

# Rebecca Bush

Chicago, IL

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## PARTNER

### Overview

When it comes to navigating employee benefits compliance, Rebecca transforms complex regulatory challenges into practical business solutions. She understands the everyday challenges employers face when managing benefit programs and provides counsel that balances legal requirements with business realities.

Chair of the firm's Employee Benefits, Executive Compensation & Tax Service Group, Rebecca brings valuable perspective from her experience as in-house counsel for employee benefits technology companies. She has worked directly with plan sponsors across multiple industries including technology, financial services, healthcare, construction, retail, and manufacturing.

Rebecca counsels employers on health and welfare plans, retirement plans, executive compensation arrangements, deferred compensation plans, equity compensation structures, health reimbursement arrangements (HRAs), flexible spending arrangements (FSAs), health savings accounts (HSAs), and cafeteria plans. She advises on ERISA compliance, ACA requirements, HIPAA privacy issues, and tax implications of benefit offerings.

Rebecca's experience overseeing human resources functions at a technology company gives her insight into the operational challenges employers face with benefit administration, workforce management across multiple states, and employee communications. This background enables her to provide counsel that addresses both legal requirements and practical implementation concerns.

She represents employers during government audits by the IRS, state taxing authorities, and U.S. Department of Labor and assists with benefit and compensation considerations in mergers and acquisitions.

### SERVICES

Employee Benefits, Executive Compensation & Tax

Labor, Employment & Immigration

### EDUCATION

Northern Illinois University  
College of Law, J.D., 2006,  
*magna cum laude*

Northern Illinois University,  
B.S., 2000

### ADMISSIONS

Illinois

Wisconsin

## Experience

### Employee Benefit Plan Design and Compliance

- Designed unique structure for specialty HRA and lifestyle account products that increased client sales revenue by 20 percent
- Counseled Fortune 500 companies and enterprise-level clients across financial services, technology, healthcare, retail, and manufacturing industries on complex employee benefit plan design and compliance matters
- Developed compliant employee benefit plan designs for medical travel assistance following the U.S. Supreme Court *Dobbs* decision, working directly with Fortune 500 companies and major enterprise clients across technology, retail, financial services, and professional services sectors
- Led employee benefit product design strategy that increased contribution margins by 700 percent through compliance redesign, minimizing disruption to employer and employee relationships while maintaining regulatory requirements

### Government Audit Defense and Compliance

- Successfully represented clients in numerous U.S. Department of Labor and IRS audits involving employee benefit plan compliance and tax matters
- Procured favorable resolutions in multiemployer pension and welfare fund audits and related litigation proceedings
- Defended employers in state and federal agency proceedings involving wage and hour compliance, unemployment taxes, and employee classification issues

### Executive Compensation and Equity Arrangements

- Designed and administered complex equity compensation arrangements for technology companies with 100 percent remote workforce spanning 38 states and international locations
- Counseled employers on complex executive compensation structures, including equity-based compensation arrangements, change in control provisions, golden parachute payments, severance agreements, and deferred compensation plans across multi-state and international workforce environments
- Advised plan sponsors on ERISA prohibited transaction issues involving equity compensation plans, including exemption analysis, party-in-interest determinations, and structuring transactions to avoid fiduciary conflicts in employee stock ownership and benefit plan investments
- Provided comprehensive stock option plan administration guidance, including plan design, grant management, vesting schedules, exercise procedures, and regulatory compliance with federal and state securities laws for public and

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private companies

### **Fintech and Payment System Compliance**

- Collaborated with engineering teams from Google, CashApp, Square, Uber, Tesla, and Hulu to develop software code logic complying with ERISA-prohibited transaction rules and payment system regulations
- Worked directly with company founders and heads of engineering to design compliance frameworks for closed-loop payment systems serving as third-party administrators
- Developed compliance strategies for corporate credit card structures intersecting with health debit card regulations and IIAS payment systems

### **Employment Law and Workforce Management**

- Oversaw compliance for reduction in force proceedings involving sophisticated equity compensation and multi-state employment law considerations
- Managed employment law compliance for 100 percent remote workforce across 38 states plus international employees in Canada and the UAE
- Procured dismissal of class action lawsuit with zero settlement after establishing plaintiff's breach of employment agreement
- Successfully defended non-compete litigation in federal court by demonstrating agreement violations of Wisconsin Uniform Trade Secrets Act

### **Membership & Involvement**

- Co-chair: Amundsen Davis Committee for Diversity, Equity & Inclusion
- Member: Illinois State Bar Association; State Bar of Wisconsin; National Society of Human Resource Management; Employers Council on Flexible Compensation
- Past President: Illinois Fox Valley Society of Human Resource

### **Honors**

- Selected to the Illinois Super Lawyers list of "Rising Stars": 2013, 2014, 2015, 2016, 2017

### **Firm News**

Rebecca Bush Joins Amundsen Davis as Lead of Employee Benefits, Executive Compensation & Tax Service Group  
Firm News, July 16, 2024

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26 Amundsen Davis Attorneys Included on 2017 Illinois Super Lawyers and Rising Stars Lists

Firm News, January 13, 2017

27 Amundsen Davis Attorneys Included on 2016 Illinois Super Lawyers and 2016 Illinois Rising Stars Lists

Firm News, January 8, 2016

Illinois Super Lawyers & Illinois Rising Stars Names 25 Amundsen Davis Attorneys to 2015 List

Firm News, January 12, 2015

Illinois Super Lawyers & Illinois Rising Stars Names 19 Amundsen Davis Attorneys to 2013 List

January 3, 2013

### Alerts

STIMULUS 2.0: The Consolidated Appropriations Act 2021 – Key Provisions for Employers

CDC Now Provides Two Options for Shortened Quarantine Time

ATTENTION Paycheck Protection Program Loan Recipients: REVISED Forgiveness Application Issued

Forgiveness Requirements Relaxed with Passage of Paycheck Protection Program Flexibility Act

Key Takeaways for PPP Borrowers: The Forgiveness Application is Finally Out!!

Families First Coronavirus Response Act: What It Means For Employers

### Speaking Engagements

Breakfast Briefing Series - Today's Remote Workforce: Offering Remote Work and Managing Multi-State Remote Workers

Event, Amundsen Davis, Webcast, August 20, 2025

Breakfast Briefing Series - Beyond Sweat Equity: Modern Compensation Strategies for Enhanced Engagement & Retention

Event, Amundsen Davis, Webcast, April 16, 2025

Discouraging Corporate Misconduct and Preserving Privilege

Speaking Engagement, Association of Corporate Counsel, Annual Ethics Seminar; Milwaukee, WI, November 1, 2024

Amundsen Davis's Tenth Annual Labor & Employment Fall Seminar

Event, Amundsen Davis, Livestream, September 4, 2024

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Addressing Employers' Rising Costs of Health Care While Staying Compliant And Competitive

Event, Amundsen Davis; Webcast, July 31, 2024

Legal Principles Surrounding Regulating Employee Appearance

Lorman, Webcast, November 9, 2021

Good Questions Lead to the Best Candidates

Lorman, Webcast, October 1, 2021

Seventh Annual Labor & Employment Fall Seminar

Event, Amundsen Davis, Seminar; Oak Brook, IL, September 29, 2021

Overview to Stay Compliant Within Employment Laws

Lorman, Webcast, September 1, 2021

Illinois/Wisconsin: Big Changes in 2020 & 2021 and What's Shaping Up in 2021

Illinois Chamber of Commerce, Webcast, August 25, 2021

### Published Works

Illinois Employment Forms-Online Version

Publication, *Illinois Chamber of Commerce*, March 2021

Model Employee Policies for Illinois Employees – 3rd Edition

*Illinois Chamber of Commerce*, 2021

Illinois Employment Law Handbook - 5th Edition

*Illinois Chamber of Commerce*, 2019

### Blog Posts

How the Big Beautiful Bill Will Impact Your Employee Benefits and Compensation Strategy

*Labor & Employment Law Update*, July 8, 2025

Court Ruling Hamstrings IRS Enforcement of ACA Employer Mandate

*Labor & Employment Law Update*, May 20, 2025

Key Takeaways – Beyond Sweat Equity: Modern Compensation Strategies for Enhanced Engagement & Retention

*Labor & Employment Law Update*, May 1, 2025

Join Us for Beyond Sweat Equity: Modern Compensation Strategies for Enhanced Engagement & Retention

*Labor & Employment Law Update*, April 2, 2025

Refusing to Quit: Class Actions on Tobacco Surcharges in Health Plans Continue

*Labor & Employment Law Update*, March 18, 2025

IRS Issues Guidance on Alternative Distribution Method for Form 1095-C  
*Labor & Employment Law Update*, February 25, 2025

Bringing AI Out of the Shadows: How to Manage the Use of AI in Your Workplace  
*Labor & Employment Law Update*, January 28, 2025

REGISTER NOW – Addressing Employers’ Rising Costs of Health Care While  
Staying Compliant And Competitive – Webcast on July 31  
*Labor & Employment Law Update*, July 11, 2024

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