



**CURRICULUM VITAE**  
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President

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## EDUCATION

J.D., Southern Methodist University Dedman School of Law  
Dallas, Texas 1994

B.A., Texas Tech University  
Lubbock, Texas 1990 – *Magna cum laude*  
*Dual major in Latin American Area Studies and Spanish*

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## PROFESSIONAL EXPERIENCE

**Employment Practices Solutions, Inc.** 2018 - present  
*President, Shareholder*  
October 2021-Present

*Senior Consultant*  
October 2018 – October 2021

Conduct investigations into complaints of workplace misconduct. Provide guidance to employers and expert witness consulting and testimony concerning sound personnel practices, policies, and procedures. Develop and facilitate training programs on a broad range of employment laws and issues, including investigation procedures, harassment and discrimination prevention, leave management, employee engagement, effective hiring, performance management, disciplinary action, and other workforce policies and practices. Provide one-on-one leadership and workplace sensitivity coaching.

**Citigroup, Inc.** 1993 - 2018  
*The leading global bank, Citi has approximately 200 million customer accounts and does business in more than 160 countries and jurisdictions, providing consumers, corporations, governments, and institutions with a broad range of financial products and services.*

*Managing Director, Head of Employee Relations & HR Policy*  
2013 – 2018

- Responsible for global oversight, tracking and reporting of the handling of 2000+ HR related ethics hotlines annually, interfacing with the Ethics Office and regional partners to ensure timely and thorough investigation and appropriate resolution of all issues

- Chaired the Global HR Policy Committee to strengthen the policy governance structure, drive consistency in the application of global HR policies and practices, and further embed a culture of ethics, integrity, and respect across all regions; represented the HR function on the Citi Policy Committee and interfaced with U.S. regulatory authorities regarding HR policies, processes and controls relating to addressing employee misconduct
- Led a team of ER Advisors who conducted thorough and independent reviews of 1500+ employee concerns raised in North America annually, including ethics and executive complaints, complaints raising legal claims, and those involving highly sensitive or complex issues. Partnered with other internal stakeholders such as Compliance, Security, Audit and Employment Law on investigations of employee misconduct and review of federal and state agency charges
- Provided guidance on the full range of employee relations issues across all businesses, covering all phases of the employee lifecycle including organizational restructuring and executive separations, translating the business strategy into the optimal organizational structure and identifying the best way to accomplish the business objectives within a legally defensible framework; responsible for administration of and adjudicating claims against the U.S. Separation Pay Plan
- Drove strategic HR and policy initiatives, including process reengineering, cross-business standardization, benchmarking, monitoring employment related legislative and regulatory changes, disciplinary review, and development of communications and training for HR professionals to support and ensure understanding of the changes; served as a member of the Benefits Plans Administration Committee
- Provided expertise on best practices in crisis management situations impacting employees and the business operations, including workplace violence and natural disasters; represented HR on the Crisis Management team

*Director, Employee Relations COE*

2010 – 2013

- Built a centralized Employee Relations function within the COE to support the Consumer Banking businesses in North America (13,000+ employees across the Cards, Retail, Commercial and Mortgage Banking channels)
- Led a nationwide team of ER Advisors in providing coaching and consultation to managers and employees on the full range of employee relations and policy issues, including formal disputes, problem resolution, investigations and ER and performance management skills development for managers
- Focused on building managerial capability through partnership with the business to review and resolve workplace concerns, analyze trends, and provide coaching and recommendations to increase manager and employee engagement

*Senior Vice President, Employee Relations COE*

2007 – 2010

- Provided guidance and training to HR professionals supporting the Consumer O&T businesses (40,000+ employees) regarding the handling of employee relations issues, including policy interpretation and administration, legal and regulatory compliance.
- Played a lead role in key HR policy initiatives, including building consensus across the major lines of business to harmonize from five to one Employee Handbook in the U.S.
- Led the development of online, self-paced anti-harassment and discrimination training for managers and employees to satisfy various state regulatory requirements and further embed a culture of respect and inclusion

*Director of Employee Relations and Sector HR-Retail Distribution North America*

2006 – 2007

- Led team of professionals in providing HR business partner support for RDNA functional areas and for the Citibank Direct (digital) business channel, partnering with senior leaders on organizational strategy, performance management, executive staffing, compensation, talent and organizational development, employee relations and coaching/counseling.
- Counseled and advised both management and HR professionals across the RDNA businesses (35,000 employees in Citibank, CitiFinancial, Primerica, Citi Assurance) on complex issues relating to employment law and human resource policies and procedures, including a major corporate restructuring initiative; focus on integration and alignment in a highly-matrixed, ambiguous environment.

*Director of Employee Relations and HR Compliance – Consumer Finance North America*  
2003 – 2005

- Provided guidance and training to HR professionals in the CFNA businesses (20,000+ employees) regarding the handling of employee relations issues, including policy interpretation and administration, legal and regulatory compliance.
- Investigated and resolved internal and external employee complaints and charges, including harassment, discrimination and highly sensitive or senior level internal issues.
- Served as operational risk coordinator for CFNA HR, leading cross business team of HR compliance specialists in the development and implementation of Risk and Control Self-Assessment processes and the Consumer pre-employment screening processes
- Assisted with M&A due diligence and integration of acquired employees.
- Drafted, reviewed and approved management and HR training materials and employee communications.

*Director of Diversity & Compliance Programs - CitiFinancial Mortgage/Citicorp Trust Bank, fsb/Chesapeake*  
2001 – 2003

- Managed compliance with employment related policies, laws, and regulations, including EEO and AAP.
- Investigated and responded to local, state, and federal administrative agency charges and investigations, internal and external complaints, requests for dispute resolution and litigation.
- Developed, implemented, and reported on strategic diversity initiatives for the businesses, including training of all key managers and new hires. Conducted in-class diversity training.
- Led cross-business diversity initiatives in the DFW area, including planning and coordination of awareness and heritage events, development of Diversity Alliance website, communications and HR training on various topics including transgender employees in the workplace.

*Vice President, Assistant General Counsel- Associates First Capital Corporation (acquired by Citigroup)*  
2000 – 2001

- Managed employment litigation, internal and external dispute resolution.
- Researched and responded to state and federal administrative agency charges and regulatory matters.
- Consulted with HR professionals regarding hiring and personnel issues, HR policy administration and fair employment practices compliance.
- Conducted research on various state and federal employment law topics.
- Reviewed and approved training materials.

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## **LICENSE/CERTIFICATIONS**

Licensed attorney in the State of Texas since 1994  
Certified Federal Equal Employment Opportunity Counselor

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## **MEMBERSHIPS**

Dallas Bar Association  
Mid-Cities Human Resources Association  
Board of Directors of Workforce Solutions for Dallas County 2006-2010

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## **PUBLICATIONS**

Author of article [Three HR Paradigms that Damage Organizational Culture](#), July 13, 2022  
Author of article [Navigating the Politicization of Black Lives Matter in the Workplace](#), November 18, 2020  
Author of article [Federal Protections for LGBT Individuals-Uncertainty Prevails](#), June 2019

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## EXPERT WITNESS DESIGNATIONS

Davis v. Blalock, et al., No. 2016-CP-12-00498, in the Court of Common Pleas, Sixth Judicial Circuit, Chester County, South Carolina, on behalf of Defendant. Report submitted on May 13, 2019, on adequacy of employer's hiring and supervision policies and practices. Deposed by Plaintiff in August 2019 and gave videotaped pre-trial testimony in October 2019. Case settled post-testimony, before trial.

Owens v. Circassia Pharmaceuticals, Inc., C.A. No. 2:19-CV-03946, in the United States District Court for the Central District of California, on behalf of Defendant. Report submitted April 27, 2020, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to anti-discrimination, harassment, and retaliation. Venue subsequently transferred to the United States District Court for the Northern District of Texas. Deposed by Plaintiff in February of 2021. Defendant's motion for summary judgment was granted in June of 2021 and affirmed by the United States Court of Appeals for the Fifth Circuit, U.S.D.C No. 3:19-CV-2231, in May of 2022.

Monden v. Consolidated Nuclear Security, LLC, Case No. 2:22-cv-00004-Z-BR, in the United States District Court for the Northern District of Texas, Amarillo Division, on behalf of Defendant. Report submitted September 26, 2022, on the adequacy of employer's policies and practices relating to investigations of timekeeping misconduct. Defendant's motion for summary judgment was granted and affirmed by the United States Court of Appeals for the Fifth Circuit, U.S.D.C No. 2:22-CV-4, in March of 2024.

Fernandez v. BNSF Railway Co., Case No. 4:22-cv-00537-O, in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted January 2, 2023, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to anti-discrimination, harassment, and retaliation. Case settled.

Tarpley v. Midland Country Club, Cause No. CV-58407, in the District Court, Midland County, Texas, 142<sup>nd</sup> Judicial District, on behalf of Defendant. Report submitted April 26, 2023, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to anti-harassment and retaliation. Case settled.

Ward v. Texas Farm Bureau, et al., Case No. 6:19-CV-00337, in the United States District Court for the Western District of Texas, Waco Division, on behalf of Plaintiff. Substituted as replacement expert on April 18, 2024, to testify at trial regarding the adequacy of employer's efforts to comply with the Fair Labor Standards Act.

Ferguson v. Texas Farm Bureau, et al., Case No. 6:17-CV-00111, in the United States District Court for the Western District of Texas, Waco Division, on behalf of Plaintiff. Substituted as replacement expert on August 14, 2024, to testify at trial regarding the adequacy of employer's efforts to comply with the Fair Labor Standards Act.

Harper v. RPM Living, LLC, Case No.: C-1-CV-24-004509, in the County Court of Travis County, Texas, County Court at Law No. 1, on behalf of Defendant. Expert's Disclosures submitted March 28, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to anti-discrimination and harassment.

Villegas v. City of San Antonio, Cause No. 2023CI07493, in the District Court, Bexar County, Texas, 57<sup>th</sup> Judicial District, on behalf of Defendant. Report submitted June 13, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to workplace violence, anti-harassment, and investigations of complaints.

Rogers v. Lhoist North America of Texas, LLC, Case No. 4:24-CV-01223-O, in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted July 11, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to anti-discrimination, harassment, and retaliation. Deposed by Plaintiff September 10, 2025. Defendant's motion for summary judgment was granted on December 16, 2025.

Gooden v. Lhoist North America of Texas, LLC, Case No. 4:24-cv-00750-P in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted July 18, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to anti-discrimination, harassment, and retaliation. Deposed by Plaintiff September 10, 2025.

Harvey v. Lhoist North America of Texas, LLC, Case No. 4:25-cv-00291-P in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted August 4, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to workplace safety, anti-discrimination, harassment, and retaliation. Deposed by Plaintiff September 10, 2025.

Waites v. Lhoist North America of Texas, LLC, Case No. 4:25-cv-00290-P in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted August 11, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to anti-discrimination, harassment, and retaliation. Deposed by Plaintiff September 10, 2025.

Jones v. Lhoist North America of Texas, LLC, Case No. 4:25-cv-00289-P in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted August 18, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to anti-discrimination, harassment, and retaliation. Deposed by Plaintiff September 10, 2025.

Gregory v. Lhoist North America of Texas, LLC, Case No. 4:25-cv-00288-P in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted August 22, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to anti-discrimination, harassment, and retaliation. Deposed by Plaintiff September 10, 2025.

Hooker v. Lhoist North America of Texas, LLC, Case No. 4:25-cv-00287-P in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted August 29, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to workplace safety, anti-discrimination, harassment, and retaliation. Deposed by Plaintiff September 10, 2025.

Candler v. Lhoist North America of Texas, LLC, Case No. 4:25-cv-00286-P in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted September 8, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to workplace safety, anti-discrimination, harassment, and retaliation. Deposed by Plaintiff September 10, 2025.

Bell v. Lhoist North America of Texas, LLC, Case No. 4:25-cv-00285-P in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted September 15, 2025, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to workplace safety, anti-discrimination, harassment, and retaliation. Deposed by Plaintiff September 10, 2025.

Byrd v. Primoris Services Corporation, et al., Case No. 3:24-cv-2767-N, in the United States District Court for the Northern District of Texas, Dallas Division, on behalf of Defendants. Report submitted on January 12, 2026, rebutting Plaintiff's expert's review of the adequacy of employer's policies and practices relating to anti-discrimination, harassment, retaliation, and investigations of complaints.

White v. American Airlines, Inc., Case No. 5:23-cv-01164, in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted on March 27, 2026, on the adequacy of employer's policies and practices relating to family and medical leaves and reasonable accommodations.

Paris v. American Airlines, Inc., Case No. 4:24-cv-00935-O, in the United States District Court for the Northern District of Texas, Fort Worth Division, on behalf of Defendant. Report submitted on March 27, 2026, on the adequacy of employer's policies and practices relating to family and medical leaves and reasonable accommodations.