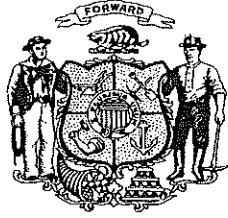


State of Wisconsin

SENATE CHAIR
Howard Marklein

316 East, State Capitol
P.O. Box 7882
Madison, WI 53707-7882
Phone: (608) 266-0703



ASSEMBLY CHAIR
Mark Born

308 East, State Capitol
P.O. Box 8952
Madison, WI 53708-8953
Phone: (608) 266-2540

Joint Committee on Finance

MEMORANDUM

To: Members
Joint Committee on Finance

From: Senator Howard Marklein
Representative Mark Born

Date: May 2, 2023

Re: s. 16.515/16.505(2), Stats. Request

Attached is a copy of a request from the Department of Administration, received May 2, 2023, pursuant to s. 16.515/16.505(2), Stats., on behalf of the Department of Justice.

Please review the material and notify **Senator Marklein** or **Representative Born** no later than **Friday, May 19, 2023**, if you have any concerns about the request or if you would like the Committee to meet formally to consider it.

Also, please contact us if you need further information.


Attachments

HM:MB:jm



STATE OF WISCONSIN
DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor
Kathy Blumenfeld, Secretary

Date: May 2, 2023
To: The Honorable Howard Marklein, Co-Chair
Joint Committee on Finance
The Honorable Mark Born, Co-Chair
Joint Committee on Finance
From: Kathy K. Blumenfeld, Secretary 
Department of Administration
Subject: s. 16.515/16.505(2) Request(s)

MAY 02 2023
St. Finance

Enclosed are request(s) that have been approved by this department under the authority granted in s. 16.515 and s. 16.505(2). The explanation for each request is included in the attached materials. Listed below is a summary of each item:

AGENCY	DESCRIPTION	2021-22		2022-23	
		AMOUNT	FTE	AMOUNT	FTE
DOJ 20.455(2)(gb)	Gifts and grants			\$360,700*	2.0**

* One-time expenditure authority
** Project positions ending November 30, 2025

As provided in s. 16.515, the request(s) will be approved on May 23, 2023, unless we are notified prior to that time that the Joint Committee on Finance wishes to meet in formal session about any of the requests.

Please contact Kirsten Grinde at (608) 266-1353, or the analyst who reviewed the request in the Division of Executive Budget and Finance, if you have any additional questions.

Attachments

CORRESPONDENCE/MemorandumState of Wisconsin
Department of Administration

Date: May 1, 2023
To: Brian Pahnke
From: Michael R. Schmidt
Subject: Section 16.515/16.505(2) Request(s)

Attached is a s. 16.515/505(2) request analysis for your approval and processing.
 Listed below is a summary of each item:

DOA RECOMMENDATION:

<u>AGENCY</u>	<u>DESCRIPTION</u>	<u>2021-22</u>		<u>2022-23</u>	
		<u>AMOUNT</u>	<u>FTE</u>	<u>AMOUNT</u>	<u>FTE</u>
DOJ 20.455(2)(gb)	Gifts and grants.			\$360,700*	2.0**

* One-time expenditure authority.

** Project positions ending 11/30/2025

AGENCY REQUEST:

<u>AGENCY</u>	<u>DESCRIPTION</u>	<u>2021-22</u>		<u>2022-23</u>	
		<u>AMOUNT</u>	<u>FTE</u>	<u>AMOUNT</u>	<u>FTE</u>
DOJ 20.455(2)(gb)	Gifts and grants.			\$360,700*	2.0**

* One-time expenditure authority.

** Project positions ending 11/30/2025

BP APPROVAL





STATE OF WISCONSIN
DEPARTMENT OF ADMINISTRATION

Tony Evers, Governor
Kathy Blumenfeld, Secretary
Brian Pahnke, Administrator

Date: May 1, 2023

To: Kathy K. Blumenfeld, Secretary
Department of Administration

From: Michael R. Schmidt
Executive Policy and Budget Analyst

Subject: Request under ss. 16.505(2) and 16.515 from the Department of Justice for the Creation of 2.0 FTE Program Revenue Special Agent Project Positions and Increased Expenditure Authority.

Request:

The Department of Justice requests the creation of 2.0 FTE program revenue special agent project positions and a one-time supplement of \$360,700 PR in fiscal year 2022-23 in the gifts and grants appropriation under s. 20.455(2)(gb) to support the Wisconsin Labor Trafficking Project.

Revenue Sources for Appropriation(s):

The gifts and grants appropriation under s. 20.455(2)(gb) is funded from revenue the department receives from gifts and grants to its Division of Law Enforcement Services and Division of Criminal Investigation. Revenue for this request would be supported by a grant from the Howard G. Buffett Foundation.

Background:

The department has partnered with other organizations on a Wisconsin Labor Trafficking Project. The project is supported by a grant of \$5,121,994.72 from the Howard G. Buffett Foundation. The department's portion of the grant is \$1,465,445. The project is for a three-year period beginning on December 1, 2022.

According to the project proposal, the Wisconsin Labor Trafficking Project will use a multidisciplinary team to address labor trafficking. It will focus on arresting and prosecuting traffickers while providing comprehensive support to victims. United Migrant Opportunity Services (UMOS) will be the lead organization and provide overall project coordination, provide victim services, train victim service providers, and with the department, lead the multidisciplinary team. It will also be the fiscal agent to receive funds and will distribute allocated funding to designated subrecipients and contractors.

The department will be the primary project partner. It will also be the lead law enforcement agency and provide law enforcement training and conduct victim-centered investigations. According to the project proposal, 2.0 FTE special agent positions will be assigned to labor

Kathy K. Blumenfeld, Secretary
Page 2
May 1, 2023

trafficking investigations and help with law enforcement training. The department will also assign a 0.5 FTE assistant attorney general position to the project, which its request notes will be done by assigning existing resources.

The department's request also notes that because its existing position authority is insufficient to transfer current special agents to the project, it is requesting, pursuant to s. 16.505(2), 2.0 FTE program revenue special agent project positions to end on November 30, 2025. The end date would correspond to the end of the project period. The department's special agents are sworn law enforcement officers assigned to its Division of Criminal Investigation. They assist local law enforcement agencies and investigate crimes of statewide importance or that require highly specialized resources. The requested positions would be assigned to the department's Human Trafficking Bureau, which investigates human trafficking offenses.

In addition to the department and UMOS, other members of the Wisconsin Labor Trafficking Project's multidisciplinary team include the Department of Workforce Development, The Women's Community Inc., Lotus Legal Clinic, Maria I. Lopez Immigration Law and Mendez Law LLC. The Department of Workforce Development will assign staff to provide outreach statewide to migrant and seasonal farmworkers and assist with investigations involving H-2A visa workers and Wisconsin labor camp residents.¹ The Women's Community will assign victim advocates to provide victim services and advocacy in central Wisconsin. The Lotus Legal Clinic will provide victim rights representation and assist with victim statements. The Maria I. Lopez Immigration Law and Mendez Law LLC will provide legal immigration services and accept referrals to process T visas.²

The department also requests a one-time supplement of \$360,700 PR in fiscal year 2022-23 for this project. According to PeopleSoft, as of April 25, 2023, the balance of the gifts and grants appropriation under s. 20.455(2)(gb) is \$44,658, with \$114,700 in expenditure authority for fiscal year 2022-23. This expenditure authority was approved pursuant to s. 16.515 on November 29, 2022, for project work related to the Joint Statistical Analysis Center Program, the Comprehensive Secure and Responsible Drug Disposal Program, and the Silver Alert program, with grant support from RTI International, the Institute of Intergovernmental Research and Bader Philanthropies, respectively.

Analysis:

The grant from the Howard G. Buffett Foundation will provide the department \$1,465,445. It would support 2.0 FTE special agent positions, 0.5 FTE assistant attorney general position, overtime, outreach and training for the Wisconsin Labor Trafficking Project from December 1, 2022, through November 30, 2025. Table 1 provides a summary of the department's budget for the project.

¹ An H-2A visa allows certain foreign nationals to fill temporary agricultural jobs in the United States.

² A T visa allows certain victims (and qualifying family members) of a *severe form of human trafficking*, which includes labor trafficking and sex trafficking, to remain in the United States if they have complied with certain requirements.

Kathy K. Blumenfeld, Secretary
Page 3
May 1, 2023

Table 1. Summary of the Department's Budget for the Wisconsin Labor Trafficking Project

Category	Year 1	Year 2	Year 3
	12/1/22-11/30/23	12/1/23-11/30/24	12/1/24-11/30/25
Salaries	\$235,000	\$289,868	\$297,467
Fringe Benefits Costs	\$78,683	\$99,376	\$101,999
Travel	\$20,300	\$20,300	\$20,300
Supplies	\$50,300	\$42,300	\$42,300
Contracted Services	\$4,600	\$7,038	\$7,179
Other Costs	\$4,000	\$3,000	\$3,000
Subtotal Direct Costs	\$392,883	\$461,882	\$472,245
Subtotal Indirect Costs	\$38,850	\$49,112	\$50,473
Total	\$431,733	\$510,994	\$522,718

The project's budgeted salary and fringe benefits costs include funding for the requested positions, the assistant attorney general and overtime. For each requested special agent, the department's project budget estimates an hourly salary of \$40.96, which was the appointment maximum for the special agent position classification prior to January 2023. It is also the average hourly rate for incumbent special agents at the department according to PeopleSoft as of April 25, 2023. The estimated salary is also adjusted by 2 percent in each of the following years. The budgeted fringe benefit costs associated with the requested special agents is calculated as 42.4 percent of the salary costs, which represents the department's fringe benefits rate included in the 2021-23 Technical Budget Instructions (37.35 percent), and because special agents are protective occupation participants in the Wisconsin Retirement System, an additional add-on (5.09 percent).³

According to the department's request, the one-time supplement of \$360,700 PR in fiscal year 2022-23 is a revised first-year grant budget for the costs that would be incurred during the fiscal year. Because UMOS is the fiscal agent for the project, it has received the entire grant from the Howard G. Buffett Foundation. UMOS will distribute the department's portion of the grant to it. The department indicates that if costs are higher than estimated, they would be absorbed using other available fund sources; and if lower, either decline funds or extend the length of the project agreement.

Recommendation:

Approve the request.

³ The department's agency fringe benefit rate included in the 2023-25 Technical Budget Instructions is 37.52 percent and its add-on for protective occupation participants is 6.44 percent.



STATE OF WISCONSIN
DEPARTMENT OF JUSTICE

Josh Kaul
Attorney General

Room 114 East, State Capitol
PO Box 7857
Madison WI 53707-7857
(608) 266-1221
TTY 1-800-947-3529

December 27, 2022

SENT VIA EMAIL (briand.pahnke@wisconsin.gov)

Brian D. Pahnke, Administrator
Division of Executive Budget and Finance
Department of Administration
101 E. Wilson Street, 10th Floor
Madison WI 53702

Re: Request for Program Revenue-Funded Position Authority

Dear Administrator Pahnke:

Pursuant to Wis. Stat. § 16.505 (2), the Department of Justice respectfully requests the creation of 2.0 full-time equivalent project positions in the law enforcement services gifts and grants appropriation under Wis. Stat. § 20.455(2)(gb) for a period of three years ending November 30, 2025. As explained below, the positions will be supported by a grant from the Howard G. Buffett Foundation.

Background and Justification

The Department of Justice has partnered with United Migrant Opportunity Services (UMOS) to establish a multi-disciplinary team to combat labor trafficking in Wisconsin. Information on the scope of labor trafficking in Wisconsin can be found in the enclosed project plan. The goal of the project is to develop a consistent and well-coordinated approach to arresting and prosecuting traffickers while comprehensively supporting trafficking victims by improving awareness of labor trafficking among the public, service providers, law enforcement and prosecutors; increasing identification of labor trafficking victims and their traffickers; and strengthening community, law enforcement and criminal justice response to labor trafficking.

The Howard G. Buffett Foundation was established in 1999 to improve conditions and create change for the world's impoverished and marginalized

populations. The foundation is headquartered in Decatur, Illinois. Combatting human trafficking is one of the foundation's focus areas, investing in an approach that strengthens community capacity to arrest and prosecute human traffickers, dismantle trafficking networks, and support survivors. The foundation notes that while many law enforcement agencies have increased their focus on sex trafficking, many have yet to develop best practices to address labor trafficking, with forced labor cases representing just seven percent of U.S. human trafficking prosecutions over the last twenty years.

The department is well-positioned to assist in the development and promulgation of best practices in the investigation and prosecution of labor trafficking crimes by providing the expertise of Division of Criminal Investigation (DCI) sworn law enforcement and Division of Legal Services (DLS) prosecutors to the multidisciplinary team. The department's efforts will be supported by UMOS and other community partners who are uniquely qualified to assist and support trafficking victims. In addition to UMOS, the team includes the Wisconsin Department of Workforce Development, The Women's Community Inc., Lotus Legal Clinic, Maria I. Lopez Immigration Law and Mendez Law LLC. The multidisciplinary team will work with other federal, state, and local law enforcement organizations and prosecutors, state and county Child Protective Services agencies, the 16th Street Community Health Center, Family Health La Clinica, the Mexican Consulate, the Equal Employment Opportunity Commission, the U.S. Department of Labor and victim services agencies and organizations.

Revenue Source

The grant provides \$1,465,445 for two full-time DCI special agents and a half-time DLS Assistant Attorney General for a period of three years, from December 1, 2022, through November 30, 2025. DLS will assign existing experienced prosecutors to the project and additional position authority is not required for the half-time position. DCI, however, will need to add 2.0 full-time equivalent (FTE) project positions for the term of the grant as existing position authority is not sufficient to transfer existing special agents from other assignments to this project. The detailed grant budget is enclosed.

Brian D. Pahnke, Administrator
December 27, 2022
Page 3

Thank you for your review and consideration of this request. Should you have questions or require additional information, please contact Michelle Gauger, Director of the Bureau of Budget and Finance, directly at (608) 267-6714 or gaugermc@doj.state.wi.us.

Sincerely,



Eric J. Wilson
Deputy Attorney General

EJW:MCG:alm

Enclosure

Cc: Krista Rick, Department of Administration

THE HOWARD G. BUFFETT FOUNDATION

November 29, 2022

Lupe Martinez
President/CEO
United Migrant Opportunity Services
2701 South Chase Avenue, Suite B
Milwaukee, Wisconsin 53207

Dear Mr. Martinez:

The Howard G. Buffett Foundation (HGBF) will provide United Migrant Opportunity Services (UMOS) with a wire transfer in the amount of \$5,121,994.72. This funding is restricted for the proposal titled *Wisconsin Labor Trafficking Project* and must be applied only to the expenditures described in the project proposal and budget submitted to the HGBF, attached here by reference. **At the conclusion of this project, or termination of this agreement, any unexpended funds must be returned to the HGBF.**

By accepting these funds, UMOS agrees that all activity supported by these funds adhere to and meet all IRS-established guidelines, rules, and regulations. UMOS further agrees to conduct all activities related to its use of the grant funds in compliance with all applicable U.S. export controls and trade sanctions, laws, and regulations.

The HGBF reserves the right to publish information pertaining to this contribution. UMOS is permitted to publicly acknowledge the amount and purpose of the HGBF grant but UMOS cannot use the HGBF name for fundraising purposes and is required to obtain permission from the HGBF in writing if it wishes to use the HGBF name or HGBF logo for any other reason than for purposes of public acknowledgement. UMOS is required to forward a copy of any public acknowledgement to HGBF for our records.

Please note that your program staff contact at HGBF will be Julie Stricker, jms@hgbfoundation.org. By accepting these funds, UMOS agrees to a project start date of December 1, 2022 and agrees to submit an interim report on this grant on June 1, 2023 and an annual report on January 1, 2024. Reporting will continue every six months in accordance with the Terms and Policies Agreement until the conclusion of the project. These reports should summarize the activities and provide a full financial accounting of all grant funds. Please send those reports directly to Julie Stricker, with a copy to compliance@hgbfoundation.org.

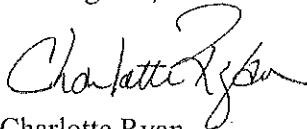
Before we initiate a wire transfer, please review the attached policies which govern our grant-making practices and sign and return the HGBF Terms and Policies Agreement and the Grant Requirements for Multidisciplinary Teams Addressing Human Trafficking. The attachments to this Agreement contain important provisions which govern this grant, including HGBF's right to terminate this Agreement at any time, for any reason.

UMOS
November 29, 2022
Page 2

Following the transfer of funds, we require that you complete and return the enclosed Acknowledgment of Charitable Contribution form within five (5) business days.

Please contact me directly with any questions.

Best regards,



Charlotte Ryan
Vice President of Administration

Attachments

cc: Ann Kelly Bolten
Julie Stricker

Agreed and Acknowledged by:



UMOS Lupe Martinez, President & Chief Executive Officer

11/29/2022

Date

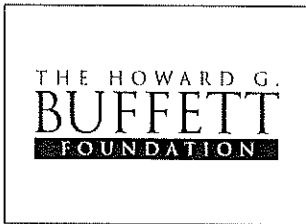
WI Labor Trafficking Project
Wisconsin Department of Justice

Proposed Partner Budget \$ 1,465,445

Escalation 1.0%

Unit/Type	Year 1		Year 2		Year 3		Year 4 - Not Applicable		Year 5 - Not Applicable		Total	Classifying Notes	
	Cost per Unit	# of Units	Cost per Unit	# of Units	Cost per Unit	# of Units	Cost per Unit	# of Units	Cost per Unit	# of Units			
a. Salaries													
DCI Special Agent - Labor Trafficking - /1/23 @ \$40.95/hr starting 1/1/2024 with 2% annual salary increase	\$ 85,200.00	0.75	\$ 63,900.00	1.00	\$ 86,904.00	1.00	\$ 86,642.08				\$ 239,448.08	Dedicated agents to perform labor trafficking investigations.	
DCI Special Agent - Labor Trafficking - /1/23 @ \$40.95/hr starting 1/1/2024 with 2% annual salary increase	\$ 85,200.00	0.75	\$ 63,900.00	1.00	\$ 86,904.00	1.00	\$ 86,642.08				\$ 239,448.08	Assistant Attorney General to prosecute traffickers at state level. The escalation rate for this position is 5% versus 2% for all others.	
OT for DCI Special Agent - Labor Trafficking @ \$81.44/hr x 32.5 hrs/yr	\$ 61.44	325.52	\$ 19,959.95	61.67	\$ 325.52	63.92	\$ 20,807.95				\$ 61,407.84	Overtime pay for agents involved in trafficking investigations. Y1 accounts for them being engaged for fewer hours.	
OT for other DCI WI Anti-Human Trafficking Task Force (WADHTF) Agents - estimate inc. fringe	\$ 87.55	942.66	\$ 29,999.88	87.55	\$ 406.62	87.55	\$ 36,312.24				\$ 101,311.70		
Total Salaries			\$ 234,999.83		\$ 289,867.53		\$ 237,467.34				\$ 822,394.71		
b. Fringe benefits													
DCI Special Agent - Labor Trafficking	\$ 63,900.00	42.4%	\$ 27,100.00	42.4%	\$ 86,904.00	42.4%	\$ 36,820.00				\$ 101,500.00	There is a retirement contribution add-on for protective service classifications that qualify for an earlier retirement eligibility, which include special agents but not the non-sworn Criminal Investigation positions.	
DCI Assistant Attorney General	\$ 57,200.00	37.4%	\$ 21,364.20	37.4%	\$ 60,060.00	37.4%	\$ 23,554.03				\$ 67,850.64	There are specific percentages that are fixed, which are:	
OT for DCI Special Agents @ 15.5%	\$ 15,999.95	15.5%	\$ 3,099.99	15.5%	\$ 20,399.95	15.5%	\$ 3,225.23				\$ 9,487.22	Fixed Percentage of Salary = 15.5%	
Total Fringe Benefits			\$ 78,688.35		\$ 98,376.48		\$ 101,998.36				\$ 280,058.77	FICA (Social Security and Medicare): 7.65%	
c. Travel													
Air Travel for Agents	\$ 600.00	8.00	\$ 4,800.00	8.00	\$ 4,800.00	8.00	\$ 4,800.00				\$ 14,400.00	Air Travel for staff to attend weekly trainings and other MDT site visits - 2 per calendar year (4 agents)	
Hotels for Agents	\$ 100.00	40.00	\$ 4,000.00	40.00	\$ 4,000.00	40.00	\$ 4,000.00				\$ 12,000.00	Hotels for staff (4 agents / 2 trips per calendar year)	
Meals for Agents	\$ 50.00	40.00	\$ 2,000.00	40.00	\$ 2,000.00	40.00	\$ 2,000.00				\$ 6,000.00	Meals for staff (\$50 per day of travel/\$150 each week of travel)	
Conference/Training Registration Fees for Agents	\$ 500.00	8.00	\$ 4,000.00	8.00	\$ 4,000.00	8.00	\$ 4,000.00				\$ 12,000.00		
Vehicle Rentals for Agents	\$ 500.00	8.00	\$ 4,000.00	8.00	\$ 4,000.00	8.00	\$ 4,000.00				\$ 12,000.00	Vehicle Rentals for out of state travel (per week of rental/per agent)	
Air Travel for Assistant Attorney General (AAG)	\$ 600.00	1.00	\$ 600.00	1.00	\$ 600.00	1.00	\$ 600.00				\$ 1,800.00	Air Travel for AAG to attend one annual training	
Hotels for AAG	\$ 100.00	6.00	\$ 600.00	6.00	\$ 600.00	6.00	\$ 600.00				\$ 1,800.00	Hotels for agent to travel to training and in-state meetings	
Meals for AAG	\$ 50.00	6.00	\$ 300.00	6.00	\$ 300.00	6.00	\$ 300.00				\$ 900.00	Meals for AAG, while traveling.	
Total Travel			\$ 20,300.00		\$ 20,300.00		\$ 20,300.00				\$ 60,900.00		
d. Consultants													
Consultants													E.g., consultant will provide training and technical assistance.
Total Consultants													
e. Supplies													
Colfax services for Special Agents (inc. cell and data service)	\$ 960.00	2.00	\$ 1,920.00	2.00	\$ 1,920.00	2.00	\$ 1,920.00				\$ 5,760.00	One data and one cell phone connection @ \$30/month x 2 agents	
Computer equipment for Special Agents	\$ 4,000.00	2.00	\$ 8,000.00								\$ 8,000.00	Computer supplies (laptop and related software, etc.) and investigative computer equipment.	
State vehicle use for two Special Agents @ \$745/month	\$ 1,490.00	12.00	\$ 17,880.00	12.00	\$ 17,880.00	12.00	\$ 17,880.00				\$ 53,640.00	Use of state vehicles by two agents charged at a monthly rate.	
Supplies and services for Assistant Attorney General (inc. telecom services, misc. supplies, insurance)	\$ 2,500.00	1.00	\$ 2,500.00	1.00	\$ 2,500.00	1.00	\$ 2,500.00				\$ 7,500.00	Includes telecom, data, miscellaneous supplies and insurance.	
Supplies for Special Agents (law enforcement investigative and protective supplies and services to include: legal coverage, clothing, protective vest, radios, duty belt equipment, flashlights, biohazard/first aid supplies)	\$ 10,000.00	2.00	\$ 20,000.00	2.00	\$ 20,000.00	2.00	\$ 20,000.00				\$ 60,000.00	Law enforcement investigative and protective supplies and services to include: legal coverage, clothing, protective vest, radios, duty belt equipment, flashlights, biohazard/first aid supplies. These supplies DO NOT include any lethal supplies, firearms or ammunition.	
Total Supplies			\$ 50,300.00		\$ 42,300.00		\$ 42,300.00				\$ 134,900.00		

Unit Type	Year 1		Year 2		Year 3		Year 4 - Not Applicable		Year 5 - Not Applicable		Total Cost	Clarity Notes
	Cost per Unit	# of Units	Cost per Unit	# of Units	Cost per Unit	# of Units	Cost per Unit	# of Units	Cost per Unit	# of Units		
f. Contracted services												
Language interpretation services	\$ 23.00	200.00	\$ 4,600.00	\$ 23.46	300.00	\$ 7,038.00	\$ 23.53	300.00	\$ 7,178.76		\$ 18,816.76	
Total Contracted services			\$ 4,600.00		\$ 7,038.00		\$ 7,178.76				\$ 18,816.76	
g. Capital equipment												
N/A												
Total Capital equipment			\$ -		\$ -		\$ -				\$ -	
h. Other direct costs												
Costs associated with outreach presentations and training	year	\$ 4,000.00	1.00	\$ 4,000.00	\$ 3,000.00	1.00	\$ 3,000.00	\$ 3,000.00	1.00	\$ 3,000.00	\$ 10,000.00	Costs associated with outreach and host/facilitate training to law enforcement, VSPs, and the public throughout the state and annual conference.
Total Other direct costs		\$ 4,000.00		\$ 4,000.00		\$ 3,000.00		\$ 3,000.00		\$ 3,000.00	\$ 30,000.00	
i. Field-level program interventions												
N/A												
Total Field-level interventions												
TOTAL Direct Costs to Grant			\$ 892,883.18		\$ 461,881.99		\$ 472,245.07				\$ 1,327,010.24	
Total Indirect Costs to Grant			\$ 38,850.00		\$ 49,112.28		\$ 50,472.90				\$ 138,435.18	



WI Labor Trafficking Project

Final Proposal

United Migrant Opportunity Services/UMOS, Inc. (UMOS)

CONTACT INFORMATION:

AUTHOR/REPRESENTATIVE: Mariana Rodriguez

ADDRESS: 2701 S. Chase Avenue, Suite D, Milwaukee, WI 53207

E-MAIL: Mariana.Rodriguez@umos.org

TELEPHONE: 414-389-6508 (Office)

05 August 2022

Revised November 14, 2022



Proposal

1. Executive Summary

Imagine being more than 2,000 miles from home in unfamiliar surroundings, separated from your family, and dependent on people you do not know. Imagine expecting to earn a decent wage and have a safe a place to sleep but instead you are threatened, your wages are withheld, your legal documents seized, and you have no place to turn for help. These are just a few of the realities for victims of labor trafficking in Wisconsin, particularly those victims who are foreign national migrant workers. Labor trafficking, wage theft, and other abuses perpetrated against migrant workers often go unnoticed or are not reported because of fear and intimidation. The physical, emotional, and financial toll of labor trafficking is enormous, and without stronger intervention, these workers will continue to be exploited.

State and local government, including law enforcement, do not have sufficient targeted resources in place to identify, investigate, disrupt, and/or prevent labor trafficking. Nonprofit advocacy and service organizations, some of which have the cultural competence and expertise to respond to victims, do not have scalable solutions to address labor trafficking adequately. Other nonprofits lack capacity altogether. While both government and the nonprofit community are doing what they can with the resources they have, they are not partnered sufficiently enough to overcome Wisconsin's labor trafficking problem.

This project, if awarded, will combine the technical capabilities and legal authority of government with the community knowledge and victim advocacy of nonprofits to combat labor trafficking in Wisconsin. United Migrant Opportunity Services/UMOS, Inc. (UMOS) and the Wisconsin Department of Justice (WI DOJ) will engage and unify law enforcement (federal/state/local), prosecutors, advocacy organizations, service providers, and other stakeholders into a multi-disciplinary team (MDT). The MDT's primary goal will be to identify, disrupt, and prevent labor trafficking in Wisconsin among guest workers (H-2A, H-2B and TN visa classifications) and undocumented workers, primarily those involved in agricultural, dairy, and carnival work. The MDT will implement a targeted, consistent, and well-coordinated approach to fight labor trafficking that include the following primary activities:

- ✦ Project/MDT Implementation
- ✦ Focused outreach to vulnerable populations
- ✦ Victim identification and recovery
- ✦ Victim-centered investigations by dedicated law enforcement personnel
- ✦ Prosecution of traffickers
- ✦ Victim advocacy and safety planning
- ✦ Victim rights representation and immigration legal assistance
- ✦ Provision of victim services and basic needs

A generous grant of \$5,121,995 over three years will enable UMOS and the WI DOJ to implement these and related secondary activities to close current gaps in MDT member capacity, services for victims, response coordination, and the prosecution of traffickers.

2. Introduction

- ***Brief Background/Context***

Each year, thousands of migrant workers arrive in Wisconsin to work in agriculture and other seasonal industries. According to WI Department of Workforce Development (DWD) annual migrant reports, the number of migrants increased from about 5,028 to 7,020 in the last five years, even amid the COVID-19 pandemic. However, the actual numbers are likely much higher as these figures do not reflect the workers who do not have authorization to work in the U.S. Additionally, during the 2016 – 2021 timeframe, the proportion of migrants with H-2A guest worker visas has more than doubled. Most Wisconsin migrants travel from Mexico, ending up at least 2,000 miles away from their homes. That distance means they are disconnected from their safety networks making them vulnerable to neglect, abuse, substandard housing, and isolation. Language barriers and cultural differences also contribute to their vulnerabilities. Those without legal status fear deportation. This is why it is critical to increase Wisconsin's awareness, attention and capacity to effectively combat labor trafficking statewide.

- ***Brief Statement of the Problem***

In 2013, the Wisconsin Department of Justice (DOJ) conducted a baseline assessment of human trafficking in the state to evaluate the extent of the problem and identify gaps in resources not only for victims but also for those responding to human trafficking situations (i.e., law enforcement, advocates, and victims service providers). The interviews revealed that sex trafficking is focused on as the most prevalent type of human trafficking in Wisconsin. However, anecdotal information indicated that labor trafficking is present but goes unnoticed or is not investigated due to limited resources, lack of training, and/or the complex nature of such cases. In fact, of the human trafficking cases charged by federal authorities in Wisconsin in 2018, only one of the 15 cases was for labor trafficking, according to a 2019 Human Trafficking Institute report.

UMOS, through its Latina Resource Center (LRC), advocates for and provides services to, victims of violence, including those subjected to domestic abuse, sexual assault, and human trafficking. The LRC has fought against human trafficking since 2007 when it partnered in Wisconsin's first Rescue & Restore Victims of Human Trafficking Coalition. Since that time, UMOS has received several federal and state funding awards to combat the issue, raise awareness, and increase services and resources for victims. The LRC has coordinated with UMOS' CSBG-funded Comprehensive Crisis Relief and DOL-funded National Farmworker Jobs Program to uncover several labor trafficking situations in Wisconsin and Missouri. In just one example ([Borzynski Farm Case](#)), UMOS' intervention resulted in criminal charges being filed against five people associated with a farm labor contractor.

In 2020 and 2021, the LRC served 88 foreign-born, labor trafficking victims by providing services, helping with immigration issues, assisting victim witnesses during investigations, and advocating for their rights. The LRC worked closely with the WI DOJ's Division of Criminal Investigation (DCI) Human Trafficking Bureau during their investigations along with the DOL Office of Inspector General (OIG) and Homeland Security Investigations (HSI), among others. Unfortunately, there is only one dedicated state agent to navigate complex investigations and local law enforcement entities lack the knowledge, training, and resources to conduct labor trafficking investigations.

In terms of services to victims, there are few legal assistance providers that have a full understanding of federal and state laws related to human trafficking and victim protections. There are also limited provider organizations around the state that understand how to respond and advocate for victims effectively let alone having the cultural capacity to relate in a meaningful way that ensures victim trust and cooperation throughout a lengthy investigation process.

3. Proposal Specifics

- **Impact Goals**

Overarching Goal: Effectively identify, disrupt, and prevent labor trafficking in Wisconsin.

Impact Goals:

- a) Increase awareness about labor trafficking in Wisconsin among the public, the service provider community, law enforcement, and state/local prosecutors.
- b) Increase identification of labor trafficking victims and their traffickers.
- c) Strengthen community and law enforcement capacity and response to potential and identified labor trafficking victims.
- d) Increase justice system action (investigations, charges, and prosecutions) against labor traffickers and their networks on a state and local level.

- **Scope & Approach**

The WI Labor Trafficking Project will use the Multi-Disciplinary Team (MDT) approach to strengthen Wisconsin's community and law enforcement capacity and response to labor trafficking by developing and applying a consistent and well-coordinated approach to arresting and prosecuting traffickers while comprehensively supporting victims throughout the criminal investigation and justice process. With established collaborative partnerships victims are better served and their needs can be fully met. The purpose of this MDT is to focus on and address labor trafficking. Should situations involving sex trafficking arise, the MDT will leverage the state's Enhanced Collaborative Model (ECM) Task Force.

The Partners & Their Roles

UMOS, headquartered in Milwaukee, WI, is the lead organization and fiscal agent to receive HGBF grant funds and will distribute allocated funding to designated subrecipients and contractors. Through its LRC, UMOS will serve as the overall project coordinator, lead victim service provider (VSP), VSP trainer, and MDT co-leader. UMOS' team will include following positions dedicated to the project:

LRC Program Director (≈ .5 FTE): Oversee the project operations and partnerships with subrecipients and contractors; ensure compliance with HGBF contract, HGBF Terms and Policies; assist with law enforcement/VSP training and public presentation; and facilitate implementation, project reviews and annual planning; and coordinate professional development/HGBF technical assistance.

Anti-Human Trafficking Manager (≈ 1 FTE): Lead and facilitate with WI DOJ the MDT meetings; serve as primary liaison between MDT partners and members; troubleshoot unforeseen barriers to team collaboration; develop MDT ground rules, protocols, service referral procedures; lead annual project reviews and planning sessions, etc.

Lead Anti-Human Trafficking Advocate (.55 FTE) Lead in training new staff; conduct victim screening and identification; develop outreach strategies; participate in case reviews; assist in training law enforcement and partners on labor trafficking; provide technical assistance to VSPs and law enforcement; and assist with the coordinated response strategy in victim recovery.

Anti-Human Trafficking Advocates (≈ 2.5 FTE): Serve as primary service contacts with victims; conduct direct outreach; provide case management and advocacy; transport and accompany victims to appointments with law enforcement, medical/dental/mental health care, court, etc.

Attorney (≈ 1 FTE): Provide legal services to foreign born labor trafficking victims in an inclusive and respectful manner; manage an immigration legal assistance caseload and provide assistance to immigrants on substantive issues that may include special immigrant juvenile petitions;

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VAWA self-petitions; U and T visa applications; provide representation concerning immigration matters before the USCIS, BIA, EOIR and the federal courts; conduct intake interviews, provide advice and referrals on immigration matters; and respond to requests for emergency legal assistance.

Paralegal (≈ 1 FTE): Provide support to the Attorney and Partial DOJ Accredited Representative; review labor trafficking victim requests/referrals for immigration assistance; assist in preparing immigration-related applications and petitions and file with the appropriate agency; translation for affidavit; collect, manage, and enter client and case activity data into electronic system (i.e., LawLogix); and prepare reports for Attorney and Partial DOJ Accredited Representative.

Victim Services Coordinator/Partial DOJ Accredited Representative (≈ .167 FTE): Make determinations of T visa eligibility; prepare legal services contracts; represent clients at immigration interviews; and finalize and sign off on applications and petitions.

Program Assistant (≈ 1 FTE): Serve as the initial point of contact for LRC incoming calls and client referrals; manage daily office responsibilities; organize general office procedures; review office duties to ensure completeness, accuracy, and timeliness of reports; prepare correspondence and perform other clerical tasks to assist Advocates.

Subrecipient (S)/ Contractor (C)	Role
Wisconsin Department of Justice/WI DOJ (S) – Divisions of Criminal Investigation (DCI) Statewide	Primary partner and lead law enforcement agency. Provide law enforcement training and victim-centered investigation; co-lead the MDT. WI DOJ will assign two dedicated <i>Special Agents</i> who will be responsible for investigations and help with law enforcement training, and .5 FTE Assistant <i>Attorney General</i> to the project.
Wisconsin Department of Workforce Development/DWD (S) – Migrant and Seasonal Farmworker Programs Statewide	Provide direct outreach statewide to migrant and seasonal farmworkers in coordination with UMOS. DWD will assign up to 1 FTE to the project. The staff will assist with investigations involving H-2A workers and Wisconsin labor camp residents, provide input on training, and distribute information about labor trafficking signs, risks and where/how to obtain help.
The Women’s Community, Inc./WCI (S), Wausau, WI	Provide victim services and advocacy in Central Wisconsin. WCI will assign 1.15 FTE to the project. These staff will be victim advocates who will provide direct services and/or coordinate with other providers to ensure victims have their needs met.
LOTUS Legal Clinic (C), Milwaukee, WI and Neenah, WI	Provide victim rights representation, including representing victims during each phase of the human trafficking investigation and related interactions with the justice system, assist in writing victim statements, ensuring victims have adequate protections, etc.
Maria I. Lopez Immigration Law (C), Milwaukee, WI	Provide legal immigration services and accept referrals to process T visas for victims.
Mendez Law LLC (C), Green Bay, WI	Provide legal immigration services and accept referrals to process T visas for victims.

The Multi-Disciplinary Team (MDT):

Central to the WI Labor Trafficking Project’s approach is the development and engagement of an MDT. In addition to the partners identified above, UMOS and WI DOJ intends to work with the following key organizations:

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Homeland Security Investigations (HSI)
Federal Bureau of Investigation (FBI)
US Attorney's Office
State/County Child Protective Services
16th Street Community Health Center
EEOC

US Dept. of Labor - OIG and Wage & Hour
Local law enforcement
Local District Attorneys' Offices
Family Health La Clinica (FHLC)
Mexican Consulate
Other Victim Service Providers

Scope of Activities:

The execution of project activities depends on strong leadership and collaboration among MDT members. UMOS and WI DOJ will facilitate the implementation of the following primary and secondary activities as outlined below:

- 1) Complete implementation tasks (within 90 – 180 days of award begin date)
 - ✦ UMOS to develop contracts with WI DOJ, DWD, and WCI.
 - ✦ UMOS and DCI hire and/or assign personnel to the project.
 - ✦ Develop project implementation meeting schedule.
 - ✦ UMOS to develop contracts with legal service providers.
 - ✦ Purchase supplies and equipment (van for outreach and victim transportation).
 - ✦ Receive TA from HGBF (during implementation and ongoing).
 - ✦ Establish MDT protocols, including ground rules, commitment pledges, meetings, communications, confidentiality, commitment and engagement standards, clear referral processes, and data collection/tracking.
 - ✦ Establish baseline metrics for comparison (current capacity in Wisconsin, current cases accepted for prosecution, current investigations initiated by local/state law enforcement).
- 2) Conduct focused outreach to vulnerable target populations (throughout project duration)
 - ✦ Presentations performed by DCI in collaboration with law enforcement to educate and inform the public. UMOS to assist as needed from an advocacy perspective.
 - ✦ Direct outreach performed by UMOS and DWD and in collaboration with other UMOS programs [e.g., National Farmworker Jobs Program (NFJP) and Community Services Block Grant (CSBG) Comprehensive Crisis Relief (CCR) program] **and** other partners (e.g., DWD, FHLC, other VSPs, etc.).
- 3) Identify and recover victims (throughout project duration)
 - ✦ Identification – Performed by UMOS and in collaboration with other UMOS programs [e.g., NFJP and CSBG CCR program] and other partners (e.g., DWD, FHLC, DCI, law enforcement, other VSPs, etc.); includes response to referral from various sources.
 - ✦ DCI/UMOS will train partner programs and organizations on human/labor trafficking, victim indicators, reporting, referring, victim supports, etc.
 - ✦ Recovery – Performed by UMOS and involves crisis stabilization (includes addressing immediate basic needs).
- 4) Perform victim/survivor-centered investigations by dedicated law enforcement personnel
 - ✦ Performed by DCI, in coordination with HSI, and with support from UMOS/WCI advocates, who will serve as liaisons between victims/witnesses and law enforcement, and in collaboration with HSI, US DOL and local law enforcement.
 - ✦ DCI to provide investigative training to law enforcement (5-day HT school).
 - ✦ DCI to act a source of intelligence information about labor trafficking in Wisconsin and receive/respond to intelligence from UMOS and other victim services provider referrals.
 - ✦ HSI will initiate and submit continued presence (CP) applications and obtain law enforcement signing endorsements for T visas.

- 5) Prosecute traffickers
 - ✦ Performed by US Attorney's Office, WI Criminal Investigations Unit Assistant Attorney General, or local District Attorney's Office with support from DCI.
 - ✦ Coordinate LT training for prosecutors with TA support from HGBF.
- 6) Advocate for victims by providing justice system/process navigation, initiating DOL wage and hour claims, and ensuring victim safety.
 - ✦ Performed by UMOS Anti-Human Trafficking Advocates – Includes accompaniment, interpretation/translation, documentation and recording, coordination of health/mental health and related services, and safety planning.
- 7) Provide rights representation and immigration legal assistance to victims.
 - ✦ Performed by UMOS and contracted legal firms to assist victims on legal immigration issues, including continued presence and visa applications.
 - ✦ Performed by contracted legal firm (LOTUS) to represent victims and ensure their rights during law enforcement interviews, court appearances, depositions, etc.
- 8) Provide for victims' basic needs during crisis stabilization (e.g., emergency lodging, rent/security deposit, transportation, food, etc.)
 - ✦ Coordinate emergency lodging (hotel) during recovery as part of crisis stabilization.
 - ✦ Assist victims with securing housing until TVAP can be accessed (first month's rent/security deposits)
 - ✦ Provide food assistance/gift cards for personal and household needs.
 - ✦ Provide local bus passes (when available at location) for local travel.
 - ✦ Provide 1-way bus fare for victims returning home (should they choose not to participate in investigation/prosecution).
 - ✦ Coordinate and pay medical, vision, dental and mental health appointments/services.
 - ✦ Coordinate appointments and pay for CP medical exams.

• ***Proposed Work Plan Linked to Impact Goals***

The proposed work plan which includes the activities listed above is designed to make a measurable impact on Wisconsin's efforts toward substantially reducing or eliminating labor trafficking statewide. The linkage between activities and impact goals is detailed in the project Logic Model provided in the Appendices section. UMOS and WI DOJ developed the proposed work plan with the following assumptions in mind:

- ✦ Labor Trafficking is more prevalent in Wisconsin than identified and reported.
- ✦ Local law enforcement not able and/or do not know how to investigate LT effectively.
- ✦ Up to now, Wisconsin has relied largely on the US Department of Labor Office of the Inspector General (DOL-OIG) to initiate and investigate LT, and DOL-OIG capacity is limited. (Region 5 of DOL-OIG has one dedicated agent).
- ✦ Cases are difficult to "uncover"/prove and lengthy to investigate and prosecute.
- ✦ Labor trafficking is perceived as an employment issue versus a crime among local law enforcement and prosecutors.
- ✦ Public has strong tendency to perceive Wisconsin's human trafficking problem as only a child and sex trafficking problem.
- ✦ In general, it is assumed LT is only able to be prosecuted in federal court versus under state law; however, Wis. Stat. Ann. § 940.302 does cover sex and labor trafficking.
- ✦ Increased justice system action will lead to prevention of labor trafficking.
- ✦ Foreign born LT victims assume there is no justice for them because of their status, race, ethnicity, etc.

General Work Plan Timeline:

Project Implementation: Most if not all activities related to project implementation (Activity 1 on Logic Model) are scheduled to be completed in the first 90 – 180 days of award. During this time, Year 1 planning* will take place related to the following:

- ✦ Outreach - soliciting feedback from past victims; dates of outreach events, locations, groups/industries; level of MDT member involvement; and data tracking mechanisms
- ✦ Professional development for project staff
- ✦ MDT meetings throughout the year – how often, method, location, etc.
- ✦ Trainings for law enforcement, public, and other service providers - when and for whom

Project Reviews: UMOS and WI DOJ will conduct thorough project reviews during Month 6 of Year 1, and in Month 12 of all three years thereafter. This practice will include:

- ✦ Reviewing HGBF Terms and Policies against project activities and funding allocations
- ✦ Examining quantifiable data as indicated in the Outputs column on the Logic Model
- ✦ Checking in on the MDT partners and evaluating whether additional partners are needed
- ✦ Evaluating progress on investigations
- ✦ Identifying gaps in communication
- ✦ Reviewing progress on activities and related outcomes
- ✦ Evaluating training effectiveness
- ✦ Conducting surveys/obtain feedback – victims outreached to, screened, and/or identified; victim services providers; law enforcement.

Annual Planning: UMOS and WI DOJ will facilitate annual planning (during implementation period of Year 1, and in month 1 of Years 2 and 3). *Planning will include the steps identified above and for Years 2 and 3 will take into consideration the results of the previous year's project review.

Ongoing Activities and Services to Victims: Throughout the duration of the project, most activities will occur based on the identification, rescue, and recovery of victims; their individual needs; the investigation and justice system process; and other variables or dependencies that dictate timing of activities.

• ***Advocacy Potential (if relevant)***

Not applicable.

• ***Anticipated Challenges/Risks and Mitigation Strategies***

UMOS and WI DOJ anticipate challenges to hiring the personnel due to the current workforce shortages and competitive labor market. UMOS understand there may be a potential lack of qualified, experienced job candidates (e.g., bilingual Spanish/English speakers) in the Wisconsin labor market. WI DOJ may be required to get positional authority to hire new agents and/or the bureaucracy involved with the re-assignment of state personnel could cause delays in onboarding.

To mitigate these hiring concerns, UMOS is offering a \$3,000 hiring incentive to new hires and working aggressively through an in-house talent acquisition specialist to identify job seekers and potential qualified job candidates. WI DOJ will opt for re-assigning personnel rather than establishing a new position to avoid needing to obtain positional authority from the state legislature. It will also proactively reach out to local law enforcement to get them involved in labor trafficking investigations early in the process while providing appropriate training and support to help local law enforcement build capacity quickly.

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Another risk that UMOS and WI DOJ recognize is tentative or lack of commitment from MDT members to the project, scheduled meetings, and activities. During implementation, UMOS and WI DOJ will obtain commitment pledges from partners and any addition organizations invited to the team.

UMOS is allowing ample time to implement the project, secure subrecipient and contractor agreements and hire/assign and train personnel.

4. Detailed Annual and Comprehensive Budget

- *This section should include the annual and comprehensive budget for the proposed program. The budget summary should be included in the narrative proposal; the line-item detail should be submitted as a separate spreadsheet.*
- *Costs should be summarized in the following categories:*
 - a. *Salaries*
 - b. *Fringe Benefits*
 - c. *Travel*
 - d. *Consultants*
 - e. *Supplies*
 - f. *Contracted Services*
 - g. *Other direct costs*
 - h. *Capital equipment*
 - i. *Field-level program interventions (These are on-the-ground activities that directly involve and benefit the project beneficiaries.)*
 - j. *Overhead*

Budget	Year 1	%	Year 2	%	Year 3	%	Total	%
Direct Costs								
a. Salaries	\$351,391	22.95%	\$433,007	24.11%	\$437,157	24.35%	\$1,221,555	23.85%
b. Fringe Benefits	\$140,556	9.18%	\$173,203	9.65%	\$174,863	9.74%	\$488,622	9.54%
c. Travel	\$15,160	0.99%	\$22,440	1.25%	\$21,105	1.18%	\$58,705	1.15%
d. Consultants	\$0	0.00%	\$0	0.00%	\$0	0.00%	\$0	0.00%
e. Supplies	\$53,369	3.49%	\$16,308	0.91%	\$16,110	0.90%	\$85,787	1.67%
f. Contracted Services	\$665,000	43.44%	\$824,967	45.94%	\$817,678	45.54%	\$2,307,645	45.05%
g. Capital equipment	\$40,000	2.61%	\$0	0.00%	\$0	0.00%	\$40,000	0.78%
h. Other direct costs	\$45,534	2.97%	\$35,806	1.99%	\$35,489	1.98%	\$116,829	2.28%
i. Field-level program interventions	\$93,225	6.09%	\$135,965	7.57%	\$139,766	7.78%	\$368,956	7.20%
Indirect Costs								
j. Overhead	\$126,665	8.27%	\$154,074	8.58%	\$153,158	8.53%	\$433,897	8.47%
Grant Total	\$1,530,900	100.00%	\$1,795,770	100.00%	\$1,795,326	100.00%	\$5,121,995	100.00%

5. Qualifications of the Organization

- ***Include personnel assigned to this project and their specific credentials. Short resumes should be included as an appendix to the proposal.***

LRC Program Director Mariana Rodriguez will oversee the WI Labor Trafficking Project for UMOS. She has 21 years of experience working with victims of violence, including victims of all forms of human trafficking. She had been instrumental in leading UMOS' efforts to fight labor trafficking in Wisconsin and advocate for victims' rights. Through her work, UMOS has gained a strong reputation for having labor trafficking experience and expertise in Wisconsin and beyond. Under her supervision will be Damaris Becker, Victims Services Coordinator & Partial DOJ Accredited Representative and Javier Acevedo-Baez, Lead Anti-Human Trafficking Advocate.

Ms. Becker has been with UMOS since 2002 and received Partial DOJ Accreditation in 2014. She worked her way up to the Coordinator position and now oversees a team of Victim Advocates. She is well-trained in how to prepare and file T and U visa applications, justice system navigation, support group facilitation, victim advocacy and direct service delivery.

Mr. Acevedo-Baez has worked at UMOS in its anti-human trafficking programs since 2016. He has assisted with several labor trafficking investigations and coordinating services for victims who choose to participate in seeing their traffickers prosecuted. He is also well-versed in Wisconsin's social service delivery systems, victims' rights to receive public benefits, and has worked closely with the US DOL Office of Inspector General and Wage & Hour Division to disrupt illegal labor practices in Wisconsin as well as Missouri.

Wisconsin Human Trafficking Special Agent in Charge (SAIC) Ben Poller will serve as the WI DOJ's lead contact on the project. SAIC Poller has supervised WI DOJ's Division of Criminal Investigations (DCI) Human Trafficking Bureau since 2017, worked for DCI since 1999, and served as a law enforcement officer in Wisconsin since 1995. In this role, Poller leads DCI's tactics training, human trafficking training, and other specialized training. He is a Master Instructor and created DCI's Human Trafficking School for law enforcement and assists with curriculum development for the DCI Defensive and Arrest Tactics (DAAT) manual. SAIC Poller sits on several law enforcement committees, including the Tactical Skills Advisory Committee, Missing and Murdered Indigenous Women Task Force, and Wisconsin Anti-Human Trafficking Task Force, among others. He has led numerous victim-centered human trafficking investigations that resulted in the prosecution of perpetrators.

Both UMOS and WI DOJ intend to hire additional personnel under the WI Labor Trafficking Project. UMOS will bring on a Anti-Human Trafficking Manager responsible for directly ensuring the project is implemented according to its Work Plan and facilitate MDT meetings and communications. In addition, UMOS will hire additional Anti-Human Trafficking Advocates (≈ 2.5 FTE), one Attorney, and one Paralegal. WI DOJ plans to assign two Human Trafficking Special Agents and one part-time Assistant Attorney General to the project. All new hires will be required to meet minimum education and/or experience qualifications, have appropriate training or complete special training within the first several months after being hired or assigned.

Brief resumes for UMOS and WI-DOJ key personnel are provided in the Appendices section.

- ***Include any relevant references or other projects of similar scope and focus for the prime grantee and any sub-grantees.***

UMOS

US DOJ Office on Victims of Crime (OVC) FY 2019 Direct Services to Support Victims of Human Trafficking grant (36 months) – Contact: Silvia P. Torres, Victim Justice Program Specialist, U.S.

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Department of Justice, Office of Justice Programs, Office for Victims of Crime, 810 7th Street NW, Washington D.C. 20531, Silvia.torres@ojp.usdoj.gov, 202-616-1796.

WI DOJ

US DOJ Office on Victims of Crime (OVC) FY 2020 Enhanced Collaborative Model Task Force to Combat Human Trafficking – Contact: Darian Hanrahan, Human Trafficking Division, Office for Victims of Crime, 810 7th Street NW, Washington D.C. 20531, 202-616-2750, Darian.Hanrahan@usdoj.gov.

6. Appendices

- ***Any additional information you feel is critical to understanding the proposal's potential for impact.***

Resumes for key personnel and project logic model are included in the following pages.

- ***If you have not already, please submit documentation of your 501c3 status.***

UMOS' IRS letter documenting its 501(c)3 status is included in the following pages.

UMOS KEY PERSONNEL – BRIEF RESUMES

Mariana Rodriguez, BA, Latina Resource Center (LRC) Program Director

Experience & Skills: Has led UMOS' LRC since it was established in 2001. In her role, she provides leadership, vision, and direction to expand culturally and linguistically relevant services for victims of human trafficking, domestic violence, and sexual assault. In her 20+ years of professional experience, she has administered at least 40 different contracts and currently oversees more than \$2 million in government and private funding. She is experienced in program operations/service delivery, partnership development and coalition building, training, staff supervision, data collection, budgeting, and performance tracking. She is fluent in Spanish and English.

Education & Training: Bachelor of Arts in Psychology from Alverno College, Milwaukee, WI and extensive training in trauma-informed care, victim response/advocacy, and human trafficking, including trainings provided and required by the US DOJ Office on Victims of Crime (OVC) Training and Technical Assistance Center and Trafficking Victims Assistance Program (TVAP), the US DHHS Office on Trafficking in Persons (OTIP), and others.

Board & Committee Memberships:

- ✦ Member of ECM Wisconsin Anti-Human Trafficking Task Force
- ✦ Member of Milwaukee Joint Human Trafficking Task Force
- ✦ Member US Attorney-led Federal Anti-Human Trafficking Task Force (Eastern WI District)
- ✦ Member of Planned Parenthood of Wisconsin Board
- ✦ Former Member of City of Milwaukee Commission on Domestic Violence & Sexual Assault
- ✦ Former Member of Governor's Council on Domestic Abuse 2003-2017; served as Co-chair 2011-2013; served as Chair of Access Committee 2008-2017
- ✦ Appointed Member of the Wisconsin Department of Children & Families Anti-Human Trafficking Taskforce 2015-2017; served as Co-chair 2016-2017
- ✦ Member of Wisconsin Coalition of Sexual Assault Board member 2011-2013

Awards & Recognitions:

- ✦ 2022 International Justice Award, Milwaukee Joint Human Trafficking Task Force
- ✦ 2020 Milwaukee Journal Sentinel Woman of Influence, Non-Profit Leadership
- ✦ 2014 Wisconsin Coalition Against Sexual Assault Courage Award
- ✦ 2012 Recipient of FBI Director's Community Leadership Award

Damaris Becker, BA, Victim Services Coordinator & Partial DOJ Accredited Representative

Experience & Skills: Has worked for UMOS' LRC starting as a Bilingual Youth Facilitator in 2002, then a Domestic Violence Advocate, and working her way into the Coordinator role in which she supervises a team of Victim Advocates. She has been an Accredited Representative under 8 CFR § 1292.16 since 2014 and has successfully prepared and filed numerous T and U non-immigrant petitions, VAWA applications, and Naturalization applications. She is also an experienced trainer and victim support group facilitator. She is fluent in Spanish and English.

Education & Training: Bachelor of Arts in Human Services with Criminal Justice concentration from Springfield College and extensive training in trauma-informed care, victim response/advocacy, dynamics of sexual assault, and immigration work provided by or through various federal and state agencies (e.g., US DOJ Office on Violence Against Women and WI Coalition Against Sexual Assault).

Morelia Blanco Rincón, Lead Anti-Human Trafficking Advocate

Experience & Skills: Has worked for UMOS since 2020 and served as an Anti-Human Trafficking Advocate since 2021. In this role, she collaborates with law enforcement to identify and rescue victims of human trafficking; conducts comprehensive outreach and trauma-informed victim screenings; provides victim-centered case management; coordinates services for victims during rescue and recovery and beyond; advocates for victims to ensure their needs are met; collaborates with legal services providers on immigration matters and victim rights; and collects/documents case data. Prior to 2021, she held positions as a UMOS National Farmworker Jobs Program Case Manager and worked with Legal Action of Wisconsin as an Intern for their Farmworker Project where she conducted outreach and distributed worker rights information to migrant and seasonal farmworkers in Wisconsin.

Education & Training:

Bachelor of Science degree in Criminal Justice from the University of Wisconsin - Milwaukee; training in trauma-informed care, victim response/advocacy, and human trafficking, including trainings provided and required by the US DOJ Office on Victims of Crime (OVC) Training and Technical Assistance Center and Trafficking Victims Assistance Program (TVAP), and others.

WISCONSIN DEPARTMENT OF JUSTICE KEY PERSONNEL - BRIEF RESUME

Ben Poller, BS, Special Agent in Charge, Human Trafficking Bureau

Experience & Skills: Has worked for WI DOJ's Division of Criminal Investigations (DCI) since 1995 and as the Human Trafficking Bureau's Special Agent in Charge since 2017. He is a Master Instructor on Defence and Arrest Tactics (DAAT) at Madison College; created the state's Human Trafficking School for law enforcement; developed and leads the DCI Lead Instructor Group; develops policy on Use of Force; and assists with curriculum content for the DAAT manual. Prior to joining DCI, he served as a county deputy sheriff and state correctional office.

Education & Training: Bachelor of Science in Criminal Justice from the University of Wisconsin – Platteville and extensive training on leadership, SWAT command, and human trafficking, including victim-centered approaches to investigation.

Board & Committee Memberships:

- ◆ Member of ECM Wisconsin Anti-Human Trafficking Task Force
- ◆ Member of University of Wisconsin-Platteville Criminal Justice Curriculum Advisory Committee
- ◆ DCI Tactical Skills Advisory Committee
- ◆ DCI Missing and Murdered Indigenous Women Task Force
- ◆ Member of Internet Crimes Against Children Task Force

Awards & Recognitions:

- ◆ 2006 Recipient of FBI Director's Investigative Award

WISCONSIN DEPARTMENT OF WORKFORCE DEVELOPMENT KEY PERSONNEL – BRIEF BIO

Kathryn (Katie) Mueller has served as Program and Planning Section Chief for the Wisconsin Department of Workforce Development (DWD) for two years. In this role, she oversees the

implementation and administration of state and federal regulations that regulate the use of seasonal agricultural labor in Wisconsin as well as the Job Center of Wisconsin Call Center. Prior to this position, Katie was the Policy Analyst and Communications Liaison for DWD's Division of Employment and Training for more than five years. She holds a Bachelor of Science degree in Political Science and Government & Communications Studies.

THE WOMEN'S COMMUNITY, INC. KEY PERSONNEL - BRIEF BIO

Jane Graham Jennings has worked at The Women's Community, Inc. (WCI) for over 26 years, serving as the Executive Director for 23 years. In her capacity as Director, she oversees a staff of 32, 10 of whom make up the leadership team and report directly to Jane. She writes and reports on multiple grants and is responsible for the agency budget of \$1.9 million.

Since 1996, Jane has been a certified Law Enforcement Trainer through the Department of Justice, training law enforcement throughout the state on how to respond to domestic violence, sexual assault, stalking and human trafficking. She was appointed by Governor Walker to serve as the victim representative on the statewide Criminal Justice Coordinating Council in 2012. She has attended numerous trainings on victimization and understanding human trafficking.

Jane is driven by her desire to improve the lives of the disenfranchised, especially women. She has dedicated her life to supporting people in their efforts to find their own truth and live it.

Jane has a Bachelor of Science degree from the University of Wisconsin Stevens Point in Psychology and Women Studies.

MARIA I. LOPEZ IMMIGRATION LAW KEY PERSONNEL - BRIEF BIO

Attorney Maria I. Lopez has been practicing immigration law since 2013. She has her own practice specializing in family and humanitarian-based immigration and frequently assists survivors of crimes and human trafficking to obtain lawful status in the United States.

Attorney Lopez is fluent in Spanish and takes pride in working one-on-one with clients to learn their stories and how to best address their immigration needs. Her close work with community organizations has fostered an understanding of the myriad obstacles that immigrants face in accessing much needed resources, which drives her to continue going above and beyond to provide quality legal services.

MENDEZ LAW LLC KEY PERSONNEL - BRIEF BIO

Attorney Kristina Mendez is a graduate from Creighton University School of Law. Mendez Law is committed to the Green Bay and surrounding communities. Kristina practices a variety of areas of law including immigration. She has done employment and family-based visas, U-visas, T-visas, asylum cases, Cuban Adjustment Act visas, and more. She has represented individuals and families in immigration court in Chicago, IL. Immigration law is a complicated area of practice, but the goal of Mendez Law is to take time to explain everything to our clients and make sure that we answer all the questions that our clients have throughout the process.

LOTUS LEGAL CLINIC, INC. KEY PERSONNEL - BRIEF BIO

Erika Petty is Executive Director and Lead Attorney at LOTUS Legal Clinic, Inc., where she has worked with survivors of sexual violence and human trafficking since 2016. Erika supervises staff attorneys and handles her own caseload of providing civil and immigration legal services to survivors. Erika is a frequent presenter and speaker on victims' rights generally, and specifically, on meeting the needs of human trafficking survivors through a rights-based and victim centered lens. She was the 2019 recipient of the Association of Women Lawyers' Community Involvement Award. Prior to joining LOTUS Legal Clinic, Erika worked as a staff attorney at Legal Action of Wisconsin, providing civil legal services to low-income individuals. Erika graduated from Marquette University Law School in 2006 where she focused on public interest law and was recognized by the State Bar of Wisconsin with the Public Interest Student of the Year Award in May 2006.

Sarah Griffiths is a staff attorney based at LOTUS's Fox Valley office at Reach Counseling in Neenah. Prior to joining LOTUS, Sarah worked in human services, higher education, and private law practice that focused on the immigration needs of vulnerable populations. A graduate of the University of Minnesota Law School and St. Norbert College, Sarah holds membership in the State Bar of Wisconsin and the American Immigration Lawyers Association (AILA). She serves as secretary of the volunteer board of directors for Literacy Green Bay, a non-profit organization that supports adult learners in the community. Sarah is fluent in Spanish.

Howard G. Buffett Foundation Proposal Form – WI Labor Trafficking Project

WI Labor Trafficking Project Logic Model		Impact	
Inputs/Resources	Activities	Short-term Outcomes	Long-term Outcomes
<ul style="list-style-type: none"> HGBF funding at \$5,121,995. Multidisciplinary team partners (UMOS, WI DOJ, victim service providers/VSP, legal services providers, federal/local law enforcement, federal/state/ local prosecutors, healthcare providers, WI DWD, and advocacy orgs) Supplies and equipment UMOS dedicated personnel LRC Program Director Anti-HT Manager Lead Advocate Advocates Paralegal BIA/DOJ Representative Program Assistant DCI dedicated personnel LT Special Agent (cross-sworn with HSI) 	<ol style="list-style-type: none"> Complete implementation tasks: <ul style="list-style-type: none"> UMOS to develop contracts with WI DOJ and WCI. UMOS and DCI hire and/or assign personnel to the project. Develop project implementation meeting schedule. UMOS to develop contracts with legal service providers and others. Purchase supplies and equipment. Receive TA from HGBF (during implementation and ongoing) Establish MDT protocols, including ground rules, commitment pledges, meetings, communications, confidentiality, commitment and engagement standards, clear referral processes, and data collection/tracking. Establish baseline metrics for comparison (current capacity in Wisconsin, current cases accepted for prosecution, current investigations initiated by local/state law enforcement) Conduct focused outreach to vulnerable target populations <ul style="list-style-type: none"> Presentations performed by DCI in collaboration with law enforcement to educate and inform the public. UMOS to assist as needed from an advocacy perspective. Direct outreach performed by UMOS and in collaboration with other UMOS programs (e.g., National Farmworker Jobs Program (NFJP) and Community Services Block Grant (CSBG) Comprehensive Crisis Relief (CCR) program) and other partners (e.g., DWD, FHLC, WCI, other VSPs, etc.) 	<ul style="list-style-type: none"> UMOS/DCI contract executed. UMOS staff hired. DCI agent assigned and trained. DCI Asst. Atty General assigned. Implementation meeting schedule established. Legal services contracts executed. Supplies and equipment purchased. TA received. MDT protocols established. Baseline metrics established. 	<p>Impact Goal: Strengthen community and law enforcement capacity and response to labor trafficking.</p> <ul style="list-style-type: none"> A well-coordinated implementation and ongoing project plan is developed which can be a model for others. Increased capacity to investigate labor trafficking and ensure victims are supported, safe and comfortable following prosecution of traffickers.
		<p>Impact Goal: Increase awareness about labor trafficking in Wisconsin.</p> <ul style="list-style-type: none"> Increased awareness among the public and service providers about how to identify and respond to labor trafficking. Increased knowledge among vulnerable populations about labor trafficking and their rights. 	<ul style="list-style-type: none"> Other states develop plans and strategies to address labor trafficking. Wisconsin continues to dedicate sufficient resources for labor trafficking cases.
		<ul style="list-style-type: none"> Outreach plan developed to include presentation and training schedules. Presentations conducted Cross-system collaborative partners engaged. LT victims screened. Victim feedback obtained regarding outreach. 	<ul style="list-style-type: none"> Increased public and service provider engagement in screening and reporting suspicious LT activities. Increased number of victims willing to come forward and report labor trafficking.

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WI Labor Trafficking Project Logic Model			-Impact	
Inputs/Resources	Activities	Outputs	Short-term Outcomes	Long-term Outcomes
<ul style="list-style-type: none"> • DCI dedicated personnel <ul style="list-style-type: none"> ○ Asst. Attorney General • WCI dedicated personnel <ul style="list-style-type: none"> ○ LAP Advocate ○ Trafficking Advocate • HGBF technical assistance (TA) • Expertise/knowledge serving LT victims 	<p>3. Identify and recover victims</p> <ul style="list-style-type: none"> ○ Identification – Performed by UMOS and in collaboration with other UMOS programs [e.g., NFIP and CSBG CCR program] and other partners (e.g., DWD, FHLC, DCI, law enforcement, other VSPs, etc.); includes response to referral from various sources. ○ DCI/UMOS will train partner programs and organizations on human/labor trafficking, victim indicators, reporting, referring, victim supports, etc. ○ Recovery – Performed by UMOS and involves crisis stabilization (includes addressing immediate basic needs). <p>4. Perform victim/survivor-centered investigations by dedicated law enforcement personnel</p> <ul style="list-style-type: none"> ○ Performed by DCI, in coordination with HSI, and with support from UMOS/WCI advocates, who will serve as liaisons between victims/witnesses and law enforcement, and in collaboration with HSI, US DOL and local law enforcement. ○ DCI to provide investigative training to law enforcement (5-day HT school). ○ DCI to act a source of intelligence information about labor trafficking in Wisconsin and receive/respond to intelligence from UMOS and other victim services provider referrals. ○ HSI will initiate and submit continued presence (CP) applications and obtain law enforcement signing endorsements for T visas. 	<ul style="list-style-type: none"> • Victims identified and recovered. • Service provider trainings conducted. • Victim services provided. • Response protocols and designated roles/responsibilities for the MDT. 	<p>Impact Goals: Increase identification of labor trafficking victims and increase awareness about labor trafficking in Wisconsin.</p> <ul style="list-style-type: none"> • Increased number of victims identified, recovered, and stabilized. • Increased number of referrals from service providers. 	<p>Impact Goals: Increase justice system action against labor traffickers on state and local level and increase awareness about labor trafficking in Wisconsin.</p> <ul style="list-style-type: none"> • Victims able to work and/or access public benefits while investigation/prosecution pending. • Increased number of investigations initiated at local law enforcement level. • Increased LT offender conviction rates in Wisconsin. • Victim's immigration status remains in good standing and able to remain in US or return home but remain eligible for

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WI Labor Trafficking Project Logic Model		Impact	
Inputs/Resources	Activities	Short-term Outcomes	Long-term Outcomes
	<p>5. Prosecute traffickers</p> <ul style="list-style-type: none"> o Performed by US Attorney's Office, WI Criminal Investigations Unit Assistant Attorney General, or local District Attorney's Office with support from DCI and UMOS. o Coordinate LT training for prosecutors with TA support from HGBF. 	<p>Charges filed against traffickers (under state law)</p> <ul style="list-style-type: none"> • Increased number of trained state/local prosecutors 	<p>Impact Goal: Increase justice system action against labor traffickers on state and local level.</p> <ul style="list-style-type: none"> • Increased state and local prosecutors initiating LT cases. • Increased capacity in Wisconsin to prosecute LT cases. • Increased number of convictions of LT offenders by state and local prosecutors. • Decreased prevalence of LT in Wisconsin overall.
	<p>6. Advocate for victims by providing justice system/process navigation, initiating DOL wage and hour claims, and ensuring victim safety.</p> <ul style="list-style-type: none"> o Performed by UMOS Anti-Human Trafficking Advocates – Includes accompaniment, interpretation/translation, documentation and recording, coordination of health/mental health and related services, and safety planning. 	<ul style="list-style-type: none"> • Trauma-informed and victim-centered advocacy provided. • Safety plans developed. • Transportation/accompaniment provided. • Referrals made for health/ mental health, etc. and appointments coordinated. 	<p>Impact Goal: Strengthen community and law enforcement capacity and response to labor trafficking.</p> <ul style="list-style-type: none"> • More effective advocacy and services provided to victims which lead to healing and self-sufficiency. • Decreased instances of victims returning to LT situations. • Increase awareness among victims about where and how to access help • Improved coordination among service provider community in response to LT. • Decreased number of individuals from vulnerable population entering into LT situations.
	<p>7. Provide rights representation and immigration legal assistance to victims.</p>	<ul style="list-style-type: none"> • Attorneys assigned to represent LT victim rights. 	<p>Impact Goals: Increase justice system action against labor traffickers on state and local level and strengthen community and law enforcement capacity and response to labor trafficking.</p>

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WI Labor Trafficking Project Logic Model		Impact		
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	<ul style="list-style-type: none"> o Performed by UMOS and contracted legal firms to assist victims on legal immigration issues, including continued presence and visa applications. o Performed by contracted legal firm (LOTUS) to represent victims and ensure their rights during law enforcement interviews, court appearances, depositions, etc. 	<ul style="list-style-type: none"> • Continued presence and visa applications initiated and completed. 	<ul style="list-style-type: none"> • Increased cooperation among LT victims to participate in investigations and prosecutions. • Increased understanding of and experience with representing LT victims among Wisconsin's legal community. • Increased legal services capacity in Wisconsin to provide LT victims' rights representation. 	<ul style="list-style-type: none"> • Increased LT offender conviction rates in Wisconsin. • T-Visas or other immigration legal remedies secured for victims.
	<p>8. Provide for victims' basic needs during crisis stabilization (e.g., emergency lodging, rent/security deposit, food, etc.).</p> <ul style="list-style-type: none"> o Coordinate emergency lodging (hotel) during recovery as part of crisis stabilization. o Assist victims with securing housing until TVAP can be accessed (first month's rent/security deposits). o Provide food assistance/gift cards for personal and household needs. o Provide local bus passes) for local travel. o Provide 1-way bus fare for victims returning home (should they choose not to participate in investigation/prosecution). o Coordinate and pay medical, vision, dental and mental health appointments/services. o Coordinate appointments and pay for CP medical exams. 	<ul style="list-style-type: none"> • Victims' basic needs met. • Lodging provided • Food and other assistance provided (gift cards, bus passes/tickets) • Health related services provided. • Medical exams completed. 	<p>Impact Goals: Increase justice system action against labor traffickers on state and local level and strengthen community and law enforcement capacity and response to labor trafficking.</p> <ul style="list-style-type: none"> • Victims are safe, stabilized and engaged in comprehensive client care. 	<ul style="list-style-type: none"> • Increased rates of victims being engaged throughout entire investigation/prosecution.

Howard G. Buffett Foundation Proposal Form – WI Labor Trafficking Project

Internal Revenue Service
District Director

Department of the Treasury

P. O. Box 2508
Cincinnati, OH 45201

Date: AUG 16 2022

Person to Contact:
Ruth Ohmer 31-03159
Customer Service Specialist

United Migrant Opportunity Services Incorporated
929 W. Mitchell Street
Milwaukee, WI 53204-3534

Telephone Number:
877-829-5500

Fax Number:
513-684-5936

Federal Identification Number:
39-1047172

Dear Sir or Madam:

This is in response to your telephone request for a copy of your organization's determination letter. This letter will take the place of the copy you requested.

Our records indicate that a determination letter issued in March 1966, granted your organization exemption from federal income tax under section 501(c)(3) of the Internal Revenue Code. That letter is still in effect.

Based on information subsequently submitted, we classified your organization as one that is not a private foundation within the meaning of section 509(a) of the Code because it is an organization described in sections 509(a)(1) and 170(b)(1)(A)(vi).

This classification was based on the assumption that your organization's operations would continue as stated in the application. If your organization's sources of support, or its character, method of operations, or purposes have changed, please let us know so we can consider the effect of the change on the exempt status and foundation status of your organization.

Your organization is required to file Form 990, Return of Organization Exempt from Income Tax, only if its gross receipts each year are normally more than \$25,000. If a return is required, it must be filed by the 15th day of the fifth month after the end of the organization's annual accounting period. The law imposes a penalty of \$20 a day, up to a maximum of \$10,000, when a return is filed late, unless there is reasonable cause for the delay.

All exempt organizations (unless specifically excluded) are liable for taxes under the Federal Insurance Contributions Act (social security taxes) on remuneration of \$100 or more paid to each employee during a calendar year. Your organization is not liable for the tax imposed under the Federal Unemployment Tax Act (FUTA).

Organizations that are not private foundations are not subject to the excise taxes under Chapter 42 of the Code. However, these organizations are not automatically exempt from other federal excise taxes.

Donors may deduct contributions to your organization as provided in section 170 of the Code. Bequests, legacies, devises, transfers, or gifts to your organization or for its use are deductible for federal estate and gift tax purposes if they meet the applicable provisions of sections 2055, 2106, and 2522 of the Code.

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United Migrant Opportunity Services Incorporated
39-1047172

Your organization is not required to file federal income tax returns unless it is subject to the tax on unrelated business income under section 511 of the Code. If your organization is subject to this tax, it must file an income tax return on the Form 990-T, Exempt Organization Business Income Tax Return. In this letter, we are not determining whether any of your organization's present or proposed activities are unrelated trade or business as defined in section 513 of the Code.

The law requires you to make your organization's annual return available for public inspection without charge for three years after the due date of the return. You are also required to make available for public inspection a copy of your organization's exemption application, any supporting documents and the exemption letter to any individual who requests such documents in person or in writing. You can charge only a reasonable fee for reproduction and actual postage costs for the copied materials. The law does not require you to provide copies of public inspection documents that are widely available, such as by posting them on the Internet (World Wide Web). You may be liable for a penalty of \$20 a day for each day you do not make these documents available for public inspection (up to a maximum of \$10,000 in the case of an annual return).

Because this letter could help resolve any questions about your organization's exempt status and foundation status, you should keep it with the organization's permanent records.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

This letter affirms your organization's exempt status.

Sincerely,



C. Ashley Bullard
District Director