
Decrypting Unemployment Compensation Appeals Thru Advice & Brief Service

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Quick Poll



Have you ever had any exposure to UI law prior to today's presentation?

This could include advising a client, doing research, or representing a claimant in an appeal.

Goals

- ~~Become an unemployment compensation (UC) expert~~
- Review fact patterns
- Understand basic UC case analysis



In-depth Recorded Trainings Available

MVLC website hosts four-part UC training series from May 2020

<http://law-media.marquette.edu/Mediasite/Catalog/catalogs/mvlc>



Presentation Outline

1. **Reviewing the Notice**
2. **Late Appeal / Good Cause**
3. **Failure to Comply with Work Registration Requirements**
4. **Quit or Discharge**
5. **Able/Available**



State Unemployment Compensation

“[I]ntended to provide a source of income to those temporarily unemployed through no fault of their own. The UI program provides weekly benefits to eligible unemployed workers. These benefits provide economic stability to workers and their families during temporary periods of unemployment and help lessen the effect of unemployment on the local economy.” - DWD, Handbook for Employers



Federal COVID-19 Unemployment Compensation

Pandemic Unemployment Assistance
(PUA)

Federal Pandemic Unemployment
Compensation (FPUC)

Pandemic Emergency Unemployment
Compensation (PEUC)



State UC References

Authority

- **Wis. Stat. Chapter 108**
- **Wis. Admin. Code DWD Ch. 100-150**
- **Wis. Admin. Code LIRC Ch. 1-4**
- **Case Law**
 - **LIRC decisions**
https://lirc.wisconsin.gov/ui_decisions.htm
 - **Case law available on LexisNexis, Westlaw, Bloomberg**
- **MVLC Gold Guides**

Labor & Industry Review Commission
State of Wisconsin

Home About LIRC Unemployment Insurance Worker's Compensation

LIRC Unemployment Insurance Decisions

There are currently 3,758 full-text LIRC UI Decisions and 355 UI court decision summaries available online at this site.

To search in all of these documents, enter a query here and click on "Search":
[See also: [Court decisions online](#)]

Search

Or, click here to access "programmed" searches using UI Digest category numbers:

Search by UI Digest category numbers

COVID-related UC References

Authority

- **CARES Act**
<https://www.congress.gov/116/bills/hr748/BI-LLS-116hr748enr.pdf> (beginning on p. 33)
- **Dept. of Labor's Unemployment Insurance Program Letters (UIPLs)**
<https://wdr.doleta.gov/directives/>
- **National Employment Law Project**
<https://www.nelp.org/publications/>

H. R. 748—33

TITLE II—ASSISTANCE FOR AMERICAN WORKERS, FAMILIES, AND BUSINESSES
Subtitle A—Unemployment Insurance Provisions

SEC. 2101. SHORT TITLE.

This subtitle may be cited as the “Relief for Workers Affected by Coronavirus Act”.

SEC. 2102. PANDEMIC UNEMPLOYMENT ASSISTANCE.

(a) DEFINITIONS.—In this section:

(1) COVID-19.—The term “COVID-19” means the 2019 Novel Coronavirus or 2019-nCoV.

(2) COVID-19 PUBLIC HEALTH EMERGENCY.—The term “COVID-19 public health emergency” means the public health emergency declared by the Secretary of Health and Human Services on January 27, 2020, with respect to the 2019 Novel Coronavirus.

(3) COVERED INDIVIDUAL.—The term “covered individual”—

(A) means an individual who—

(i) is not eligible for regular compensation or extended benefits under State or Federal law or pandemic emergency unemployment compensation under section 2107, including an individual who has exhausted all rights to regular unemployment or extended benefits under State or Federal law or pandemic emergency unemployment compensation under section 2107; and

(ii) provides self-certification that the individual—

(I) is otherwise able to work and available for work within the meaning of applicable State law, except the individual is unemployed, partially unemployed, or unable or unavailable to work because—

Life of a UC Appeal Case

1. Initial Claim - online or by phone
2. Monetary computation
- ~~3. Waiting week (suspended from March 15, 2020 to February 7, 2021)~~
4. Ongoing requirements
 - Weekly claim certification
 - Registering with Re-Employment Services (RES)
 - ~~Work search requirement (suspended for the duration of the public health emergency)~~
5. Investigation by DWD Adjudicator (triggered by any separation other than layoff)
6. Initial determination from DWD Adjudicator (14 days to appeal)
 - Disqualification = no benefits for certain # of weeks and until after claimant earns certain amount of wages
7. Appeal to DWD Appeal Tribunal (then LIRC, then Judicial Review)

Review the Initial Determination

Almost every UC case begins with a initial determination (denial notice). Each denial notice will list the relevant statutes.

ID: [REDACTED] PAGE 1 OF 1 State of Wisconsin C FF141
SEE REVERSE SIDE FOR Department of Workforce Development
IMPORTANT INFORMATION Unemployment Insurance Division

SS # [REDACTED] UI LO #: 05
UI Acct. #:

DETERMINATION

[REDACTED]

Issue Week: Week Ending: [REDACTED]	Applicable Wisconsin Law: 108.04(11)
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FINDINGS AND DETERMINATION OF THE DEPUTY:

THE CLAIMANT CONCEALED WORK PERFORMED, WAGES EARNED, AND/OR A MATERIAL FACT RELATING TO HIS ELIGIBILITY FOR BENEFITS ON HIS WEEKLY CLAIM CERTIFICATION(S) FOR WEEK(S) ENDING 10/19/19-11/2/19.

THE CLAIMANT INDICATED: - HE DID NOT WORK. HE WORKED FOR [REDACTED]

DEPARTMENT RECORDS SHOW THE CLAIMANT AGREED THE ANSWER(S) GIVEN WAS/WERE TRUE AND ACCURATE TO THE BEST OF HIS KNOWLEDGE AND HAD THE OPTION TO CHANGE HIS ANSWER(S). THE CLAIM CONFIRMATION AND INSTRUCTIONS WERE ALSO SENT.

IN ADDITION, HE PREVIOUSLY REPORTED WAGES AND/OR HOURS ON WEEKLY CERTIFICATION(S).

EFFECT

THE CLAIMANT'S BENEFIT AMOUNT SHALL HAVE A REDUCTION OF \$1368.00. THIS REDUCTION REMAINS IN EFFECT FOR BENEFITS AND WEEKS THAT BECOME PAYABLE DURING THE SIX-YEAR PERIOD THAT ENDS 11/22/25.

***** THIS BENEFIT REDUCTION OF FUTURE PAYABLE BENEFITS IS AN ADMINISTRATIVE PENALTY FOR INTENTIONALLY CONCEALING INFORMATION AFFECTING YOUR UNEMPLOYMENT ELIGIBILITY AND IS IN ADDITION TO ANY OVERPAYMENT CAUSED BY SUCH CONCEALMENT OF INFORMATION. *****

Deputy ADJUDICATOR 5172	U45 11/27/19	Decision Final unless an appeal is received or postmarked by: 12/11/19
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WS-20 R. 04/08/2010 8000242

Review the Notice II

ID: [REDACTED] PAGE 1 OF 1
SEE REVERSE SIDE FOR IMPORTANT INFORMATION

State of Wisconsin C FF141
Department of Workforce Development
Unemployment Insurance Division

SS # [REDACTED] UI LO #: 05
UI Acct. #:

DETERMINATION

[REDACTED]

Week Ending: [REDACTED] Wisconsin Law: 108.04(11)

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U45

Deputy ADJUDICATOR 5172 11/27/19 Decision final unless an appeal is received or postmarked by: 12/11/19
83-23 R. 04/01/2018 820242

ID: [REDACTED] PAGE 1 OF 1
SEE REVERSE SIDE FOR IMPORTANT INFORMATION

State of Wisconsin C FF141
Department of Workforce Development
Unemployment Insurance Division

SS # [REDACTED] UI LO #: 05
UI Acct. #:

DETERMINATION

[REDACTED]

Issue Week: [REDACTED] Applicable Wisconsin Law: 108.04(11)
Week Ending: [REDACTED]

Review the Notice III

FINDINGS AND DETERMINATION OF THE DEPUTY:

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ID: [REDACTED] PAGE 1 OF 1
SEE REVERSE SIDE FOR IMPORTANT INFORMATION

State of Wisconsin C PF141
Department of Workforce Development
Unemployment Insurance Division



SS # [REDACTED] UI LO #: 05
UI Acct #: [REDACTED]

DETERMINATION

Issue Week: [REDACTED] Applicable

FINDINGS AND DETERMINATION OF THE DEPUTY:

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ADJUDICATOR 5172
11/27/19
Decision final unless an appeal is received or overturned by: 12/11/19

U45

Review the Notice IV

ID: [REDACTED] PAGE 1 OF 1
 SEE REVERSE SIDE FOR IMPORTANT INFORMATION

State of Wisconsin C PF141
 Department of Workforce Development
 Unemployment Insurance Division

UI LO #: 05
 UI Acct. #:

DETERMINATION

ISSUE WEEK: [REDACTED]
 WEEK ENDING: [REDACTED]
 APPLICABLE WISCONSIN LAW: 108.04(11)

FINDINGS AND DETERMINATION OF THE DEPUTY:

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Deputy
 ADJUDICATOR 5172
 11/27/19

Decision final unless an appeal is received or postmarked by: 12/11/19

U45

Deputy
 ADJUDICATOR 5172
 11/27/19

Decision final unless an appeal is received or postmarked by: 12/11/19

UCB-20 (R. 04/05/2019) (030242)

Decision final unless an appeal is received or postmarked by: 12/11/19

Preparing Advice

- Review statute(s) / regulation(s)
- Review applicable section of MVLC Gold Guide
- Review applicable Unemployment Insurance Program Letters (for federal programs)
- Search for LIRC decisions with similar facts or referencing specific statute
- NOTE: If the case seems challenging, check with MVLC about referring the case to Legal Action of Wisconsin, Inc. for further assistance

Late Appeal / Good Cause



Wis. Stat. Section 108.09(4)(c) c *Late appeal*

- On April 13, 2020, DWD mailed a Spanish-speaking claimant a determination that found she was discharged for misconduct. The claimant had previously informed DWD that she did not speak English.
 - The determination was in English but contained instructions in Spanish that the claimant could call 414-435-7069 for help understanding the notice. Claimant tried to call the number but could not reach anyone.
-

Late Appeal / Good Cause

Hypo

Worth appealing.

Client should be prepared to walk through all steps, from when she received and opened the determination to the steps she tried to take to understand the determination/all her calls to the number listed on the notice.

Salinas 19001182EC contains some helpful information regarding the DWD's obligation to provide language access

Winning this hearing leads to hearing on the merits

Quit or Discharge

Quit or discharge = common issue

Employer has burden of proof for both discharge and quit

If quit established, EE has burden of proof to prove exception applies.



Quit or Discharge II

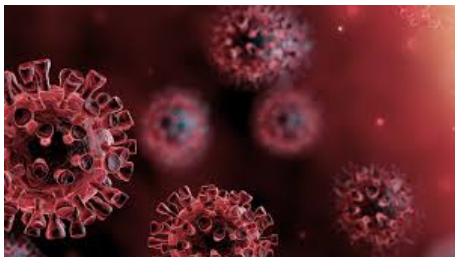
Quit (voluntary termination)

- Wis. Stat. Section 108.04 (7)
- Unless claimant meets a quit exception under 108.04(7), claimant is disqualified until claimant earns 6 times their benefit rate.



Quit or Discharge

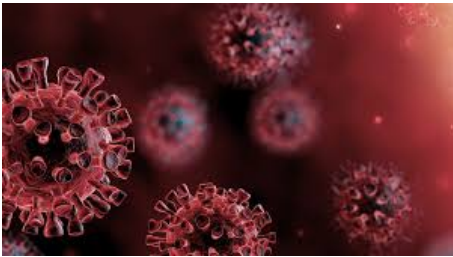
Hypo #1



Claimant was working full-time when claimant came down with COVID-19 symptoms while at home. She called in sick on the first day. On the second day, she called in sick again and visited her doctor, who gave her a doctor's note to quarantine for 14 days. Claimant was tested for COVID-19 but could not obtain immediate results. She was home for several more work days; she called in each day. Her employer's absence policy allows two sick days with a doctor's note, and possible termination thereafter. Her employer tells her that because she has been sick for so many days, her employment is terminated. Is claimant eligible for unemployment compensation?

Quit or Discharge

Hypo #1



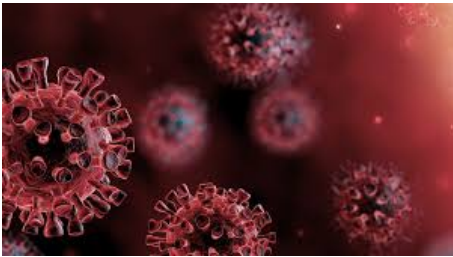
If characterized as a quit, look to exception in 108.04(7)

(c) Paragraph (a) does not apply if the department determines that the employee terminated his or her work but had no reasonable alternative because of the verified illness or disability of the employee.

Also, when considering a separation from employment, an employee's intent should be considered. *Nottelson v. Wisconsin Dep't of Indus., Labor, & Human Relations*, 94 Wis. 2d 106, 119, 287 N.W.2d 763, 770 (1980)

Quit or Discharge

Hypo #1



If discharge, analyze whether the discharge was for misconduct.

108.04(5)(e) Absenteeism by an employee on more than 2 occasions within the 120-day period before the date of the employee's termination, unless otherwise specified by his or her employer in an employment manual of which the employee has acknowledged receipt with his or her signature, or excessive tardiness by an employee in violation of a policy of the employer that has been communicated to the employee, if the employee does not provide to his or her employer both notice and one or more valid reasons for the absenteeism or tardiness

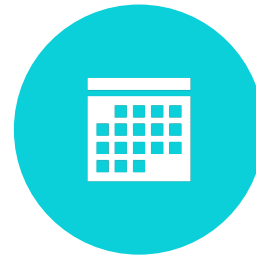
An employer may have an absenteeism policy that is more or less restrictive than the statute.

Wisconsin Dep't of Workforce Dev. v. Wisconsin Labor & Indus. Review Comm'n. 2018 WI 77, ¶ 23.

Practice Tips! (Quit / Discharge)



Facts matter in any quit/discharge and misconduct/substantial fault case



For misconduct/substantial fault, review exceptions to substantial fault Wis. Stat. § 108.04(5h)(a)1



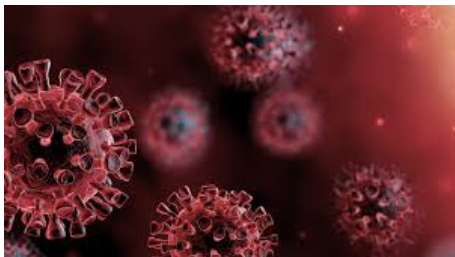
Prepare your client to discuss workplace norms/common occurrences (e.g. was it common practice to arrive 20 minutes late, which policies don't allow?)



Obtaining a copy of your client's personnel file can be helpful Wis. Stat. § 103.13 (Note change in 7-day req. (2m))

Quit or Discharge

Hypo #2



Claimant was working limited hours as wait staff at a restaurant immediately prior to the Safer at Home Order. Each time he reported for work, claimant was often sent home because there were not enough customers. Claimant went to his boss and explained that it was not financially smart or worth COVID-19 exposure to continue working. The boss agreed, explaining that claimant was an excellent employee, that the boss was sad to see the claimant go, and that the claimant would be welcomed back some day. Claimant applied for benefits but received a determination denying benefits due to quit but not for an exception that allows benefits. Quit/discharge/something else? Does he have a meritorious appeal to obtain benefits?

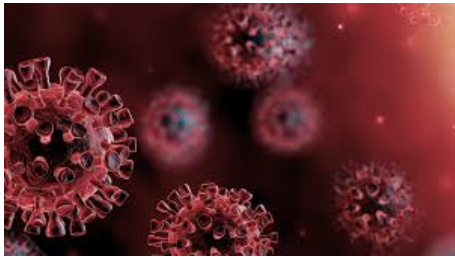


Poll!

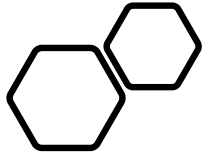
Discharge, quit
or something else?

Quit or Discharge

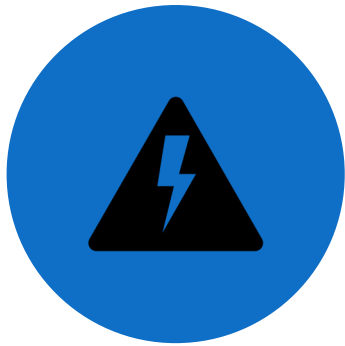
Hypo #2



Claimant was likely laid off. Reviewing the intentions of both parties, neither wanted claimant to separate from employment. However, with no business for claimant to participate in, employer couldn't continue employing claimant at this time. Employer showed a willingness to re-employ as business allowed. Claimant should appeal and does have a meritorious case. In preparation for the hearing, claimant should emphasize the comments he made about his willingness to work.



Practice Tips! (Safety Concerns)



In some situations, clients contact us *prior to* separation from employment



If possible, claimants should be as clear as possible when they do not want to quit but instead raise safety concerns.



Example: “I am happy to continue working; my co-workers and I are concerned about working when customers aren’t wearing masks.”

Able/Available

Wisconsin Statute Section 108.04(2)(a)1.

The claimant is able to work and available for work during that week. See also DWD Chapter 128.

Able: Maintain attachment to labor market, has physical/psychological ability to engage in substantial gainful employment in suitable work (consider usual/customary occupation, nature of restrictions, qualifications to perform other work, other occupational information)

Able/Available II

Wisconsin Statute Section 108.04(2)(a)1. The claimant is able to work and available for work during that week. See also DWD Chapter 128.

Available: Ready to perform full-time suitable work in labor market (many factors to consider)

[Emergency Order #7](#)

Able/ Available Hypo 1



Prior to COVID-19, claimant worked full time at a café. She often worked “during school hours” but also picked up some evening and weekend shifts. The café closed due COVID-19, and claimant was laid off. While applying for UC, claimant mentioned to an adjudicator that she didn't know how she could make it all work because her kids were home from school. Claimant does have some family members that can watch her kids sometimes, usually only at night. During two of the weeks at issue, claimant received and declared some income working at a restaurant with curbside pickup.

Able/ Available

Hypo 1



In order to qualify for regular state UI, claimants need to be able and available for full time work. The facts matter here.

Claimant remains attached to the labor market during the weeks she earned wages

[Schroeder, 09005266MD](#)

Able/ Available Hypo 1



The other weeks will depend on the specific situation. Claimant needs to be available for full time work –but she does not need to be ready to start job tomorrow. Hearing may depend on how client articulates childcare plan.

Crennell “The commission disagrees with the ALJ's reasoning that because the employee watched his children during first shift hours he therefore had withdrawn from the labor market. **This was a situation where the employee was watching his children because he did not have a job. This was not a situation where the employee did not have a job because he was watching his children.**”

Crennell also says: Wis. Admin. Code § DWD 128.01(4)(a)(5) requires a claimant who is absent from his labor market for more than 48 hours to be able to receive and respond to offers of work and return to the labor market within 24 hours in order to demonstrate a continuous attachment to the labor market. **But the claimant is not required to be able to start work within 24 hours.**

Able/ Available Hypo 1



Also consider DWD 128.01(4)2. "...standard hours in which work is performed in the occupations in which the claimant usually works or has prior training or experience. In determining the standard hours in which work is performed in the occupations, the department shall include the hours and the shift that the claimant worked in an occupation in one or more previous jobs since the start of the claimant's base period. "

Ask client about schedule at previous job(s) From info in hypo, evening hours made up at least a portion of claimants previous full time availability.

Able/ Available Hypo 2



Claimant worked in a grocery store, giving out free food samples. When COVID-19 began, the grocery store ended sampling and reduced shifts available to claimant. At the same time, claimant received a medical note from her doctor that she is high risk, and because her job required her to be in close proximity to customers, she was unable to continue her job. Her employer encouraged her to return “when it’s safe.”

Able/ Available

Hypo 2



No benefits eligible under State UC because she is not exhibiting symptoms, hasn't been quarantined.

Likely eligible for Pandemic Unemployment Assistance (PUA) federal UC program. Meant for individuals not otherwise eligible for UI benefits from January 27, 2020 to December 31, 2020. PUA COVID-19-related reason that job was eliminated or inaccessible.

Q&A

Legal Action of Wisconsin, Inc.'s Volunteer Lawyer Project

- Variety of opportunities, from full representation to one-time clinics
- Covered by Legal Action of Wisconsin's malpractice insurance
- Free CLE credit!

Contact Atty. Maggie Niebler-Brown at
MNB@legalaction.org or (414)