

# Clearinghouse REVIEW

July–August 2008  
Volume 42, Numbers 3–4

Journal of  
Poverty Law  
and Policy



## Use Contract Law to Enforce Third-Party Beneficiary Claims Against Vendors and Agencies

### MORE:

Displaced Workers and  
Trade Adjustment Assistance

Technological Barriers to  
Public Benefits Administration

*Buckhannon* on When  
a Party Prevails

Best Practices for Public  
Housing Agencies

A Human Rights Strategy  
to Eliminate Discrimination  
Against Women

Massachusetts'  
Health Care Reform

Race-Conscious  
Community Lawyering

Ending Poverty and  
Reducing Inequality

**AND A NEW COLUMN:**  
Ethics and Legal Aid



Sargent Shriver National Center on Poverty Law



## Race-Conscious Community Lawyering

# Practicing Outside the Box

By Tammi Wong

**Tammi Wong**  
*Volunteer Attorney*

Legal Services of Northern California  
515 12th St.  
Sacramento, CA 95814  
916.551.2150  
tammi.wong@gmail.com

**T**he growing cultural diversity throughout the country is leading to the forced integration of cultural, social, and political mores between people and systems in the United States. Over time the interaction of cultural differences will result, I hope, in a more tolerant and aware society. However, the newly emerging multiracial communities in states other than California and New York lead to a tension between cultural isolation and acculturation and assimilation.<sup>1</sup> This tension comes from adjustment by new population groups to the structure of American society and is found not only between ethnic and racial population groups but also within ethnic population groups themselves. Nonnative arrivals struggle in adapting to a sudden upheaval of norms: structural, cultural, social, and political. Public interest advocates can decrease the burden placed on newly arrived population groups to adapt to American society. We can also create awareness about our society's obligation to incorporate values and practices of diverse population groups into our own systems and decision making. Here I describe community lawyering as a strategy to develop cultural competence between our client population and the systems with which our clients interact by providing them with the tools and resources necessary to establish a presence in their communities. Citing the Sacramento Hmong Mediation Council as an example, I discuss some community-lawyering principles that can apply to any racial or ethnic population for whom we provide advocacy.

<sup>1</sup>WISCONSIN DEPARTMENT OF WORKFORCE DEVELOPMENT, MIGRANT, REFUGEE AND LABOR SERVICES, WISCONSIN REFUGEE POPULATION CHART (2006), [http://dwd.wisconsin.gov/migrantsandrefugees/pdf\\_files/proj06arrivals.pdf](http://dwd.wisconsin.gov/migrantsandrefugees/pdf_files/proj06arrivals.pdf) (from 2004 to 2005 a total of 3,118 Hmong refugees resettled in Wisconsin); Minnesota Council of Nonprofits, Hmong Refugee Resettlement, [www.mncn.org/hmongbriefing.htm](http://www.mncn.org/hmongbriefing.htm) (last visited April 26, 2008) (about 45,000 Hmong people lived in Minnesota in 2003).

## Background

Historically, Hmong people experienced persecution by the Chinese, French, and Communist government of Laos.<sup>2</sup> They most recently became refugees after serving for the U.S. Central Intelligence Agency in the Vietnam War and were forced to flee their native country of Laos to avoid persecution by the Vietnamese and Laotian governments. The migration from Laos, to Thai refugee camps, to life in the United States since 1975 has been traumatic for many Hmong.<sup>3</sup> The multi-stage resettlement and geographic shift to the United States created tension between young and old, between men and women, and among clans.<sup>4</sup> The trauma is compounded by the forced interaction among Hmong people, law enforcement, social services, and the American courts.<sup>5</sup> The Hmong community gains its strength from culture, but the community began to break down in America as the Hmong were no longer isolated from other population groups and systems as they were in Laos or Thailand.

One method the Hmong community concluded could help acculturate its members to American structures, but simultaneously maintain its culture, was to incorporate Western legal and cultural principles into their cultural dispute resolution system. The traditional model of Hmong dispute resolution is embedded in the clan-based structure of the community. The system includes family elders, clan elders, and council elders. Family and clan elders function as negotiators who listen and attempt to resolve

a variety of intra- and interclan disputes. For more complex disputes or interclan disputes, a council representing each of the clans gathers to determine how to resolve the problem. Much like the role of the judge in American courts, the elders hear evidence and ask questions in an endeavor to seek the truth, allocate fault, and determine the resolution or punishment. As more Hmong people had contact with the American court system, they realized that they were not legally bound by the elders' decisions. The strength of the community began to break down as conflicts arose between a system that recognized cultural values but whose decisions were not legally binding and a system whose decisions were legally enforceable but not culturally competent.

## Principles of Community Lawyering

Community lawyering, as a skill, is not the natural instinct of the new public interest lawyer. With the limited practical experience we gain in law school, our expectations are often to use the traditional model of lawyering to seek justice for our clients.<sup>6</sup> This model describes our roles as litigators, negotiators of claims, and counselors to clients in their transactional or dispute resolution decision making.<sup>7</sup> In a practice that emphasizes one-on-one attorney-client relationships, the traditional direct service strategy alone creates a dependence on the attorney as the holder of the knowledge necessary to solve the problem.<sup>8</sup> The traditional methods can benefit our clients and their legal needs but may not lead to the fulfillment of many of our legal aid goals such

<sup>2</sup>Dave Moore, *A Free People: Tracing Our Hmong Roots* (2d ed. 2003).

<sup>3</sup>Stephen Magagnini, *The Leftover People: A Special Report by the Sacramento Bee*, SACRAMENTO BEE, Sept. 12, 2004, <http://dwb.sacbee.com/content/news/projects/hmong>.

<sup>4</sup>Hmong people are a relatively new ethnic population in the United States. Much of the information here about Hmong people and the impact of resettlement comes from my interaction with Hmong community members and service providers in Sacramento, California, since 2003.

<sup>5</sup>Associated Press, *Hmong Murder Shows Hate Crime Prosecution Rare*, April 30, 2007, <http://wcco.com/topstories/hate.crime.prosecution.2.367128.html> (a white-on-Hmong murder is suspected to have occurred in retaliation for a Hmong-on-white shooting); see also ANNE FADIMAN, *THE SPIRIT CATCHES YOU AND YOU FALL DOWN: A HMONG CHILD, HER AMERICAN DOCTORS, AND THE COLLISION OF TWO CULTURES* (1997) (a young Hmong girl with epilepsy is forcibly removed from her home by child protective services; her social workers and the health care system lack cultural competence).

<sup>6</sup>Stephen Wexler, *Practicing Law for Poor People*, 79 YALE LAW JOURNAL 1049 (1970).

<sup>7</sup>Ascanio Pionelli, *Appreciating Collaborative Lawyering*, 6 CLINICAL LAW REVIEW 427, 438 (2000).

<sup>8</sup>Wexler, *supra* note 6, at 1053.

as empowering our clients to identify and defeat the causes of poverty.<sup>9</sup>

The concept behind community lawyering is to develop inside the client population a sustainable knowledge base that allows the population to build foundations for opportunity from within. The attorney is a tool people can choose to use in creating their own resources for achieving equality or negotiating the systems with which poor people come into contact on a regular basis. Community lawyering has many names: collaborative lawyering, community development, client empowerment, and lay lawyering.<sup>10</sup> The common thread among them is that the clients, not the attorneys, play a central role in resolving the issues that have an impact on their opportunities to succeed.

Another critical component of community lawyering is creating cultural competence—a set of beliefs, values, and skills built into a structure that enables one to negotiate cross-cultural situations in a manner that does not force one to assimilate to the other.<sup>11</sup> Without this competence, the systems with which our clients interact will continue to exclude them from an equal opportunity to utilize the systems as they were designed to serve people in America. A lack of cultural competence is to ignore that diversity in beliefs, values, and attitudes influences how people determine their self-worth and abilities to interact within American society.<sup>12</sup> Legal aid programs are no exception to institutions that need to be culturally competent and must examine how we are providing service to communities of color.<sup>13</sup> So that groups understand how to adapt to their surroundings, cultural competence about American

structures and values must be developed within our client communities. In the case of the Hmong dispute resolution program, we would aim for the court to be cognizant of the values of the Hmong refugee community and consider them both in their personal interactions as well as their decision making. Similarly we would want the refugee community to be aware of how the law determines value and fault so that its members can access the courts for their purposes.

### Entrance into the Community

By definition, a community lawyer is part of the community. The traditional model of lawyering places the burden on the client to seek out the attorney. If the client does not make it to the attorney, the attorney does not know, or must seek out, the client. Alternatively, under the community-lawyering model, the attorney would leave the office and attempt to integrate herself into the communities served. In doing so, she is in a position of keeping her finger on the pulse of community issues as they affect particular sectors of the population. By building a relationship with people, before her services are needed, she becomes accessible to people who otherwise would not have a legal advocate as part of their repertoire.

Often the attorney does not belong to the community she is attempting to serve. She must become conscious of her own biases and instinct to take the lead in the situation. In what is termed as “mindful lawyering,” the attorney can better approach the community by understanding the need to develop adequate attorney-client communication to prevent divisiveness.<sup>14</sup> She must then train herself in

<sup>9</sup>The mission statement of Legal Services of Northern California is to assist and empower clients to identify and defeat the causes and effects of poverty by using all available resources. See Legal Services of Northern California, [www.lsncc.org/Mission%20Statement](http://www.lsncc.org/Mission%20Statement) (last visited April 19, 2008).

<sup>10</sup>Daniel Shaw, *Lawyering for Empowerment: Community Development and Social Change*, 6 *CLINICAL LAW REVIEW* 217–18 (1999).

<sup>11</sup>Mayia Thao & Mona Tawatao, *Developing Cultural Competence in Legal Services Practice*, 38 *CLEARINGHOUSE REVIEW* 245 (Sept.–Oct. 2004).

<sup>12</sup>*Id.* at 246.

<sup>13</sup>See Mona Tawatao et al., *Instituting a Race-Conscious Practice in Legal Aid: One Program's Effort*, 42 *CLEARINGHOUSE REVIEW* 48 (May–June 2008).

<sup>14</sup>Angela Harris et al., *From “The Art of War” to “Being Peace”: Mindfulness and Community Lawyering in a Neoliberal Age*, 95 *CALIFORNIA LAW REVIEW* 2073, 2114 (2007).

the skills of listening without judgment and speaking without offending the community's sensibilities.<sup>15</sup>

Advocates must recognize that we, too, are guided by our own stereotypes.<sup>16</sup> We are not consciously activating our stereotypes to influence our work, but our subconscious application of them can have an impact on our effectiveness as community lawyers.<sup>17</sup> Social cognition theory posits that the brain takes shortcuts in order to be more efficient. Based on our previous experiences, exposure, and information gathering, the brain creates categories of characteristics which, when activated by certain stimuli, help us draw conclusions about what it is we see.<sup>18</sup> One of the first exercises in community lawyering is taking the time to become aware of the stereotypes we hold about our clients and how they are activated. By becoming aware, we can be less inhibited by our need to assert the "attorney" in us and listen to how people articulate their needs.

As part of its Race Equity Project, our program, Legal Services of Northern California (LSNC), decided to explore why Asian and Pacific Islanders were underutilizing their services despite a quarter of the population living in poverty.<sup>19</sup> Not native to Sacramento, advocates began their inquiry by visiting the community-based organizations that provide social services to the Asian and Pacific Islander community. The legal services advocates used previous connections, word of mouth, and the phone book to make appointments with community-based organizations in the county to survey the needs of low-income Asian and Pacific Islanders. Some organizations welcomed the advocates, and others were suspicious

of contacts from unfamiliar people. The advocates investigated the legal needs and maintained contact with the community-based organizations to create ways for the advocates to become an as-needed resource to the service population.

The range of needs was great: language competence, public benefits, immigration, and accessible legal services. The advocates worked to integrate themselves into some community-based organizations to build a bond with the organizations. By having a physical presence, getting to know staff, and maintaining regular communication, the advocates began to gain trust. Here the advocates and service providers developed cultural competence, one about the other, to understand how to articulate the community's needs. By becoming conscious of the differences among ethnic Asian population groups, the ethnic background of advocates themselves, and the legal culture, the advocates and community-based organizations could better express the role of a legal advocate and how the advocates and community-based organizations could work together.<sup>20</sup> Mindful of asserting their privilege of class, education, and notions of justice, the advocates let go of their instinct to tell the community what the community needed.<sup>21</sup>

From this outreach, one LSNC attorney developed a close working relationship with the Hmong community in Sacramento to create a culturally appropriate dispute resolution program. The dynamics among the normally highly isolated Hmong community in Sacramento were changing as people became more settled in America and the Office for Refugee Resettlement funded their resettle-

<sup>15</sup>*Id.*

<sup>16</sup>Gary Blasi, *Advocacy Against the Stereotype: Lessons from Cognitive Social Psychology*, 49 UNIVERSITY OF CALIFORNIA, LOS ANGELES, LAW REVIEW 1241 (2002).

<sup>17</sup>Harris, *supra* note 14, at 2115; Blasi, *supra* note 16, at 1249.

<sup>18</sup>Anthony Greenwald et al., *A Unified Theory of Implicit Attitudes, Stereotypes, Self-Esteem, and Self-Concept*, 109 PSYCHOLOGICAL REVIEW 3–25 (2002).

<sup>19</sup>TIMOTHY FONG AND GREG KIM-JU, *ASIAN AND PACIFIC ISLANDER AMERICANS IN SACRAMENTO: A COMMUNITY PROFILE: 2000 AND BEYOND* (2006), [www.csus.edu/news/communityprofile/AsianAmericanReport.pdf](http://www.csus.edu/news/communityprofile/AsianAmericanReport.pdf).

<sup>20</sup>See Thao & Tawatao, *supra* note 11.

<sup>21</sup>See Harris et al., *supra* note 14, at 2115.

ment.<sup>22</sup> Faced with a lot of negative press, Hmong leaders were grappling with how to adjust to systems of justice that did not correspond with cultural practices.<sup>23</sup> The timely legal services outreach allowed Hmong leaders to develop an understanding of the American legal system and LSNC to develop a greater awareness of one of its client groups.

### Building a Fundamental Knowledge Base Within the Community

Community lawyering involves working with clients to assist them in navigating the ways about immediate problems. One goal is to leave behind a knowledge base in the community so that people can take their seat at the table when political, social, and economic decisions are being made.<sup>24</sup> A community lawyer recognizes that the needs of the community may not be legal in the traditional sense: that litigation or related advocacy may not always be the solution. The lawyer recognizes that her time with any particular client population is finite and that she will eventually leave or be taken away.<sup>25</sup> Part of the solution then becomes working with community members to create awareness of methods to develop and implement resources that enable people to interact with political systems and government agencies.

Through community town hall meetings, LSNC learned that one of the challenges in the Hmong community was interacting with the court system. Primarily in family court, Hmong people did not understand—because of language and cultural barriers—court processes, proceedings, and decision making. Through the traditional legal model, we assessed

the potential for a language access lawsuit under federal and state civil rights laws.<sup>26</sup> The Hmong community resisted adversarial measures and requested instead that we assist them in bettering their cultural dispute resolution process so that it could be endorsed by the California court system and laws.

Our program conducted extensive training about Western mediation, California law, and court systems for many Hmong community members and elders. Language, age, and gender were challenges faced. How could an English-speaking person describe the principles of mediation, concepts of justice, and fairness to primarily elder Hmong men whose perception of justice and fairness differed? How could a young non-Hmong female earn the trust of a community where she was an outsider? Through months of trial and error, the community and the advocate patiently worked together to teach each other about dispute resolution processes and value-motivated outcomes. The advocate learned about Hmong systems and how to analogize Western systems so that they made sense to Hmong people.

A small delegation of Hmong community members and attorneys working with them traveled to St. Paul, Minnesota, to learn about the Hmong mediation program there.<sup>27</sup> The idea behind the trip was for both the community members and the attorneys to interact and learn from Minnesota Hmong people, lawyers, and judges about how to create a program. By maintaining the client-lawyer dynamic, the Hmong delegates were able to inform, translate for, and gain acceptance by, the Hmong community in St. Paul. The attorney delegates were able

<sup>22</sup>U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, HHS PROVIDES STATES FUNDING TO HELP RESETTLE HMONG REFUGEES (2004), [www.hhs.gov/news/press/2004pres/20040722a.html](http://www.hhs.gov/news/press/2004pres/20040722a.html).

<sup>23</sup>See, e.g., KCRA.com, Hmong Community Pleads for Help on Asian Gang Problem, [www.kcra.com/news/4299814/detail.html](http://www.kcra.com/news/4299814/detail.html) (last visited May 15, 2008).

<sup>24</sup>Michael Diamond, *Community Lawyering: Revisiting the Old Neighborhood*, 32 COLUMBIA HUMAN RIGHTS LAW REVIEW 67, 109–10 (2000).

<sup>25</sup>Wexler, *supra* note 6, at 1053.

<sup>26</sup>See EMILY FISHER ET AL., LANGUAGE ACCESS TO THE COURTS IN CALIFORNIA: A LEGAL ADVOCATE'S MANUAL (2006), [www.lsnrc.net/special/language\\_access\\_11-16-06.pdf](http://www.lsnrc.net/special/language_access_11-16-06.pdf).

<sup>27</sup>Established in 1999, the Minnesota 18 Clan Council is a Hmong mediation program in partnership with the Ramsey County Superior Court (see James R. Coben, *Lessons Learned from Family Mediation Training for the Hmong Community of Minnesota*, 40 FAMILY COURT REVIEW 338 (2002)).

similarly to inform, translate for, and gain acceptance by, the judicial and legal community—all were players in developing the Minnesota program. Together the team could bring back information to Sacramento to develop a local model.

Equipped with the history and knowledge from Minnesota, the Sacramento delegation returned ready to build a program. The seemingly slow progress of the program development thus far had been purposeful. We hoped that, by involving the Hmong leaders in developing a community resource, training about principles of Western mediation and creating a knowledge base about program development, Hmong people could increase their skill sets and create a meaningful service in their community.

In essence, for the attorney to develop a knowledge base in the community, she acted as a translator.<sup>28</sup> By first developing her own foundation of knowledge about Hmong culture, she was able to translate the legal terms and concepts into terms and concepts that created a better understanding among the Hmong community about how to maintain its cultural practices and incorporate California law and dispute resolution processes. By learning about the Hmong language and culture from Hmong people, she could understand better how the community described its practices and she could then try to make the American system of justice more comprehensible.

### Developing Community Relations

Sometimes the role of the advocate is to negotiate relationships, or to guide discussion using her unique role as an outsider. LSNC and the Hmong group could not be the only players in the development of the cultural mediation program. What the Hmong leaders sought was an established relationship with the judicial system to legitimize their decisions. However, they did not have the connections to the judicial systems, resources to develop a viable nonprofit incorporation, and finances. What they also lacked was perspective on how to maintain their

own cultural practices while interacting with Western ones. One service we could provide was to broker relationships and discussion between the Hmong group and our resources as well as facilitating discussion within the Hmong community regarding acculturation.

Knowing that partnership with the state superior court for Sacramento County was crucial, we set out to determine what the court's requirements would be to adopt a Hmong mediation program as one of its alternate dispute resolution resources. Using the long-standing relationship between LSNC and the bench, we surveyed judicial officers to find out how the court understood Hmong culture, where culture could serve a role in judicial rulings, and what principles of equity the court would refuse to accept as a cultural norm. We learned that, based on the press or their limited interaction with Hmong people through the court system, some judges had misperceptions about Hmong values. Many indicated that they believed partnering with the Hmong community to raise awareness among the bench about this community would assist them in making the court more accessible and in making more culturally competent decisions. One judge with close ties to Hmong people committed to adopting the mediation program as one of her community-focused projects.

The first community relationship we brokered was between Hmong men and Hmong women. Traditionally women are very well respected within Hmong families. However, when a family decision is presented, the male presents the decision on behalf of the family. The court refused to consider the Hmong mediation program if women were not equally allowed to speak as men. LSNC and the Hmong mediation team met to discuss gender roles, to consider if women mediators would decrease the acceptance of the program within the community, and to identify women mediators. We were cautious to facilitate the discussion by sharing American concepts of gender roles without disrespecting those

<sup>28</sup>Christine Zuni Cruz, *On the Road Back in: Community Lawyering in Indigenous Communities*, 5 *CLINICAL LAW REVIEW* 557, 568 (1999).

of Hmong people and without imposing or influencing the committee's decision to include women for the sole reason of obtaining the court's blessing. The planning team ultimately determined that women mediators would not fundamentally change the culture and successfully recruited women to the team.

The second community relationship we brokered was between Hmong elders and younger generation Hmong. Traditionally Hmong clan elders are the arbiters of dispute between people. Our work with both Hmong elders and Hmong youth made clear that a major source of tension throughout the transition to life in the United States was between generations. The younger generation, after learning in school, realized that some of the Hmong ways conflicted with American values of family, freedom, and fairness. As the younger generation struggled with negotiating traditional Hmong family and American ways, the elder generation struggled to maintain cultural methods and values. This generational strain led to conflicts—the type of dispute that a culturally appropriate dispute resolution model could resolve *if* it were cognizant of both Hmong culture and American culture. Again, the advocate's role was to walk the fine line between observing as an outsider to offer context and avoiding undue influence during community decision making. The planning team determined that a multigenerational team would benefit the program and be diversified by age.

LSNC brokered relationships between other community organizations and the Hmong community. Asian Legal Services Outreach is partnered with the mediation planning committee to provide financial support and legal advice and consultation.<sup>29</sup> Asian Resources Incorporated is a partner incubating the mediation program and providing infrastructure for meetings and fund-raising.<sup>30</sup> The Super-

rior Court, County of Sacramento, Community Focused Court Planning Committee works with the mediation program to conduct training about court rules and processes within particular jurisdictions, currently in the family law court.

The uniqueness of doing community lawyering is that we serve in roles we are not used to playing. We must take crash courses in language and culture to be more cognizant of community politics, values, and systems. However, by sharing an outsider perspective and brokering new relationships, community lawyers can open otherwise closed channels of communication and enable people and systems to coexist.

### Framing Outcomes and Letting Go

The Sacramento Hmong mediation planning committee recently filed its articles of incorporation and is now a legal entity known as Sacramento Hmong Mediation Council. Drafting the bylaws, we trained the board of directors in establishing the foundations of a business. After years of training, planning, and meeting, Hmong community members and their partners created what, we hope, will be a culturally appropriate alternative dispute resolution program. The council is fund-raising, consulting with the court about cultural interpretations of events, and selecting and training its mediators. The partnerships with other legal and nonprofit service agencies are well developed and will continue until the council is a fully functioning not-for-profit organization.

So where does the attorney go now? For the past four years one advocate worked in one community and generated direct-service cases, outreach, community economic development projects, and a mediation program. Does she still have a role? Can her energy be placed elsewhere to share a knowledge base with another community seeking to create its own re-

<sup>29</sup>Asian Legal Services Outreach meets the needs of the Asian and Pacific Islander community by coordinating outreach, education, and advocacy in the provision of legal services and educational programs and by building coalitions (see Asian Legal Services Outreach, [www.alsosac.org](http://www.alsosac.org) (last visited May 15, 2008)).

<sup>30</sup>Asian Resources Incorporated provides multiple social services needed in the Sacramento community to empower everyone served to become a vital part of a changing, diverse society (see Asian Resources, [www.asianresources.org](http://www.asianresources.org) (last visited May 15, 2008)).



sources to serve its needs? Will her old community let her go, or has she become so entrenched in its operation that she is now a community member? And if she is so entrenched, has she then defeated the goal of serving as a tool to build a foundation rather than a box that keeps the pieces together?

The difficulty—and the challenge—that the community lawyer faces is to let go. There comes a time when the community can and should be able to achieve its goals without her. When is that point reached? When the attorney and the clients are comfortable with the mutual relationship they have built, the attorney can go in one or the other direction. She can continue focusing her energy on a particular community, on their particular cases, and seeing to it that the community understands the multifaceted use of legal aid. Or she can begin to extract herself and redirect her energy to a new community where once again she places herself in the position of an outsider, uncomfortable with her presence, but making available her skills in an effort to empower another community to seek justice

or equality. Either is a worthwhile goal. Both achieve the mission of empowering low-income people of color to identify their needs and develop and sustain resources to meet those needs.



Community lawyering at heart is the advocate being able to realize that before she is an attorney, she is a human being; perhaps poor herself once, an immigrant, of color, or simply seeking justice through her chosen career. We need to expose our ignorance about the people we serve, our inability to know the solutions to all problems, and our own class, social, and ethnic biases. Like any human relationship, community lawyering is reciprocal trust building that does not always need to be outcome-driven.<sup>31</sup> In recognizing the humanness of our work, we can better develop relationships with our clients such that exposing their needs and knowledge gap is not an uncomfortable and invasive. Instead our awareness can equip our clients with strategies to bolster their voices for the opportunities they seek.

---

<sup>31</sup>Zuni Cruz, *supra* note 28, at 563–64.

---

# Subscribe to CLEARINGHOUSE REVIEW

## Annual subscription price covers

- six issues (hard copy) of CLEARINGHOUSE REVIEW and
- www.povertylaw.org access to current issues of CLEARINGHOUSE REVIEW and all issues from 1990

## Annual prices (effective January 1, 2006):

- \$250—Nonprofit entities (including small foundations and law school clinics)
- \$400—Individual private subscriber
- \$500—Law school libraries, law firm libraries, other law libraries, and foundations (price covers a site license)

---

## Subscription Order Form

Name \_\_\_\_\_

*Fill in applicable institution below*

Nonprofit entity \_\_\_\_\_

Library or foundation\* \_\_\_\_\_

Street address \_\_\_\_\_ Floor, suite, or unit \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

E-mail \_\_\_\_\_

Telephone \_\_\_\_\_ Fax \_\_\_\_\_

\*For Internet Provider-based access, give your IP address range \_\_\_\_\_

### Order

Number of subscriptions ordered \_\_\_\_\_

Total cost (see prices above) \$ \_\_\_\_\_

### Payment

- My payment is enclosed.  
*Make your check payable to **Sargent Shriver National Center on Poverty Law.***

- Charge my credit card: Visa or Mastercard.

Card No. \_\_\_\_\_ Expiration Date \_\_\_\_\_

Signature \_\_\_\_\_

*We will mail you a receipt.*

- Bill me.

Please mail or fax this form to:  
Sargent Shriver National Center on Poverty Law  
50 E. Washington St. Suite 500  
Chicago, IL 60602  
Fax 312.263.3846

CUT HERE