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# What the *Fowlkes*? How Fleeing-Felon Rules Apply to Veterans

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**M**ay your government disability compensation benefits be cut off due to an outstanding warrant about which you knew nothing? The answer now depends on whether you receive those benefits from the Social Security Administration or the U.S. Department of Veterans Affairs (VA). Both agencies have “fugitive-felon” regulations intended “to cut off the means of support that allows fugitive felons to continue to flee.”<sup>1</sup> Both agencies started with the interpretation that the mere existence of an outstanding warrant placed an individual in fugitive-felon status whether or not the individual had any knowledge of the warrant.

I begin by discussing the evolution of the interpretation of the Social Security Administration fugitive-felon regulations; such interpretation has led to the divergent results above. I then contrast that evolution to the similar but less fully developed progression in interpretations of the VA fugitive-felon regulations. I conclude with some advice for veterans advocates faced with fugitive-felon cases.<sup>2</sup>

## The Social Security Administration Fugitive-Felon Regulation

The Personal Responsibility and Work Opportunity Reconciliation Act, effective August 22, 1996, amended the Social Security Act to authorize the suspension or denial of Supplemental Security Income (SSI) benefits to individuals fleeing to avoid prosecution or custody or confinement after felony conviction.<sup>3</sup> The Act provided, in relevant part:

(4)(A) No person shall be considered an eligible individual or eligible spouse for purposes of this subchapter with respect to any month if during such month the person is—

(i) fleeing to avoid prosecution, or custody or confinement after conviction, under the laws of the place from which the person flees, for a crime, or an attempt to commit a crime, which is a felony under the laws of the place from which the person flees, or, in jurisdictions that do not define crime as felonies, is punishable by death or imprisonment for a term exceeding 1 year regardless of the actual sentence imposed....<sup>4</sup>

<sup>1</sup>See Memorandum from the U.S. Department of Veterans Affairs (VA) General Counsel to the Director of Compensation and Pension (Dec. 2, 2002), [www.va.gov/ogc/docs/2002/PREC\\_7-2002.doc](http://www.va.gov/ogc/docs/2002/PREC_7-2002.doc) (the authorizing statute for the VA fugitive-felon regulations was modeled after Public Law No. 104-193, which barred fugitive felons from receiving Supplemental Security Income from the Social Security Administration, and therefore the same legislative intent applied).

<sup>2</sup>For general guidance on advocacy on behalf of Veterans Administration benefits claimants, see Barton F. Stichman, *Advocating Benefits for Veterans*, in this issue.

<sup>3</sup>Personal Responsibility and Work Opportunity Reconciliation Act, Pub. L. No. 104-193, 110 Stat. 2105 (1996) (codified at 42 U.S.C. §1382(e)(4)).

<sup>4</sup>42 U.S.C. §1382(e).

The final regulation to implement the statutory provision in the SSI program, promulgated in 2000, provides that the suspension of benefits

is effective with the first day of whichever of the following months is earlier—

(i) The month in which a warrant or order ... is issued by a court or other duly authorized tribunal on the basis of an *appropriate finding* that the individual—

(A) Is fleeing, or has fled, to avoid prosecution ...;

(B) Is fleeing, or has fled, to avoid custody or confinement after conviction; ... or

(ii) The first month during which the individual fled to avoid such prosecution, fled to avoid such custody or confinement ... *if indicated in such warrant or order, or in a decision by a court or other appropriate tribunal.*<sup>5</sup>

Despite the clear language of the authorizing statute and implementing regulation, the Social Security Administration adopted an internal policy that any outstanding warrant would constitute ineligibility for benefits and that the “warrant does not have to state that the individual is ‘fleeing’ for the suspension to apply.”<sup>6</sup>

The termination or denial of SSI benefits due to the mere existence of an

outstanding warrant was challenged and overturned in cases brought in federal district courts across the country.<sup>7</sup> In only one case did a district court uphold a denial of benefits based on the Social Security Administration’s policy—and that decision was overturned in the only appellate decision on the issue to date.<sup>8</sup> In that case, *Fowlkes v. Adamec*, the Second Circuit found that “the plain language of the statute and its implementing regulation” precluded the Social Security Administration from determining that a person is “fleeing to avoid prosecution” based solely on the existence of an outstanding warrant.<sup>9</sup>

The sound defeat in *Fowlkes* did not motivate the Social Security Administration to abandon its untenable policy. Instead the agency issued the *Fowlkes Acquiescence*, whereby the agency announced that it would stop suspending or denying benefits solely on the basis of an outstanding felony warrant in New York, Vermont, and Connecticut—the states which constitute the Second Circuit—but would continue to enforce it in other states.<sup>10</sup>

The turning point for the Social Security Administration’s interpretation of its fugitive-felon regulation came in October 2008, when a class action lawsuit was filed in California.<sup>11</sup> The plaintiffs in *Martinez v. Astrue* repeated the same points that had been so successful in the earlier cases: that the statutory language requires an intent to flee that the mere existence of a warrant does nothing to

<sup>5</sup>20 C.F.R. § 416.1339(b) (2009) (emphasis added).

<sup>6</sup>Social Security Program Operations Manual System (POMS) SI 00530.010, <https://secure.ssa.gov/apps10/poms.nsf/lnx/0500530010!opendocument>. For more on the fugitive-felon provision and the Social Security Administration’s handling of it, see Gerald McIntyre, *Have You Seen a Fleeing Felon? Social Security Administration Targets SSI Recipients with Outstanding Warrants*, 36 CLEARINGHOUSE REVIEW 474 (Jan.–Feb. 2003).

<sup>7</sup>*Reff v. Astrue*, 2008 WL 4277713 (D. Minn. Sept. 15, 2008); *Caldwell v. Astrue*, 2008 WL 2713714 (E.D. Tenn. July 10, 2008); *Blakely v. Commissioner of Social Security*, 330 F. Supp. 2d 910 (W.D. Mich. 2004) (Clearinghouse No. 56,021); *Hull v. Barnhart*, 336 F. Supp. 2d 1113 (D. Or. 2004) (Clearinghouse No. 55,778); *Thomas v. Barnhart*, 2004 WL 1529280 (D. Me. June 24, 2004) (Clearinghouse No. 55,777); *Garner v. Barnhart*, 352 F. Supp. 2d 1059 (N.D. Cal. 2004).

<sup>8</sup>Westlaw search conducted April 30, 2009, reveals *Fowlkes v. Adamec*, 2003 WL 24241828 (N.D.N.Y. March 31, 2003) as the only district court to side with the Social Security Administration and *Fowlkes v. Adamec*, 432 F.3d 90 (2d Cir. 2005) (Clearinghouse No. 55,829) as the only appellate case dealing with the agency’s fugitive-felon regulation.

<sup>9</sup>See *Fowlkes*, 432 F.3d 90, 96 (citing *Black’s Law Dictionary* for the proposition that “fleeing” requires “the conscious evasion of arrest or prosecution”).

<sup>10</sup>*Fowlkes v. Adamec*, 432 F.3d 90 (2d Cir. 2005): Determining Whether an Individual Is a Fugitive Felon Under the Social Security Act (Act)—Titles II and XVI of the Act, 71 Fed. Reg. 17551 (April 6, 2006), [www.ssa.gov/OP\\_Home/rulings/ar/02/AR2006-01-ar-02.html](http://www.ssa.gov/OP_Home/rulings/ar/02/AR2006-01-ar-02.html); see also POMS SI 00530.010, *supra* note 6.

<sup>11</sup>*Martinez v. Astrue*, No. 08-CV-4735 CW (N.D. Cal. Dec. 12, 2008).

establish, and that the plaintiffs never “fled”; rather, they moved—if at all—for work or family reasons.<sup>12</sup> Perhaps recognizing the writing on the wall, the Social Security Administration agreed to a settlement that called for it to change its policy starting April 1, 2009.<sup>13</sup> Under its new policy the agency will not initiate action to suspend or deny benefits for the mere existence of an outstanding warrant unless the warrant was issued under one of three National Crime Information Center codes: escape (code 4901); flight (4902); or escape-flight (4999).<sup>14</sup> This limit satisfies the statutory requirement

that, as an alternative to a tribunal finding that the individual had fled, the warrant indicates flight.<sup>15</sup> The Social Security Administration implemented these changes in its policy by issuing Emergency Message 09025, effective April 1.<sup>16</sup> The settlement had yet to be finalized at this writing (see box).

### The VA Fugitive-Felon Regulation

The story of the VA fugitive-felon regulations begins in much the same way as the Social Security Administration’s. Congress enacted the Veterans Education

## Settlement Announced in Social Security “Fleeing” Case; \$500 Million in Back Benefits

A settlement in *Martinez v. Astrue*, No. 08-CV-4735 CW (N.D. Cal. Dec. 12, 2008), the nationwide class action challenging the Social Security Administration’s “fugitive felon” policy described in Dale A. Hauser III’s article, was preliminarily approved on August 12 by U.S. District Judge Claudia Wilken. As in the policy implemented by the U.S. Department of Veterans Affairs, the Social Security Administration had been concluding that an individual was “fleeing to avoid prosecution” for a felony and summarily suspending or denying benefits whenever an outstanding felony arrest warrant was associated with the individual.

The settlement will change the policy and will provide substantial relief to over 200,000 people. The Social Security Administration will no longer suspend or deny benefits for “fleeing” on the basis of a warrant unless the warrant is issued in connection with an underlying charge of flight or escape. Recovery of overpayments will cease for all class members. Some 80,000 people who have lost benefits since January 1, 2007, and continue to meet other

eligibility requirements will be entitled to full retroactive reinstatement—relief valued at over \$500 million. Those who lost their benefits between 2000 and 2006 will be notified that they may reapply for Supplemental Security Income or seek reinstatement of their social security benefits. If they reapply within six months of being notified and are found eligible, they will receive retroactive benefits as if they had filed their claim on April 1, 2009. (The *Martinez* case did not deal with suspensions for warrants based on alleged violations of probation or parole.)

More information about the settlement (the agreement, notice to the class, complaint, and named plaintiff profiles, among other documents) is on the National Senior Citizens Law Center’s [www.nslc.org](http://www.nslc.org). Watch for a CLEARINGHOUSE REVIEW article through which plaintiffs’ counsel will advise advocates about the best ways to ensure that clients who are class members receive the benefits they deserve under the agreement.

<sup>12</sup>*Id.*, Complaint at 7–13.

<sup>13</sup>Press Release, National Senior Citizens Law Center Press Release, Social Security Settlement Could Benefit 100,000+ People and Restore Hundreds of Millions in Benefits, <http://bit.ly/4vfwkG>.

<sup>14</sup>*Id.*

<sup>15</sup>20 C.F.R. § 416.1339(b) (2009).

<sup>16</sup>Emergency Message 09025, Fugitive Felon: Stop Suspension or Denial of Individuals with Felony Warrants Affected by the Martinez Settlement (April 1, 2009), <http://bit.ly/FAehD>.

and Benefits Expansion Act of 2001 with the following provision:

(a) A veteran who is otherwise eligible for a benefit specified in subsection (c) may not be paid or otherwise provided such benefit for any period during which such veteran is a fugitive felon.

...

(b) For purposes of this section:

(1) The term “fugitive felon” means a person who is a fugitive by reason of—

(A) fleeing to avoid prosecution, or custody or confinement after conviction, for an offense, or an attempt to commit an offense, which is a felony under the laws of the place from which the person flees; or

(B) violating a condition of probation or parole imposed for commission of a felony under Federal or State law.<sup>17</sup>

Not by accident was the statutory language identical to the Social Security Administration statute; the VA provision was patterned after Public Law No. 104-193.<sup>18</sup> The implementing regulation states:

(n) Fugitive felons.

(1) Compensation is not payable on behalf of a veteran for any period during which he or she is a fugitive felon.

...

(2) For purposes of this section, the term fugitive felon means a person who is a fugitive by reason of:

(i) Fleeing to avoid prosecution, or custody or confinement after conviction, for an offense, or an attempt to commit an offense, which is a felony under the laws of the place from which the person flees; or

(ii) Violating a condition of probation or parole imposed for commission of a felony under Federal or State law.<sup>19</sup>

However, when crafting its policy, the VA, like the Social Security Administration before it, ignored the intent-to-flee component of the authorizing statute and implementing regulation.<sup>20</sup> The VA Adjudication Procedures Manual states that a veteran is to be considered a fugitive from the later of the date of the warrant or the enactment of Public Law No. 107-103—that is, the mere existence of the warrant is sufficient to place a veteran in fugitive-felon status, with no limit on the type of warrant or requirement that the veteran be found to be fleeing.<sup>21</sup> VA boasts that, since the inception of its fugitive-felon matching program, it has received 26.4 million felony warrants from the National Crime Information Center, resulting in 1,882 fugitive felons being apprehended and \$576.3 million in overpayments being identified.<sup>22</sup> Of course, VA does not break down how much of that \$576.3 million is now being recovered from veterans who knew nothing of an outstanding warrant.

<sup>17</sup>Veterans Education and Benefits Expansion Act, Pub. L. No. 107-103, 115 Stat. 976 (2001) (codified in scattered sections of 38 U.S.C. (2000)); the quoted section is at 38 U.S.C. § 5313B.

<sup>18</sup>See *supra* note 1.

<sup>19</sup>38 C.F.R. § 3.665(n) (2007).

<sup>20</sup>Board of Veterans Appeals Citation No. 0905688 (Feb. 17, 2009), [www.va.gov/vetapp09/files1/0905688.txt](http://www.va.gov/vetapp09/files1/0905688.txt) (VA relies on its interpretation of a VA circular, but even the board has abandoned that interpretation). See also VA Office of Financial Policy Bulletin 05GC1.01, Further Instructions on the Impact of the Fugitive Felon Act on Committees on Waivers and Compromises, Nov. 24, 2004, [www.va.gov/publ/direc/finance/05GC1\\_01bul.htm](http://www.va.gov/publ/direc/finance/05GC1_01bul.htm) (“A person who has an outstanding warrant for a felony offense is considered to be a fugitive felon whether or not he or she is literally fleeing.”).

<sup>21</sup>U.S. Department of Veterans Affairs M21-1MR, Adjudication Procedures Manual Rewrite, Part X, 16.1(d) (updated Feb. 5, 2008), [www.warms.vba.va.gov/M21\\_1MR.html#i](http://www.warms.vba.va.gov/M21_1MR.html#i).

<sup>22</sup>Office of Inspector General, Department of Veterans Affairs, Semiannual Report to Congress, April 1, 2008–September 30, 2008, at 20, [www.va.gov/oig/pubs/VAOIG-SAR-2008-2.pdf](http://www.va.gov/oig/pubs/VAOIG-SAR-2008-2.pdf).

Unfortunately the similarities between the histories of the VA regulation and the Social Security Administration regulation end here; no body of case law blasts VA's interpretation. The Veterans' Judicial Review Act created the Court of Appeals for Veterans Claims and stripped the district courts of jurisdiction over cases involving veterans benefits and VA rules and regulations.<sup>23</sup> A veteran challenging termination or denial of benefits due to being labeled a fugitive felon must exhaust administrative review before the Board of Veterans Appeals (BVA), then appeal to the Court of Appeals for Veterans Claims and from there to the Federal Circuit. By capitulating in individual cases at the BVA level, VA can avoid lawsuits that might lead to binding precedent and force it to change its policy. To date, no Court of Appeals for Veterans Claims case has presented the question of intent in determining fugitive-felon status.<sup>24</sup>

BVA is not overloaded with fugitive-felon cases either, but a recent board decision may herald the beginning of the end for VA's unjustifiable policy.<sup>25</sup> In that decision the veterans law judge quoted heavily from *Fowlkes* and held that, as the VA regulation had been modeled after the Social Security Administration regulation, the same commonsense reasoning regarding the intent to flee applied in both situations. The opinion points to a lack of evidence that the warrant was ever served and notes that the veteran lived at the same address for two years following the issuance of the warrant. Moreover, after receiving notice of the warrant in a letter from VA stating that his benefits would be terminated, the veteran promptly presented himself

to the authorities. The judge concluded, "Consequently, [the veteran] may not be considered to have been a fugitive felon under the controlling statute and regulation during the time at issue, and, therefore, the termination of his VA compensation during that period was improper."<sup>26</sup> A second BVA decision also adopted the Social Security Administration line of cases.<sup>27</sup>

Of course, these decisions are only the first crack in the VA policy of denying benefits to fugitive felons who were not—and *could not* have been—fleeing. Here the similarities with the Social Security Administration resume: BVA's rejection of VA's interpretation has not changed the policy in any way. Veterans benefits continue to be denied and terminated due to the mere existence of an outstanding warrant. The BVA decision will help only veterans who know to appeal a denial or termination, and how to do so.

### Advice for Advocates

The wording of the authorizing statute and implementing regulation, the English language itself, and now BVA "case law" all demand intent to flee, which, in turn, requires knowledge that an individual faces prosecution or custody from which to flee if the fugitive-felon provision is to apply. However, anyone with VA experience will not be surprised that VA policy still has no such requirement.<sup>28</sup> And we veterans advocates must play by VA rules. If you have a veteran client who was unaware of an outstanding warrant and now faces termination of benefits, here is how you should proceed.

<sup>23</sup>Veterans' Judicial Review Act of 1988, Pub. L. No. 100-687, 102 Stat. 4105 (codified in scattered sections of 38 U.S.C. (2000)).

<sup>24</sup>A Westlaw search conducted on May 4, 2009, yielded one case on the fugitive-felon regulations. This case sought a writ of mandamus against the VA secretary to compel restoration of unpaid back compensation after it had already been determined that the veteran was not the subject of a felony warrant (*Jones v. Shinseki*, 2009 WL 641228 (C.A.V.C. March 4, 2009)).

<sup>25</sup>Board of Veterans Appeals Citation No. 0901278 (Jan. 13, 2009), [www.va.gov/vetapp09/files1/0901278.txt](http://www.va.gov/vetapp09/files1/0901278.txt).

<sup>26</sup>*Id.* at 5-6.

<sup>27</sup>Board of Veterans Appeals, Citation No. 0905688 (Feb. 17, 2009), [www.va.gov/vetapp09/files1/0905688.txt](http://www.va.gov/vetapp09/files1/0905688.txt) (finding insufficient evidence that the veteran met the Social Security Administration definition of a fugitive felon).

<sup>28</sup>Indeed, official VA policy holds that knowledge is unnecessary (VA Office of Financial Policy Bulletin 04GC1.08, Impact of the Fugitive Felon Act on Committees on Waivers and Compromises, Aug. 19, 2004, [www.va.gov/pub/direc/finance/04GC1\\_08bul.htm](http://www.va.gov/pub/direc/finance/04GC1_08bul.htm) ("some of these debtors may not know that they are in a fugitive felon status")).

First, two concurrent deadlines apply. The veteran will receive a notice letter from the regional VA office informing the veteran about having been matched with an outstanding warrant and proposing to terminate the veteran's benefits in sixty days. From the date of that letter, the veteran has thirty days to request a hearing and sixty days to file a notice of disagreement with the proposed action. The veteran (or the veteran's representative) should, within the thirty-day period, send a certified letter requesting the personal hearing and, more important, explicitly demanding that benefits continue. If this request is not made and the veteran is ultimately successful, the veteran may receive back pay, but many veterans cannot wait that long for benefits. Within the sixty-day period, the veteran should file a notice of disagreement specifically requesting a *de novo* review by a decision review officer.

The next step is to contact the jurisdiction that issued the warrant and attempt to get the warrant withdrawn. However,

[t]he fact that a warrant has been dismissed, recalled, quashed (that is, annulled or set aside), or otherwise cleared does *not* mean that no action is required on the fugitive referral, *unless* it has been established that the warrant was cleared effective on or before the date the beneficiary went into fugitive status. In most cases in which a warrant is dismissed, recalled, or quashed, there was still a valid warrant up to the date the warrant was cleared. VA benefits are subject to adjustment from the warrant date (or date of the law) until the recall/dismissal/quash date.<sup>29</sup>

Unless the warrant is determined always to have been invalid or is quashed retroactively (quashed *ab initio* or *nunc pro tunc*), it is considered valid from the date of issuance until cleared, and benefits received during that time are considered an overpayment for which the veteran is liable.

For the hearing before the decision review officer (and subsequent appeal that is likely necessary), the veteran and the veteran's representative must develop a well-reasoned brief and evidentiary record. The brief should parallel the BVA decision above and discuss the plain language requirements of the authorizing statute and implementing regulation, the development of the Social Security Administration interpretation, and how the VA and Social Security Administration regulations are related. The brief should also discuss the particular facts of the veteran's case (supported by the veteran's affidavit attached as an exhibit), covering such points as lack of evidence that the warrant was served, the veteran's not having left the jurisdiction, or why the veteran did leave. Even detailing subsequent arrests can be helpful if the outstanding warrant never came up at those times. Any records supporting those assertions should be exhibits to the brief.



Although BVA recognized in at least two cases that VA's policy of denying or terminating benefits based on the mere existence of an outstanding warrant is contrary to the authorizing statute and implementing regulations, that policy is still alive and effective at the regional office level. Ensuring that veterans are not wrongfully denied their benefits by VA's overzealousness toward fugitive felons is, until VA is forced to change its policy, up to veterans advocates.

**Author's Note**

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**COMMENTS?**

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—The Editors

<sup>29</sup>VA M21-1MR, Adjudication Procedures Manual Rewrite, *supra* note 21, Part X, 16.2(f).

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