



Response to Request for Qualifications (RFQ) – Fair Housing Program

To: Lake County Community Development

Central Permit Facility
500 W. Winchester Road, Unit 101
Libertyville, IL 60048

*(one original and 5 hard-copies to above address and 1 electronic copy to
communitydevelopment@lakecountyl.gov)*

From: Prairie State Legal Services, Inc. (PSLS)

303 N. Main St., Suite 600
Rockford, IL 61101
Lake County Office:
325 West Washington Street, Suite 100
Waukegan, IL 60085

Date: October 24, 2013

Attachment B

Summary of Qualifications

1) Attachments (one copy only, included with electronic submission):

- Agency Audit (most recently completed)
- Certification of non-profit status (copy of IRS letter)
- Articles of Incorporation
- Proof of Central Contractor Registration
- Copy/summary of non-discrimination policy covering recruitment/placement of staff, volunteers and clients.
- Agency Actual Profit/Loss Statement for past six months

Attachment B

Summary of Qualifications

2) Organization Description

A. Purpose of the organization

PSLS provides free legal services to the most vulnerable groups in our society, including the poor, the elderly, and all protected groups under the federal Fair Housing Act and the Illinois Human Rights Act. As one of the largest legal services entities in Illinois, PSLS has provided legal education and legal services to low income persons for 36 years.

Since May 2011, PSLS has operated the Fair Housing Program for Lake County (FHPLC) which offers a variety of services to Lake County residents who believe that they were treated unfairly by a housing provider, often due to their protected status under the fair housing laws. Between 2003 and 2012, PSLS operated a HUD-funded FHIP Education and Outreach program. Since January, 2013, PSLS has maintained a Fair Housing enforcement project (FHP) which includes the FHPLC.

Our FHPLC assists clients who feel unfairly treated in their housing situation regarding all aspects of housing law, either with advice, direct individual representation beyond advice, or referrals to appropriate programs within PSLS or other appropriate agencies. In particular, we seek to represent individuals who a housing provider treated unfairly due to their status within a classification protected under our fair housing laws. FHPLC services include: advice to clients about their rights under the fair housing laws; investigations of fair housing complaints, negotiations seeking solutions to problems with housing providers; assistance filing discrimination complaints with HUD or IDHR, and representation of clients at fair housing hearings before those agencies. Our investigations include fair housing testing, either based on specific complaints or other criteria. Through our FHPLC, FHIP and FHP programs we have provided extensive fair housing educational trainings and outreach throughout Lake County and the rest of the PSLS service area for the public (including groups identified in Attachment A).

We are experts in housing matters such as fair housing/ housing discrimination, landlord-tenant disputes, and federally subsidized housing rights. Our expertise covers family law, consumer law, disability, education, public benefits, guardianships, nursing homes, Medicaid/Medicare, Social Security and SSI. We have successfully maintained multi-year special projects with diverse funding to provide legal advocacy services to persons with HIV/AIDS; disabled children and adults; the elderly; the homeless; victims of domestic violence; victims of housing discrimination; and many others.

B. Type of entity/corporation

Prairie State Legal Services, Inc. (PSLS) is a not-for-profit corporation, organized under the laws of the State of Illinois, with 501(c)(3) tax status.

C. Number and overview of services provided

PSLS provides a full range of legal services including: a) counsel and advice or other brief service; b) preparation of documents; c) negotiation and resolution of disputes with individuals, housing providers, businesses, and government agencies; d) representation before administrative agencies; and e) representation in both state and federal courts at both the trial and appellate court levels. In addition, throughout our history PSLs has provided legal education to community agencies and other interested groups on a wide variety of substantive legal issues, including fair housing rights. Since 2003, we have operated a Fair Housing Initiatives Program (FHIP) to provide fair housing education and/or fair housing enforcement.

Due to high demand, Prairie State provides a full range of legal services only for those eligible persons whose legal problem(s) fall within established priorities, including securing or maintaining affordable and suitable housing without discrimination, utility shut-offs, domestic abuse, denials of essential medical care, access to needs-based government benefits and other income, medical or housing benefits vital to clients' ability to meet their basic human needs. The operation of the FHPLC to enforce the fair housing rights of Lake County residents is a PSLs priority.

Since May, 2011, with CDBG funds, PSLs has provided fair housing enforcement services in Lake County. Since January 1, 2013, our services have included the operation of a FHIP-FHOI fair housing education, testing and enforcement project (FHP), as described below in section B 4) C).

Special project funding helps PSLs to expand services for certain vulnerable populations, including persons with disabilities, children, victims of domestic violence, persons of advanced age, persons with HIV/AIDS, low-income taxpayers to resolve disputes with the IRS, respondents in foreclosure lawsuits and others. In our Volunteer Lawyers Projects, community attorneys represent PSLs clients without charge. PSLs is the only agency offering legal services without charge in the vast majority of its service area. In order to assess the nature of applicants' legal problems, Prairie State has a Telephone Counseling Service, primarily attorneys, who interview callers, determine eligibility of callers and the nature of the legal problem, provide immediate advice to those eligible and route priority, special project and potential Volunteer Lawyer Project cases to the appropriate office. Callers are provided with legal advice, or referral options, and legal information materials.

D. Number of clients currently served

Each year, over 20,000 persons apply for legal services from PSLs. In 2012, PSLs opened 15,642 new cases and closed 15,465 cases. We conducted 343 education and outreach events, reaching 3,719 attendees. We estimate that our educational presentations via news media and radio have reached over 47,000 persons.

E. Vision and mission statements, if applicable

Our mission is "to provide or coordinate the delivery of high quality legal services to low-income individuals, families and groups. The delivery of legal services will be directed to protecting the client's basic human needs, including income, shelter and physical safety, enhancing the client's independence, and resolving related legal problems. "

F. Describe your organization's strategic plan – include date when it was completed

The PSLS Board of Directors adopted a new long-range strategic plan in September, 2013. The Plan is organized around 8 strategic goals. Each goal has 3 to 6 specific outcome measures, and each outcome measure has up to 10 identified tactics that will be employed to achieve the outcomes. We have assigned staff and/or Board members responsibility for the achievement of these tactics which will be accomplished over an extended period. The 8 strategic goals are as follows:

- 1) PSLS is a client-centered team delivering effective legal service and advocacy with expertise, responsiveness, and professionalism.
- 2) Every part of PSLS is intentionally engaged in identifying and responding to issues impacting the low-income community.
- 3) Local communities view PSLS as a leader, partner, and resource in dealing with community problems.
- 4) PSLS creates a workplace where staff members are energized and excited about their job, feel valued, know the difference that they make, and reach their maximum potential.
- 5) PSLS organizational design is optimal to achieve core services and strategic goals (Includes staff design, office structure, budget, compensation structure and retention).
- 6) The PSLS *pro bono* program is efficient, effective, and integrated into Prairie State, so that the time and resources devoted to *pro bono* allows PSLS to serve all qualified clients seeking legal services.
- 7) Board members are instrumental in advancing the PSLS mission.
- 8) More private dollars are raised to increase PSLS flexibility and stability in order to provide effective, strategic services that are responsive to client needs.

G. Other pertinent information

PSLS is well into a third successful year of the Fair Housing Program for Lake County (FHPLC) with CDBG funding from Lake County and the cities of Waukegan and North Chicago (started May, 2011). Through extensive outreach efforts, we have promoted the FHPLC which is now closely identified in Lake County as a service of Prairie State Legal Services. We have submitted nine quarterly reports documenting program achievements. During those nine quarters we made 57 presentations in Lake County and trained 1,272 Lake County persons in fair housing rights, including members of the community, religious organizations, social service providers, housing providers, high school students and ESL students (the majority of whom were Spanish speakers). The Program provided fair housing and related legal advice and advocacy services to 182 local residents.

PSLS applies each year to the U.S. Department of Housing and Urban Development (HUD) for a grant under their Fair Housing Initiatives Program (FHIP). Since 2004, PSLS has completed six highly successful one-year FHIP/EOI (Education and Outreach) Projects and a seventh, 18-month FHIP/EOI project which ended in September 2012. Each year, HUD has given our FHIP programs a rating of "excellent." In January 2013 we expanded our Fair Housing Program of Lake County by obtaining a Fair Housing Organizations Initiative grant from HUD (renewed for 2014). With this grant, PSLS has developed in-house fair housing testing capacity. We have hired and trained Kara Grubb as a full-time Testing and Outreach Coordinator for our Waukegan office service area. Kara expands our fair housing services to Lake County residents by using volunteer testers. Testing is a method of measuring and documenting differences in the quality, content, and quantity of information and service given to home-seekers by housing providers, the purpose of the test being to collect evidence of housing discrimination (or the absence thereof) by a particular housing provider. The Outreach and Testing Coordinator recruits and trains the testers, designs and monitors the tests, evaluates test results, and provide this information to the attorneys for the purpose of enforcing fair housing laws. As an outreach coordinator Kara assists in various efforts to publicize and promote the project, creates awareness of our services, and conducts fair housing education. Having in-house testing capability greatly increases our ability to serve Lake County residents in two ways. First, tests can provide evidence of discrimination in situations where Lake County residents perceive discrimination but there is scant direct evidence of the discrimination. Second, testing allows PSLS to identify properties and locations in Lake County where housing discrimination is occurring, even though there may be no specific complaints about the property or area in question. See Section B 4) C) for more details about our Fair Housing Enforcement Project.

To the extent resources allow, PSLS attorneys in each of Prairie State's 12 offices serving a 36 county area provide advice and/or extended representation to victims of housing discrimination.

3) Program Management

A. Identify the current oversight structure and major staff positions that will be responsible for this program and their qualifications.

The Fair Housing Program for Lake County (FHPLC), in conjunction with the larger Fair Housing Project funded by the HUD-FHOI grant, will have 4 major responsible staff positions of attorneys serving Lake County residents.

John Quintanilla, a licensed staff attorney with 12 years of experience at the PSLs Waukegan office, will serve as Staff Attorney for the FHPLC. John is funded 80% by CDBG and 20% by HUD. John has served as the FHPLC attorney since it began. John conducted all program activities and ensured that all objectives and timelines were met. He provided all of the legal services for clients and conducted most of the training presentations. He revised our fair housing training materials, developed knowledge-sharing and capacity-building relationships with numerous social service agencies, associations, and providers. As a staff attorney at PSLs and as FHPLC attorney, John represented clients in housing cases presenting complex issues, enforced clients' rights under the Fair Housing Act and Illinois Human Rights Act; advocated to obtain reasonable accommodations for clients with disabilities; and represented clients at hearings to preserve federally subsidized housing benefits. John is bi-lingual (English and Spanish) and bi-cultural and has close ties to the Lake County Hispanic community. Moreover, he has extensive knowledge of Lake County having worked his entire career at Prairie State in our Lake County office.

David Wolowitz, Prairie State's Associate Director, supervises Mr. Quintanilla and other staff of the Fair Housing Project, and provides general Project oversight. An attorney with 36 years of direct legal services experience, Mr. Wolowitz was our 2003/2004 FHIP/EOI project manager, and directly supervised the project manager in our FHIP/EOI and FHIP/FHOI Projects for years 2005 through the present. He was a trainer at formal and informal FHIP training events and has provided overall supervision for our FHIP and FHOI Projects. He either wrote or edited all of the FHIP Project's original educational materials. He has supervised reporting to HUD under the FHIP and FHOI grants, acting as the liaison with HUD for contract and project purposes. Mr. Wolowitz helped develop and update a Housing Discrimination Complaint Packet and a Trainee Manual for distribution at fair housing training events, as well as a Trainer Manual and PowerPoint presentations. He has extensive grant management experience with numerous state and federal programs. He ensures grant compliance and is responsible for grant applications and reporting. He has served as lead trainer on a variety of legal subjects for legal services staff in Illinois and the Midwest and was an adjunct faculty member at Northern Illinois University College of Law for 8 years. He is a contributing author of legal books published by the Illinois Institute for Continuing Legal Education, including *Representing Residential Tenants*.

Attorney Andrea (AJ) Young, a graduate of the John Marshall Law School, is funded entirely with the HUD grant, and has served as Project Manager for Prairie State's larger Fair Housing Program (FHP) since it began in January, 2013. The FHP currently serves 4 counties (including Lake), but will be expanded to 6 counties in 2014. She is the fair housing attorney in Prairie State's Rockford office. Attorney Young supervises two Testing and Outreach Coordinators, including Kara Grubb, and assists in supervising Mr. Quintanilla. Ms. Young is an experienced fair housing litigator, having received her training in fair housing law from Willis Caruso, Michael Seng, and other experts at the John Marshall Law School Fair Housing Legal Clinic (JMLS-FHLC), first as a Student Intern, and then as their Clinical Attorney Fellow. At JMLS-FHLC Ms. Young was responsible for moving cases through investigation and litigation, as well as teaching and mentoring student interns. She negotiated large financial settlements of a number of fair housing cases, and worked closely with the JMLS-FHLC testing coordinator. Ms. Young also worked at the Disability Rights Division of the Illinois Attorney General's office, and at the office of the General Counsel of the Chicago Housing Authority, and has substantial experience in human resources, marketing, negotiation, and training.

Attorney Kara Grubb has served as the Testing and Outreach Coordinator in our Waukegan office since the FHP began in January, 2013, and is funded entirely with the HUD grant. She performs the testing function for Lake and McHenry Counties. Ms. Grubb has a demonstrated commitment to public service having worked for several clinics and non-profits while in law school. Ms. Grubb has worked energetically to inform Lake County residents of their fair housing rights through outreach efforts and educational presentations, as well as a Fair Housing Month event in North Chicago. She has been critical to the development of the fair housing testing program by assisting in the development of the Fair Housing Project's administrative forms, policies and procedures for testing, the recruitment and training of testers, and coordinating and completing numerous tests of properties in Lake County in a highly professional manner.

B. How is staff trained, and evaluated? What is the rate of turnover?

Staff members receive on-the-job feedback and an annual evaluation from their supervisors, using recently updated evaluation tools designed specifically for attorneys and for test coordinators. There has been no turnover in FHPLC staff since the county CDBG jurisdictions entrusted PSLs with the program. Since that time, John Quintanilla has attended fourteen (14) different fair housing related training events on diverse subjects, including those relating to: investigations of fair housing complaints; effective advocacy under the fair housing laws; fair housing strategies in the context of rental housing; the ADA and community integration; working with clients with mental illness; fair housing for persons with disabilities; challenges serving returning veterans; fair housing testing procedures; FHIP/FHAP training for advocates; affirmatively furthering fair housing; access and universal design; litigating and preventing employment discrimination cases; practice updates and tips concerning the Illinois Human Rights Act, among other issues.

Since joining PSLs in 2013, AJ Young has attended at least seven (7) different fair housing related training events on diverse subjects, including those relating to: litigation skills; fair housing testing; FHIP/FHAP training for advocates; affirmatively furthering fair housing; and fair lending, among other issues. Since joining PSLs in 2013, Kara Grubb has attended at least five (5) different fair housing related training events on diverse subjects, including those relating to: responsibilities of test coordinators; fair housing testing; FHIP/FHAP training for advocates; affirmatively furthering fair housing; access and universal design; and fair lending.

C. How will persons in need of assistance have access to your services? Are your facilities accessible to persons with disabilities?

The FHPLC operates out of our Waukegan office at the address shown on the cover page. Clients access the FHPLC usually by phone or walk-in. Business hours are 8:30 am to 5:00 pm. Callers reach the Program either through its own dedicated 24-hour 7days/week hotline, 855-FHP-LAKE, or by calling the PSLs office in Waukegan directly, 847-662-6925 or 800-942-3940. Both the receptionist and the Program attorney J. Quintanilla are bi-lingual in English and Spanish. Mr. Quintanilla has very close ties to the Hispanic community in Lake County and has represented over 350 Spanish-speaking clients from that community. For clients who speak a different language, PSLs uses Language Line for translation services. The attorney has a private, individual office among our suite of offices, all located on the ground floor of the building and which all are accessible to persons with disabilities, without any steps. There is signage on the front door identifying PSLs and the FHPLC. The offices are attractive, well-designed, and in excellent condition. Clients can learn directly about the services offered by PSLs and by the FHPLC and how to apply for same on the PSLs website, www.pslegal.org. We have begun to develop on-line access through funding from the Legal Services Corporation, and we expect to have on-line access available in late 2013. Clients will be able to access services from PSLs either through our website or through the state-wide legal services website, www.illinoislegalaid.org

4) Select Qualifications

A. Describe how a Fair Housing Program would fit into your organization.

PSLS has operated the Fair Housing Program for Lake County since May 1, 2011. Helping clients secure and maintain safe and affordable housing without discrimination is one of the highest of PSLs priorities, consistent with our overall mission to provide clients with services that assist with basic human needs. Lake County residents know that this is a PSLs priority, and even before PSLs began operating the FHPLC, the client community sought our assistance with complaints of unfair housing treatment. Usually, housing cases account for 30% of the entire PSLs caseload. Unlike other fair housing programs that provide mediation but are limited in their advocacy services, PSLs uses its own experienced housing attorneys, who can best advise clients with respect to their rights under the law and advocate to maximize outcomes for clients presenting fair housing issues, providing direct representation either in the context of a formal complaint, or informally. Also, unlike other fair housing programs, our attorneys can immediately intervene in a case without the client having to wait for a referral to outside counsel. Moreover, we can effectively guide and represent many clients who come to PSLs with a housing problem but who do not realize they have a fair housing issue that we can then resolve. All PSLs attorneys are trained to identify fair housing issues.

HUD has selected PSLs for a FHIP grant nine (9) times. PSLs has successfully completed six one-year and one 18 month education and outreach (EOI) Projects , the purpose of which was to expand consumer-oriented fair housing education to ensure that residents throughout our service area receive information on their legal rights to be treated fairly and without unlawful housing discrimination. As described above, in January 2013 we began receiving a Fair Housing Organizations Initiative grant from HUD which enables PSLs to be a full-service fair housing enforcement organization in 4 counties (Lake, McHenry, Boone, and Winnebago) and recently HUD notified us that our application has been approved for 2014 (with sufficient funds to expand operations into two additional counties, Peoria and Tazewell. Each year, HUD has evaluated PSLs and given us an “excellent performance” rating in all categories.

B. Describe your organization's familiarity with Lake County and with Fair Housing issues in Lake County.

Through its experience representing low-income clients in Lake County since 1977, PSLs is intimately familiar with the legal issues and the legal culture in the county. We have in-depth knowledge of fair housing issues in the county from operating the FHPLC for over two years now (see our quarterly reports) and from analysis of the reports of the former Fair Housing Center of Lake County. For many years, our Waukegan office has played an integral role in the social service network in the county. Through this work, PSLs has developed extensive knowledge and contacts regarding the various resources available in the community for individuals, children and families, including those relating to housing, health, education, victim abuse, senior citizens, HIV, transportation, and many other areas.

We are very familiar with the demographic, social and economic characteristics of the county, including the racial composition of its various communities. FHPLC attorney Quintanilla has 12 years representing clients with housing and fair housing issues exclusively in Lake County, and works in an office that has other attorneys focusing on housing issues, including foreclosure and subsidized housing benefits. Through such representation, we have developed relationships with the major housing providers and their legal counsel and know how they operate. As a result, we have a keen sense of where random FH testing would produce results. We also have identified housing providers who can benefit from FH education.

In connection with our annual applications to HUD, we familiarize ourselves with our communities' Consolidated Plans and Analyses of Impediments to Fair Housing (AI). Although Lake County is close to completing a new AI (its first since 2004), we are aware that a draft of the AI showed that the county suffers from hyper-segregation. In many communities racial composition varies from what it should be in a free housing market undistorted by discrimination. For example, there are some communities such as Highland Park, Deerfield and Barrington where the percentage of the African American and Hispanic population is significantly lower than what a free market would yield, and other communities such as Waukegan have a disproportionately high percentage of Hispanics and high concentration clusters of African Americans. Highwood also has a high concentration of Hispanics. The Round Lake area is a changing area, where the Hispanic population is increasing, and Round Lake Heights has more than doubled its Hispanic population since the last census. We also expect the new AI to recommend a focus on group homes for people with disabilities.

The 2010 – 2014 Housing and Community Development Consolidated Plan for Lake County finds that despite fair housing laws, housing discrimination still continues in the county, that “continued education, outreach, and advocacy are needed in order to further fair housing practices throughout Lake County,” and that there is a compelling need to provide equal housing opportunities, eliminate fair housing violations, and encourage efforts to provide education on fair housing laws. The 5-Year Goal sets as a “High Priority” that Lake County residents have open housing choices, free from discrimination against any of the protected classes and that persons/families experiencing housing discrimination either have their complaints successfully mediated or filed with HUD. In addition, as attorneys we are aware of HUD’s new rule which will provide a completely new model for how program participants like Lake County should assess fair housing determinants, prioritize fair housing issues, and take actions to affirmatively further fair housing.

C. Provide information about your past experience with grants from the US Department of Housing & Urban Development.

PSLS has received a FHIP/EOI (education and outreach) grant seven times starting in 2003-2004. PSLS also received a FHIP/FHOI grant (enforcement and education) for 2013 and 2014. See discussion above.

PSLS also has received HUD funding under the Supportive Housing Program for over 12 years. The Supportive Housing Program is designed to develop supportive housing and services that will allow homeless persons to live as independently as possible. Eligible applicants are States, units of local government, other governmental entities such as PHAs, and private nonprofits. Under this grant, PSLS provides services for homeless persons in Lake County and in DuPage County. These grant funds are used primarily for salary and benefit costs of staff attorneys for legal services for persons who meet HUD’s definition of homeless. The goals of legal representation are to enable homeless persons to obtain permanent housing, obtain mainstream benefits, and overcome obstacles to obtaining employment.

PSLS also was the recipient of 8 Homelessness Prevention and Rapid Re-Housing Program (HPRP) grants from HUD through six CoCs (Continuum of Care). The HPRP provided financial assistance and services to prevent individuals and families from becoming homeless and helped those who were experiencing homelessness to be quickly re-housed and stabilized. The funds provided for short-term or medium-term rental assistance and housing relocation and stabilization services, including such activities as mediation, credit counseling, security or utility deposits, utility payments, moving cost assistance, and case management. PSLS used the HPRP grants for legal services to prevent homelessness. The HPRP grants generally began in September 2009 and ended in August 2012. These HUD funds flowed through the State of Illinois and Lake, McHenry and DuPage Counties.

As noted above in section B.2.G., beginning in January 2013, PSLS was the recipient of a Fair Housing Organizations Initiative grant which has enabled PSLS to expand its capacity to conduct fair housing enforcement in four counties, including Lake County. HUD has increased the size of its grant to PSLS which will allow us to continue the enforcement work begun in 2013, and to add two additional counties. The current FHOI grant has allowed us to expand John Quintanilla's position to full-time, and employ a Testing and Outreach Coordinator in Waukegan, which supplements our CDBG funding in the operations of the FHPLC. We have hired additional staff with the HUD grant (no cost to the CDBG jurisdictions), including a fair housing attorney and a Testing and Outreach Coordinator in Rockford.

The most notable beneficial change that the HUD FHOI grant has brought in our service to Lake County residents is the ability to conduct in-house testing, as described above. This benefits our complainants who need testing evidence to support their claims (complaint-based testing), as well as allow for enforcement opportunities at properties and locations where we suspect there may be discrimination but no victims are forthcoming (audit testing). The Waukegan Testing and Outreach Coordinator increases our capacity in a number of other ways including outreach and education efforts, intake and counseling of clients, and other assistance related to client representation. The attorney in Rockford serves as Project Manager for the FHOI grant and in that capacity assists with the supervision and training of the Waukegan Testing and Outreach Coordinator. This is a direct benefit to the FHPLC, at no additional cost to the FHPLC. The Project Manager in Rockford is responsible for reporting to HUD and has other administrative responsibilities, so these tasks will not detract from the work of the Waukegan staff attorney. As a whole, the expansion of our fair housing enforcement program with HUD funds serves to increase Prairie State's expertise in fair housing matters and its ability to serve the needs of Lake County residents. The new funding also allows for increased training opportunities for the FHPLC staff attorney. The growth of the program increases PSLS presence in the fair housing community, and allows us to increase our partnership with the Illinois Department of Human Rights. As part of the FHOI Enforcement Project we are entering into working agreements with various community agencies and faith based groups for reciprocal referrals and coordinated trainings. We anticipate additional fair housing complaints from Lake County residents due to the increased exposure of the program, through increased partnerships, and through advertising in print and electronic media. An increase in fair housing complaints in Lake County will mean that more Lake County residents are aware of their rights and more Lake County housing providers are aware of their responsibilities. Prairie State intends to seek ongoing funding from HUD for this enforcement project.

D. Explain how your program will assist the County to affirmative further fair housing and to overcome any impediments identified in its most recent analysis.

Although a current AI for Lake County has yet to be released, we project three common impediments based in part on the draft AI which the County has been reviewing: 1) lack of knowledge of FH laws; 2) need for FH testing; and 3) zoning and other local ordinances that have the effect of limiting FH choice. Because PSLS is a well-established legal aid agency, familiar to county residents and social service agencies, we are ideally suited to assist the County in overcoming these impediments. There may be other impediments identified in the new AI, and the County may have additional thoughts about how to address them. PSLS will be flexible in its approach and is committed to working with the County to address identified impediments and affirmatively further fair housing.

Lack of fair housing knowledge: PSLS is the best candidate to help the County provide FH education due to our known reputation for providing meaningful, useful, and engaging legal education to community groups. We are well positioned to solicit additional opportunities to conduct FH training presentations for a variety of audiences, in English and Spanish, including to social service agencies serving all protected classes, limited English proficiency students in ESL classes, local government officials, housing providers, and high school seniors soon to enter the housing market. PSLS has completed seven HUD-FHIP Education and Outreach grants under which we have developed a variety of media outreach and education materials to use in Lake County including radio public service announcements, newspaper articles, online resources, and informational pamphlets in English and Spanish. Because PSLS provides legal advice and representation to low-income persons, the elderly, and persons with disabilities, our attorneys meet county residents from all protected classes who seek our assistance for a broad array of legal problems. Our contact with clients presents another opportunity for fair housing outreach through the availability of educational materials in our office and one-on-one client counseling

Zoning and other ordinances that may have the effect of limiting fair housing choice: Through FHIP, PSLS has developed a full curriculum for training local government officials about the AFFH provision, its importance, and how to comply with it. We have conducted successful training events on AFFH for Illinois local jurisdictions, and will continue to do so. Our FHPLC will use our experience conducting these presentations, as well as the materials we have developed for AFFH education, as a foundation for a series of conversations with local decision-makers in Lake Co to eliminate barriers to fair housing choice that can result from zoning and other ordinances. The attorneys in PSLS's Fair Housing Project are knowledgeable about HUD's new rule on Affirmatively Furthering Fair Housing. This rule will provide a completely new model for how program participants like Lake County should assess fair housing determinants, prioritize fair housing issues, and take actions to affirmatively further fair housing.

Need for fair housing testing: A FH program administered by PSLS is more likely to identify the best cases for complaint-based testing because persons with all manner of housing problems seek our services, allowing us to identify subtle forms of discrimination that clients themselves might not perceive. Where (as in Lake County) lack of fair housing knowledge is an identified impediment, a PSLS-administered program affirmatively furthers fair housing because we do not rely on clients to self-identify in seeking our services. Our broad-based legal advocacy work in the field of housing also makes PSLS the best agency to conduct effective random FH testing which depends on careful choice of testing sites, because our housing attorneys are closely acquainted with Lake County private landlords and providers of public housing, and, therefore, better able to identify testing sites likely to return a finding of discriminatory conduct. As described above, since January 2013, with assistance from well-known experts in fair housing testing, we have developed a highly professional program which is up and running and providing results. Currently, PSLS is the only agency that provides fair housing testing services in the vast majority of Lake County. PSLS also currently maintains a strong base of active volunteer testers in the community to execute testing and investigations.

The draft AI sought to demonstrate that racial, ethnic and economic segregation is the norm rather than the exception in much of Lake County. This segregation has resulted in the overwhelming majority of African-American and Latino residents of the county living in the lowest and low opportunity group communities and contributes to the concentration of minorities in North Chicago and Waukegan. The draft AI posited that these levels of hyper-segregation are largely the result of discriminatory private and public sector practices and policies or neutral ones that generate discriminatory impacts. The draft AI had numerous suggestions and recommendations for the jurisdictions of Lake County, and the cities of Waukegan and North Chicago to counteract and mitigate possible discriminatory effects of these practices and policies. However, we focus here on those that directly or indirectly implicate PSLS or FHPLC resources or activities:

1. **Recommendation:** It is impossible to determine the extent of discriminatory practices in the housing industry in the 3 jurisdictions without on-going systemic testing of real estate agents, rental agents, and rental managers as well as real estate appraiser, insurers, and lenders. Testing is essential to determining the extent of racial and ethnic steering and other discriminatory practices. The 3 jurisdictions should contract with a qualified organization to conduct such testing, according to proper standards, and then follow-up when testing uncovers discriminatory practices to bring an end to such practices. Focus should be on racial steering by real estate and rental agents.

Response: With our FHOI testing program up and running, PSLS has achieved the capacity to conduct testing in house. We have an on-going process to decide on test targets through the use of a combination of past or current complaints to HUD/ IDHR/SER/PSLS, the recommendations in the draft AI and the recommendations of any newly issued AI for Lake County. Based on the draft AI, there should be a focus on the mortgage lending industry. When testing uncovers discriminatory practices, we will work with jurisdictions to end them.

2. Recommendation: The 3 jurisdictions need to establish housing discrimination web pages that explain how to recognize housing discrimination and a way to file an online housing discrimination complaint. The sites should give viewers the phone number and toll free number for Prairie State Legal Services free FHPLC. Each site should state that this is a free service available in English and Spanish. PSLS needs to build a web page on housing discrimination with a link to its page from its home page. Once this page is up and running, all 3 jurisdictions should add a link to it. All housing discrimination web pages should be posted in both English and Spanish, or include a translation engine that can translate the page in different languages.

Response: Creating a designated web-page will require additional funds that were not included in this year's allocation. With additional funds, PSLS can build a web page on housing discrimination with a link to its page from its home page, so that the 3 jurisdictions can link to it on their websites. It should be available in English and Spanish. Absent additional funds, the jurisdiction websites should connect to HUD's website for information on fair housing, and connect to PSLS's website for advocacy services. This could reduce the amount of work in creating things that HUD has already created and has available in numerous languages. In the meantime, PSLS has made more prominent the link on its current web page to information on the FHPLC and other fair housing services. We have also brought online and regularly update a Facebook page and a Twitter account which provide interesting fair housing news in a timely and user friendly manner, as well as publicize the FHPLC.

3. Recommendation: All 3 jurisdictions need to refine their phone system and train their staff members who answer the phones (or include choices on their automated attendant) to refer callers with a housing discrimination issue or question both to their fair housing officer if they have one (or other live person) AND to Prairie State's FHPLC, and callers should be told that PSLS services are available in English and Spanish.

Response: PSLS can train the staff members of the 3 jurisdictions who answer phones, or who otherwise are referred calls or program automated attendants. The training should focus on how to recognize fair housing discrimination issues as well as scope of the services of the FHPLC and the relief it can seek for victims of discrimination.

4. Recommendation: All 3 jurisdictions, but especially Lake County, should work closely with local real estate firms, developers, rental management companies, and landlords to get them to include people of all races and Latinos in their display advertising brochures and websites. Lake County should consider filing fair housing complaints against those developers and landlords who fail to use racially/ethnically-diverse models in their display advertising and marketing campaigns, brochures, and websites. Training seminars conducted by a fair housing organization are one way to convey this information.

Response: PSLS can provide information to the jurisdictions regarding the legal ramifications under the Fair Housing Act for realtors, developers, and rental management who fail in this manner, to help persuade them to change their advertising and websites and attend training on the issue. PSLS can provide such training for the realtors, developers and landlords, or litigate, as necessary.

5. Recommendation: The ongoing disparity in loan approval rates and issuance of prime loans (as opposed to subprime or predatory loans) between Caucasians and Asians on the one hand, and Blacks and Latinos on the other hand, suggest a substantial need to provide African-Americans, Latinos and low-income households with financial counseling to better prepare applicants before they submit a mortgage loan application. Such counseling should include educating potential home buyers to recognize what they can actually afford to purchase, avoiding the use of high cost and high risk mortgages, budgeting monthly ownership costs, building a reserve fund for normal and emergency repairs, recognizing racial steering, and encouraging consideration of the full range of available housing choices. The 3 jurisdictions should establish this function or contract with an organization that provides such counseling, and require all real estate firms to provide written notice to potential buyers that informs them about this counseling and alerts them to signs of discrimination in issuing home loans

Response: While the counseling function is best performed by organizations such as the Affordable Housing Corporation of Lake County or Catholic Charities, rather than by PSLS, nevertheless PSLS can prepare such educational materials as a hand-out or brochure to give to its clients or to the clients of FHPLC, and should include such information on a PSLS web page on housing discrimination that is linked from the home page.

6. Recommendation: The 3 jurisdictions should embrace the concept of achieving and maintaining stable, racially, ethnically, and economically diverse communities through the leadership of elected officials and the building of public support. This goal belongs in the jurisdictions' comprehensive plans and in the plans of the county's other 49 municipalities.

Response: PSLS and the FHPLC should be included in the efforts of the jurisdictions to identify ways to promote public support for this goal, and in efforts to build such support. This should include PSLS presence and involvement in efforts to pursue affirmative fair housing marketing policies, such as advertising the availability of housing to the population less likely to apply through various forms of media (radio, posters, newspapers), promotion of use of the Equal Housing Opportunity Logo, and the equal housing opportunity statement, the education of persons about fair housing and their obligations to follow the laws, and outreach to advocacy groups (i.e. disability rights groups) on the availability of housing.

7. Recommendation: Lake County municipalities should adopt fair housing ordinances applicable to all residential properties in the respective municipalities that are as broad as the nation's Fair Housing Act and Illinois Human Rights Act, but should also add coverage for "source of income" so that landlords cannot legally refuse to rent to households solely because they use a housing choice voucher. The ordinances should establish simple, accessible, fair and efficient local enforcement processes that are swifter than federal or state processes. The ordinances should appoint and adequately fund Fair Housing Commissions to implement the ordinance.

Response: At the request of the jurisdiction, PSLS can assist or take the lead in the drafting of such ordinances.

8. Recommendation: Each of the 3 jurisdictions should appoint and train a fair housing officer to spearhead efforts to combat housing discrimination, provide assistance to people who may have a fair housing complaint, and staff any fair housing commission the jurisdictions or member municipalities may create. The individual would be the "go-to" staff person on housing discrimination issues.

Response: PSLS can provide the training for the fair housing officers, and offer on-going support to such officers.

9. Recommendation: Each jurisdiction should print brochures in English and Spanish about how to recognize housing discrimination and how to file a fair housing complaint under their local ordinances. All leasing and real estate offices should be required to give a copy of the brochure at first contact with a prospective customer. An electronic version of the brochure should be available on the jurisdictions' websites in English and Spanish.

Response: PSLS has such brochures already developed and printed, and can provide such brochures to the jurisdictions so that they can adapt them appropriately.

10. Recommendation: Building permit and zoning approval should require a variety of actions that target, in various identified ways, racial and ethnic groups whose proportions in a municipality are significantly less than would exist in a free housing market, including (among other things) giving every client who comes to look at housing a brochure that clearly identifies illegal discriminatory practices and provides clear contact information to file a fair housing complaint. The county should consider producing this brochure (English and Spanish) and providing a PDF file to each developer, real estate firm, landlord and rental management firm to print.

Response: PSLS has such brochures already developed and printed, and can provide such brochures to the jurisdictions so that they can adapt them appropriately.

11. Recommendation: The Lake County Housing Authority and the North Chicago Housing Authority need to train their staff on the fair housing laws protecting people with disabilities and should make the reasonable accommodations necessary to enable people with disabilities to live in their properties.

Response: PSLS can provide such training, and the County can encourage the Housing Authorities to use PSLS for this purpose.

Possible Bases for Testing Suggested by the draft AI

A. Concentrations of Hispanics. Nearly 40% of Lake County's cities and villages have developed concentrations of Hispanics significantly greater than what would have been expected in a free housing market, and the draft AI identified the communities with the largest percentages. The draft AI suggested that testing is needed to determine the extent to which these concentrations of Latinos are due to racial steering and or housing discrimination in other communities as opposed to the historical pattern of first and second generation immigrants deliberately seeking to live together.

B. The Exclusion of African-Americans. The proportion of Blacks in all but a handful of Lake County jurisdictions is a mere fraction of what could be expected in a free market. The draft AI gives percentages for each municipality and the county as a whole. On the other hand, Blacks are concentrated in North Chicago, Waukegan and Zion in numbers significantly above what would be expected in a free market. The draft AI suggested testing is needed to determine the extent to which these results are due to racial steering or other forms of housing discrimination.

C. Possible Discrimination of Latinos in Subsidized Housing. Just over half of the county's voucher holders are Black but only 7% are Latino. More than 9 in 10 household with Housing Choice vouchers via the North Chicago Housing Authority are Black. Less than one in 20 is Latino. Waukegan Housing Authority: More than 8 in 10 voucher holders are Black, and one in 10 is Latino. In terms of public housing, Shiloh Towers in Zion is 9.4% Hispanic, a fraction of the 31.8 % in the census tract. It is 65% white, greater than the 47% in the census tract. Beach Haven Towers in Round Lake Beach is 83% white compared to 60% in census tract, but the proportion of Latinos is one-tenth of the census tract. Barwell Manor in Waukegan is 80% black but only 10% Hispanic although the percent of the population is 58.6 % Hispanic. Henry Poe Manor: more than two-thirds Black, but only 13% Latino, just a fraction of the proportion of Hispanics living in the census tract.

5) Overall Organization Budget

| REVENUE | Actual Previous Year | Current Operating Year | Projected Next Year |
|--------------------------------------|----------------------------|------------------------------|------------------------|
| Contributions | 514,396 | 520,000 | 520,000 |
| Special Events | 59,505 | 63,200 | 63,200 |
| Foundation & Corporate Grants | 1,820,629 | 1,767,905 | 1,908,625 |
| Lake County CDBG | 78,276 | 70,000 | 70,000 |
| Lake County ESG | 8,387 | 20,000 | 25,000 |
| North Chicago CDBG | 6,865 | 4,000 | 4,000 |
| Waukegan CDBG | 16,818 | 10,496 | 14,000 |
| CDBG Carryover | | | |
| Other Governmental Fees & Grants | 5,335,155 | 6,587,909 | 7,588,735 |
| Membership Dues - Individuals | | | |
| Program Service Fees | | | |
| Investment Revenue | 29,570 | 8,400 | 8,400 |
| Miscellaneous | 8,014 | 400 | 400 |
| United Way Funding | 716,238 | 714,435 | 773,890 |
| TOTAL REVENUE | 8,633,853 | 9,766,745 | 10,976,250 |
| EXPENSES | | | |
| Salaries | 4,589,858 | 5,292,510 | 6,185,780 |
| Benefits | 647,594 | 834,310 | 1,093,205 |
| Payroll Taxes | 348,164 | 421,470 | 533,670 |
| Client Wages | | | |
| Professional Fees | 76,070 | 192,020 | 148,155 |
| Supplies | 127,786 | 98,000 | 100,945 |
| Telephone and Facsimile | 114,162 | 126,580 | 130,395 |
| Postage & Shipping | 39,167 | 43,310 | 44,605 |
| Occupancy (including depreciation) | 588,587 | 647,975 | 673,160 |
| Equipment (including depreciation) | 119,017 | 73,865 | 72,635 |
| Printing & Publications | 5,279 | 5,000 | 7,180 |
| Travel | 86,970 | 102,370 | 103,625 |
| Conferences & Meetings | 36,223 | 63,660 | 62,870 |
| Specific Assistance to Individuals | | | |
| Insurance | 25,415 | 31,310 | 32,255 |
| National Organization Dues | 43,096 | 50,160 | 51,665 |
| Miscellaneous | 14,125 | 14,845 | 15,285 |
| Library & Research | 104,985 | 117,050 | 120,565 |
| Line Item B | | | |
| TOTAL DIRECT EXPENSES | 6,966,498 | 8,114,435 | 9,375,995 |
| Administration & Fundraising Costs | 1,295,676 | 1,418,960 | 1,508,360 |
| Admin & FR Costs / Total Expense (%) | 16% | 15% | 14% |
| TOTAL EXPENSES | 8,262,174 | 9,533,395 | 10,884,355 |
| SURPLUS OR (DEFICIT) | 371,679 | 233,350 | 91,895 |

6) Proposed Program Budget

| | Actual Previous Year | Current Operating Year | Projected Next Year |
|--------------------------------------|----------------------------|------------------------------|------------------------|
| REVENUE | | | |
| Contributions | | | |
| Special Events | | | |
| Foundation & Corporate Grants | | | |
| Lake County CDBG | 70,000 | 70,000 | 70,000 |
| Lake County ESG | | | |
| North Chicago CDBG | 4,000 | 4,000 | 4,000 |
| Waukegan CDBG | 5,496 | 5,000 | 5,000 |
| CDBG Carryover | | | |
| Other Governmental Fees & Grants | 9,806 | 25,190 | 37,420 |
| Membership Dues - Individuals | | | |
| Program Service Fees | | | |
| Investment Revenue | | | |
| Miscellaneous | | | |
| United Way Funding | | | |
| TOTAL REVENUE | 89,302 | 104,190 | 116,420 |
| EXPENSES | | | |
| Salaries | 63,764 | 64,905 | 75,120 |
| Benefits | 5,344 | 4,586 | 7,840 |
| Payroll Taxes | 5,382 | 5,095 | 6,250 |
| Client Wages | | | |
| Professional Fees | | 300 | |
| Supplies | 582 | 1,770 | 1,635 |
| Telephone and Facsimile | 332 | 1,670 | 1,535 |
| Postage & Shipping | 352 | 515 | 560 |
| Occupancy (including depreciation) | 9,878 | 17,870 | 17,855 |
| Equipment (including depreciation) | 333 | 605 | 645 |
| Printing & Publications | | 1,605 | |
| Travel | 953 | 600 | 600 |
| Conferences & Meetings | | | |
| Specific Assistance to Individuals | | | |
| Insurance | 281 | 710 | 690 |
| National Organization Dues | 543 | 1,000 | 960 |
| Miscellaneous | 109 | 229 | 215 |
| Library & Research | 1,449 | 2,730 | 2,515 |
| Line Item B | | | |
| TOTAL DIRECT EXPENSES | 89,302 | 104,190 | 116,420 |
| Administration & Fundraising Costs | | | |
| Admin & FR Costs / Total Expense (%) | | | |
| TOTAL EXPENSES | 89,302 | 104,190 | 116,420 |
| SURPLUS OR (DEFICIT) | 0 | 0 | 0 |

7) Budget Narratives

| | |
|--|----------------------|
| <p><i>A. Explain any surplus or deficit in either budget</i></p> <p>For agency budget, surpluses are put into reserve.</p> | |
| <p><i>B. If any line item has increased or decreased by 10% or more, please explain why</i></p> <p>For agency budget - Projected increase in Other Governmental Fees & Grants for next year is due to increased funding from Legal Services Corporation as a result of a redistribution based on newer poor population census figures.</p> <p>For project budget - Projected increase in Other Governmental Fees & Grants for next year is due to more revenue needed for projected increased costs for project.</p> <p>For agency and project budgets - Salaries increase due to salary adjustments for attorneys and non-attorneys and annual raises. Benefits increase due to increase in salaries and increase in retirement benefits. Payroll Taxes increase due to increase in salaries.</p> | |
| <p><i>C. Please provide information about the fiscal solvency of the organization:</i></p> | |
| <p><i>How many months of operating reserves does the organization typically have?</i></p> | <p>3 to 4 months</p> |
| <p><i>If less than 3, please explain how organization's cash flow assures meeting financial obligations:</i></p> | |
| <p> </p> | |

8) Agency Certification

Please mark "YES" or "NO" as appropriate next to each statement and type initials next to each. Your typed initials certify the accuracy of each statement. Supporting documents may be requested at a future date and must be supplied upon request.

Agency's Date of Incorporation Associate Director Initials

| Initial | Yes | No | |
|---------|-----|----|--|
| DW | x | | Agency maintains a personnel policy manual |
| DW | x | | Agency has an enforced affirmative action plan |
| DW | x | | Agency has an enforced non-discrimination policy |
| DW | x | | Agency has an enforced sexual harassment policy |
| DW | x | | Agency has a grievance procedure |
| DW | x | | Agency has the capacity to financially administer grant funds and has an effective fiscal management system in place. |
| DW | x | | Agency maintains liability insurance coverage If yes, amount of coverage <input type="text" value="3,000,000"/> Name of insuring agency <input type="text" value="Travelers Insurance Company"/> |
| DW | x | | Agency pays all payroll taxes and workers' compensation as required by Federal and State law |
| DW | x | | Agency maintains fidelity bond coverage for principal staff handling agency accounts If yes, amount of coverage <input type="text" value="All staff and volunteers - \$750,000"/> <input type="text" value="ERISA - \$500,000"/> <input type="text" value="Employee theft of client property - \$100,000"/> Name of insuring agency <input type="text" value="Travelers Insurance Company"/> |
| DW | | x | Agency has a religious affiliation If yes, describe fully <input type="text"/> |
| DW | | x | An agency representative, paid or unpaid (staff, board, volunteer, etc.) maintains a family or business tie with an employee, agent, consultant, officer, elected or appointed official of the funding agency or personally maintains a dual role. If yes, state the names and positions of the parties involved and define the relationship: <input type="text"/> |
| DW | x | | Agency has by-laws in place Date Accepted <input type="text" value="1977"/> Date Last Amended <input type="text" value="2007"/> |

David Wolowitz, Associate Director
Name & Title of Person Initialing Above


Signature

9) Board of Directors

Questionnaire

| | |
|---|---|
| A. How often does your Board of Directors meet? | |
| quarterly | |
| B. What are the standing Board Committees? (add more lines as necessary) | |
| <i>Committee Name</i> | |
| Audit | |
| Development | |
| Evaluation | |
| Executive | |
| Finance | |
| Grievance | |
| | |
| | |
| C. Board President: | |
| <i>Name</i> | Wendy Vaughn |
| <i>Mailing</i> | 319 West State Street, Rockford, IL 61101 |
| <i>Start Date</i> | 6/08 |
| <i>Term</i> | 9/15 |
| D. Identify any unique characteristics of Board Members as they relate to the Agency's mission (i.e.: persons with disabilities, persons who were prior agency clients, formerly homeless persons, etc.) | |
| 2/3 – attorney 1/3 – client eligible | |
| E. Explain any recent changes to the composition of the Board, such as turnover, a new President, etc. | |
| Linnea Thompson resigned, not yet replaced Jane Waller resigned, replaced by Steve Greeley | |

Board Roster

| Name | Sex | | Race/Ethnicity | | | | | | | Town of Residence | # of Years on Board | # Meetings attended in past year | From the numbers in "B," what committees are they on? | |
|-----------------------|------|--------|------------------------|--------------------|------------------------|--------------------|----------------|--------------------------------|-------|-------------------|---------------------|----------------------------------|---|---------|
| | Male | Female | Caucasian/Non-Hispanic | Black/Non-Hispanic | Asian/Pacific Islander | Hispanic/Caucasian | Hispanic/Black | American Indian/Alaskan Native | Other | | | | | |
| Wendy Vaughn | | x | X | | | | | | | | Rockford | 5 | 4 | 4/5 |
| Christine Blankenship | | x | X | | | | | | | | Rockford | 1 | 3 | 4/6 |
| Matt Mueller | x | | X | | | | | | | | Morris | 5 | 2 | 4 |
| Tom Boswell | x | | X | | | | | | | | Rockford | 6 | 4 | 4/5 |
| John Cheek | x | | X | | | | | | | | Peoria | 3 | 3 | 1/2 |
| Dave Collins | x | | X | | | | | | | | Peoria | 1 | 3 | 1 |
| LaGloria Dean | | x | | X | | | | | | | Kankakee | 2 | 0 | 1 |
| Paul Donahue | x | | X | | | | | | | | Joliet | 2 | 4 | 3/5 |
| Bill Franks | x | | X | | | | | | | | Waukegan | 3 | 1 | 2/5 |
| Tricia Goostree | | x | X | | | | | | | | St. Charles | 4 | 1 | 1/2/3/6 |
| Karl Johnson | x | | X | | | | | | | | Galesburg | 6 | 2 | 6 |
| Julia Lansford | | x | X | | | | | | | | Sparland | 2 | 2 | 1/3 |
| Sonia Mares-DuBose | | x | | | | | X | | | | Libertyville | 3 | 1 | 6 |
| Oralia Martinez | | x | | | | | X | | | | Lena | 6 | 0 | 5 |
| Dorothy Mintz | | x | | X | | | | | | | Naperville | 6 | 4 | 1 |
| Linda Murray | | x | X | | | | | | | | University Park | 3 | 0 | 6 |

| | | | | | | | | | | | | | | | |
|-----------------|---|---|---|--|--|--|---|--|--|--|--|--------------|---|---|-------|
| Barbara Santana | | X | | | | | X | | | | | Hanover Park | 4 | 3 | 3 |
| Mark Steffen | X | | X | | | | | | | | | Kankakee | 3 | 3 | 2/3/6 |
| Alan Sternberg | X | | X | | | | | | | | | Bloomington | 2 | 3 | 2/5 |
| Steve Greeley | X | | X | | | | | | | | | Marengo | 0 | 0 | 2 |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |