Sample Closing Statement:

First paragraph: Start with a strong sentence. Summarize why the claimant should be entitled to benefits / wasn’t overpaid / etc. Be careful not to completely recount the facts. Keep it brief.

*Ex: “My client, Ms. Rodriguez, worked for her employer for 25 years without a single warning. When she left her job in January, she left due to a medical issue. Ms. Rodriguez provided documentation to the employer of her medical issue over the course of several months. Ms. Rodriguez requested appropriate leave and was denied. Without other options to keep her job, Ms. Rodriguez was forced to quit.”*

Second paragraph: This is the time to note the employer’s shortcomings. These shortcomings depend on the hearing – maybe the employer didn’t show up to the hearing, or they didn’t provide a good reason for termination, or didn’t provide any evidence of the facts they put forward.

*Ex: “Ms. Rodriguez’s supervisor, Bob, failed to provide testimony or evidence that Ms. Rodriguez’s request for a leave of absence was approved.”*

Third paragraph: Legal basis. This is your moment to point to any relevant case law in your favor. Primarily, you are citing Appeal Board Decisions. Judges can consider other favorable hearing decisions, but they are not controlling.

*Ex: “According to Section 593 (1) (a), a claimant is disqualified from receiving benefits after a voluntary separation from employment without good cause. The credible evidence establishes the claimant quit with good cause. According to Appeal Board No. 12345, a claimant can be found to have quit with good cause when they took reasonable steps to try to preserve their employment. In the present case, the claimant took XYZ steps…*

Fourth paragraph: bring it all home. This is your final stand to make a case for your client. End on a strong note – pull at the heartstrings, note the struggles your client has faced or why they are right in their entitlement for benefits.

*Ex: “Ms. Rodriguez suffered for years with this medical issue that ultimately forced her to stop working. Without a means to provide for her family, Ms. Rodriguez has been struggling. Ms. Rodriguez should be eligible for benefits because she only left her job due to medical reasons and took adequate steps to preserve her position.”*