

# AGENTS FOR CHANGE

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Agents for Change  
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Battered Women's Legal  
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## Conceal & Carry Law Declared Unconstitutional

In a decision issued on July 13, 2004, Ramsey County District Court Judge John Finley struck down Minnesota's "conceal and carry" law. In *Unity Church of St. Paul, et. al, v. State of Minnesota*, the court held that the Minnesota Citizens Personal Protection Act violates Article 4, Section 17 of the Minnesota Constitution, which requires that laws embrace only one subject.

In order to get the conceal and carry law passed, its supporters utilized a strategy known as "bundling" or "logrolling." In April of 2003, House members tacked the conceal and carry bill (House File No. 261, the Boudreau Amendment) onto an unrelated, uncontroversial Senate file – a Department of Natural Resources technical bill (Senate File No. 842) – to prevent it from being defeated in Senate committee. The bill went back to the Senate, where it passed by a vote of 37-30 without any committee hearings, and was then signed into law by Governor Pawlenty.

The conceal and carry law was not the only bill passed last session utilizing the bundling tactic; an abortion bill dubbed the "Woman's Right to Know" law was passed using a similar strategy. House members who supported a 24-hour abortion waiting period amended the legislation onto a bill regulating circuses around the time of the State Fair. They then deleted the content about circus regulation, leaving only the restriction on abortion, and sent the bill to the Senate, where it passed and was signed by the governor.

Judge Finley's ruling is raising many questions about the constitutionality of other "bundled" legislation, namely, the "Woman's Right to Know" law. However, others say that the conceal and carry law was an extreme case and the decision is unlikely to result in the repeal of other Minnesota laws. The full impact of the *Unity Church* decision remains to be seen. The decision could end up before the Minnesota Supreme Court, which has ruled on the question of single-subject legislation many times, most recently in 2000, when it invalidated a Minnesota law that included both a tax bill and a prevailing wage amendment as unconstitutional. See *Associated Builders v. Ventura*, 610 N.W.2d 293 (Minn. 2000). The Court has frequently asserted its authority to sever statutes which embrace more than a single subject, and may do so again if asked to rule on the district court's decision in *Unity Church of St. Paul v. State of Minnesota*.

## Upcoming Events at BWLAP

- **Aug. 16** — DV and Homelessness in Moorhead with MCH.
- **Aug. 24** — DV and Homelessness in Mankato with MCH.
- **Aug. 25** — DV and Homelessness in St. Cloud with MCH.
- **Sep. 9-10** — New Laws Carlton hosted by Rural Women's Advocates.
- **Sep. 13-14** — New Laws Crookston hosted by Migrant Health Services.
- **Sep. 16-17** — New Laws Fergus Falls hosted by Someplace Safe.
- **Sep. 20-21** — New Laws Princeton hosted by Pearl.
- **Sep. 23-24** — New Laws Metro hosted by OutFront MN.
- **Sep. 27-28** — New Laws Windom hosted by SW Crisis Center.

## Plan Ahead for New Laws Training Series!

New Laws is an annual training held by BWLAP to update advocates and others about laws affecting battered women. Each year BWLAP holds the training in six locations throughout the state – two in the North, two in the South, one in the metro area, and one in central Minnesota. While the trainings are geared towards domestic violence advocates, anyone is welcome to attend.

New Laws includes updates on state, federal, and tribal law, case law, candidate forums, and special focus sessions; this year's special focus topic is Housing and Homelessness.

You can find the registration form on our website at [www.bwlap.org](http://www.bwlap.org). Click on "New Laws 2004" and you'll be taken to the information page. From there, click on "New Laws Registration" and you'll find the fill-in form that you can print and mail to us. Please register at least one week before the training so that we can arrange for enough food and materials!

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### New Resources Available on our Website

Technical Assistance Packet: "A Battered Woman Tenant's Right to Call 911"

Under Minnesota Statutes Section 504B.205, it is illegal for landlords to penalize or retaliate against crime victims for calling 911 or other emergency assistance in response to domestic abuse (or any other conduct). Local ordinances which require eviction or penalize a landlord in response to tenant calls for police or emergency assistance are preempted. If a landlord violates this law, a tenant may bring a civil action for the greater of \$250 or actual damages, and reasonable attorney fees. This Technical Assistance Packet (TAP) contains information about the rights of battered women tenants to call 911 without retaliation or penalty from their landlords. With the TAP come copies of the relevant Minnesota Statutes and forms for tenants to use in court.

Technical Assistance Packet (in Spanish): "Battered Women traveling Outside the US with their minor children"

(Documentos que una mujer maltratada necesita para viajar fuera de los EEUU con sus hijos menores de edad.)

This packet was done to provide in Spanish an overview on Minnesota family law institutes like custody, parental time, termination of parental rights, paternity, adjudication, kidnapping, etc. to legal advocates serving Latino battered women with children in Minnesota. With the purpose of discussing which documents a women traveling outside the US with her minor children need, the packet analyzes the above mentioned institutes giving legal information about definitions, requirements, stipulations, procedures, etc about the above mentioned family law institutes.

FAQ: New Questions & Answers about Unadjudicated Fathers & OFPs, Abusers getting released from incarceration, Abusers and guns.

### Immigration Corner

Raul Yzaguirre, National Council of La Raza said: "Matriculas make communities safer because they facilitate easier access to financial services, which deters crimes and predatory schemes against immigrants, who are more vulnerable not only because they are more likely to have cash on hand to pay for daily needs, but because they are less likely to report crimes to police."

## *Punto de Vista Latino*

Hoy queremos tratar un tema que nos parece de vital importancia para la comunidad Latina: como protegernos ante las autoridades de inmigración, en otras palabras, cuales son nuestros derechos cuando un oficial de inmigración se presenta, ya sea en nuestro hogar o en nuestro lugar de trabajo.

1. Que podemos hacer si un oficial de inmigración desea entrar a nuestro hogar:

- Lo primero que debemos saber es que ningún oficial o autoridad de cualquier tipo puede entrar a nuestro hogar si no tiene un permiso escrito emitido por un juez o magistrado competente, esto es lo que se llama “warrant” en inglés o, para el caso de que no tenga permiso, si no ha obtenido nuestro consentimiento.
- Por lo tanto, si algún oficial o autoridad toca a nuestra puerta y pide que lo autoricemos a entrar lo primero que debemos hacer es preguntar quien es y con que agencia trabaja. No debemos abrir la puerta sin antes preguntar.
- Si el oficial contesta que trabaja con el Departamento de Homeland Security o con US Immigration and Customs Enforcement, igualmente no debemos abrir la puerta. Debemos pedirle que nos muestre si tiene un permiso judicial, esto es un “warrant” y si lo tiene que lo pase por debajo de la puerta.
- Si no tiene permiso debemos decir que no abriremos la puerta, que se retire y que vuelva con un permiso.
- Si tiene permiso y lo pasa por debajo de la puerta, debemos examinarlo cuidadosamente, sobre todo cotejar que el nombre y la dirección sean correctos y que luzca una firma y un sello que nos parezcan auténticos. Cuidado con esto, muchas veces pueden tener un permiso para otra persona en otra dirección y con el nerviosismo del momento no controlamos esos datos. Otra cosa a tener en cuenta acá es que los permisos o “warrants” pueden ser de arresto o de revisión de la casa, o en algunos casos de ambas cosas. En los casos de inmigración lo más frecuente es que el permiso sea de arresto.
- Recién luego de revisar el permiso y evaluar su validez, si entendemos que es válido y correcto debemos salir y hablar con el oficial. Es importante saber que aún en el caso de que el permiso sea válido, si éste es sólo un permiso de arresto y no un permiso para revisar la casa no tenemos por qué dejar que el oficial entre a nuestro

hogar. En nuestra casa pueden haber familiares o amigos que pueden ser interrogados por el oficial una vez que está dentro de nuestra casa.

- Debe ser muy clara nuestra actitud en cuanto a no dejar entrar el oficial a la casa. El puede pedir que le franqueemos el paso y si nosotros le decimos que si, esto puede significar un consenso y en ese caso el oficial estaría entrando legalmente.
2. Que podemos hacer si un oficial nos interroga:
- Si un oficial nos interroga tenemos derecho a no contestar sin la presencia de nuestro abogado. Frente a las preguntas tenemos derecho a responder: “Antes de responder cualquier pregunta deseo hablar con un abogado/a.”
  - Tampoco debemos firmar ningún papel o documento sin antes hablar con un abogado.
  - Es nuestro derecho también no mostrar ni entregar ningún documento o identificación al oficial sin antes hablar con un abogado.
3. Que podemos hacer si un oficial de inmigración viene a nuestro lugar de trabajo:
- Tenemos el derecho a permanecer callados. No debemos dar ni siquiera nuestro nombre. Por vivir en los Estados Unidos tenemos el derecho a no hablar sin antes haber tenido la oportunidad de consultar con un abogado.
  - Tenemos el derecho a no exhibir ni entregar ningún documento y por supuesto no contestar ninguna pregunta sobre nuestro estatus migratorio. Nuestra respuesta debe ser sencilla: “Quiero tener un abogado”
  - Si pertenecemos a una unión de trabajadores podemos tener algunos otros derechos y es necesario que averigüemos. Algunos empresarios tienen firmados acuerdos con la unión en los cuales puede haber estipulaciones para proteger a sus empleados de cualquier investigación o requisita de inmigración. Por ejemplo el empleador puede haber acordado no revelar nombres o domicilios de sus empleados a inmigración.
  - El empleador o la unión pueden haber acordado contratar abogados para la defensa de sus empleados. El empleador puede haber acordado contactar inmediatamente a la unión y comunicarle sobre cualquier investigación o pedido de informes de inmigración.
- Nota: Extractado de NILC en [www.nilc.com](http://www.nilc.com)

## Case Law Update: *Hageman v. Stanek*

### Men's Rights Groups Fail in Their Second Attempt to Get Funding for Battered Women's Programs Declared Unconstitutional

In *Hageman v. Stanek*, A03-2045 (Minn. Ct. App. July 13, 2001) the Minnesota Court of Appeals struck down an appeal by men's rights activists which sought to have funding for battered women's programs in Minnesota declared unconstitutional. The appellants challenged the district court's dismissal of their suit, which alleged that Minnesota Statutes §§ 611A.31-.375 (providing for grants of state funds to programs that offer services to victims of domestic abuse) are unconstitutional on equal protection grounds. The appellants asserted that the statutes violate both the state and federal equal protection clauses because they provide no funding or services for male victims of domestic abuse and therefore discriminate on the basis of sex. The district court dismissed the action, holding that appellants lacked standing to bring the claim and that the complaint failed to state a claim under 42 U.S.C. § 1983. The Court of Appeals upheld the dismissal of the action, holding that the appellants lacked standing and therefore the court did not have jurisdiction to hear the matter.

The appellants asserted that they had standing to challenge the statutes based on their status as residents and taxpayers of the state of Minnesota. They did not claim that they had personally sought domestic abuse services and been denied those services based on their gender, nor did they claim to know any individual who had been denied domestic abuse services on the basis of gender. The Court of Appeals rejected appellants' claimed standing as taxpayers, holding that taxpayer status, without evidence of actual injury or an immediate threat of actual injury, is an insufficient basis for challenging the constitutionality of a state statute. The court declined to open the door to unrestricted taxpayer standing, stating that "[t]his would allow any individual taxpayer to challenge any Minnesota statute providing for the expenditure of state funds, without showing that any person had been injured, or that the taxpayer's interest is different than that of citizens generally ... this would constitute an unwarranted intrusion on the authority of the legislature."

The same plaintiffs brought similar claims in a federal lawsuit four years ago, hoping to set a precedent for having the Violence Against Women Act (VAWA) declared unconstitutional. That case, *Booth v. Hvas*, was dismissed for lack of standing by the federal district court and the dismissal was affirmed by the Eight Circuit on appeal. It is likely that the plaintiffs in *Hageman* will appeal this decision to the Minnesota Supreme Court. However, as in *Booth v. Hvas*, it is unlikely that they will succeed.

Kudos should go to Professor Beverly Balos of the University of Minnesota, The Domestic Abuse Project and other respondent advocacy organizations for their victory in securing an appellate ruling dismissing the plaintiffs' claims in *Hageman v. Stanek*. At a time when state funding for battered women's programs is becoming increasingly scarce, efforts to ward off legal challenges to the funds that are being allocated are extremely important to the viability of services for domestic abuse victims in Minnesota. The *Hageman* opinion is available at: <http://www.courts.state.mn.us/opinions/coa/current/opa032045-0713.htm>.

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### Domestic Violence and Homelessness

Designed to benefit a wide range of service providers, the training will include best practices; barriers and potential solutions; available resources in that area; and a brainstorming session concentrating on what service providers can do to better serve their clients within their region, what policies need to be changed, and what MCH can do for that region on the statewide level. Presentations will focus on Corrections, Mental Health, Domestic Violence, and Foster Care. The registration fee is \$20 and includes lunch. For further information or to register, please contact Katie Viner at the MN Coalition for the Homeless, 612-870-7073 or [mchkatie@yahoo.com](mailto:mchkatie@yahoo.com)



## Case Law Update: *State v. McCoy*

### MN Supreme Court Holds that Evidence of Similar Conduct by the Accused Against a Victim of Domestic Abuse May be Admitted Without First Being Established by Clear and Convincing Evidence

On July 1, 2004, the Minnesota Supreme Court issued its decision in *State v. McCoy*, holding that evidence of past abusive conduct by the accused against a victim of domestic abuse may be admitted under Minn. Stat. § 634.20 without first being established by clear and convincing evidence. In so doing, the Court concluded that in enacting Section 634.20, the legislature intended for evidence of past domestic abuse to be admitted against the accused in a domestic assault case if established by a preponderance of the evidence, rather than the higher clear and convincing standard governing admission of prior acts evidence under Rule 404(b) of the Minnesota Rules of Evidence.

The Minnesota Supreme Court reversed the Minnesota Court of Appeals prior ruling, which had held that the district court erred in admitting evidence of similar prior conduct without first determining whether it had been proven by clear and convincing evidence. The court of appeals concluded that the legislature did not intend for the statute to alter the clear and convincing evidence requirement for the admission of prior bad acts under Rule 404(b), and since it could not determine whether evidence of the prior incident of domestic abuse offered by the prosecution satisfied the clear and convincing standard, the defendant's conviction for domestic assault had to be reversed. (At trial, the prosecution attempted to introduce evidence of a prior domestic assault by the defendant against his wife through her testimony; however, when questioned, the defendant's wife denied any recollection of past abuse and testified that she did not remember telling the police or hospital staff that her husband had beaten her. The prosecution did not attempt to admit the police report or her medical records, but argued in closing that the wife's testimony was not credible. Therefore, as the Supreme Court decision notes, no evidence of similar prior conduct was admitted.)

*McCoy* is a significant victory for battered women's legal advocates in that the Court's decision highlights the ways in which domestic assault prosecutions differ from other types of criminal proceedings, and thus, why they may be subject to different evidentiary standards. The opinion notes that evidence of past abuse between the parties in domestic assault cases is conceptually distinct from "prior bad acts" evidence (known as *Spreigl* evidence in Minnesota), which is typically evidence of an unrelated crime against a person other than the victim, offered for the limited purposes enumerated in Rule 404(b), such as to show identity, opportunity, intent, or motive. In contrast, in domestic abuse prosecutions, similar conduct evidence involves evidence of prior abuse by the accused against the victim, which forms part of a sustained pattern of power and control. The latter type of evidence "illuminates the history of the relationship between an accused and a victim." As the Court explains: "Domestic abuse is unique in that it typically occurs in the privacy of the home, it frequently involves a pattern of activity that may escalate over time, and it is often underreported. Domestic abusers often exert control over their victims, which undermines the ability of the criminal justice system to prosecute cases effectively." (citations omitted). Because fear of the abuser's retaliation leads many battered women to recant allegations of abuse when the case goes to trial, and eyewitness testimony of the abuse is often lacking, the prosecution should be allowed to present evidence of prior acts of domestic abuse by the accused without having to first satisfy a heightened evidentiary standard. The *McCoy* opinion is available at: <http://www.courts.state.mn.us/opinions/sc/current/opc021788-0701.htm>

CHECK OUT OUR WEBSITE!

[www.bwlap.org](http://www.bwlap.org)

## Elder Abuse

- \* The National Crime Victimization Survey reports that the rate of violent crime victimization of persons ages 65 or older was about 4 per 1,000 (Bureau of Justice Statistics, 2001).
- \* Persons ages 65 or older numbered 34.5 million in 1999, about 13% of the U.S. population (Administration on Aging, 2000).
- \* The National Elder Abuse Incident Study reports that an estimated total of 551,011 elderly persons, aged 60 and over experienced abuse, neglect, and/or self-neglect in domestic settings in 1996 (National Center on Elder Abuse, 1998).
- \* The most frequent forms of elder abuse reported to adult protective service agencies included neglect (48.7%), emotional/ psychological abuse (35.4%), financial/ material exploitation (30.2%), physical abuse (25.6%), and abandonment (3.5%) (Ibid).
- \* Adult children are the largest perpetrators of elder abuse (47.3%), followed by spouses (19.3%), other relatives (8.8%), and grandchildren (8.6%) (Ibid).

### Background

According to the Attorney General's Family Violence Task Force, references to elder abuse can be traced throughout Greek mythology, the writings of Shakespeare and modern literature. Yet, it has only been in the last twenty years that serious attention has been given to family violence and elder abuse. Perhaps, at least in part, this elevated consciousness can be attributed to the increasing numbers of aging Americans (Commonwealth of Pennsylvania, 1988). An important step towards recognizing elder abuse occurred in 1978 when Suzanne Steinmetz presented her research on the abuse of the elderly to the Congressional Subcommittee hearings on domestic violence. Her testimony prompted the House Select Committee on Aging, chaired by the late U.S. Representative Claude Pepper, to further examine the mistreatment of the elderly. The "Pepper Committee" subsequently introduced the term "elder abuse," and alerted the nation to the widespread severity of this problem (Commonwealth of Pennsylvania, 1988).

### Overview

The effects of the baby boom and increased life expectancy have both contributed to the immediate and projected increase in the number of elderly Americans. Medical advances and the implementation of "protective legislation" have greatly increased the length of life for many Americans (Griffin and Williams, p. 19, 1992). Yet, other simultaneous societal changes may have contributed to the predisposition of some individuals to become abusive towards the elderly. In previous generations extended family members could share the responsibility of caring for the aging. However, increased mobility, strained economic times and smaller nuclear families have limited familial resources. Currently, the responsibility of elder care usually falls on a select few (Griffin and Williams, p. 20, 1992). The definitions and statistics regarding elder abuse vary. They range from estimates that one out of ten persons living with a family member is subject to abuse—approximately 2.5 million a year (Griffin and Williams, p. 20, 1992)—to 1 in 25 elderly persons being victimized annually (Heisler, 1991). Still others conclude that 3.6 percent of our nation's elderly citizens are victims of abuse each year (Commonwealth of Pennsylvania, 1988). Most researchers agree that the abuse of the elderly fall within the five following categories: physical abuse, sexual abuse, psychological abuse, financial abuse and neglect.

### Physical Abuse

"Non-accidental physical force that results in injury" (Commonwealth of Pennsylvania, 1988). Indicators of physical abuse:

- \* fractures and dislocations;
- \* lacerations and abrasions;
- \* burns;
- \* injuries to the head, scalp, face; and/or
- \* bruises—on upper arms (from shaking), around wrists or ankles (from being tied down), in shapes similar to objects, inside of thighs or arms (Bloom, p. 41, 1989).

Physical frailty, decreased physical ability, and vision and audio impairments make older persons especially susceptible to physical abuse (NOVA, 1985).

### Sexual Abuse

"Non-consensual sexual contact" (Commonwealth of Pennsylvania, 1988). Indicators of sexual abuse:

- \* sexually transmitted diseases; and/or
- \* pain, itching, bleeding or bruising in the genital area.

As elderly victims are less physically able, often all that is needed to subdue them during a sexual assault is intimidation by physical force (Muram, Miller and Cutler, 1992).

### Psychological Abuse

“Infliction of mental anguish by threat, intimidation, humiliation, or other such conduct” (Commonwealth of Pennsylvania, 1988). Indicators of psychological abuse:

- \* low self-esteem;
- \* overly anxious or withdrawn;
- \* extreme changes in mood;
- \* depression;
- \* suicidal behavior; and/or
- \* confusion or disorientation (Bloom, p. 41, 1989).

Diminished ability to cope with stress, termed a “decrease in homeostatic capacity,” as well as the state of “chronic loss” that often accompanies aging (i.e., loss of one’s home, peers, spouse, etc.), renders elders susceptible for psychological abuse (NOVA, 1985).

### Financial Abuse

“Unauthorized use of funds or property” (Commonwealth of Pennsylvania, 1988).

Financial abuse or exploitation involves the theft or conversion of money or property belonging to an elder, accomplished by force, misrepresentation, or other illegal means often by taking advantage of the elder’s partial or total lack of legal competency (Hyman, p. 6, 1990). The loss of what may appear to be a minimal amount of money to some may account for a substantial loss for an elder person. It may result in the elder having to go without food, medication, or possibly his or her apartment.

### Neglect

“Failure to fulfill a caretaking obligation” (Commonwealth of Pennsylvania, 1988). Indicators of neglect:

- \* poor personal hygiene;
- \* signs of over-medication, under-medication, and/or misuse of medication (Bloom, p. 42, 1989);
- \* incontinent elder dressed in soiled clothing;
- \* elder left alone and deprived of stimulation and affection (Skeates and Douglas, 1990); and/or
- \* malnutrition (Bloom, p. 42, 1989).

The different types of neglect include the following:

- \* *Active Neglect*: willful failure to provide care.
- \* *Passive Neglect*: inadequate knowledge or infirmity of caretaker, resulting in non-willful failure to provide care.
- \* *Self-neglect*: failure of elder to care for her or himself (Commonwealth of Pennsylvania, 1988).

In addition to the abuse that elderly persons are subject to by relatives and/or caretakers in their homes or in institutions, they may also become targets for criminal victimization. Contrary to popular assumptions that elderly citizens are disproportionately victims of crime as a result of their physical limitations, in reality, they are the least victimized age group. Yet, further examination does reveal that elderly persons may be subject to more severe crimes, and that they are more fearful of crime; thus the consequences of victimization are often more detrimental (Commonwealth of Pennsylvania, 1988). The low victimization rate for elderly persons may be explained by their lifestyles, which limit the amount of time they spend out in the evening and their contact with likely offenders. However, this does not safeguard them from becoming victims of serious crimes. Research indicates that personal larceny with contact (pocket-picking, purse snatching), a significant and dangerous crime as it involves both theft and personal contact, is the most common crime against elderly Americans. Robbery, inclusive of both theft and assault, is second in frequency. In addition, the following are further aspects that characterize the severity of crimes against the elderly:

- \* Elders are twice as likely as younger persons to be victimized in or near their homes.
- \* Elders are more often victimized by offenders with weapons, including firearms.
- \* Elders are more likely than younger persons to be victims of violent crime perpetrated by strangers.
- \* Elders suffer greater physical, psychological, and financial loss when victimized.
- \* Elders are more easily injured, heal more slowly, are less resilient emotionally, and are less financially stable than younger victims (Commonwealth of Pennsylvania, 1988).

As the number of aging Americans continues to increase, the abuse and victimization of the elderly will become a national problem of even greater proportion. Effective programs to detect elder abuse and to treat its victims are necessary and should be established in every community.

(from The National Center for Victims of Crime at [www.ncvc.org](http://www.ncvc.org))

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BWLAP is a Minnesota-based, statewide, non-profit organization that provides legal information, consultation, training, litigation and legal resource support, and policy development assistance to battered women and to criminal justice, legal, and social service systems.

Questions or Comments? E-mail us: [staff@bwlap.org](mailto:staff@bwlap.org)

## MARK YOUR CALENDARS!

Tuesday, August 17, 2004

### Board of Trustees Meeting

Re: Strategic Planning

2 - 4 p.m.

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★ Would you like to serve on ★  
★ BWLAP's Board? ★  
★ We are taking applications. If you are ★  
★ interested, please e-mail: ★  
★ [staff@bwlap.org](mailto:staff@bwlap.org) ★  
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It is only with the help of our funders that we may help others. *Thank you!*