

February 16, 2018

**CONFIDENTIAL/ATTORNEY  
CLIENT PRIVILEGED**

Mr. Chuck Huckelberry  
Pima County Administrator  
Pima County  
130 West Congress Street, 10<sup>th</sup> Floor  
Tucson, AZ 85701

Re: *RICO Funds*

Dear Mr. Huckelberry:

Thank you for providing the materials for my review and input. Initially, I want to comment on my evaluation of the procedures instituted by the Pima County Attorney's Office and my recommendations going forward.

**I. PROCEDURES INSTITUTED BY PIMA COUNTY ATTORNEY'S OFFICE  
FOR APPROVAL:**

Overall, her procedures are acceptable. One issue is that she states a maximum grant amount of \$5,000.00, but then grants some organizations \$10,000.00. One issue this Board will have to decide is how closely a community group needs to be allied with law enforcement to merit a RICO grant. Many applicants are after school programs which keep kids off the streets during high risk hours. Many of these have no other real connection with law enforcement.

- Maybe misstates permissible uses.
- Miscategorizes many expenditures as community based.
- Problem with limit of percentage of funds to community groups.

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II. RECOMMENDATIONS FOR PIMA COUNTY ATTORNEY'S OFFICE:

- A. Stick to the stated maximum amount.
- B. Require larger groups with diverse activities some of which fall outside of authorized uses to provide accounting for use of funds.

Preliminary Statement:

Pima County Board of Supervisors' role is only to provide binary approval of requests for expenditures. Pima County Board of Supervisors does not solicit, support or oppose any group or request except on the basis of determining whether the information provided to Pima County Board of Supervisors by County Attorney Barbara LaWall appears to satisfy the requirements of state and local guidelines regarding the expenditures of RICO funds.

It is the responsibility of the County Attorney to review applications, investigate organizations and to track the appropriate use of funds by the organizations.

This letter will provide one of two responses to each requested expenditure: Approved or Seek Clarification.

**Approved:** Approved means that the Pima County Board of Supervisors has received legitimate documentation from the County Attorney which the Pima County Board of Supervisors believes to demonstrate that the expenditure sought by the County Attorney is an approved use of funds pursuant to Arizona statutes and/or Federal guidelines for the use of RICO funds.

The Pima County Board of Supervisors necessarily relies upon the County Attorney to conduct adequate inquiry into the nature of the requesting organizations before submitting a request for approval of an expenditure. While a good deal of reliance is placed upon the County Attorney and her investigation and analysis, the Pima County Board of Supervisors will not approve any expenditure which clearly fails to satisfy State and Federal statutes and guidelines.

**Seek Clarification:** While it appears that the request for approval is deficient it may be possible to provide additional information to satisfy relevant laws and guidelines. The expenditure may be approved at a later date.

General comments regarding my review of these expenditures. Every expenditure request appears to be from excellent community groups providing excellent services to Tucson or Southern Arizona. Unfortunately, RICO expenditures are only appropriate for “community-based programs whose missions are supportive of and consistent with a law enforcement effort, policy, and/or initiative.”

The only examples provided by the Federal guidelines are: “a drug treatment facility, job skills program, or a youth program with drug and crime prevention education.”

Under the Federal guidelines, it is the chief law enforcement officer’s duty to approve and ensure the recipient is a qualified entity.

Under Arizona’s recently enacted RICO fund approval statute, the Pima County Board of Supervisors bears the responsibility of approving or denying Pima County Attorney’s Office’s expenditure requests if it does not appear that a community-based program’s mission is supportive of and consistent with a law enforcement effort, policy and/or initiative.

The language of the guidelines is somewhat broad, but clearly funds are not meant to go to every noble community-based group. There must be some criteria for approval. In my recommendations, I have suggested seeking clarification as to a few groups. For example, I recommended seeking clarification from a program which teaches children to golf, and a program which teaches adolescent girls to be confident and assertive. While both of these organizations touched on issues that would be somewhat important to law enforcement, they both seemed only to include passing references stating that a minor part of their program related to some benefit in which law enforcement would be interested. In short, both programs seemed like fantastic community-based programs which realistically had very little to do with law enforcement goals.

Other programs looked like programs which might have been able to state a mission that was supportive of and consistent with a law enforcement effort, policy and/or initiative but failed to do so. One striking example is Higher Grounds Community Resource (HGRC). The HGRC is providing after school programs to kids. It appears to be a fantastic organization. HGRC’s application failed to establish how its mission supports law enforcement. HGRC asked for \$5000 to fund a STEM and robotics program. HGRC failed to identify how the program participants are selected and they referred to college scholarships which are a strictly prohibited use of RICO funds. It is believed that HGRC and other programs may be able to draft applications which demonstrate a mission that is supportive of and consistent with a specific law enforcement goal or initiative.

This Board will have to use its own discretion to determine which groups have a mission which is supportive of a law enforcement purpose or policy. Although every after-school program technically keeps kids off the streets during high risk times for exposure to crime and drugs, not all after school programs have crime prevention and drug avoidance as their mission. An after-school program in an affluent neighborhood which taught low risk kids to play video games is probably not a mission supportive of a law enforcement effort, policy or initiative. An after-school program for children living in a high crime area which taught kids about substance abuse and avoiding gang participation with a purpose of exposing kids to positive experiences with law enforcement is closer to the mark.

The following is my assessment and recommendations regarding utilization of RICO funds for community-based programs.

1. **88-Crime**

\$5,000.00

Recommendation: Approve

Submitted as a community-based program. Probably does not qualify as a community-based program, HOWEVER, this is a specifically allowable expenditure under law enforcement operations and investigations: Under Federal guidelines, RICO funds may be used to support law enforcement operations and investigations which specifically includes annual dues paid to a crime time organization OR payment for a specific reward for information in a specific case.

2. **Amistades, Inc.**

\$5,000.00

Recommendation: Approve

Amistades is a community group self-described as having wide-ranging interests and services all of which are not described in the application. Amistades requests specific amounts for three specific programs. The three programs meet the criteria for RICO funding.

Recommendation: The County Attorney should ask for documentation at the end of the year the funds were used as described and NOT for other purposes of this organization.

3. **Angel Heart Pajama Project**

\$5,000.00

Recommendation: Seek Clarification

Angel Heart is a non-profit group which serves the worthwhile purposes of providing children in difficult situations with pajamas and books. While this is a noble cause, it is unclear how this goal is supportive of or consistent with a law enforcement goal.

A. The application lists a page of agencies which it supports; not one of them is a law enforcement agency.

B. There is mention of a new program whereby the group provides first responders with books for children. "First responders" does not equate with law enforcement. This could be limited to paramedics or other emergency personnel. We need to see evidence from a police agency that (1) they have utilized books from this program and (2) the use of the books have been effective to support a law enforcement interest or purpose.

C. The Application Certificate seems to indicate that an officer, director, trustee or fiduciary of the applicant has been convicted of a crime. (It may be because of a lack of clarity in the certification, but this needs to be resolved.)

4. **Arizona Coalition for Victim Services (ACVS)**

\$5,000.00

Recommendation: Approve

ACVS is a 501(c)(3) which provides training to victim advocates regarding law enforcement, court system and how to assist and support crime victims during and after prosecution of the person or persons who victimized them. Victim advocates are an integral part of law enforcement. They are employed by the County Attorney's Office s and this training clearly supports a law enforcement purpose or policy. That policy is training of law enforcement support personnel.

Recommendations: As noted by PCAO the application contains one reference to providing "scholarships" to the training courses. Creation of scholarships is a specifically prohibited use of RICO funds. It does not appear that this is a necessary use of these funds. ACVS should be instructed that funds may not be used for creation of scholarships.

5. **Arizona's Children Association (Las Familias)**

\$5,000.00

Recommendation: Approve

ACA is a group which provides support and counseling to victims of childhood sexual abuse. The group has participants from Pima County Attorney's Office, Tucson Police Department, Pima County Sheriff's Office, Child Protective Services, Adult Probation and University Hospital Pediatrics. This organization provides victim support from the time of the initial crime beyond prosecution.

The expenditure clearly qualifies as funding a program that provides assistance to victims of a criminal offense.

6. **Aviva Children's Services**

\$5,000.00

Recommendation: Approve

ACS is a non-profit organization focusing on assisting parents who are seeking to re-unify with their children after the children have been or, are in the process of being removed from their parents' custody.

This organization says that it provides some services which would qualify for expenditure of RICO funds. For example, ACS provides substance abuse prevention for parents seeking to regain custody. ACS also provides mentoring and training to better equip parents to deal with the stressors attendant upon raising children. The group clearly has a focus on preventing crime (domestic violence).

A substantial element of this program appears to be providing peer volunteers to assist parents in navigating the court processes regarding removal and/or re-unification with their children. This is not as clearly a purpose which would justify expenditure of RICO funds, however, this organization appears to have substantial programs which could satisfy the requirements for approval. PCAO should probably get some follow up information regarding the use of the funds by ACS.

7. **Big Brothers Big Sisters of Tucson (BBBS)**

\$4,000.00

Recommendation: Approve

BBBS is a non-profit organization. Here, BBBS seeks a grant to support its Big in Blue Program which recruits, runs background checks and trains volunteer law enforcement officers to serve as mentors for at-risk youth. This program clearly supports law enforcement goals of creating good relationships with members of disadvantage communities. There are also crime and gang prevention benefits in this program.

This expenditure is even more effective because it will be matched by BBBS's national office.

8. **Boys and Girls Club of Tucson (BGCT)**

\$5,000.00

Recommendation: Approve

BGCT operates six clubhouses for kids in Tucson's highest stress neighborhoods. According to the application "BGCT is successful at keeping our most vulnerable kids off the streets." The program deters kids from gang activity and substance abuse among other things.

The money will be used to fund after school and summer programs which are intended to keep kids engaged in positive activities during the times when they are most likely to engage in criminal activity or substance use.

9. **Casa de las Ninos (CN)**

\$5,000.00

Recommendation: Seek Clarification

CN is seeking a grant for what is a great purpose but seems tenuously related to law enforcement purposes.

CN seeks \$5,000.00 to fund a course program for adolescent girls which "promotes healthy psychosocial development in female adolescents." The course will focus on topics: (1) being a girl and understanding our bodies, (2) girls issues in today's society, (3) positive self-image, (4) friendship, dating and the importance of being assertive, (5) making tough choices, (6) talking about touch, (7) let's talk about sex, (8) STD's and contraception, and (9) visions for a stronger future.

Undoubtedly these are all worthy topics; however, it is a stretch to say that any of those topics relate to any of the permissible uses of RICO funds.

CN says their program supports law enforcement purposes by preventing juvenile crime. That connection does not seem justified.

CN also claims the program will reduce substance abuse. While one of the course topics might touch on substance abuse (Making Tough Choices), substance use appears to be only a small part of one of nine courses taught here.

This may be a program worthy of grant funds, however, the current application fails to demonstrate that the program satisfies the laws and guidelines for the expenditure of RICO funds.

PCAO approved this expenditure as:

1. A gang prevention program.
2. A substance abuse prevention program.
3. A community-based program supportive of law enforcement interests and policies.

While the application briefly mentions substance use and gang prevention, it does not seem fair to classify this as a “gang prevention program” or “substance abuse education program.”

The law enforcement policies and interests supported by this group seems extremely tenuous.

10. **Center for Economic Integrity (CEI)**

\$5,000.00

Recommendation: Approve

CEI seeks \$5,000.00 to support the Las Abuelitas After School Program. The Las Abuelitas After School Program is an after-school program for children who reside in the Las Abuelitas Housing Project. Children are physically present in the facility during the after-school hours which have been shown to be the riskiest hours for juveniles to engage in criminal behavior and/or be exposed to crime and substance use or abuse.



The program provides literacy support and has a focus on urban gardening. This program is endorsed by Tucson Police Chief Ford. There is substantial law enforcement involvement with this project. Law enforcement officers are sometimes present in the facility to create positive relationships with this at-risk population by teaching and interacting with the kids.

**11. Child and Family Resources, Inc. (CFRI)**

\$5,000.00

Recommendation: Approve

CFRI is a non-profit organization focusing on a number of areas which reduce the risk of a number of bad outcomes in Tucson children.

Although they operate a number of facilities and programs, these funds are being sought to fund after school programs in two facilities which are located in the most impoverished areas of Tucson. The money will be used to reduce the cost of services.

The application specifically states that these after school programs are designed to prevent kids from being exposed to or involved with crime and substance use during the hours when they are most at risk.

This seems to qualify as a gang-prevention program, a substance abuse prevention program, and a community-based program that supports law enforcement policies.

**12. Culture of Peace Alliance (COPA)**

\$5,000.00

Recommendation: Approval (total of \$5,000.00)

According to materials submitted by County Attorney, Barbara LaWall, COPA is an organization dedicated to preventing violent crime in the form of gang violence, domestic violence, and sexual assault.

COPA is seeking funds to support a number of activities which support and empower victims of sexual assault to share their experiences through art. COPA also seeks RICO funds to train and educate young people to make choices to avoid violence and to spread awareness to others at their schools about avoiding violent behavior.

COPA seems to request \$5,000 for each of two activities or priorities. I believe Ms. LaWall's program provides for a maximum of \$5,000 to an organization.

13. Educational Enrichment Foundation (EEF)

\$5,000.00

Recommendation: Seek Clarification

EEF is an organization which pays for the teens to be involved in extracurricular activities that now require parents to pay additional money. Activities like sports and band are effectively unavailable to low income students whose families cannot afford the extra fees.

EEF pays the fees for teens who qualify for low cost meals in the school system.

This seems like an excellent program but the way in which it supports law enforcement policy and interests has not been demonstrated.

14. Emerge! Center Against Domestic Abuse (ECADA)

\$10,000.00

Recommendation: Approve \$5,000.00

Emerge is an organization which works closely with PCAO to support victims of domestic violence.

Emerge seeks funds to provide cards with emergency information regarding resources for potential victims of domestic abuse. They also seek funds to create ads routing people to a website with education, information and resources regarding domestic violence.

This expenditure is clearly an expenditure to support crime victims and a crime prevention community group.

Warning: Pima County Attorney Barbara LaWall should be advised that Emerge's proposal offers to promote PCAO by putting the PCAO logo on materials and the website. Featuring the PCAO logo is probably not problematic, but Ms. LaWall should be careful to ensure that Emerge's efforts do not cross the line into campaign materials.

**15. The First Tee of Tucson**

\$1,000.00

Recommendation: Seek Clarification

The First Tee is a great program seeking to enhance the lives and choices of youth by pairing them with a mentor and teaching them golf.

The First Tee's application makes reference to reducing crime by building self-esteem, but any connection to crime reduction seems tenuous, at best.

This is another noble program which would certainly be worthy of funding by some organization, but First Tee has failed to demonstrate a real connection to gang prevention, substance abuse education or support a tangible goal of law enforcement. As such, First Tee would not be an appropriate use of RICO funds.

**16. Friends of Robles Ranch, Inc. (FRRI)**

\$1,600.00

Recommendation: Approve

FRRI is a non-profit organization which seeks to educate residents of a low-income and sparsely populated area regarding issues relating to crime prevention. They have provided education from the, Sheriff's Office, the Pima County Attorney's Office, and other law enforcement agencies on topics from identifying and helping to eliminate drugs from their area, to legally protecting your home and family to preventing and reacting to domestic violence.

It appears that the centerpiece of this program is an annual festival which not only highlights the available programs but allows residents to fill out surveys which assist law enforcement officers to identify crime which is occurring in the Robles Ranch area.

The funds are sought to promote and support the annual event. This seems to qualify under a community group supporting law enforcement goals and purposes.

**17. GAP Ministries**

\$5,000.00

Recommendation: Approve

GAP is a non-profit which seeks to prevent crime and substance abuse in two high risk groups for those behaviors. Specifically, GAP works with 18 year olds

who have aged out of the foster system and they work with parolees who are at a high risk to reoffend. Both groups have a high likelihood to engage in criminal activity and substance abuse.

GAP is a free ten-week program which teaches culinary and kitchen sanitation skills to people from those two groups. Group participants learn skills and obtain an important certification relating to food safety while in the program.

GAP is specifically designed to reduce the incidence of crime, recidivism and drug use in two very high-risk populations. It also provides job skills and training.

This grant should be approved as it is specifically designed to reduce crime, recidivism and drug abuse. This is clearly a community group which serves to support law enforcement goals.

**18. Girl Scouts of Southern Arizona (GSSAZ)**

\$5,000.00

Recommendation: Approve

GSSAZ is seeking \$5,000.00 for the specific purpose of funding the Adelante Jovencitas (AJ) program.

AJ is a program whereby committed volunteers train and mentor girls who are in juvenile detention, on juvenile probation, or are imminently facing the threat of being committed to juvenile detention.

AJ's purpose is to provide mentoring, empowerment and life skills training to girls who are in the juvenile justice system in order to reduce rates of recidivism. The volunteers are women who stay with the program long-term to provide a stable good influence in the lives of this population which is at a high risk for recidivism.

AJ coordinates with the Pima County Attorney's Office and other law enforcement organizations to achieve these goals.

This is a community group which is supporting the law enforcement goal of reducing incarceration and recidivism rates for one of the fastest growing segments of prison inmates in Arizona, women.

**19. Higher Ground A Resource Center (HGRC)**

\$5,000.00

Recommendation: Seek Clarification

HGRC is a large organization providing services to a vast array of young people. It is certainly a praise-worthy organization doing excellent community service.

It is probably possible for HGRC to draft an application that would satisfy the requirements for RICO funding but they have failed to do so. Their application all but ignores the questions asked by the application and reads like an advertisement for their organization.

They talk about improving people's lives in a number of ways. They deal with kids who have any number of difficulties. Clearly, they are primarily an after-school program. The problem is that they fail to identify specific law enforcement purposes they support.

Finally, they request \$5,000 to fund a STEM and robotics program without providing even a hint as to how that program serves a law enforcement purpose. If the PCAO and HGRC choose to clarify HGRC's request for funding, it is highly recommended that HGRC uses the application form utilized by all 49 of the other applicants or at least provide focused answers which are responsive to the analysis of whether this is an appropriate expenditure of RICO funds.

Additionally, HGRC states as one of their purposes to provide "college scholarship." That is a specifically prohibited use of RICO funds.

**20. Hispanic Women's Corporation (HWC)**

\$5,000.00

Recommendation: Approve

HWC seeks \$5,000 to support their mission of providing middle school and high school students with a curriculum addressing drug and alcohol abuse prevention, auto safety, DUI laws, teen domestic violence, cyber bullying and self-defense tactics. The program will feature an address by U.S. Marshall David Gonzalez. They will also have presentations from prosecutors, crime lab technicians, and other law enforcement personnel.

The program has a goal of increasing graduation rates for a highly at-risk group of students and the application states that a primary focus of the program is crime education and prevention.

This seems to be a community-based organization with a mission supportive of and consistent with many law enforcement purposes including crime prevention and education, substance abuse awareness and auto safety.

**21. Homicide Survivors Inc. (HSI)**

\$5,000.00

Recommendation: Approve

HSI is a 501(c)(3) providing support, therapy and assistance to the family members and friends of murder victims. HSI seeks \$5,000 to support a particularly effective group program. HSI works closely with Pima County law enforcement agencies to provide much needed support to these crime victims.

Clearly this is an expenditure which should be approved. This is a non-profit group which supports and provides assistance to crime victims.

**22. Lohse Family YMCA (LFYMCA)**

\$5,000.00

Recommendation: Seek Clarification

LFYMCA is a non-profit organization operating a gym and community center providing after-school and summer programs to children in an area that is economically stressed.

According to the application, the children and families who utilize the facility and its services are higher risk for crime and substance abuse.

Like many other programs, the after school and summer programs will keep kids occupied during the high risk after school and summer times.

This application makes no mention of law enforcement involvement in the program. It also makes no mention of gang or substance abuse programming.

Similar to other organizations, the LFYMCA appear to be a fantastic program doing great work for families in the community, however, the connection with law enforcement seems tenuous at best.

LFYMCA does claim that their program reduces and deters crime but other than keeping kids occupied during high risk hours, there is no connection to law enforcement.

Federal guidelines cite youth programs as a potentially appropriate use of RICO funds, but the guideline specifically say “a youth program with drug and crime prevention education.”

This is a youth program, but there is no mention of any content relating to law enforcement purposes.

You should seek clarification and allow LFYMCA to tell you if the grant will be used to sponsor content regarding crime and drug prevention.

**23. MADD Arizona**

\$10,000.00\*\*

Recommendation: Approve

MADD is a well-known non-profit group with a dual mission to end impaired driving and support victims of impaired drivers.

The grant they are seeking will be used to purchase supplies and pay for services which will assist law enforcement in removing impaired drivers from the road.

\*\*The application seeks \$10,000 but PCAO’s process allows for a maximum of a \$5,000 grant.

**24. Make Way for Books (MWB)**

\$5,000.00

Recommendation: Approve

MWB is a non-profit program which sets up temporary classrooms in low-income areas to provide instruction to children to help them become stronger readers.

There are a couple of connections to a law enforcement purpose. First, according to MWB, children who have high-quality early learning experiences are 70% less likely to commit a violent crime. Second, MWB partners with local law enforcement by inviting officers to conduct public readings with the children and their families. MWB is seeking to create meaningful positive experiences with law enforcement.

The funding will be used to buy books to give to children.

**25. Marana Broncos Youth Football (MBYF)**

\$5,000.00

Recommendation: Seek Clarification

MBYF is a youth football league. They are seeking \$5,000 to provide equipment to players from low-income families.

The only connection to law enforcement is the claim that “several coaches and volunteers within the organization are law enforcement officers.” The participation of coaches and volunteers in youth sports organizations is highly variable. Because the only real connection to law enforcement is through coaches and volunteers, PCBS should ask Ms. LaWall to provide information indicating that law enforcement officers have made up a significant number of the coaches and volunteers over the years and that their participation has been consistent.

**26. Marana Police Volunteers, Inc. (MPVI)**

\$5,000.00

Recommendation: Approve

MPVI is a non-profit group of volunteer police officers who support the Marana Police Department. MPVI is seeking \$5,000 to provide training to officers and volunteers regarding the proper installation of child safety seats and to purchase child safety seats to be given to low income families at events and during traffic stops.

MPVI is taking a very proactive approach to ensuring motor vehicle safety for children. MPVI has a number of personnel certified to install and/or teach parents to install child safety seats.

Ensuring motorist safety and compliance with traffic laws is a law enforcement effort.

**27. Metropolitan Education Commission (MEC)**

\$2,500.00

Recommendation: Seek Clarification

MED is a non-profit organization which provides guidance to adolescents regarding pursuing educational goals including completing high school and attending college.



MEC assists people from any background so it is not fair to so say that this organization serves exclusively at-risk populations. However, MEC clearly has an interest in reaching out to at risk youths.

The only law enforcement connection is the idea that kids who are engaged in their education will be less likely to commit crime. MEC cites studies which found that students who are encouraged to go to college are less likely to engage in delinquent behaviors. The link to law enforcement seems tenuous.

**28. Midale Park Neighborhood Assn (MPNA)**

\$2,000.00

Recommendation: Seek Clarification

MPNA is a non-profit neighborhood association. MPNA describes nebulous goals such as promoting community cooperation and interacting with law enforcement.

They seek funding to support a festival. MPNA claims that the festival will allow the community to interact with law enforcement. There is no more specific description of what law enforcement's role will be. The application describes no law enforcement activities which might occur at the festival.

This is in contrast to an application for another festival which described specific benefits to law enforcement.

Funds will be used for DJ services, insurance, stage rental, jumphouse, kiddie train, tables and chairs and something called fingerprint kits.

**29. NAMI Southern AZ**

\$5,000.00

Recommendation: Approve

NAMI is a mental health advocacy and support group. In addition to providing group support meetings and peer monitoring, NAMI provides speakers to an annual training program called Crisis Intervention Team. From the application, it would appear that law enforcement officers are in attendance at this annual program. NAMI identifies people with mental illness to speak at these events. According to the application, law enforcement officers find these speakers very informative.

NAMI seeks \$5,000 to assist them in the programs which identify and assist these speakers in creating and improving their presentations.

Clearly one of NAMI's primary goals is to educate law enforcement officers regarding mental illness to aid them in understanding how best to deal with confrontations with the mentally ill.

**30. Neighbors for Justice, Inc.**

\$5,000.00

Recommendation: Approve

NFJ is a non-profit organization which works in conjunction with the juvenile justice systems to provide a diversion program for certain juveniles who stand accused of criminal offenses. The offenders are offered a chance to complete NFJ's diversion program which includes counseling and other services. Once they have completed the program, their case is dismissed. NFJ cites statistics showing that their participants have a significantly decreased rate of recidivism.

The funds will be used to provide low or no cost therapy and other services through the program.

This certainly is an organization with a mission that is supportive of a consistent with law enforcement interests. It is actually providing probation and rehabilitation services.

**31. One on One Mentoring (OOM)**

\$5,000

Recommendation: Approve

OOM is a non-profit organization which provides mentoring to at risk juveniles in an effort to reduce the chances of delinquency. Youth with mentors are 45% less likely to use drugs.

The funds will be used to pay for events, attended by the youth and mentors. The events are holiday parties, a college football game, and a fishing trip, among others. These events are not luxury items; they are the foundation for the development of the mentor/mentee relationship.

OOM is clearly an organization with a mission to reduce crime in a high-risk population. Statistics show OOM's methods to be effective at reducing crime.

**32. Our Family Services, Inc. (OFSI)**

\$5,000.00

Recommendation: Approve

OFSI is a large and venerable Pima County community organization. OFSI seeks \$5,000 to support its Family Connection and Conflict Resolution Programs.

Family Connection and Conflict Resolution are diversion programs which provide an alternative to prosecution for juveniles identified as good candidates for the program by the Pima County Attorney's Office.

The programs involve group session and teaching by a mix of trained volunteers and experts. These groups focus on teaching communication skills in hopes of deterring instances of domestic violence.

The programs work hand-in-hand with law enforcement to create diversion programs and reduce crime.

**33. Perimeter Bicycling Association of America, Inc. (PBAA)**

\$5,000.00

Recommendation: Approve

PBAA is a 501(c)(3) which coordinates five major cycling events per year. They seek \$5,000 to support their juvenile community service program. This program has been in existence for 16 years. The program provides supervision, work and mentoring to juveniles who have been found delinquent and sentenced to community service. The purpose of the program is to teach the juveniles to avoid substance use and to make choices which will allow them to become productive members of society.

The program has been successful and has garnered praise from local dignitaries.

The primary purpose of the juvenile justice system is to rehabilitate young offenders. That is the goal of the law enforcement agencies involved in the juvenile justice system. PBAA's community service program has as its mission to rehabilitate juvenile offenders. The program's mission is clearly supportive of and consistent with law enforcement purposes and policies.

PBAA seeks \$5,000 to cover supplies and to offset costs of oversight of this program. They normally provide 565 hours of community service through this

program. Supervision of the juveniles during those hours comprise 27% of supervisor's annual work hours.

Note: The PCBS received a memorandum from State Representative Bob Thorpe dated February 6, 2018, in which Mr. Thorpe complained about the use of RICO funds. He specifically mentions the PBAA request as one that demonstrates to him "that further state legislative action is needed in order to hold county officials personally accountable for their decisions." Respectfully, I disagree with Mr. Thorpe. An organization which is providing stable, long-standing and effective community service to fulfill juvenile sentencing requirements is an organization which qualifies for RICO funds.

**34. Pima Prevention Partnership (PPP)**

\$5,000.00

Recommendation: Approve

PPP administrators a juvenile diversion program known as teen court. An adult judge oversees trained teens who act as attorneys, bailiffs and jurors. The delinquent is given a hearing before the teen jurors who then impose what they believe to be fair consequences. Teen court provides 12 highly effective options for rehabilitation ranging from substance abuse prevention to domestic violence workshops.

Teen court works closely with the PCAO to identify juveniles who are good candidates for the program. It has been in existence for a number of years. PPP states that less 12% of their program participants re-offend within 6 months of completing the program.

This program clearly supports and is consistent with law enforcement interests and policies including: crime and recidivism reduction, rehabilitation, substance abuse education, and domestic violence education and reduction.

**35. PPEP Microbusiness and Housing Development Corporation (PMHDC)**

\$5,000.00

Recommendation: Seek clarification

PMHDC is a non-profit corporation which seeks to foster community development "by offering financial product, business services and community-based programs." The program states that it will help former inmates by

providing loans, capital and business services to assist them in starting small businesses.

The stated mission is certainly admirable and could be aligned with the law enforcement purpose of rehabilitating ex-prisoners so that they can successfully re-enter society.

The funds will be used to: provide technical assistance (\$4,000), business counseling (\$3,000), loan processing (\$2,000), and material/supplies (\$1,000). PCBS should inquire as to what entailed in these categories. The first three are service expenses.

- To whom will these funds be paid?
- By whom will the services be provided?
- What is the service of the loans?
- What interest rates are being charged?
- Where is the capital coming from?
- What terms are being offered in exchange for capital?
- How long has this organization been in existence?
- Do they have any success stories?
- Does PMHDC provide loans, capital and advice to other types of business development clients?
- Would providing funds to this organization constitute the government conferring an unfair business advantage to certain business owners or investors?

**36. Project Graduation for Ironwood Ridge HS, Oro HS, and Amphitheater HS (PG)**

\$15,000.00 (\$5,000.00 for each school)

Recommendation: Approve

PG is a non-profit organization with a mission to save young lives by providing safe, sober, and supervised graduation night celebrations on the campuses of these 3 schools.

Graduation night is a statistically very dangerous night for teens. PG seeks to protect teens and the public from harm at a particularly risky time.

The mission of this organization is to prevent substance use and abuse by underage graduates and to avoid deadly crashes. Clearly, the mission of this organization supports and is consistent with law enforcement objectives.

**37. Rincon Optimist Club (ROC)**

\$3,000.00

Recommendation: Seek clarification

ROC is an organization dedicated to helping youth. ROC seeks \$3,000 to purchase new shoes, socks and backpacks for students from low-income families. The thought is that providing these items can remove barriers to school attendance.

The connection to law enforcement is tenuous. ROC claims that their program reduces truancy which keeps kids off the street which reduces crime during those hours. Second, ROC claims that this program helps kids graduate and makes them less likely to be criminals.

Other organizations have suggested keeping kids off the street was a law enforcement mission. While that may hold a kernel of truth, my recommendation is that there should be some additional connection to law enforcement goals or law enforcement involvement.

**38. Southern Arizona Children's Advocacy Center (SACAC)**

\$10,000.00

Recommendation: Approve\*

SACAC is an organization which provides valuable services and support to children who have been victims of abuse in the time immediately following the abuse. In addition to assisting victims, SACAC also confers direct benefits on law enforcement by providing safe, convenient, non-threatening surroundings which maximize the chances of the child feeling comfortable enough to provide valuable information to the investigating agency.

The mission of SACAC is solely to support victims and law enforcement.

The funds requested will be used to purchase supplies and educational materials.

\*This application is for \$10,000. By the terms of her own program, Ms. LaWall said the maximum donation would be \$5,000.00.

**39. Southern Arizona Institute of Leadership (SAIL)**

\$5,000.00

Recommendation: Approve

SAIL seeks funds to pay for costs associated with hosting their Youth Leadership Conference. SAIL states that "this event focuses on prevention of crime." It is a 1-day event providing workshops, career information and exposure to positive role models.

Workshops regarding substance abuse education will be provided.

Additionally, SAIL states that Southern Arizona law enforcement agencies attend the event in attempts to recruit new officers and employees.

While this event is not solely focused on law enforcement purposes, such purposes are a large part of the program.

**40. The Shyann Kindness Project (SKP)**

\$2,000.00

Recommendation: Seek Clarification

SKP seeks funds for its annual backpack night. Backpacks and other useful items will be provided to underprivileged kids on a night with other activities.

The connection to law enforcement seems tenuous. Other than boosting self-esteem which leads to better chances of staying in school, there are really no other law enforcement purposes served here.

**41. Southern Arizona AIDS Foundation (SAAF)**

\$5,000.00

Recommendation: Approve

SAAF seeks \$5,000 to support its EON Homeless Youth Program (EYHP). The program provides substance abuse education and helps homeless youth to find jobs and housing.

This is a large organization offering many services. This application is not well-written, but it does state that the funds it is seeking will be used to present educational topics including substance abuse, suicidal prevention and issues which would help take these homeless teens off of the streets.

The teaching programs above are supportive of law enforcement interests, i.e. substance abuse and getting homeless people off of the streets. PCAO should require accounting to ensure that the funds are spent on substance abuse education.

**42. Sunnyside Neighborhood Association (SNA)**

\$5,000.00

Recommendation: Seek clarification

SNA's mission is all over the place. Clearly, they have a mission to get older people and younger people to cooperate to their mutual benefit. Some of their projects appear to benefit and involve law enforcement others do not.

SNA seeks \$5,000 to spend as follows:

- 1) \$3,000 for supplies needed to host the All-American Awards Program



- 2) \$500 for tools and supplies for neighborhood cleanups
- 3) \$250 for bicycle supplies
- 4) \$1,000 for something called Peace Garden

With the exception of the \$500 for tools and supplies for neighborhood cleanup which entails graffiti removal, SNA has failed to establish how the other activities support real law enforcement interests and policies.

I recommend approving \$500 but seeking clarification for the remaining projects.

**43. The Haven**

\$3,000.00

Recommendation: Approve

The Haven is a drug treatment program for women. Drug treatment programs are specifically noted as a permissible use of RICO funds.

**44. TMM Family Services (TMM)**

\$5,000.00

Recommendation: Approve

TMM provides temporary housing and other support to women and children who find themselves suddenly without a home.

Most of the program participants are victims of domestic abuse. TMM also provides referrals to services.

Although TMM does not specifically seek out crime victims, it is believed that a significant percentage of its enrollees are such victims in light of that, I am recommending approval of the grant as a program supporting victims.

TMM also provides substance abuse education which is another allowable expenditure.

**45. Tucson Police Foundation (TPF)**

\$5,000.00

Recommendation: Approve

TPF is an organization founded to support law enforcement. TPF provides much needed equipment to the police department and hosts events with the public whereby officers get to interact with the public in a positive way. Finally, TPF raises money to provide safety training to officers.

This organization's mission supports law enforcement interests.

**46. Tucson Urban League – Project Yes**

\$5,000.00

Recommendation: Seek Clarification

Project Yes is another after school program which cites its basis for RICO funding as the high risk of committing offenses or using drugs in the after-school hours.

Unfortunately, Project Yes makes no mention of anti-gang, substance abuse courses or any programming that supports law enforcement issues.

Some, but not all, of their participants are at risk and there is no mention of law enforcement involvement.

The connection to law enforcement interests is tenuous.

**47. Tucson Youth Development (TYD)**

\$5,000.00

Recommendation: Seek Clarification

TYD focuses on encouraging youth to finish their education and become contributing members of society. One of many of their programs pairs students with law enforcement officers for mentoring students who are interested in law enforcement careers.

The primary focus on this program appears to be on making young people ready to enter the workforce. Other than the positive effects of attention and

encouragement on a child's future, there is little here to say that this group's mission supports a law enforcement effort policy or initiative.

**48. Women's Foundation of Southern Arizona (WFSA)**

\$5,000.00

Recommendation: Seek Clarification

WFSA seeks funding to support Unidas, an after-school leadership program for high school aged girls. They attend regular classes. A portion of the curriculum relates to substance abuse and domestic violence.

WFSA has speakers from various law enforcement agencies from time to time.

WFSA is involved in many other activities. It is unclear how many presentations per year relate to substance abuse education, domestic violence, or involve law enforcement speakers.

We need clarification regarding the issues above.

**49. Youth On Their Own (YOTO)**

\$5,000.00

Recommendation: Seek Clarification

YOTO is another group helping homeless teens by providing a number of services aimed at assisting these teens to graduate high school. YOTO cites several statistics for the proposition that increased graduation rates lead to decreased crime rates.

The problem here is that it is another program which has an attenuated connection to law enforcement support. YOTO submitted a lengthy proposal which barely mentions substance abuse education.

This excellent organization probably will not qualify for RICO funds, but should give Ms. LaWall a chance to clarify.

**50. YWCA of Southern Arizona**

\$5,000.00

Recommendation: Approve

YWCA seeks funds to support Promotora, a program which supports, educates and encourages domestic violence victims who are from other countries.

This is a valid expenditure as it supports victims of a criminal offense and this is a group supporting the law enforcement mission of preventing domestic violence.

Please advise if you have any questions or comments.

Very truly yours,



J. Arthur Eaves  
For the Firm

JAE:ml