasion; yet at times I cannot help recalling a saying of William James about certain passages of Hegel: that they were no doubt written with a passion of rationality; but that one cannot help wondering whether to the reader they have any significance save that the words are strung together with syntactical correctness. Hand, “Thomas Walter Swan,” 57 *Yale L.J.* 167, 169 (1947).

After many hours preparing this book I sometimes wonder whether syntactical correctness is enough.

BRUCE J. McNEIL

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