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Furthering the Fight to Make Clean Water a RIGHT in California

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Throughout California myriad communities lack reliable access to clean, affordable drinking water. According to the state's Department of Public Health, more than a million state residents rely on water systems that violate drinking water standards at least once and in most cases at least five times in a year.¹ But this is only one part of the story; due to uneven reporting and monitoring guidelines California has no data about the quality of the water consumed by thousands or tens of thousands more residents. The human cost of unreliable, unsafe, and unaffordable drinking water, especially in rural, agricultural, unincorporated communities, is staggering.

In the agricultural community of Lanare, in Fresno County, the median household income is approximately \$24,000.² Residents pay a *minimum* of \$54 per month, nearly 3 percent of the median, for water that they cannot drink or use for cooking due to high levels of arsenic contamination and, as we write, E. coli contamination. Because the community also lacks a public wastewater system, nitrates and coliform bacteria from failing septic systems may soon further compromise water quality. Lanare residents thus face an additional average monthly cost of \$35 for bottled water, increasing the cost of water to nearly 5 percent of income for the median household. Lanare is not even the most egregious example. Throughout California's San Joaquin Valley, the agricultural region that stretches south from Sacramento to just north of Los Angeles, and the Coachella Valley east of Los Angeles, hundreds of thousands of Californians pay unaffordable rates for water that they cannot drink.

The International Human Right to Safe Drinking Water

The right to safe drinking water has long been recognized under international law, most recently in a General Assembly of the United Nations July 2010 resolution: the human right to water consists of "the right to *safe and clean* drinking water and sanitation that is essential for the full enjoyment of life and all human rights[.]"³ The right is also explicitly recognized in the Convention on the Rights of the Child, the Convention on the Elimination of all forms of Discrimination Against Women, and the Af-

¹Michelle Baass, California Senate Office of Research, *The Water We Drink: What Is California Doing to Ensure Its Water Is Safe?*, POLICY MATTERS, May 2011, at 4, <http://bit.ly/oTMCmE>.

²California Rural Legal Assistance, with technical and research support from PolicyLink, conducted a door-to-door household survey in Lanare to gather demographic information.

³The Human Right to Water and Sanitation, G.A. Res. 64/292, ¶ 1, U.N. Doc. A/RES/64/292 (Jul. 28, 2010).

ican Charter on the Rights and Welfare of the Child.⁴ The U.N. Economic and Social Council's Committee on Economic, Social, and Cultural Rights explicitly identifies the right to water as a basic human right.⁵

Furthermore, several countries refer to a right to water in their constitutions.⁶ Elsewhere domestic courts interpret constitutional provisions to uphold the right to water.⁷ Regional legal agreements also recognize the right to water.⁸ An online petition is seeking to add the right to safe drinking water as Article 31 of the Universal Declaration of Human Rights.⁹

The Unrealized State-Law Right to Safe and Affordable Drinking Water

California law recognizes the right of all Californians to "pure and safe" drinking water.¹⁰ The use of water to further the public welfare is similarly established in the state's constitution.¹¹ Nonetheless this right is unrealized. The state's delegation to thousands of water providers of the duty to make water available to state residents, the fragmented patchwork of government agencies responsible for regulating and overseeing water and its provision, and the jurisprudence on the enforceability of California's Safe Drinking Water Act create obstacles to realizing this critical right.

Thousands of water providers, some public and some private, are responsible for water that complies with the state and federal Safe Drinking Water Acts.¹² Most of these providers, some 4,600, serve fewer than 200 connections, most in small rural communities.¹³ Small systems face many difficulties in ensuring clean and safe water to their customers. The systems often lack not only resources and the economies of scale necessary to treat water and deliver potable water to their customers but also technical and managerial capacity. The state offers little technical support, instead delegating responsibility for monitoring and regulating those systems to counties that are strapped for resources, staff, and technical expertise.

California's public finance scheme further disadvantages these small communities since financial responsibility for water provision resides exclusively with the small communities themselves. Propositions 13 and 218, passed as ballot initiatives in 1978 and 1996, impose extremely high barriers to local governments' ability to raise funds from a broad base of voters to support services and infrastructure, including water services.¹⁴ As a result, each water provider is solely responsible for funding maintenance and operation of its system through taxes, assessments, and user charges to its

⁴Convention on the Rights of the Child, Nov. 20, 1989, G.A. Res. 44/25, U.N. GAOR, 44th Sess., Supp. No. 49, U.N. Doc. A/44/49 (1990) (entered into force Sept. 2, 1990), ¶ 24, <http://bit.ly/kPwEN6>; Convention on the Elimination of All Forms of Discrimination Against Women, Dec. 18, 1979, G.A. Res. 34/180, U.N. GAOR 34th Sess., Supp. No. 46, U.N. Doc. A/34/36 (1980) (entered into force Sept. 3, 1981), ¶ 14, <http://bit.ly/piF2Cc>; African Charter on the Rights and Welfare of the Child, OAU Doc. CAB/LEG/24.9/49, ¶ 14 (1990) (entered into force Nov. 29, 1999), <http://bit.ly/kZN8iZ>.

⁵Economic and Social Council, U.N. General Comment No. 15 E/C.12/2002/11 (Jan. 20, 2003).

⁶See, e.g., CONSTITUCIÓN POLÍTICA DE COLOMBIA [C.P.] art. 366 (1991) (potable water is basic state objective); CONSTITUTION, art. 216 (1997) (Gambia) (state shall "attempt to facilitate equal access to clean and safe water"); CONSTITUTION, art. 43 (2010) (Kenya) (right to clean and safe water); S. AFR. CONST., 1996, ch. 2 § 27 (right to "sufficient" water).

⁷E.g., in *Subhash Kumar v. State of Bihar* the Indian Supreme Court held that "the right to live is a fundamental right ... and it includes the right of enjoyment of pollution-free water" (A.I.R. 1991 S.C. 420).

⁸See, e.g., Committee of Ministers, Council of Europe, Recommendation Rec(2001)14 of the Committee of Ministers to Member States on the European Charter on Water Resources (Oct. 17, 2001), <http://bit.ly/qHgJU9>.

⁹See Sign the Petition to Adopt Article 31 (n.d.), <http://article31.org/>.

¹⁰CAL. HEALTH & SAFETY CODE § 116270(a) (West 2011).

¹¹CAL. CONST. art. 10, § 2.

¹²CAL. HEALTH & SAFETY CODE §§ 116270 *et seq.* (West 2011); 42 U.S.C. § 300j-8.

¹³Baass, *supra* note 1, at 4.

¹⁴CAL. CONST. arts. 13A, 13C, 13D.

customers, many of whom already struggle to feed their families and pay their rent or mortgages. Many communities simply do not have sufficient resources themselves to maintain and operate their water systems at a standard that ensures clean and safe drinking water.

At the state level the Department of Public Health has few employees to oversee the almost 4,000 larger water systems that the department is responsible for monitoring. Moreover, state responsibility is fragmented; the Department of Public Health is responsible only for monitoring water at the point it is pumped from the source to be used as drinking water, while other agencies are charged with preventing contamination of ground and surface water and overseeing, governing, and monitoring water quality, capacity, and service.¹⁵ An unfortunate result of this multilayered and multijurisdictional scheme is significant gaps in responsibility and accountability for water provision in California.

Nor has litigation proved helpful. The state's courts have ruled that a statute, in order to impose a mandatory duty on a public entity, must require particular actions and phrase the duty in explicit and forceful language.¹⁶ Legislative goals to achieve a particular result are merely objectives, not mandatory duties, and are not grounds for civil liability.¹⁷

The state Safe Drinking Water Act's objective to "ensure that the water delivered by public water systems of this state shall at all times be pure, wholesome, and potable" does not impose a mandatory liability under the Government Claims Act.¹⁸ Only numerical standards

that the Department of Health Services adopts for contaminants are enforceable; qualitative standards such as "potable, healthful, or wholesome" are mere statements of legislative policy regarding drinking water quality and are neither enforceable nor a basis of liability for water contamination.¹⁹ Plaintiffs have a cause of action under both state and federal Safe Drinking Water Acts when their water exceeds numerical contamination standards on an ongoing basis.²⁰ But the liable party in a small community is likely to be an underresourced water provider, and ultimately the low-income residents of the community will be responsible for the costs associated with any legal action. California does not recognize common-law tort liability for public entities; unless a statute allows for liability, the sovereign immunity of the public entity prevents liability.²¹

Safe and Affordable Drinking Water: From Goal to Reality

Advocates and community leaders throughout California are engaged in a host of strategies to push the state closer to meeting its commitment to ensure clean drinking water to all Californians. Here we can describe only a sample: administrative processes, the court system, regulatory advocacy, and a Human Right to Water package of bills signed into law in October 2011. Each relies heavily on the active participation of community residents who are affected by unsafe drinking water.²²

Using Administrative Process: Sunbird and the Public Utilities Commission. In the Eastern Coachella Valley, farmworker

¹⁵Among these agencies are the Office of Environmental Health Hazard Assessment, the Department of Water Resources, the California Public Utilities Commission, and the State and Regional Water Quality Control Boards (see Baass, *supra* note 1, at 2).

¹⁶*In re Groundwater Cases*, 64 Cal. Rptr. 3d 827, 849 (2007).

¹⁷*Id.* at 851.

¹⁸CAL. HEALTH & SAFETY CODE § 116270(e); *Guzman v. County of Monterey*, 209 P.3d 89, 104 (2009).

¹⁹*In re Groundwater Cases*, 64 Cal. Rptr. 3d at 834, 849.

²⁰*Id.* at 834; however, temporary exceedance of water quality standards is not a basis for liability.

²¹*Id.* at 849.

²²For a discussion of the importance of community residents in advocacy for a human right to clean water, see Rose Francis & Laurel Firestone, *Implementing the Human Right to Water in California's Central Valley: Building a Democratic Voice Through Community Engagement in Water Policy Decision Making*, 47 WILLAMETTE LAW REVIEW 495, 518–36 (2011).

families live scattered among hundreds of mobile home park communities. Because the parks are isolated from cities, their water source is often private wells owned and managed by park owners who are solely responsible for both the quality of the water and the rates charged for its usage. Many of these water “systems” have levels of arsenic that far exceed legal limits, yet most of these wells remain untreated, leaving residents with unclean drinking water for which they are often charged unconscionably high and largely unregulated rates.

In 2008 a very determined mobile home resident took a stand and asked California Rural Legal Assistance to help him fight exorbitant rates for contaminated water at the Sunbird Mobile Home Park. Sunbird is home to more than 500 residents, primarily low-income farmworker families. The state’s Mobilehome Residency Law has no requirements regarding water quality or cost.²³ California Rural Legal Assistance discovered that the California Public Utilities Commission has jurisdiction over both water rates and water service in mobile home parks, but that jurisdiction is triggered only when a mobile home park tenant files a complaint.²⁴

California Rural Legal Assistance approached the Public Utilities Commission’s public advisor for guidance on filing an administrative complaint, but we were rebuffed on numerous occasions by personnel who refused to acknowledge that the agency had any jurisdiction over mobile home parks. We nonetheless filed an administrative complaint against Sunbird for unjust water rates and inadequate water service; the commission summarily rejected our complaint. Nearly a year later, following several additional attempts, the Public Utilities Commission accepted the complaint and admitted jurisdiction.

The budget subcommittees of both the state Assembly and Senate invited us to testify about our difficulties with the

public advisor and obstacles in complaint filing. In the same legislative hearings mobile home park residents testified about their nonpotable contaminated water and unconscionably high water rates. Based on this testimony, the subcommittees directed the commission to exercise its jurisdiction over mobile home parks and immediately begin responding to administrative complaints about the parks’ water systems.

Soon thereafter the Public Utilities Commission apologized to California Rural Legal Assistance and our clients and committed to retraining its staff on the jurisdiction over mobile home park water systems. The commission issued a preliminary injunction against the park owner and reduced the allowable water charges to a reasonable level comparable to the local municipal water district. Those affordable rates have remained in effect during the proceeding, which is still under way. Sunbird was recently approved for future connection to the municipal water system, and the park’s owner installed a point-of-use arsenic filtration system to supply potable water to residences until that connection occurs.

This advocacy highlighted a previously ignored and enormous loophole in California’s purported commitment to residents’ rights to water. Moreover, this advocacy secured protections for mobile home park residents throughout the state.

The Courts: Mandating Development of the Safe Drinking Water Plan. Frustrated by a lack of action to solve California’s rural drinking water crisis, residents from communities in Fresno and Tulare Counties asked California Rural Legal Assistance to seek legal redress for the state’s failure to submit a Safe Drinking Water Plan to the legislature as required by a 1989 amendment to the Safe Drinking Water Act.²⁵ Under the amendment the plan must analyze overall drinking water quality in the state; the emphasis must be on issues facing pub-

²³CAL. CIV. CODE §§ 798 *et seq.* (West 2011).

²⁴CAL. PUB. UTIL. CODE § 2705.6(a) (West 2011).

²⁵CAL. HEALTH & SAFETY CODE § 116355; subsequent legislation required such plans to be submitted every five years.

lic water systems with fewer than 10,000 service connections and on solutions to those issues. The plan must also recommend improvements in water quality and propose a detailed five-year implementation schedule.

Despite this clear mandate, the Department of Public Health had not prepared a plan since 1993. On behalf of two individuals and the A.G.U.A. Coalition, in early 2009 we filed an administrative writ against the Department of Public Health; we asserted that the department had a ministerial duty to prepare the plan.²⁶ In February 2010 the Fresno County Superior Court denied the writ; the court contended that funding for the plan was discontinued and as a result the mandate, too, was eliminated.²⁷ The Fifth District Court of Appeal overturned that decision, ruled that the Department of Public Health did not present sufficient evidence that funding for the safe drinking water plan had ever been eliminated, and remanded the case to superior court.²⁸

Enforcing the Safe Drinking Water Plan mandate will be essential in creating a feasible and comprehensive long-term solution to California's drinking water crisis. The dearth of information about water quality creates an insurmountable barrier to overcoming the problem. Data on the quality of water delivered by each provider are not even available, much less a plan to tackle the systemic issues of quality and affordability. The plan will also benefit individual communities by

informing them about the feasibility and affordability of treatment technologies and will encourage, or even compel, the state and local governments to take more seriously their duty to promote safe and affordable drinking water.

The Regulatory Scheme: Holding Water Boards Accountable. Runoff and leaching of agricultural chemicals, animal waste, and other contaminants present great risks to the Central Valley's surface water and groundwater aquifers. While no overarching program monitors the Central Valley's groundwater, data indicate persistent contamination, particularly widespread contamination from nitrates.²⁹ Historical data in the eastern San Joaquin Valley indicate that nitrate concentrations in groundwater have increased every decade since the 1950s; nitrogen fertilizer is the largest contributor to this increase, although dairy production plays a large role as well.³⁰ Nonetheless nitrogen is the only major pollution source that is not yet regulated. No comprehensive regulatory program protects groundwater from fertilizers or from many pesticides, which irrigated agriculture applies intensively and extensively throughout the valley.

The Central Valley Regional Water Quality Control Board is charged with implementing regulations to protect water quality. In 2003 the board adopted a policy, which it revised and extended in 2006, to require growers that discharged irrigation runoff to surface water to take

²⁶The AGUA (Asociación de Gente Unido por el Agua) Coalition is a group of residents and organizations who advocate clean and affordable drinking water.

²⁷Respondents relied on California Government Code Section 11098, which suspends the report mandate if a budget act suspends funding for it. However, the Department of Public Health did not submit evidence of any such suspension and offered only three nearly identical declarations from agency officials that "funding for the plan was not included in the budget act." The Fifth District Court of Appeal determined that these declarations were insufficient to meet respondents' burden of proof under Section 11098.

²⁸*Newton-Enloe v. Horton*, 124 Cal. Rptr. 3d 310, 315 (2011).

²⁹See Karen R. Burow et al., *Regional Nitrate and Pesticide Trends in Ground Water in the Eastern San Joaquin Valley, California*, 37 JOURNAL OF ENVIRONMENTAL QUALITY 5-249, 5-262 (2008), <http://bit.ly/kKaHyj>; California State Water Resources Control Board & California Regional Water Quality Control Boards, *Groundwater Ambient Monitoring and Assessment: Domestic Well Project Groundwater Quality Data Report Tulare County Focus Area 17* (Aug. 2010), <http://1.usa.gov/mIDYJz>; Christopher Cochrane, State Water Regional Control Board, *Groundwater Information Sheet: Nitrate/Nitrite 2* (2002).

³⁰Burow et al., *supra* note 29, at S-261; see also Thomas Harter, *Nitrates in Groundwater: Agricultural Impacts on Groundwater Nitrate*, SOUTHWEST HYDROLOGY (July-Aug. 2009), <http://bit.ly/oWhuAS>; Jo Ann M. Gronberg et al., U.S. Geological Survey, *Water-Quality Assessment of the San Joaquin-Tulare Basins—Entering a New Decade* (April 2004), <http://on.doi.gov/oVpDxZ>.

measures to protect local rivers and streams. However, the program explicitly exempted discharges to groundwater and left no regulations to protect the groundwater on which some 90 percent of San Joaquin Valley communities rely as their only source of drinking water.

In 2005 the Community Water Center joined other advocates in pressuring the regional board to protect groundwater through the regulatory program.³¹ As a result of affected residents' testimony at board hearings, press coverage, and regulatory and legislative advocacy, the state and regional water boards directed their staff members to develop a long-term irrigated lands regulatory program to protect groundwater quality.

In 2008 the Central Valley Water Board convened an advisory work group; among the participants were the Community Water Center, California Rural Legal Assistance Foundation, and the Clean Water Fund. In 2010, based on recommendations from the work group, the board released a report analyzing the environmental impact of a variety of policy alternatives and recommending the first groundwater regulatory program.³²

The Community Water Center and other advocacy organizations and residents of affected communities submitted extensive written technical comments and testified at the hearing on the proposed regulatory framework; the organizations advocated stronger requirements on individual farms, enforcement mechanisms, mitigation measures for affected communities, and improved monitoring and data collection. The board directed staff members to improve protection in targeted locations; of particular importance, staff members were to develop a mitigation program to help affected

communities finance and obtain alternative safe drinking water sources. The board subsequently convened a group of industry, agency, environmental justice, and environmental organizations; the group is working to develop solutions to the problem of nitrate contamination of drinking water.

The long-term regulatory program is still being developed. Grassroots advocacy has resulted in a program to monitor and regulate agricultural runoff into groundwater; in doing so, advocates have taken great strides in protecting drinking water permanently from one of the largest sources of contamination.

Legislative Advocacy: Enacting the Human Right to Water Package. Even with the progress made through the approaches described, advocates understand that the right to clean drinking water in California may be realized fully only if, through legislation, the laws and mechanisms that protect drinking water quality and quantity are strengthened.

Advocates came together to present a Human Right to Water Package before the state legislature.³³ The package began with Assembly Bill 685, which would have added to the state's Water Code as a declaration of state policy that "every human being has the right to clean, affordable, and accessible water ..." and would have charged state agencies with taking that right into consideration when developing policies and taking actions. The bill died in the legislature.³⁴ The remaining bills passed, and Gov. Jerry Brown signed them into law on October 7, 2011:

- Senate Bill 244 will require local governments, when they update their general plans, to consider adjacent unincorporated communities and assess

³¹The Community Water Center is an environmental justice organization that works with low-income, primarily Latino communities to attend to problems that range from chronic drinking water contamination to barriers to participation in local water governance.

³²CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD, DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (2010), <http://1.usa.gov/rrJfRF>.

³³Cosponsors are California Rural Legal Assistance Foundation, Clean Water Action, Catholic Charities Diocese of Stockton, Community Water Center, Environmental Justice Coalition for Water, Food and Water Watch, Southern California Watershed Alliance, Unitarian Universalist Legislative Ministry Action Network (Cal.), Unitarian Universalist Service Committee, Urban Semillas, and Winnemem Wintu Tribe.

³⁴A.B. 685, Leg., 2011–12 Reg. Sess. (Cal. 2011), <http://1.usa.gov/iW22c2>.

these communities' water and sanitation needs.³⁵

- A.B. 983 will make funding to improve water systems more accessible to low-income communities by providing grants for the full cost of upgrades rather than providing a portion of the funding in the form of loans.³⁶
- A.B. 1221 will help low-income communities and their water providers gain access to funding to improve sanitation systems.³⁷
- A.B. 938 will strengthen water providers' language access obligations by requiring translation of public notices on serious violations of drinking water standards whenever a language is spoken by more than 10 percent of customers.³⁸

In signing the bills Governor Brown affirmed that “[c]lean drinking water is a basic human right. The bills I have signed today will help ensure that every Californian has access to clean and safe sources of water. Protecting the water we drink is an absolutely crucial duty of state

government.”³⁹ This legislative package will ensure that more Californians enjoy access to safe, clean, and affordable drinking water.



Water is so basic as to be a prerequisite for the exercise of other human rights. California advocates have accomplished much in the struggle to realize the human right to water, but much work remains. One thing is certain: all forms of advocacy, all supported and fortified by an engaged resident base, will continue until California recognizes—and enforces—a right to safe, clean, and affordable drinking water for all its residents.

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³⁵S.B. 244, Leg., 2011–12 Reg. Sess. (Cal. 2011), <http://1.usa.gov/lXVpV3>.

³⁶A.B. 983, Leg., 2011–12 Reg. Sess. (Cal. 2011), <http://1.usa.gov/ilxm8V>.

³⁷A.B. 1221, Leg., 2011–12 Reg. Sess. (Cal. 2011), <http://1.usa.gov/j1gMo2>.

³⁸A.B. 938, Leg., 2011–12 Reg. Sess. (Cal. 2011), <http://1.usa.gov/jphT2i>.

³⁹Press Release, Office of Governor Edmund G. Brown Jr., Governor Brown Signs Legislation to Bring Clean Drinking Water to Californians (Oct. 7, 2011), <http://1.usa.gov/qops7g>.



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