

From: [Krystle Thomas](#)
To: [Woodward, Chris, DOH](#)
Subject: [EXTERNAL] Angie Brooks
Date: Friday, October 20, 2023 1:06:26 PM
Attachments: [image001.png](#)


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Chris,

I am counsel for Quality Life Services, a DD Waiver provider in Las Cruces. My clients are being sued for allegedly misclassifying their DSPs as independent contractors rather than employees. Quality Life Services' owners, April Licon and Sally Chavez, have spoken to Angie Brooks regarding the same. It is my understanding that Ms. Brooks has knowledge regarding the DD Waiver provider agency landscape and, specifically, knows that most agencies classify their DSPs as independent contractors rather than employees.

As a result, I would like to talk to her as a potential witness on our behalf in this case. She indicated that she would not be able to speak to me without your blessing/involvement. Can I set up a time to have a telephonic interview with Ms. Brooks? If you would like to speak to me beforehand, I am happy to talk to you more about this case.

Thank you for your time, and have a great weekend.

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