

For ease of reference, our comments are organized to correspond with the sections of the strategy.

Part 1 – Introduction

The framing of this document within the context of the legislative provisions of the *Corrections and Conditional Release Act (CCRA)* and the 1990 Task Force on Federally Sentenced Women: *Creating Choices*, was extremely helpful. Indeed, it is our view that the legislation, in particular the sections that articulate the need to employ the least restrictive measures and address the particular needs of women, Aboriginal peoples, as well as other groups with 'special' needs, forms the most vital component of the framework for any correctional program strategy for women. As such, we are curious as to the manner in which the presence or absence of the integration of these vital legal obligations are determined and/or evaluated.

Throughout the document, there was a lack of specificity regarding the manner in which the Correctional Service of Canada (CSC) will evaluate and reflect, in terms of the concrete evidence and results expected with respect to the principles, programs and approaches used by the CSC vis-à-vis women prisoners. For example, although the final paragraph of the background section of the introductory part of the strategy indicates that all participation in correctional programs will be "voluntary and based on informed consent", there is no discussion of the manner in which this may be assessed.

Perhaps more significantly, there is no discussion of the contextual reality of the prison environment, not even the coercion inherent in the relationships between prisoners and staff and the fact that there cannot therefore be informed or voluntary involvement in any aspect of prison life when the alternative is a punitive reaction, response or result. The Correctional Service of Canada has, in fact, documented this challenge in the past, particularly in relation to difficulties in securing the assistance of medical doctors to perform what might otherwise be seen as routine medical procedures in prison settings. Most physicians have determined that a prisoner, by virtue of the very nature of their imprisonment, may not be capable of making an informed and voluntary decision without the absence of the influence of the correctional authorities who are 'suggesting', 'encouraging', 'requiring'; or, more clearly, 'expecting' certain decisions to be made.

Similarly, although the expressed desire to develop relational approaches to programming for women would seem quite laudable, the linking of such approaches with psycho-social learning and cognitive behavioural interventions, only serves to reinforce the reality that the context of the lives and circumstances of women are largely absent and are deemed essentially irrelevant. By privileging psycho-social and cognitively based approaches and other programming which focus primarily on individual responsibility and thinking patterns, the CSC only serves to reinforce the systemic

inequalities and preconditions that resulted in the criminalization of many of the women serving federal sentences.

Without systemic analyses and relevant assessments of the role of the Correctional Service of Canada and others in situating women in more vulnerable positions by perpetuating the notions that they are the sole architects of their own misfortunes and challenges, women are routinely and systematically told and taught that it is all within their personal control and ability to address their own needs and vulnerabilities in society. Such messages only serve to reinforce, rather than challenge, the hypocritical and fallacious notions that feed theories regarding the individual nature of the responsibility women bear for the systemic barriers and governmental, economic, health and social policies that have led to increasing numbers of women, especially young racialized women and women with disabilities being criminalized.

Furthermore, the fact that many bald assertions are made regarding the viability, validity and reliability of CSC-funded research, without any mention, much less any addressing, of the very cogent critiques that have been provided of current approaches to correctional programming in Canada, is a significant flaw of this and other CSC strategies and research documents. For example, particularly with respect to the areas addressed in this strategy, the absence of discussion regarding the critiques and recommendations of Madam Justice Arbour, Dr. Margaret Shaw, Dr. Kelly Hannah-Moffat, Dr. Shoshana Pollack and Dr. Kathy Kendall, to mention just a few of the recognized experts whom CSC and the Solicitor General has hired to investigate, evaluate, provide legal analyses and academic research in this area, leaves the strategy open to significant challenge. Clear and cogent critiques have been ignored by CSC.

Similarly and more significantly absent, are the voices of the women who are subject to such program strategies as the one defined in the July 2003 draft. Women in and from prison, particularly those who have self-organized in order to provide support and assistance with and for other federally sentenced women, as well as other equality-seeking groups, have expressed consistent concern regarding the lack of adherence to the law, particularly the *Canadian Charter of Rights and Freedoms*, the *Canadian Human Rights Act*, and the *Corrections and Conditional Release Act*, not to mention the principles and fundamental approaches outlined in *Creating Choices* – the 1990 Report of the Task Force on Federally Sentenced Women.

There is more than ample evidence now to substantiate the reality that it is destructive to continue to develop programs and approaches that perpetuate myths about the extent to which the increased criminalization of women is all within the control of women prisoners themselves. It is a truism at this point to assert the fact that we need to address the needs and vulnerabilities of our social, economic and medical systems in order to ensure that the needs and vulnerabilities of all are tackled. Suffice it to say, the nature of the increased criminalization of women demands that the Correctional Service of Canada, desist in the continued perpetuation of theories about women's involvement that are focused merely on individual choices, absent the contextual framework for the reality of women's lives.

Furthermore, the lack of analysis of the extent to which the prison environment creates many of the issues which this correctional strategy and others purport to address, feeds the tautological logic, philosophies and actions of the system. For instance, a statement that the Correctional Service of Canada is increasingly focusing on relational theory, with the primary goal being “to increase women’s capacities to engage in mutually empathic and mutually empowering relationships”, absent any discussion of the nature and extent of the influences of the prison milieu itself or the role of other intersecting strategies that CSC has implemented vis-à-vis federally sentenced women, underscores the hypocrisy of such a statement.

Too frequently, when women actually do form strong personal and mutually supportive empowering relationships, these are seen as a challenge to the authority of the prison administration. For instance, when women have worked together to bring forth complaints and/or grievances regarding abuses of power, breaches of policy and/or the law, these have not been embraced as an exemplification of the success of CSC’s application of relational theory. Rather, they have tended to be regarded as threats to the CSC control of an institution and usually have resulted in non-supportive responses and often quite destructive approaches which range from moral suasion to reverse or abandon the action, to warnings, charges, segregation, security re-classification and even institutional transfers. Relational approaches should encourage women’s self-organizing to address their mutual interests and/or concerns.

Another factor that interferes with women’s abilities to experience the principles of *Creating Choices* is the limited empowerment of the institutional Peer Support Teams (PST) in the regional prisons for women. Team members are selected by institutional administration and the teams tend to have very limited autonomy, choices, or opportunities to link with independent, external community-based resources, all of which makes it difficult for them to take responsibility for assisting their sisters to create alternative choices.

In the past, the success of the Peer Support Team at the Prison for Women in Kingston was predicated upon the fact that the selection process was determined by women prisoners, and that the training and on-going support for the PST was provided by independent and/or arms length, feminist counsellors and community-based advocates. Although the administration at the Prison for Women might have occasionally found the PST interventions to be challenging, there was never any allegation or evidence that the challenges were inappropriate, incorrect, or ill conceived. In fact, it was our experience that the administration relied quite significantly upon the resources, insight, support and even critique that the PST members provided to them, especially in times of crisis. The PST encouraged and supported the natural and recognized leadership of women inside.

We encourage you to re-examine the overall framework that you have provided for the correctional strategy in order to commence a review of the manner in which the approaches suggested may be serving to reinforce, rather than address, the very real needs and issues that have contributed to the criminalization of the women serving federal sentences. Moreover, in the section subtitled, *Risk, Need and Responsivity Principles*, we were surprised to find such a bold assertion as that which commences this section.

Although it is true that CSC continues to assert that, “the principles of risk and need apply equally to women offenders”, we have yet to see any valid or reliable research basis for this conclusion. Indeed, it is our view that this assertion is not substantiated by even the research that the Correctional Service of Canada has conducted. For instance, while we have been repeatedly assured that self-injury and suicide attempts are not considered criminogenic factors by CSC, the inclusion of these in the section dealing with criminogenic needs underscores the reality that CSC remains convinced that these are valid and reliable indicators of criminality. The absence of any such linkage in literature external to CSC must in and of itself create doubt as to the validity and reliability of CSC’s own assertions. Moreover, there is considerable critique of the approaches taken by the Correctional Service of Canada in this regard, including that which the Auditor General included in her most recent Annual Report (Chapter 4).

We are in full agreement with the assertion that programs must be delivered in a manner that is responsive to gender and culture in order to increase program effectiveness. Unfortunately, we see precious little evidence that the correctional program strategy has been developed in such a manner. Accordingly, we are very interested in receiving information regarding the examples of the application of “the responsivity principle”.

Similarly, we are very keen to learn more about the manner in which corrections believes that current correctional programs are able to address the needs of women in order to reduce “their risk to reoffend” without providing viable educational, employment, income earning, or other support services in the community. We find it difficult to imagine how the current focus on cognitive and psycho-social programming is assisting women to survive upon release from prison. Please provide us with additional information as to how you see the current correctional programs will assist women to address the very real and concrete needs and challenges they face, rather than merely perpetuate their own feelings of sole responsibility and blame for their social, economic and other forms of vulnerability and marginalization.

We encourage CSC to consider approaches that encourage women to develop linkages with social justice and equality-seeking groups, in addition to continuing your laudable efforts to assist individual women to enroll in vocational training and other employment programs. We also encourage CSC to release women on more temporary and work releases, with a corresponding re-allocation of resources to ensure the development or enhancement of necessary community resources and partnerships. The existence and/or availability of financial, educational, medical and social services for federally sentenced women released from prison are a necessary prerequisite to community reintegration.

We find it quite ironic that after alluding to the relational nature of women’s existence in community, including the community that develops within prison environments, there is no mention of the fact that it is the very relational nature as well as the resiliency of women in community that ensures that, even with relatively few resources, most women are not re-criminalized and returned to prison for new offences. CSC at once claims to implement relational theory and accepts accolades for their success for integrating women in the community, yet fails to adequately address the rather high rate of return to prison of women, for real or perceived breaches of their conditional release.

The reality is that women are often suspended and returned to prison for behaviour which, compared to their male counterparts, usually looks relatively benign in terms of the risk women pose to others in the community or public safety in general. As we will discuss further in the following sections, it our suggestion that correctional programming and community integration efforts must necessarily acknowledge the inequity of the application of law and policy to women, particularly Aboriginal women and women with disabilities, if there is truly a desire to address their needs and assist the community integration potential of criminalized women who receives sentences of two years or more.

Part 2 - Correctional Programs, Mental Health Programs, Education and Employment Programs and Social Programs

We find it extremely useful that this section begins with an attempt to conceptualize the role of correctional programs. We would encourage you to examine the work of the Law Commission of Canada with respect to their examination of definitions and constructions of crime in order to improve this and other facets of CSC's understanding of the factors that contribute to who is criminalized, by whom, and in what context, rather than a merely speak about "the multiple factors that contribute directly to criminal behaviour". The Law Commission of Canada has devoted significant time and energy to developing some excellent research with respect to the increased criminalization of some of our most vulnerable people in Canada. The importance of linking their findings with the practical interventions of CSC and other correctional authorities cannot be sufficiently underscored.

The strategy lacks any discussion or evidence of any awareness or acceptance of the increasing reality that women being released from prison, regardless of how intent they are upon integrating and becoming "productive members of society", are significantly hindered in their efforts as a result of the lack of community supports and services. All levels of government, including individual agencies such as CSC, have actually been complicit in reducing the resources available and consequently the concrete skills, opportunities and means for women to support themselves and/or their families upon their release.

For instance, the focus on employability, versus employment, presumes and therefore results in very different realities. Encouraging someone to be ready to work, as opposed to providing concrete employment skills training and ensuring there are viable work options available, necessarily means significant differences in the ability of the individual to support herself upon release. In the context of the lack of available employment options generally for all, and particularly for women, this must necessarily mean that the needs of women must be identified and addressed separate from and absent current approaches that are being used for men.

As many women's groups have ably articulated in various fora, in order to meet the needs of women, the women themselves must identify their own needs as well as the manner in which they would like to have them addressed. Such an approach requires that the women also have access to resources and services with which they choose to engage.

We encourage you to review previous submissions by CAEFS regarding the need to develop a different form of resourcing for community release options, one that allows women to be involved in brokering their own services and supports in the community.

In terms of the specific correctional interventions that are being proposed for women, we have many questions. Most notably, we would like to request copies of all the documents and studies that are referred to on page 9 of the Draft Correctional Program Strategy. We are interested in familiarizing ourselves with some of the research that CSC has commissioned, as well as any other materials upon which the approaches outlined in this strategy are based. Accordingly, I thank you in advance for forwarding these to our attention.

With respect to the section identified in the document as ‘Sex Offender Therapy for Women’, we find the lack of context in terms of the linkages of women’s involvement in sex offences to their own experiences of sexual abuse extremely disconcerting and misleading. We are all too well aware that women’s involvement in sexual offences, especially against other women and children, often occurs at the same time and in the context of their own experiences of abuse. We also note that this section is absent any discussion of the extent to which duress and coercion may be factors in the procurement of women’s involvement of sexual offences.

We are also interested in knowing who is the national consultant in the field of women who sexually offend referred to on page 10 of the draft strategy. Please forward the contact information at your earliest convenience. Finally, we found it difficult to follow the logic in this section, which determines that most of the women had acted in conjunction with a male partner, yet were seen to be the “initiators” of sexual offences involving young women. Some further articulation of the linkages that you see here, or the elimination of these kinds of assertions, seems in order.

In addition to reiterating the issues raised previously regarding the lack of context with respect to correctional programming, we would also like to underscore the fact that particularly in areas such as “anger and emotions management”, it is our view that the mere suppression of anger, without any attempt to address the sources of it, will likely not result in long term growth or assistance to women. We encourage you to instead think about the legitimacy of encouraging women to focus their frustrations and anger on such vital activities as self-organizing and developing linkages with community based social justice and advocacy groups in order to provide personal support, as well as opportunities for them to actually address the very real issues that exist for them and countless other women who are struggling to survive in the community.

With respect to your discussion of mental health programs in the strategy, we wish to commend you for articulating that there are systemic factors that contribute to the increased criminalization of women with mental and/or cognitive disabilities. We encourage you to further expand the understanding of members of the Correctional Service of Canada by ensuring that these contextual factors are fundamental to the development and underpinning of any strategies and policies developed in relation to mental health programs and services for women serving federal prison sentences.

With respect to the types of programs and services offered to those women who have been sexually abused and experience trauma in their lives, we are extremely troubled to once again see the allusion to any form of linkage between the past and current victimization and “criminogenic needs” of women. Moreover, we consider absurd the suggestion that additional research is required to substantiate this assertion.

We are loathe to even address this issue once again, as we see it as uncontrovertibly that, if in fact misogynist victimization of women led to women becoming more violent, then given the level of victimization experienced by women and girls in the general population, a fact that is reinforced in your document, presumably we would be experiencing mayhem in our streets at the expense of retaliating women and girls. We urge you to immediately remove all such characterizations and faulty conclusions from this and other CSC documentation.

We are also interested in receiving the names and contact information of the “recognized experts in the community” who are offering group and individual counseling for women in each of the regional prisons. We would also like information regarding the number of contacts that each federally sentenced woman may have with externally contracted support, the length and frequency of such contacts, and any other conditions that may apply to the availability of such support services to women prisoners.

With respect to the dialectical behaviour therapy (DBT) that is provided for women in federal prisons, we are surprised that the section dealing with this makes no mention of and therefore does not attempt to address the very real and important critiques and concerns that have been raised by federally sentenced women, academics and ourselves regarding the applicability of this approach to women in prison. Moreover, we are especially concerned about the ongoing absence of any focus on the community realities and lack of supports, et cetera that women face upon release from prison. This deficiency is compounded by the fact that women have very little choice as to whether they actually participate in this programming, and the tendency that this sort of approach has had to induce, create or increase dependencies that women may have on available authority figures. We are extremely concerned about all of the foregoing contributing to an increased inability of women to actually sustain themselves once they are released to the community.

It is also our view that DBT exposes very clearly the tyranny that is possible when ultimate power and control is cloaked in benevolent language and professed intent, absent real resourcing and addressing of concrete needs. We do not wish to suggest that the CSC staff consciously intend to induce dependence, but the very nature of imprisonment is such that it directly interferes with and impairs the ability of individual women to survive the sorts of untenable situations to which they may be forced to return upon their release from prison.

We are extremely concerned that DBT is even offered in a prison setting; more so that DBT involvement is characterized as voluntary. DBT induces reliance upon a program approach and seemingly operates in a manner that presumes ongoing institutional and professional support. In addition to questioning the overall utility of DBT as a means of assisting women to integrate into the community, when other more basic supports are

prerequisite, it is our view that it is ethically and morally inappropriate to be training parole officers and other community based staff to deliver DBT, as the dependency it induces on such staff is more likely to perpetuate, rather than address, any challenges to their reintegration potential.

Women who are encouraged to abandon previous survival strategies in favour of new “thinking” strategies, may in fact be set up to not only fail miserably at surviving upon release into the community, but they may also be encouraged to feel worse about their inability to survive, absent any contextual analysis of the social and economic realities they face. As such, we encourage CSC to thoroughly and critically examine the extent to which many of the approaches are actually assisting and promoting community integration.

Albeit from an economical perspective, it is clear that the Auditor General had similar concerns regarding the lack of effectiveness of interventions that are currently provided for federally sentenced women. CAEFS and other groups continue to reiterate the primacy of the need for much more concrete and long lasting practical interventions to assist women in meeting their basic needs, particularly those related to accommodation, employment, training/education and personal supports, as a prerequisite to other more psycho-social and behavioural types of interventions.

In the section dealing with education and employment programs, the notion that CSC must be involved in fixing women in order to improve their “social reassertion potential” is problematic because it presumes that women control their life circumstances. Indeed, comments such as the reference on page 14 of the strategy to women demonstrating “dependence on welfare, alcohol and men” reinforces the notion that CSC judges them as ultimately responsible for the circumstances within which they find themselves prior to incarceration.

The presumption that inadequate welfare, unemployment, mental health and other health services, educational and vocational opportunities, et cetera, are in any manner within the control of women prisoners, or other members of vulnerable groups for that matter, is ludicrous at best. Worse still, it is these sorts of presumptions and judgments that also influence the manner in which staff interact with women, and which serves to reinforce the inability of CSC to understand, much less address, the very real life circumstances of the women in prison.

Many of the programs suggested are ones that many women do welcome and to which many more would enjoy having access. The reality is that for many of these women there is far too little in terms of programs and services while they are in prison. Moreover, one of the obvious questions that arise as a result of reviewing the draft strategy is the nature and extent of the programs and services that are currently available to and for women. Accordingly, we encourage you to include some identification of how often each program will be offered, for how many women and for what length of time in each of the prisons for women, for the women in general population as well as those isolated in the mental health and maximum security units. This kind of information is vital, as there are far too many examples of programs being listed in documents such as

research studies, program plans and prisoner orientation manuals which operate rarely or infrequently, for small numbers of women and for limited periods of time.

With respect to the Life Line Program in particular, we encourage you to ensure that every region has a full time woman life line worker to assist women serving life and long-term sentences. While it is clear that some of the men providing services are very well regarded by the women, women in each region have requested the opportunity to availing themselves of the support of women in-reach workers. A number of women discuss the fact that their needs are secondary to those of the men in the Atlantic and Prairies regions in particular, where there are currently no women life line workers. As such, we encourage you to ensure that women in-reach workers are available to all federally sentenced women serving long sentences, regardless of in which region they are imprisoned. We also advise that it is our view that a separate management process needs to exist for women life line workers, as their issues and concerns are too often subsumed by those of their male counter parts when discussions move to the national level.

Part 3 – Aboriginal Programs

The introductory section to Part 3 is mislabeled “context”.. In fact, the introduction to this section appears to be aimed at obfuscation and clouding of the very real and significant reality of the clear over-representation of Aboriginal women in the federal prison system. Although this is a program strategy for women, the statistics blend general population data regarding Aboriginal men and women. While this may result in a statistical snapshot that might appear more favourable to CSC, we think it is vitally important that the very real over-representation of women be directly and concretely articulated in this section. Aboriginal women represent 1-2% of the general population in Canada. Yet, CSC’s own data shows that Aboriginal women represent 29-30% of the federal women in prison and the majority of women classified as maximum security prisoners. These realities are not only accurate, but inescapable, in terms of the magnitude and implications for CSC.

While we continue to applaud any and all opportunities to ensure that services and approaches are provided for Aboriginal women, and particularly want to mention the positive manner in which women have reacted to the “Sprit of a Warrior” program, we also want to reiterate that the appropriate place to commence in terms of developing programs for Aboriginal women prisoners, is with the Aboriginal women prisoners themselves. Far too many examples abound of Aboriginal women requesting supports and interventions without having their needs met.

Is our view that the need is urgent and that it is not one that CSC is equipped to address. Accordingly, we consider it vital that processes be put in place to acknowledge and honour the natural leadership of imprisoned Aboriginal women. Furthermore, it is necessary that they be supported with advisors they choose to work with from their communities, including equality-seeking Aboriginal and social justice organizations, in order to ensure the immediate development of services, support and accountability frameworks that actually assist Aboriginal women in developing skills to address the

social, economic, racial and other inequalities that they face both within prison and upon release into the community.

Part 4 – Community Programming

CAEFS supports any and all efforts to enhance the provisions of services to women exiting prison. We are extremely concerned, however, about the reality that there are virtually no community resources in some areas of the country and very limited resources overall for women, much less women exiting prison. Again, we wish to reiterate that resources would be much better spent if they were allocated according to the constellation of needs that CSC assesses or determines exist for each woman, so that each woman may develop and avail herself of the very individualized practical services and supports which she desires and requires in order to successfully integrate into her community of choice.

With respect, it is our view that many of the current institutional programs as well as many of those replicated in the community, particularly in the context of the economies of scale that you have outlined in your document, are unlikely to result in very favourable results in terms of human or fiscal success. The Auditor General’s report focused upon the fiscal deficiencies of current approaches. CAEFS is most concerned about the human costs of perpetuating current inadequacies. Accordingly, we encourage you to re-examine this entire area in order to evaluate the manner in which too many community programs have been conceived and the manner in which they will be developed and delivered in the future.

In fact, rather than slavish adherence to the current “program approach”, CAEFS favours a more individualized and self-directed approach, whereby resources are allocated in direct proportion and relation to the needs identified by federally sentenced women and corrections. Such a model would not only increase the investment of federally sentenced women themselves in the services with which they engage, as they would be directing the application of resources to assist themselves, it would also be likely to increase CSC’s record in terms of human and fiscal reintegration success, a reality that would no doubt be of interest to the Auditor General and equality-seeking groups, as well as federally sentenced women and the Correctional Service of Canada as a whole.

Part 5 – Program Evaluation

CAEFS is in absolute agreement that program evaluation is an essential and necessary component of any correctional program strategy of women. We are extremely concerned, however, that program development and evaluation is not predicated upon the involvement and direction of the women for whom the services are being developed. In addition, we encourage you to ensure that the primacy of the *Canadian Charter of Rights and Freedoms*, the *Canadian Human Rights Act*, and the *Corrections and Conditional Release Act* are recognized in ensuring the adequacy and appropriateness of all programs and services developed for women prisoners.

We are also extremely concerned to see the reference at the end of the program strategy to “program accreditation”. Pursuant to the recommendations of national and

international government, nongovernmental, academic and research experts, in January 1999, CSC agreed that the accreditation model being developed by the Correctional Service of Canada for men's programs would not apply to women's programs. While it is well recognized that there is a need to ensure that programs are based on sound principles, beliefs and approaches, it was also agreed that the accreditation process developed by the CSC would not be adequate or appropriate as a means of assessing and evaluating the programs being developed and implemented for federally sentenced women.

Accordingly, we have many questions as to how the accreditation process has managed to now creep in to, and apparently overrun, the results of the 1999 meeting. Please advise us as to when and why CSC decided to incorporate federally sentenced women's programs into the accreditation process. We also request details as to who the experts are who are forming the review panels, as well as who the "internationally recognized experts in the field" are who are assessing the programs and services that are being offered for federally sentenced women. Moreover, we encourage you to provide this information at your earliest convenience, as this is a significant and marked departure from previously articulated policies and practices.

Finally, we are interested in receiving an update regarding the manner in which you see the proposed program strategy enlivening and ensuring the implementation of the legal obligations outlined in the *Canadian Charter of Rights and Freedoms*, the *Canadian Human Rights Act* and the *Corrections and Conditional Release Act*, as well as the manner in which you see this strategy actually embodying the principles of *Creating Choices*. It is our view that, although there is reference made to the foregoing, there is precious little evidence of substantive understanding or practical application of these legislative and policy frameworks.

As always, we remain committed to working with you to develop the best possible interventions that are consistent with the earliest return and integration of women prisoners into the community. We encourage you to avail yourself of the expertise that has been offered to you by our organization and other equality-seeking national and international groups to assist you in developing a more complete and comprehensive intervention and accountability framework for federally sentenced women. We are also interested in your involvement in our work as we continue our efforts to address the factors contributing to the increased criminalization of women and girls in Canada.

Thank you once again for seeking our input regarding the work of the Correctional Service of Canada vis-à-vis criminalized women subject to federal sentences. We also thank you in advance for forwarding the materials that we have requested above. Please advise us if you anticipate that there will be any delay in the receipt of this information. We look forward to hearing from you soon.

Sincerely,

Kim Pate
Executive Director