ANNUAL REPORT TO THE RMI GOVERNMENT THROUGH MLSC BOARD OF DIRECTOR: MINISTER OF JUSTICE, IMMIGRATION AND LABOR, HONORABLE WISELY ZACHRIAS,

SUBMITTED BY

RMI REGIONAL OFFICE

July 1, 2023 to June 30, 2024

TABLE OF CONTENTS

A Office Personnel

B Caseload Summary

D Particular Problems and Needs

E Special Projects and Accomplishments

F RMI Community Needs Assessment

G Recommendation for 2025

A. Office Personnel

I. Majuro and Ebeye Office

Title	Name
Directing Attorney	Rosania A. Bennett
Staff Attorney	Tiantaake Beero-Sexton
Trial Counsel	Wagner Joash
Legal Secretary and Notary Public	Tamara Andrike
Legal Secretary and Notary Public	Donna Ishoda

II. Ebeye Office

Title	Name
Legal Secretary and Notary Public	Jesse Riketa II

III. Changes in Staffing RMI Office.

Our office has a total of five dedicated staff members. To better support our legal services in RMI, we have recently welcomed two new legal secretaries to our team, Tamara Andrike and Donna Ishoda, replacing Legal Secretaries, Melanie Enne and Eugenia Reiher. Their addition allowed us to enhance our capacity and efficiency in assisting clients and addressing RMI's community legal needs. As for Ebeye Office, it is manned by one dedicated staff member, Legal Secretary Jesse Riketa II, who is currently trained to take up the Trial Counsel post that is currently opened.

Our office short by 1 Trial Counsel which we are actively working to fill this vacant position for Ebeye Office. We are hoping to open another Staff Attorney position for Majuro Office and another Secretary Position for Majuro Office to complete our team.

B. Caseload Summary

I. Majuro and Ebeye Offices

Total Opened Cases – July 1, 2023 – June 30, 2024	2,046
Total Closed Cases – June 30th, 2024	1047
Total Pending Cases as of June 30th, 2023	999

Between July 1, 2023, and June 30, 2024, the total number of cases opened was 2,046, from that there were 1047 cases closed leaving 999 cases pending as at June 30 2024. On June 30, 2024, there were 999 cases left opened. Following pie chart shows breakdown of closed cases throughout the year by problem code and by reason

Figure 1: Breakdown of closed cases by Problem Code.

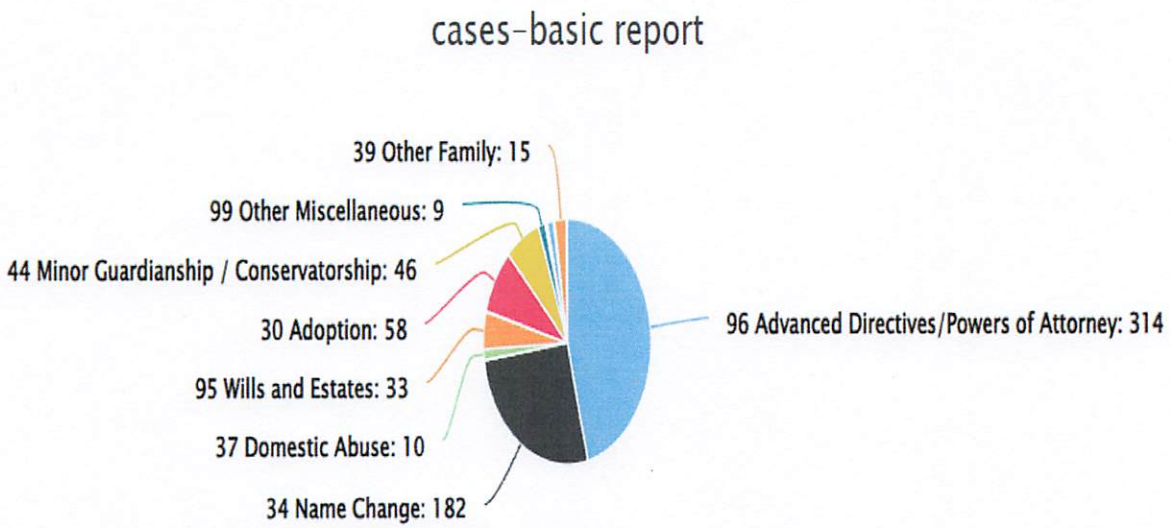
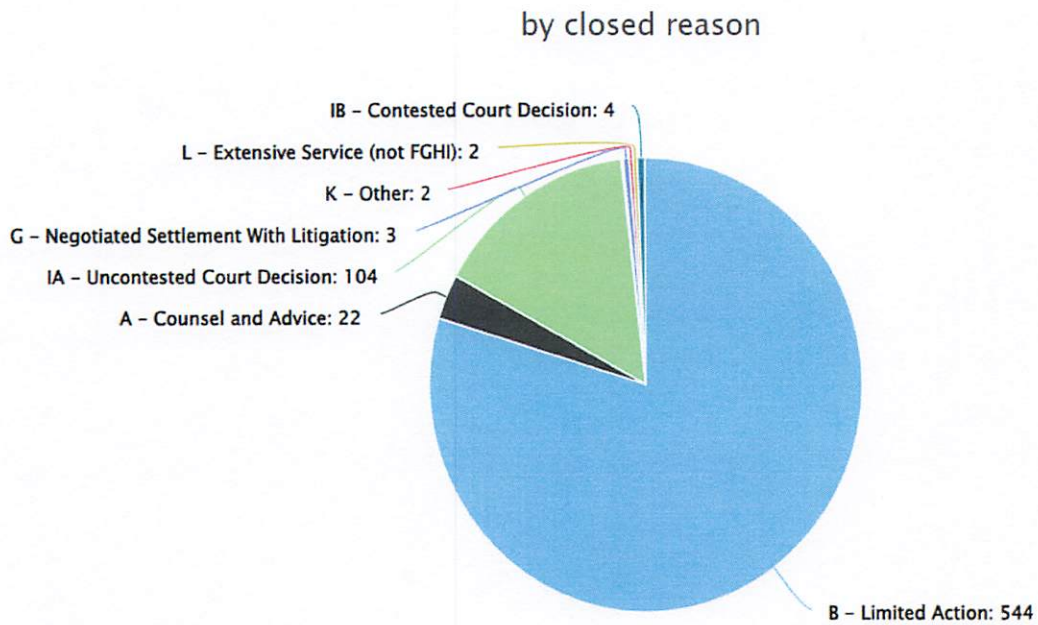


Figure 3: Breakdown of closed cases by reasons:



C. Particular Problems and Needs

1. Current State of the Ebeye Office Building

The Ebeye office building has deteriorated considerably over time, resulting in conditions that are increasingly unfit for work and a barrier to client's accessibility. Below, I outline the particular problems and challenges we face:

1. **Structural Integrity:**
    - The building's stairs have become unstable and unsafe, making it dangerous for staff and visitors to walk upstairs. This poses a serious risk of accidents.
    - The overall structure show signs of significant wear and tear, compromising its safety.
    -
2. **Leaks and Water Damage:**
    - The building leaks during rainfall, causing water damage to office interiors and increasing the risk of mold and structural deterioration. This situation disrupts the work environment and threatens both staff health and office equipment.

- The bathroom toilet does not have water and it is a daily practice to fetch water in order to flush the toilet. The fact that the Office is located on the second floor one way for entry and exit creates more hardship on our staff on Ebeye.

3. **Climate Control Issues:**

   - The air-conditioning units are no longer operational, leading to an uncomfortable and often stifling work environment. Given the tropical climate of the region, this condition significantly affects staff productivity and well-being.

4. **Connectivity Limitations:**

   - The office's internet connection is unreliable and has poor range, which hampers communication and the timely completion of work. This poses a significant barrier to maintaining essential services.

5. **Electrical System Concerns:**

   - The electrical wiring throughout the building is corroded and unsafe, raising the risk of equipment damage and potential electrical hazards. Frequent power fluctuations have already led to equipment malfunctions, which further strain our limited resources.

6. **Implications for Our Operations**

The state of the Ebey office directly impacts the safety, morale, and effectiveness of our team. Working under these conditions not only poses a risk to the health and safety of the staff but also limits our capacity to provide the quality of service expected by the community. Furthermore, the ongoing risk of equipment damage due to electrical issues could lead to higher maintenance costs and unanticipated expenses.

With the well-being of our staff and the efficiency of our services in mind, support in addressing these pressing challenges, is pressing. Potential solutions may include securing funding for urgent repairs, evaluating the feasibility of temporary relocation, or exploring options for a new, safer facility. The other feasible option is remote work with no physical Office.

2. Current Staffing challenges:

One of the most pressing challenges faced by our office is the shortage of qualified staff. Currently, we have only two lawyers and one trial counsel on board to address the significant civil legal needs of the Republic of the Marshall Islands (RMI) community. This shortage severely impacts our capacity to address and resolve the growing number of cases, leading to an overwhelming workload that strains our resources.

The disparity between the number of cases opened and closed each year highlights the persistent demand for legal services in the RMI:

- **2024**: A total of 2,046 cases were opened, but we were only able to close 1,047 cases. This indicates that nearly half of the cases remained unresolved by year-end, resulting in a significant backlog.

- **2023**: The numbers were even more challenging, with only 720 cases closed out of over 1,000 cases opened.

This data underscores the high demand for legal services that far exceeds our current staffing capabilities. The inability to close cases in a timely manner affects the community's access to justice and increases the workload for existing staff, further straining their capacity.

Apart from case management, our office is also tasked with fulfilling other essential mandates for the RMI community. One such responsibility is providing support for vital civil documentation, particularly birth certificates. This service was highly requested, reflecting a primary legal need among residents, backup by data from legal server in 2022 fiscal year.

The shortage of qualified staff is the root of many operational challenges:

1. With only two lawyers and one trial counsel managing a caseload exceeding 2,000 in number annually, it is nearly impossible to close all cases on time.

Inefficient Service Delivery: The shortage of hands becomes even more pronounced when secretaries are off-island for outreach or other assignments. This results in a lack of capacity to handle client intakes. The strain is further amplified by frequent situations where only one or two staff members are left on Island to take care of the flow of visitors each day affecting productivity.

2. **Dependence on Support Staff**: Legal secretaries who participate in outreach trips are unable to draft power of attorneys, further delaying the legal process and straining resources when they return with case information.

Recommendations: To address these challenges, the following steps should be considered:

1. **Staff Expansion**: Hiring additional staff attorneys could alleviate the bottlenecks and improve service delivery.
2. **Training Programs**: Implementing training programs for legal secretaries to enhance their capacity for drafting basic petitions to be reviewed by attorneys would expedite the legal process and reduce the backlog.
3. **Resource Allocation**: Allocating more resources for travel and outreach would enable more comprehensive and efficient assistance to residents in neighboring atolls, improving access to justice.

Conclusion The current shortage of staff significantly hampers our ability to meet the high civil legal demands of the RMI community. Addressing this issue through strategic hiring and training, along with better allocation of resources, will enhance our office's capacity to close cases in a timely manner and fulfil the legal needs of the community more effectively. While we aim for more qualified lawyers, we also need more legal secretaries to allocate specialized tasks to more experience legal secretaries while other less demanding and less intense tasks could be allocated to lesser experience legal secretaries.

The shortage of hands becomes even more pronounced when secretaries are off-island for outreach or other assignments. This results in a lack of capacity to handle client intakes, as the lawyers are already occupied with ongoing cases and other commitments. The strain is further amplified by frequent situations where only one or two staff members are available due to family obligations or illness, making the office feel busier than ever and affecting productivity.

These conditions underscore the urgent need for strategies to strengthen staff capacity, improve workload distribution, and maintain service continuity even when team members are unavailable.

- Equipment/Devices/IT Challenges.

Report on Current Challenges with Equipment, Devices, Power outages

1. Overview of Current Challenges: At one point, the office experienced a significant challenge related to equipment, devices, and IT infrastructure, which are affecting overall productivity and workflow. With the end-of-year reporting deadline approaching, these issues were becoming increasingly pressing.

2. Recurring Power Outages One major challenge is the frequent power outages. These power disruptions make it difficult for staff to work comfortably and efficiently in the Office and get work done especially those requiring engagement with other offices due to frequent black outs on Majuro and Ebeye. The outages not only interrupt work but also pose risks to the functionality and longevity of electronic equipment, and inability to acquire billings and other work. It is likely that whenever there is a power outage, there will be no one in the Office.

3. Computer and Printer Issues

- **Old Equipment Replacement**: The office has faced delays in the replacement of old, dysfunctional computers and printers. While these issues have largely been resolved, the process took an extended period, causing considerable inconvenience and workflow disruptions.

- **Ongoing Printer Problems**: Despite recent replacements, printer problems persist. Staff members are still experiencing difficulties with the printer failing to recognize their computers. This issue is significantly hampering the ability to print and scan necessary documents and complete tasks on time. Whenever there is a power outage, resetting of the printer is required sometimes resulting in printer not recognizing our computers affecting our ability to print and scan to our computers.

- **Backup Printer Installation**: The installation of a new backup printer has also proven to be problematic. Assistance is required to ensure the backup printer is properly set up and operational. Without proper installation, there is a risk of additional technical issues, which could further disrupt office operations.

4. Implications for End-of-Year Reporting The inability to print documents efficiently is a considerable concern, particularly with the upcoming end-of-year reporting deadline. The challenges with printer functionality and the lack of reliable backup solutions could impede the timely submission of reports and other essential documents.

5. Recommendations

- **Immediate IT Support**: Engage with IT support to resolve the current printer recognition issues and ensure all staff computers can connect to the printer seamlessly.

- **Assistance with Backup Printer**: Schedule a technician to assist with the installation and configuration of the new backup printer to prevent potential technical problems.

- **Power Backup Solutions**: Explore the possibility of investing in uninterruptible power supply (UPS) systems or backup generators to mitigate the effects of power outages and protect office equipment.

- **Future Equipment Upgrade Plans**: Establish a proactive plan for timely replacement and upgrading of essential office equipment to avoid extended downtime and productivity loss.

6. Conclusion Addressing these equipment and IT challenges is essential to maintain office productivity and meet critical deadlines. Immediate action and continued support will be necessary to ensure that staff can work efficiently and complete their end-of-year reporting without further disruption.

D. Special Projects and Accomplishments

I. Collaborative Effort:

Project Title: SAAM - Presentation on Domestic Violence Awareness and Legal Protection Processes

Date Held: April 29, 2024

Overview:
On April 29, 2024, the MLSC team conducted a successful presentation as part of the SAAMS project at the College of the Marshall Islands (CMI). The event was aimed at educating students about the critical topic of domestic violence and the process of obtaining

protection orders, a service for which the Marshall Islands Legal Services Corporation (MLSC) holds responsibility.

Details of the Event:

- **Audience:** Approximately 32 CMI students attended the presentation.
- **Presentation Content:** The MLSC team provided an in-depth explanation of what constitutes domestic violence, emphasizing its various forms and the potential impact on individuals and families. Additionally, the presentation covered the legal steps involved in obtaining a protection order, outlining MLSC's role in assisting those affected by domestic violence.
- **Engagement and Interaction:** The session was highly interactive, with students showing keen interest through questions and discussions. The active participation demonstrated their understanding and responsiveness to the subject matter.

Outcome:
The presentation was met with positive feedback and engagement, furthering MLSC's mission to raise awareness and inform the community about their rights and the resources available to combat domestic violence. The project reinforced MLSC's commitment to community outreach and legal education, empowering individuals with knowledge to seek assistance and protection when necessary.

Conclusion:
The SAAM project presentation on April 29, 2024, stands as a significant achievement in MLSC's community engagement efforts. The strong attendance and enthusiastic response from CMI students highlight the importance of continued education and outreach to build awareness and understanding of domestic violence issues and legal recourse options.

Special Accomplishment: Expanding Access to Justice through the Early Childhood Sensitization Program

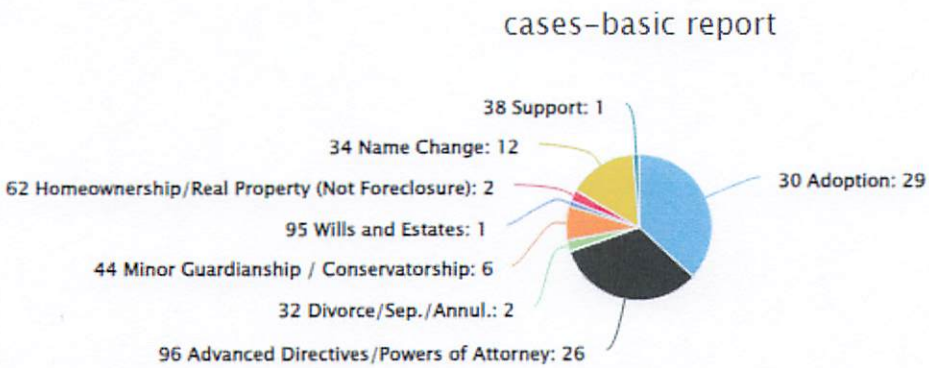
The latter part of 2023 through to 2024, MLSC engaged with Ministry of Culture and Internal Affairs and other partners in the Early Childhood Sensitization (ECD) Program, focusing on assisting families with small children from several neighboring atolls, including Wotje, Jaluit, Arno, Lib, Wotho, Ujae, Lae, Aelonlaplap, Namdrik, and Ebon, primarily with their birth certificate needs. The inclusion of the Vital and Statistics Office in the team reduced the need for direct involvement of our legal staff in birth certificate corrections, which allowed us to redirect our efforts toward conducting legal clinics in these communities. During these outreach visits, family law issues such as customary adoption and legal guardianship frequently arose as significant legal concerns. Addressing these issues underscored the importance of having dedicated resources and specialised attention for family law cases. However, a substantial challenge we faced was the inefficiency in completing case filings directly from the atolls. Due to obvious limitations in that secretaries on board these trips are unable to draft petitions independently. As a result, they must return to Majuro for the lawyers to prepare the necessary documents, which causes delays and necessitates additional travel to notarize documents with clients once petitions are drafted. Despite these obstacles, MLSC successfully opened 21 new cases through the ECD Program this year (and more in the upcoming reporting year, 2024), illustrating our commitment to enhancing access to justice. The ECD report (Appendix 1, page 25) highlights how this initiative expanded beyond its original intent to include educational legal clinics, allowing residents to better understand MLSC's services and their rights under the law.

This year, MLSC engaged in the Early Childhood Sensitization (ECD) Program, focusing on assisting resident families with children from several neighboring atolls, including Wotje, Jaluit, Arno, Lib, Wotho, Ujae, Lae, Aelonlaplap, Namdrik, and Ebon, primarily with their birth certificate needs. The inclusion of the Vital and Statistics Office in the team reduced the need for direct involvement of our legal staff in birth certificate corrections, which allowed us to redirect our efforts toward conducting legal clinics in these communities.

During these outreach visits, family law issues such as customary adoption and legal guardianship frequently arose as significant legal concerns. Addressing these issues underscored the importance of having dedicated resources and specialized attention for family law cases. However, a substantial challenge we faced was the inefficiency in completing case filings directly from the atolls. Due to limitations, such that, the secretaries accompanying these trips were unable to draft petitions independently. As a result, they must return to Majuro for the lawyers to prepare the necessary documents, which causes delays and necessitates additional travel to notarize documents with clients once petitions are drafted. Despite these obstacles, MLSC successfully opened 79 new cases through the ECD Program, illustrating our commitment to enhancing access to justice. The ECD report (Appendix 1, page 25) highlights how this initiative expanded beyond its original intent to include educational legal clinics, allowing residents to better understand MLSC's services and their rights under the law.

Breakdown of Cases Opened in the Neighboring Islands:

Figure 4: Breakdown of number of intakes



For specifics on Jaluit trip please click: ECD Jaluit .docx - Google Docs.

This accomplishment not only demonstrates MLSC's ability to adapt and respond to emerging legal needs but also highlights the dedication of our staff to deliver critical services, even when facing logistical and staffing challenges.

E. Community Needs Assessments RMI

RMI MLSC has been assisting with Domestic Violence Legal education and outreach including taking on Domestic Abuse cases in which clients seek Protection Order from Court.

Figue 5: Breakdown cases by Advocate:

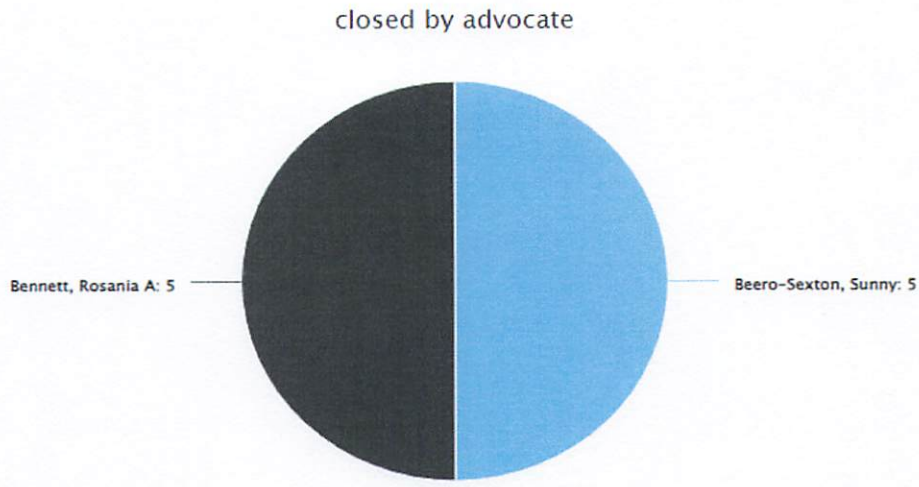
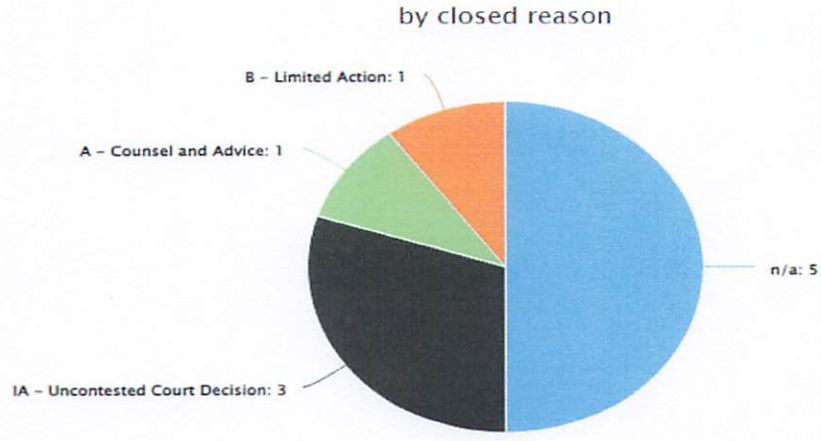


Figure 6: breakdown of domestic abuse cases by reasons:



Overview

Our office is still involved in ongoing outreach and education programs on Domestic Violence and will continue to strive to do more on this area. Currently, domestic violence outreach and education are satisfactorily managed by Women United Together Marshall Islands (WUTMI), and has achieved considerable progress in this area. We would like to commend WUTMI on their relentless commitment and support in this area. Currently the two partners are working

on review of the MOU in hope to renew the Agreement between WUTMI and MLSC. WUTMI has demonstrated sustained efforts in domestic violence outreach and legal education, with measurable success in increasing public awareness and community engagement. Their specialized programs are well-regarded, and they have developed a strong rapport with the community, which enables them to effectively address domestic violence issues. Complementing these services MLSC continues to support mainly in filing motion and affidavits in support of motion for Temporary Restraining Orders and Permanent Restraining orders against the perpetrators by the victims. We have a total of 10 case 5 were resolved and 5 were halted by the victims themselves who decided not to proceed.

Other Potential Areas of Focus:

- **Focus on Emerging Needs**
  To better serve the evolving needs of our community, we could pivot our focus to areas that require heightened legal education and outreach, including:
- **Climate Change Awareness and Legal Education**: Addressing the legal implications of climate-related issues affecting our islands, assisting communities with climate adaptation, climate resilience, and informing residents about their legal rights related to environmental changes.
- **Food Security and Non-Communicable Diseases (NCDs)**: Providing legal education around food security as it intersects with health concerns, particularly non-communicable diseases, which are increasingly prevalent. Provide support legal assistance in formation of NGO's in this regard.
- **Nuclear Legacy Legal Education and Awareness**: Informing the public of legal matters associated with the Nuclear Legacy of the Marshall Islands, with a focus on educating communities on their rights and available legal recourse in this context.

Conclusion

With WUTMI's proficient handling of domestic violence outreach, our office could redirect our focus to other significant areas of need, thus broadening our impact on the community. This (anticipated) reallocation of resources may allow us to leverage our resources more effectively and address other legal issues crucial to the welfare and resilience of our communities.

Next Plausible Steps

Our team will continue to coordinate with WUTMI to ensure that there is no overlap and that any new cases or areas of concern in domestic violence are referred appropriately. We will also monitor the progress in our potential redirected focus areas and adjust our approach as needed to best serve the legal needs of the Marshall Islands

In 2025, we will continue to be open for protection order requests from our domestic abuse case as they come.

2025 workplan

Methodology: Using these diverse data sources—government official interviews, external studies, and internal data—we are able provide a more solid foundation for creating a well-informed work plan for 2025.

Unique emerging needs:

1. Land Rights and Relocation: As rising sea levels threaten habitability, legal issues surrounding land rights, ownership, and potential relocation are becoming pressing. Many Marshallese citizens may need to relocate internally or internationally, raising questions of property rights, compensation, and access to resources. Marshall Islands is mainly composed of Atoll distinctive and more prone to erosion compared to an Island. Many Marshallese have actually migrated to the US.

2. Community Legal Support: At a community level, climate-driven legal issues intersect with family law, health rights, and access to services and food security. RMI citizens are likely to face disputes over water and food resources, health impacts due to environmental degradation, and access to aid, all of which require legal assistance.

Some reports estimate that a significant portion of RMI's population will be at risk of displacement within the next two decades if current sea-level rise trends continue. The UN and other agencies suggest that up to 40% of the country's population could face displacement in the coming decades due to rising sea levels, particularly in the outer atolls where homes and agricultural areas are increasingly affected. To provide more precise

3. Marshallese rights under the Trust Fund Act as amended:

a. Enra Bwe Jen Lale Rara or Basic Universal Scheme: Pursuant to Article 17 of the Trust Fund, a financial distribution scheme administered by Social Security Administration. All RMI citizens living in the Marshall Islands are eligible and will be compensated. This is to support economic stability addressing social welfare needs, addressing environment and economic vulnerabilities. This program is up for registration of all Marshallese and people of the Marshall Islands will need legal support to inform them of their rights under the scheme. Currently an MOA is being drafted between the Government and Social Security Administration who is the responsible institution in charge of distributing the money to all citizens.

b.Midrange Distribution Scheme for vulnerable communities: a scheme based on policy decision of the Government. Today the midrange atolls include: Ailuk Atoll, Aur Atoll, Bikini Atoll, Likiep Atoll, Lib Island Mejiit Island, Rongelap Atoll, Rongdrik Atoll, Wotje Atoll, Ujelang Atoll. The Local Authority Acts of each Atolls and Islands were newly enacted which established the membership and their role defining each authority's role. The midrange distribution scheme is yet to be finalized by each Authority. There is a need for raising awareness and legal education in this area.

Vision Statement: *To provide personalized, high-quality legal services with integrity, compassion, and expertise, empowering our clients to navigate complex legal challenges and achieve their goals with confidence and peace of mind.*

Three areas to attain the above vision. Strategy based on the following:

1. **Improving Customer Service protocol for our clients**

Objective 1: Provide Exceptional Service in Opening Legal Cases
Goal: Enhance access to justice through customer-focused case handling in priority legal areas such as family law, land rights, and labor disputes.
- Action Items:
1. Client-Centered Intake Clinics: Host monthly intake clinics Ebeye and Majuro (with a focus on empathetic and clear communication).
2. Increase Case Accessibility: Boost the number of open cases by 20%, ensuring every client receives timely updates and access to their case status.
3. Prioritize Vulnerable Clients (Neighboring Islands): deploy mobile legal clinic, develop tailored services for vulnerable groups (women, children, elderly, special needs), and track their satisfaction with services provided. Targeting 150 cases.
4. Telelaw Services Expansion: Open 100 remote cases by offering virtual consultations to outer island residents, with a focus on customer convenience and accessibility; extend this service to Marshallese overseas needing assistance in guardianship and adoption cases

5. Targeting 4 impact cases
- Measurable Outcomes:
- Monthly client satisfaction surveys after intake clinics.
- Number of cases opened and client satisfaction with communication.
- Satisfaction rates from vulnerable clients.
- Feedback on ease of using telelaw services.

Objective 2: Customer-Oriented Outreach and Community Education

- Goal: Empower communities through legal education on Enra Bwe Jen Lale Rara Scheme and the Midrange Distribution Scheme, delivered in a way that is accessible, clear, and responsive to community feedback.
Action Items:
1. Interactive Legal Workshops: Conduct quarterly workshops, with a focus on engaging participants and responding to their questions and concerns in real-time.
2. Accessible Educational Materials: Create materials in both Marshallese and English, ensuring clarity and ease of understanding, and distribute through channels clients trust (e.g., community centers, radio).
3. Tailored Education Sessions: Hold 12 education sessions in rural and outer islands, on climate driven legal issues intersect with family law, health rights, and access to services and food security designed to address community-specific legal concerns, and collect feedback for ongoing improvements.
4. Client-Focused Radio Program: Launch a bi-monthly radio show that answers community legal questions live, ensuring the content is practical and relevant to listener needs.
- Measurable Outcomes:
- Client feedback on workshop relevance and clarity.
- Number of materials distributed and community feedback on their usefulness.
- Number of education sessions and participant satisfaction.

- Listener feedback and participation rates for the radio program.

Objective 3: Collaboration to Enhance Customer Service and Legal Impact

- Goal: Strengthen partnerships that improve client service delivery and create seamless, holistic legal experiences.
- Action Items:

1. Client-Focused Partnerships: Form 3 new partnerships with local organizations (dealing with climate change issues and food security projects), to integrate services and reduce client burden when seeking multiple types of assistance. Draft incorporation document for 3 new NGO's dealing with new aspects of climate change, nuclear legacy, and food security.
2. Responsive Legal Forums: Organize biannual forums that give clients, community leaders, Faith based institutions and NGO's, a voice in shaping our services, ensuring we remain responsive to their evolving legal needs.
3. Efficient Case Referral System: Set up a referral system with partners that minimizes wait times and ensures clients are directed to the right services without delays.

- Measurable Outcomes:
  - Client satisfaction with referral process and collaborative services.
  - Feedback from training participants on improved client interactions.
  - Community feedback from legal forums and implementation of client suggestions.
  - Partners feedback on the effectiveness of the referral system

Keeping in mind that the overarching outcome is to have a speedy resolution of cases by monitoring intake, change in status of a case progressively on a quarterly basis until it reached closure in Legal Server. With a Mid-Year Review in place whereby in June 2025, the office slows down for assessment progress which is based on client satisfaction surveys, case numbers, and feedback from outreach and collaborative efforts. A time to make adjustments to ensure we continue to meet the needs of the community in a client-focused way. By the end of 2025, an Annual Report to be published highlights how customer service has improved across all objectives, using both quantitative data (number of cases) and qualitative data relaying back the feedback from our clients and partners.

F Recommendation 2024

From our discussion, it is clear that the current priorities of the Office remain relevant for managing our case load. However, given the pressing and evolving challenges we face, such as rising sea levels and climate-related impacts, it is recommended that our focus gradually shift toward addressing these emerging areas of need. This shift would allow us to better serve the most vulnerable members of our community, particularly those facing climate change threats and the ongoing need for reparative justice related to the nuclear legacy in the Marshall Islands (RMI).

As land erosion continues to affect our environment, it brings forward critical issues in food security and sustainability, especially for atolls most susceptible to these changes. The ongoing impacts of sea level rise mean that communities now, more than ever, require support to adapt and maintain access to secure and sustainable food resources.

While the Trust Fund was originally established to meet the needs of nuclear-affected communities, its purpose has evolved to cover the broader socio-economic challenges faced by midrange atolls, whose populations experience heightened vulnerability to environmental and economic shifts. This is no longer limited to nuclear-related matters but encompasses a wider array of issues affecting family health, livelihood, and resilience.

Given these shifts, our office's priorities must also adapt to meet the unique demands of RMI, a nation of low-lying atolls prone to natural disasters such as drought, tidal waves, seasonal flooding, and high tides during monsoon seasons. By realigning our focus, we can provide more effective legal education, community outreach, and support to those most affected by these unique challenges in the Marshall Islands

Respectfully submitted,

Rosania A. Bennett

Directing Attorney

RMI MLSC Regional Office