CASE NO. A20-0427

STATE OF MINNESOTA
IN SUPREME COURT

In re Polaris, Inc., Petitioner,

COLBY THOMPSON,
Plaintiff-Respondent,

v.

POLARIS, INC.,
Defendant-Petitioner,

JOHN DOES I-X,
Defendants.

PUBLIC JUSTICE'S BRIEF OF *AMICUS CURIAE* IN SUPPORT OF RESPONDENT COLBY THOMPSON

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Page(s)

Cases

Trial Court Documents

Other Authorities

INTEREST OF *AMICUS CURIAE*

Public Justice is a national public interest advocacy organization that specializes in precedent-setting, socially significant civil litigation, with a focus on fighting corporate and governmental misconduct.[1] To further its goal of defending access to justice for workers, consumers, and others harmed by corporate wrongdoing, Public Justice has a special project devoted to combatting court secrecy. Public Justice aims to expose and prevent excessive secrecy in courts to maintain trust in the justice system and to keep corporations honest. As part of this project, Public Justice often challenges unlawful sealing orders, overbroad protective orders, or confidentiality provisions in settlement agreements that are used to hide corporate misconduct—often misconduct that is continuing to cause harm precisely because the evidence is hidden by the unlawful use of secrecy provisions. The abuse of the attorney-client privilege to shield safety audit reports of a non-legal nature is just another form of court secrecy that denies victims of dangerous products access to justice and threatens public safety.

ARGUMENT

I. Polaris' over-expansive interpretation of the attorney-client privilege would create cultures of corporate impunity and threaten public safety.

The abuse of the attorney-client privilege has, historically, cost lives, and Polaris' interpretation of the privilege would make such abuse easier—even lawful. Under Polaris'

[1] In accordance with Minnesota Rule of Civil Appellate Procedure 129.03, Public Justice certifies that no counsel for any party authored this brief in whole or in part, and no person or entity, other than the *amicus curiae* and its counsel, made a monetary contribution to the preparation or submission of this brief.

interpretation of the attorney-client privilege, any document that relates in any tangential way to the provision of legal advice, no matter how minor, would be privileged. But in a world where lawyers are increasingly taking on the role of business or operational consultants, such a standard would enable widespread abuse of the discovery process and make it lawful for corporations to conceal entire documents just because they were drafted by an attorney, included a footnote about legal risks, or were about a subject—like a defective product design—that "relates" in some abstract sense to legal compliance.

A. Historically, corporations have abused the attorney-client privilege to conceal corporate wrongdoing and ongoing threats to public safety.

Corporations' use of the attorney-client privilege to hide evidence of corporate wrongdoing and ongoing threats to public safety has cost people their lives. The most prominent example of abuse of the attorney-client privilege to conceal a serious, ongoing threat to public safety was unearthed by the state of Minnesota in what the U.S. Surgeon General called "one of the most significant public health achievements of the second half of the 20th century." Henry Weinstein, *Big Tobacco Settles Minnesota Lawsuit for $6.6 Billion*, L.A. Times, May 9, 1998, at A1.[2]

Tobacco product liability litigation began in the early 1950s and, for decades, the industry successfully fended off consumers' claims that tobacco use caused adverse health effects like cancer. "The key to the industry's defense strategy . . . was the concealment of the industry's internal documents, including documents disclosing the industry's secret acknowledgment of the health hazards and addictiveness of smoking, documents

[2] https://www.latimes.com/archives/la-xpm-1998-may-09-mn-47882-story.html.

disclosing the industry's manipulation of nicotine, and documents disclosing the industry's dependence upon new generations of American youth to preserve the viability of the cigarette market." Michael V. Ciresi, Roberta B. Walburn & Tara D. Sutton, *Decades of Deceit: Document Discovery in the Minnesota Tobacco Litigation*, 25 Wm. Mitchell L. Rev. 477, 479 (1999).

The industry took an expansive view of the attorney-client privilege, "arguing that privilege protects any 'confidential communication' between client and counsel, between counsel, or even between client representatives." *Id.* at 505. Relying on this interpretation of the privilege, tobacco companies would conduct scientific research under close consultation with their lawyers, and sometimes under their lawyers' management, so that bad scientific findings could be held back as privileged, attorney-client communications. *See* Edward J. Cleary, Director of the Minnesota Office of Lawyer Professional Responsibility, *The Use and Abuse of the Attorney-Client Privilege*, Bench & Bar Minn., at 18 (Sept. 1998);[3] *see also Haines v. Liggett Grp., Inc.*, 140 F.R.D. 681, 695-96 (D.N.J. 1992) (concluding that "the attorney-client privilege was intentionally employed [by the tobacco industry] to guard against such unwanted disclosure").

In 1994, the State of Minnesota and Blue Cross and Blue Shield of Minnesota sued the tobacco industry and challenged defendants' assertion of privilege over tens of thousands of documents. The late Judge Fitzpatrick of the Ramsey County Minnesota District Court appointed a Special Master to conduct an in-camera review of the documents

[3] http://lprb.mncourts.gov/articles/Articles/The%20Use%20and%20Abuse%20of%20the%20Attorney%20Client%20Privilege.pdf

and assess the privilege claims. The Special Master concluded that the documents containing scientific findings "do not demonstrate a process of a client seeking advice or an attorney providing advice. On the contrary, the documents reflect the involvement of the Liggett attorneys in the monitoring of that company's research function." Report of the Special Master: Findings of Fact, Conclusions of Law and Recommendations Regarding Non-Liggett Privilege Claims, *State ex rel. Humphrey v. Philip Morris Inc.*, No. C1-94-8565, 1998 WL 34194340 (Minn. Dist. Ct. Feb. 10, 1998) ¶ 328 (internal brackets omitted). The Special Master further found that the tobacco companies were using "maneuvers intended to 'create' privileges," pointing, for example, to a memo from a high-level tobacco executive telling his legal department that "in the operational context [the company] would send documents without attempting to distinguish which were and which were not litigation documents." *Id.* ¶ 42

The Special Master concluded that the documents were discoverable under the crime-fraud exception, but he also concluded that the documents with factual findings that implicate science and health "are not attorney-client privileged in the first instance." *Id.* ¶ 335. He stated that the attorney-client privilege only protects communications "where legal advice is sought" and where the "predominate purpose is legal in nature." *Id.* ¶ 277. The Special Master's 144-page report recommended that 39,000 of the withheld documents be made public because they were either not privileged or subject to the crime-fraud exception. The trial court adopted the Special Masters' recommendations, concluding "that many documents examined contained nothing of a privileged nature, establishing a pattern

of abuse" of the privilege claim. *State, By Humphrey v. Philip Morris Inc.*, No. C1-94-8565, 1998 WL 257214, at *7 (Minn. Dist. Ct. Mar. 7, 1998).

The disclosure of documents in the Minnesota tobacco litigation was not just a win for the state of Minnesota or individual plaintiffs seeking damages; it was a win for public health. At the time, the number of deaths caused by smoking tobacco surpassed the combined totals for alcohol, suicide, homicide, AIDS, cocaine, heroin, and motor vehicles. *See* Ciresi, *supra* at 480. Two months after the trial court's order denying the tobacco industry's privilege claims, the industry agreed to a settlement with unprecedented monetary and injunctive relief. Under the agreement, Minnesota would receive $6.1 billion over a 25-year period and the cigarette industry would be prohibited from making material misrepresentations or targeting children in the advertising, promotion, or marketing of cigarettes. The industry was forced to remove advertising billboards in Minnesota, fund smoking cessation programs, and dissolve one of its trade groups. *See id.* at 479 n.5; Settlement Agreement and Stipulation For Entry of Consent Judgment, *State ex rel. Humphrey v. Philip Morris Inc.*, No. C1-94-8565, 1998 WL 394331 at *4-6 (Minn. Dist. Ct. May 8, 1998).[4]

Big tobacco isn't the only industry that has abused the privilege and concealed threats to public safety—so too the medical device industry. For nearly a decade, the manufacturer of Dalkon Shield, a defective intrauterine device, used the attorney-client privilege to improperly withhold documents concerning the safety or characteristics of the

[4] https://www.publichealthlawcenter.org/sites/default/files/resources/mn-settlement-agreement.pdf.

IUD. *See Dean v. A.H. Robins Co.*, 101 F.R.D. 21, 24 (D. Minn. 1984). By the time the documents were released, 200,000 women had been injured by the device, suffering serious pelvic infections that left at least 13,000 women infertile and 21 women dead. *See* Gina Kolata, *The Sad Legacy of the Dalkon Shield*, N.Y. Times (Dec. 6, 1987)[5]; Robin Marantz Henig, *The Dalkon Shield Disaster*, Wash. Post (Nov. 17, 1985).[6]

The Minnesota tobacco and Dalkon Shield litigation is a stark reminder that abuse of the attorney-client privilege can quickly "go beyond 'catch me if you can' resistance—which the adversary system permits in everything from service of process to the enforcement of judgments—to vanishing acts that make adjudication on the merits impossible." Norman W. Spaulding, *Compliance, Creative Deviance, and Resistance to Law: A Theory of the Attorney-Client Privilege*, 2013 J. Prof. Law. 135, 166 (2013). In fact, because documents withheld under the attorney-client privilege are usually not reviewed by a court, abuse of the privilege is often only discovered by accident. For example, in actor Paul Walker's wrongful death suit against carmaker Porsche, faulty redaction revealed that Porsche had improperly withheld factual information—like the car's accident rate—under the attorney-client privilege. *See* Jayme Deerwester, *Damaging Porsche emails turn up in Paul Walker wrongful death suit*, USA Today (Feb. 16, 2017).[7]

[5] https://www.nytimes.com/1987/12/06/magazine/the-sad-legacy-of-the-dalkon-shield.html.
[6] https://www.washingtonpost.com/archive/entertainment/books/1985/11/17/the-dalkon-shield-disaster/6c58f354-fa50-46e5-877a-10d96e1de610/.
[7] https://www.usatoday.com/story/life/people/2017/02/16/damning-porsche-emails-turn-up-paul-walker-wrongful-death-suit/97993644/.

While these may be particularly egregious examples, they demonstrate that unchecked use of attorney-client privilege can have deadly effects. An overly broad rule about what can constitute attorney-client privilege would only encourage more of these scenarios, either by rendering such use of privilege perfectly lawful, or by moving the line far enough that such use of the privilege is arguably in compliance with the law. An expansive view of attorney-client privilege, divorced from context-specific inquiries about the particular nature of a communication, only encourages abuse—especially given how hard it is to detect such abuse.

B. Polaris' interpretation of the attorney-client privilege would make it easier—even lawful—for corporations to conceal wrongdoing and threats to public safety.

Polaris' expansive interpretation of the attorney-client privilege is a recipe for corporate impunity. Under Polaris' standard, corporations could withhold entire documents so long as the documents contain discrete legal opinions or address a business or operational matter tangentially related to legal compliance, even if the *purpose of the document* is to "address safety, engineering, design, and corporate practices," and not to provide legal advice. *See* Pet'r's Br. at 25; P.Add. 2. Polaris claims such a test is preferable because it minimizes the role of courts in assessing whether documents serve a legal or nonlegal purpose. *See* Pet'r's Br. at 50-52. But such an expansive interpretation of the attorney-client privilege, combined with limited judicial review, is a formula for corporate impunity.

Polaris' interpretation of the privilege gives corporations a means to thwart legitimate discovery requests and to conceal corporate wrongdoing and ongoing threats to

public safety in two ways: (1) it allows corporations to insert discrete legal opinions into non-legal documents and then withhold the entire document under the attorney-client privilege and (2) it allows corporations to conceal documents on non-legal matters just because those matters—like most matters—could have legal consequences.

i. Under Polaris' interpretation, any document that contains a single discrete legal opinion could be withheld in its entirety.

Polaris proposes an extreme expansion of the privilege, arguing that even when a court finds that a document serves primarily a non-legal purpose, the entire document should still be withheld under the attorney-client privilege if it contains any minor, discrete legal opinion whatsoever. *See* Pet'r's Br. at 19. But this standard is exceptionally dangerous in a world where lawyers are increasingly retained to provide not just legal advice, but an array of services—from negotiator to public relations manager to compliance officer, broker, investment banker, overseer of government affairs, ethics advisor, or manager of human resources.

"[A]s a reaction to this need, outside law firms have structured arrangements, such as ancillary businesses, to provide related [] non-legal services to their clients including public relations, investment banking, environmental consulting, management consulting, and financial services." Michele DeStefano Beardslee, *Taking the Business Out of Work Product*, 79 Fordham L. Rev. 1869, 1877 (2011); *see also* Working Notes: Deliberations of the ABA Committee on Research About the Future of the Legal Profession on the Current Status of the Legal Profession, 17 Me. B.J. 48, 56 (2002) (explaining that firms are expanding by developing ancillary services).

Under Polaris' interpretation of the privilege, attorneys acting in these non-legal roles can turn their business or operational reports into privileged communications by simply adding a few footnotes of legal advice. PLAC defends Polaris' standard, arguing that business considerations are frequently weighed in rendering legal advice and that such considerations should not vitiate the attorney-client privilege. *See* Amicus Curiae Br. of the Product Liability Advisory Council, Inc. in Support of Pet'r at 9. But the opposite is also true. Assessments of product design, product efficacy, marketing strategy, business operations, and even corporate culture may require some consideration of legal risks. That does not mean that all of those matters are "related to the provision of legal advice" and therefore privileged. Such an approach would vitiate civil discovery. Just as a sprinkling of business considerations should not eliminate the attorney-client privilege, a sprinkling of legal opinions should not eliminate a corporate defendant's discovery obligations.

The Court of Appeals' interpretation of the attorney-client privilege strikes the correct balance. The court assessed the evidence and decided that the report served primarily a non-legal purpose, but then went through and withheld specific legal opinions under the work product doctrine. *See* P.Add. at 2-3. The court recognized that the report focuses on corporate culture and safety issues—not legal strategy, but that certain sections do include some legal opinions that should be withheld. *Id.* It was not an all-or-nothing approach, but instead, a context specific approach that properly balances the purpose of the attorney-client privilege with the purpose of civil discovery.

Polaris argues that this is a bad approach because if courts must evaluate the legal or nonlegal character or purpose of the communication, then application of the privilege is "inherently uncertain." Pet'r's Br. at 35. But courts make this determination all the time. *See, e.g.*, *Burton v. R.J. Reynolds Tobacco Co.*, 170 F.R.D. 481, 487-88 (D. Kan. 1997) (concluding attorney-generated reports about scientific studies on the effects of tobacco "are that of a business and not a legal nature" in part because the "communications in the documents . . . could have been performed by company personnel, a scientist, or any non-lawyer knowledgeable in the subject matter"); *Stephenson Equity Co. v. Credit Bancorp, Ltd.*, No. 99-113951RWS, 2002 WL 59418, at *3 (S.D.N.Y. Jan. 16, 2002) (concluding that although reports investigating insurance claims on behalf of insurance company were prepared by attorneys, such reports were prepared "as part of the 'regular business' of the company" and therefore were not of a primarily legal character); *U.S. Postal Serv. v. Phelps Dodge Ref. Corp.*, 852 F. Supp. 156, 164 (E.D.N.Y. 1994) (concluding that "[l]obbying conducted by attorneys does not necessarily constitute legal services for purposes of the attorney-client privilege").

Moreover, when a document contains significant factual information about safety culture and operations as well as some discrete legal considerations, then application of the attorney-client privilege *should be*, at minimum, uncertain and the document should be closely reviewed by a court. The phenomenon of lawyers taking on non-legal roles raises difficult questions in applying the privilege, but the solution is not for courts to throw up their hands and allow excessive application of the attorney-client privilege without any judicial oversight. A new species of fox provides no occasion to abandon the henhouse.

The solution is to keep our courts front and center: considering all the evidence and surrounding factual circumstances and then deciding whether the predominate purpose of a given communication was to provide legal or non-legal advice and require redactions if necessary.

ii. Under Polaris' interpretation, any attorney-created document on a subject that could affect legal compliance could be withheld in its entirety.

Polaris' interpretation of the attorney-client privilege is overly expansive and likely to be abused because, according to Polaris, the privilege applies to all matters that "can adversely affect compliance," Pet'r's Br. at 43, and almost everything a corporation does has the potential to adversely affect compliance. Specifically, Polaris argues that the Crowell Report is related to the provision of legal advice because it is about safety, culture, and operational issues that "can adversely affect compliance" and thus "relates to" the provision of legal advice. Pet'r's Br. at 43. But such an expansive interpretation of the privilege would encompass practically all corporate matters. The fact that a corporation retains an attorney to handle those non-legal matters should not make those matters privileged.

Indeed, courts in other jurisdictions have rejected Polaris' argument for exactly that reason. In *In re Seroquel Products Liability Litigation*, drug manufacturer AstraZeneca made the same argument Polaris makes here. The company claimed that all documents created in the context of seeking FDA approval or advertising fall under the attorney-client privilege because "[v]irtually everything a pharmaceutical company says about its products is governed by statutes and regulations, and therefore must be reviewed and approved by

counsel." 2008 WL 1995058, at 6 (May 7, 2008, M.D. Fla.). "Legal considerations therefore are an essential focus of the company's deliberations and the communications on these matters." *Id.* But the court explained, "[t]his argument goes way too far." *Id.* at 7. "Almost any act by a business (or an individual for that matter) carries the potential for running afoul of some law or regulation or giving rise to a civil action." *Id.* If an attorney's involvement in those matters were sufficient to insulate documents from discovery, that "would effectively immunize all internal communications of the drug industry, thereby defeating the broad discovery authorized in the Federal Rules of Civil Procedure." *Id.*

Polaris' proposed privilege test would do the same. The reason the Crowell Report purportedly "relates" to the provision of legal advice is because it is about safety matters that could affect legal compliance. The report is, according to Polaris' amicus, of a legal nature because "[p]romoting an ethical and honest corporate culture, and promoting processes that prevent and remedy errors and wrongdoing, are both essential parts of ensuring compliance with the law." Br. of Amicus Curiae of Coalition of Minnesota Companies at 6. But such a standard has no limiting principle. For example, making sure a product does not have a deadly defect is also an "essential part of ensuring compliance with the law." Under Polaris' proposed standard, all corporate documents about a potential defect, like engineering design plans or safety assessments, could be withheld as privileged just because an attorney created them.

Therefore, Polaris' interpretation would make it lawful for corporations to use attorneys to manage non-legal matters and then conceal communications about those

matters, even if those communications are essential to assessing whether there is corporate wrongdoing or an ongoing threat to public safety.

* * *

As discussed above, Polaris' proposed standard for the attorney-client privilege is dangerous because it creates multiple avenues by which corporations could conceal from discovery communications of a non-legal nature, made for non-legal purposes. Whether it's scientific studies about the dangers of tobacco, reports on the safety of a defective intrauterine device, intentionally misleading marketing strategies, or a list of personal injury claims, the type of documents that could be withheld under an overly broad interpretation of the attorney-client privilege could be the very documents necessary to hold corporations accountable and identify existing threats to public safety.

This case demonstrates that danger is not just hypothetical. The underlying case involves allegations that Polaris' off-road vehicle has a defect that caused it to abruptly catch fire, inflicting severe third-degree burns to 30% of Colby Thompson's body. Polaris' vehicle has been linked to scores of other fires as well as four deaths. *See* David Jeans, *The Polaris RZR, an Off-Road Thrill that Can Go Up in Flames*, N.Y. Times (Sept. 6, 2019).[8] In 2018, Polaris settled a dispute with federal regulators in which it was accused of not immediately reporting a possible defect in more than 200,000 vehicles sold over four years. The company paid $27.25 million – the highest penalty assessed by the Consumer Product Safety Commission – but Polaris did not admit to any wrongdoing. *Id.* Given these

[8] https://www.nytimes.com/2019/09/06/business/polaris-rzr-fires.html?smtyp=cur&smid=tw-nytimes.

circumstances, the underlying Crowell Report may very well unearth corporate wrongdoing and expose ongoing threats to public safety.

Regardless of the facts of this case, this Court is tasked with clarifying the standard for the attorney-client privilege in Minnesota, and that standard should guard against the corporate impunity and threats to public safety that a broad view of attorney-client privilege would impose.

II. The Court of Appeals' interpretation of the attorney-client privilege will not undercut corporations' efforts to comply with the law.

A context-specific standard for attorney-client privilege that considers the purpose and legal nature of the communication will not, as Polaris contends, deter corporations from seeking full and frank legal advice or from engaging in self-critical assessments of their safety practices. For starters, the attorney-client privilege is designed to protect full and frank communication with an attorney when seeking legal advice—not full and frank safety, engineering, design, or operational advice. The argument that the threat of discovery may prevent corporations from forthrightly discussing a poor safety management plan, or may deter corporations from conducting internal safety reviews, has no limiting principle and would justify widespread secrecy of a corporation's internal operations despite "the policy of broad discovery under the Federal Rules of Civil Procedure." *O'Connor v. Johnson*, 287 N.W.2d 400, 403 (Minn. 1979).

The argument that the threat of discovery may prevent corporations from forthrightly discussing and investigating potential safety issues is also entirely hypothetical. Internal safety reviews "will rarely, if ever, be curtailed simply because they

may be subject to discovery." *Dowling v. Am. Hawaii Cruises, Inc.*, 971 F.2d 423, 426 (9th Cir. 1992). "Organizations have many incentives to conduct such reviews that outweigh the harm that might result from disclosure," including "the desire to avoid lawsuits arising from unsafe conditions" and "to avoid developing a reputation for having an unsafe [product]." *Id.* "One need only view a few automobile advertisements to recognize that manufacturers perform safety tests not required by law not only because of the threat of products liability suits for design defects, but because a reputation for safety renders a product more marketable" *Id*.

Finally, if there is any uncertainty in the application of the attorney-client privilege that chills full and frank communication, it is the corporation's own fault. Corporations can choose not to use attorneys for both legal and non-legal purposes and thereby avoid thorny privilege questions that may result. As *In re Seroquel* explained, "The structure of certain business enterprises, when their legal departments have broad powers, and the manner in which they circulate documents is broad, has consequences that those companies must live with relative to their burden of persuasion when privilege is asserted." 2008 WL 1995058, at *4. The court further noted that "AstraZeneca chose, as part of its business organization, to mix legal consultation with many other sources for creating final documents" and that "[t]his choice makes it difficult to determine the primary purpose in creating the communication and to determine whether the attorneys' roles were primarily providing legal (rather than business) advice." *Id.* at *7.

Another court, in a lawsuit against drug-manufacturer Merck, also recognized that lawyers are increasingly being used to provide business, technical, scientific, promotional,

and even public relations advice. The court explained that "[t]he benefit from this expanded use of lawyers, however, comes at a cost . . . in the form of differentiating between the lawyers' legal and business work when the attorney-client privilege is asserted for their communications within the corporate structure." *In re Vioxx Prod. Liab. Litig.*, 501 F. Supp. 2d 789, 798 (E.D. La. 2007).

Likewise, here, Polaris chose to have outside counsel provide advice on operational matters like corporate safety culture. If Polaris had maintained a barrier between attorneys hired to provide legal advice and attorneys hired as consultants to improve the corporation's day to day operations, then Polaris could have avoided any uncertainty as to which communications are privileged and which are not. Polaris should not be allowed to muddle the distinction between legal and non-legal services and then use that self-created uncertainty to argue for a rigid, all-or-nothing standard for attorney-client privilege.

CONCLUSION

For the foregoing reasons, the Court should affirm the decision of the Court of Appeals.

Dated: January 11, 2021

Respectfully submitted,

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CERTIFICATION OF LENGTH OF *AMICUS CURIAE* BRIEF

I hereby certify that this brief conforms to the requirements of Minn. R. Civ. App. P. 132.01, subd. 3(c), because it contains 4,059 words, exclusive of the caption, table of contents, table of authorities, and signature block. This brief was prepared using Microsoft Word 2011 software.

Dated: January 11, 2021

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