### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

STEVEN HANSON and RANDALL PELLETIER, on behalf of themselves and all others similarly situated.

C.A. No. 20-cv-00232-WES-PAS

v.

MATTHEW WELDON, in his official capacity as Director of the Rhode Island Department of Labor and Training

Defendant.

**Plaintiffs** 

### STIPULATION OF SETTLEMENT

WHEREAS this action was commenced by Plaintiffs pursuant to 42 U.S.C. § 1983 under the Due Process Clause of the Fourteenth Amendment of the United States Constitution and federal regulation;

WHEREAS Defendant denies any and all claims of wrongdoing asserted in connection with Plaintiffs' complaint;

WHEREAS no finding of liability has been made;

WHEREAS the Parties share a mutual interest in seeing that due process is provided to claimants who receive Unemployment Insurance Benefits;

WHEREAS the parties wish to avoid the expense and disruption of litigation on the issues presented in this litigation and are prepared to settle their differences without admitting any fault or liability;

NOW, THEREFORE, UPON THE STIPULATION AND AGREEMENT OF THE PARTIES, through their undersigned attorneys for the respective parties herein, that this action is settled, subject to the approval of this Honorable Court pursuant to the Federal Rules of Civil Procedure, on the following terms and conditions:

### I. TERMS AND DEFINITIONS

- 1. Defendant Matthew Weldon, in his official capacity as Director of the Department of Labor and Training ("DLT"), is responsible for the administration the unemployment insurance program in Rhode Island, pursuant to 42 U.S.C.§ 501, et seq. and R. I. Gen. Laws 28-44-1, et seq.
- 2. DLT is the state agency that administers the Unemployment Insurance Program.
- 3. Unemployment insurance ("UI") provides temporary income support to eligible claimants who are currently partially or fully unemployed.
  - 4. UI is a federally funded state administered program.
- 5. Unemployment Insurance is funded through state unemployment insurance taxes paid by employers and remitted to the federal UI trust fund where each state has a separate account for covering regular unemployment insurance benefits. As eparate federal payroll tax is paid by employers and used to cover the states' administrative costs.
- 6. In response to the COVID-19 Pandemic, Congress acted to expand the availability of unemployment benefits, first with the Families First Coronavirus

Response Act, signed into law on March 18, 2020, and then with the Coronavirus Aid, Relief, and Economic Security (CARES) Act, signed into law on March 27, 2020. Congress then acted to expand the availability of unemployment benefits with the Consolidated Appropriations Act of 2021, signed into law on December 27, 2020. Congress also acted to expand the availability of unemployment benefits with the American Rescue Plan, signed into law on March 11, 2021.

- 7. The CARES Act created the Pandemic Unemployment Assistance (PUA) program, the Federal Pandemic Unemployment Compensation (FPUC) program, and the Pandemic Emergency Unemployment Compensation (PEUC).
- 8. The PUA program provides income assistance to claimants partially or fully unemployed due to reasons related to the COVID-19 Pandemic by expanding UI eligibility to include part-time workers, members of the so-called "gig economy," and self-employed claimants.
- 9. PUA benefits are funded by the federal government, pursuant to the CARES Act.
- 10. Extended Benefits (EB) may provide additional weeks of unemployment benefits.
  - 11. EB benefits are funded by the federal government.
- 12. The FPUC program provided a flat, universal additional \$600 benefit payment to any UI or PUA claimant who is eligible to receive a base UI or PUA payment in a given week (i.e., is programmatically eligible and certifies that the claimant's weekly earnings were less than the claimant's benefit rate) for the period March 27, 2020, to

- July 25, 2020. Subsequently, a flat, universal additional \$300 payment to any UI or PUA or PEUC or EB claimant was extended, currently through September 6, 2021.
- 13. FPUC benefits are funded by the federal government, pursuant to the CARES Act.
- 14. The PEUC program functions as a federal analog to state Extended Benefits, providing additional weeks of benefits to claimants who have exhausted their regular UI entitlement. PEUC is additive to EB, not a replacement.
- 15. PEUC benefits are funded by the federal government pursuant to the CARES Act.
- 16. For purposes of this Stipulation, "UI-All" refers to UI, PUA, PEUC, and EB benefits.
- 17. Where monetarily eligible for UI-All, the claimant's UI-All claim will start with the Sunday of the week in which he/she first files the UI-All claim. This begins the "Benefit Year." The cessation of payments at the end of a Benefit Year is not a Termination of Benefits for the purpose of this Stipulation of Settlement.
- 18. Once the claimant is deemed monetarily eligible, a DLT-379 (Benefit Rate Decision), is mailed to the claimant's address on file to keep for their records.
- 19. On March 9, 2020, Governor Raimondo issued an Executive Order declaring a state of Disaster Emergency related to the COVID-19 pandemic.
- 20. As a result of the COVID-19 Pandemic, DLT received a significant increase in claims for unemployment insurance benefits.
  - 21. Rhode Island, along with a number of states, was the victim of criminal

conspiracies attempting to exploit the COVID-19 crisis by defrauding state unemployment insurance programs.

- 22. State and federal law and regulations have been enacted for DLT to safeguard the integrity of the UI trust fund and to guard against fraud (*see, e.g.*, 20 C.F.R. 602.11, Rhode Island Gen. Laws § 28-42-62.1).
- 23. For purposes of this Stipulation of Settlement, "Notice" is defined as written communication that complies with the legal requirements of the UI-All federal statute and regulations as well as the state statute and regulations, to the extent the state regulation imposes stronger requirements. "Notice" must be (1) in writing; (2) state the action that DLT intends to take; (3) provide the reasons for the intended action; (4) explain the rights to a hearing to contest the intended action and the method for obtaining the hearing; and (5) explain the circumstances under which UI-All benefits are continued if a hearing is requested.
- 24. For purpose of this Stipulation of Settlement, "Termination of Benefits" is defined as the permanent, temporary, or interim suspension of UI-All benefit payments.
- 25. For purpose of this Stipulation of Settlement, "Simultaneous Notice" is measured from the time that a Termination of Benefits is initiated. When provided by email, simultaneous notice must be provided to a claimant no later than twenty-four (24) hours after Termination is initiated. When provided by mail, simultaneous notice must be both delivered to the US Postal Service (USPS) and post-marked by the next business day after Termination is initiated.

26. For purpose of this Stipulation of Settlement, Notice of the Termination of Benefits is required in the following circumstances (a) suspected fraud by someone other than the claimant; (b) the employer objects to the claimant's receipt of UI-All benefits after the payment of benefits has commenced and (c) an allegation of a claimant's return to work premised on information from the National Directory of New Hires.<sup>1</sup>

### II. DEFENDANT'S OBLIGATIONS

### A. Notice of Termination of Benefits

27.DLT acknowledges the need to provide timely and adequate Notice of Termination of Benefits to a claimant when fraud is suspected by someone other than the claimant. DLT's procedure for providing this Notice of Termination of Benefits under this circumstance is:

- a. DLT will provide Simultaneous Notice to the claimant by email or mail through the USPS;
- b. The parties have agreed to the form of the Notice of Termination of Benefits to be sent, set forth at Exhibit A. The parties agree that this exemplar may be amended during the life of this Stipulation of Settlement as long as the information is provided in a materially similar form. DLT shall provide Plaintiffs' counsel with a copy of the proposed amended form;

<sup>&</sup>lt;sup>1</sup> There may be other circumstances when federal or state law or constitution requires notice, but such circumstances are outside the scope of this case and nothing herein shall be deemed to be a concession by either party that notice provided in such circumstances is, or is not, timely or adequate.

- c. In addition to the Notice of Termination of Benefits, DLT will send the claimant, either (a) as an attachment to an email or (b) identified in the paper correspondence, a hyperlink directing the claimant to an online resource by which the claimant can verify their identity through a questionnaire developed with DLT by Amazon/LexisNexis or a successor entity; and
- d. If a claimant is unable to verify their identity online through the Amazon/LexisNexis questionnaire or a successor questionnaire, the claimant is provided with a telephone number to call DLT's fraud hotline or Call Center to verify their identification via phone.
- e. DLT's obligations regarding the aforesaid telephone number are addressed below.
- 28.DLT acknowledges the need to provide timely and adequate Notice of Termination of Benefits to a claimant when the employer objects to the claimant's receipt of UI-All benefits after the payment of benefits has commenced. DLT's procedure for providing this Notice of Termination of Benefits is:
  - a. DLT will provide Notice of Termination of Benefits advising the claimant that DLT needs to interview (hereinafter "Adjudication Interview") the claimant about their eligibility for UI-ALL benefits. The Notice will set forth the date and time, or a window/block of time, that DLT will initiate a telephonic interview of the claimant and to provide the claimant the opportunity to be heard (hereinafter "Adjudication Date"). Where a window

or block of time is provided, it shall be no more than a window or block of four hours. If the individual does not answer, DLT will make at least two additional attempts to reach them. The parties have agreed to the form of the Notice of Termination of Benefits, set forth at Exhibit B. The parties agree that this exemplar may be amended during the life of this Stipulation of Settlement as long as the information is provided in a materially similar form. DLT shall provide Plaintiffs' counsel with a copy of the proposed amended form;

- b. "Notice" of the Adjudication Interview shall be sent by email or USPS to the claimant. If the Notice is sent by email, it must be sent at least ten (10) days prior to the Adjudication Date. If the Notice is sent by USPS, it must be delivered to USPS and post-marked at least ten (10) days prior to the Adjudication Date; unless a longer notice period is required by state law, which shall then control;
- c. The claimant will continue to receive UI-All benefits until an Adjudication

  Decision has been rendered; and
- d. The Adjudication Decision will advise a claimant of the right to appeal the decision to the Board of Review and of the need to continue to certify for benefits pending a decision on the appeal.
- 29. DLT acknowledges the need to provide timely and adequate Notice of Termination of Benefits to a claimant when DLT receives information from the National Directory of New Hires (hereinafter "NDNH") that the claimant has

returned to work. DLT's procedure for providing this Notice of Termination of Benefits is:

- a. Upon receipt of information from the NDNH that a claimant has returned to work, DLT will contact the claimant advising the claimant that DLT has received information that he or she has returned to work. Upon confirmation from the claimant that he or she has returned to work, DLT will stop benefits.
- b. In the event that the claimant fails to respond or indicates that the claimant has not returned to work, DLT will contact the claimant's employer inquiring about the claimant's employment status. If the claimant's employer indicates that the claimant has returned to work, then DLT will provide Notice of Termination of Benefits advising the claimant that DLT needs to conduct an Adjudication Interview about the claimant's eligibility for UI-ALL benefits. The Notice will set forth the date and time, or a window/block of time, that DLT will initiate a telephonic interview of the claimant and to provide the claimant the opportunity to be heard (hereinafter "Adjudication Date"). Where a window or block of time is provided, it shall be no more than a window or block of four hours. If the individual does not answer, DLT will make at least two additional attempts to reach them. The parties have agreed to the form of the Notice of Termination of Benefits, set forth at Exhibit B. The parties agree that this exemplar may be amended during the life of this Stipulation of Settlement

- as long as the information is provided in a materially similar form. DLT shall provide Plaintiffs' counsel with a copy of the proposed amended form;
- c. "Notice" of the Adjudication Interview shall be sent by email or USPS to the claimant. If the Notice is sent by email, the notice must be sent at least ten (10) days prior to the Adjudication date. If the Notice is sent by USPS, it must be delivered to USPS and post- marked at least ten (10) days prior to the Adjudication Date; unless a longer notice period is required by state law, which shall then control;
- d. The claimant will continue to receive UI-All benefits until an Adjudication

  Decision has been rendered; and
- e. The Adjudication Decision will advise a claimant of the right to appeal the decision to the Board of Review and of the need to continue to certify for benefits pending a decision on the appeal.

### B. Certification

30. For purpose of this Stipulation of Settlement, "Certifying" or "Certification" is defined as the process involved when a claimant has been determined eligible for UI-All benefits, the claimant must request a payment for each week, by affirming that the claimant is unemployed or underemployed. The claimant makes this affirmation online or by telephone. The claimant is instructed on the proper reporting of earned wages. The information the claimant reports to DLT each week will determine whether the claimant is entitled to receive any UI-ALL benefits for the previous week.

Claimants may not be eligible for UI-All benefits if (i) claiming total unemployment,<sup>2</sup> they report that their weekly income is equal to or greater than their weekly benefit rate; (ii) claiming partial unemployment,<sup>3</sup> they report that their weekly income is in an amount equal to or greater than one hundred and fifty percent (150%) of the weekly benefit rate for total unemployment to which the employee would be entitled if totally unemployed and eligible; (iii) they were not able to work full-time that week; (iv) they were not available to work full-time that week; (v) they refused work, (vi) they worked full time, (vii) their pension amount changed, (viii) they do not agree to the Attestation that week; or (ix) they do not agree to the Earnings Certification that week. A claimant's failure to certify is not a Termination of Benefits or a denial of UI-All benefits. Unless the claimant's Benefit Year has ended, the claimant will be able to certify in subsequent weeks and will not be locked out of weekly certification on the basis of failure/rejection of weekly certification in a previous week.

31. The parties have agreed to amend certain error messages that may appear during the online Certification in the form provided in Exhibit C. The parties agree that these exemplars may be amended during the life of this Stipulation of Settlement as long as the information is provided in a materially similar form. DLT shall provide Plaintiffs' counsel with a copy of the proposed amended form.

32. As part of the online Certification, claimants must be notified if the certification has been successfully recorded or if the certification has not been recorded. During the last Certification week, the claimant is advised that the Benefit

<sup>&</sup>lt;sup>2</sup> R.I.G.L. § 28-42-3(28).

<sup>&</sup>lt;sup>3</sup> R.I.G.L. § 28-42-3(26)(i).

Year will end. The parties have agreed that DLT must provide a mechanism for claimants to be able contact DLT in a timely manner if their efforts to certify are unsuccessful or if their certification is rejected.

### C. <u>DLT Response</u>

- 33. The Defendant avers, upon information and belief, that on or about Friday, June 5, 2020, DLT sent 8,168 emails to a total of 5,708 SSNs in the form attached as Exhibit D, and by Tuesday, June 9, 2020, DLT sent written notice to the remaining 1,977 claims that did not have email addresses associated with their claims.
- 34. Plaintiffs' Counsel agreed that the notice sent on June 5, 2020 via email was acceptable, and that the Defendant sent that notice. Plaintiffs' counsel agreed that the notice sent via U.S. mail was acceptable, and that the Defendant sent that notice.
- 35. DLT avers that it has implemented a policy since June 5, 2020 to provide written notice (whether by email, U.S. mail or other written means) to any claimant whose UI-All has been stopped because fraud by someone other than the claimant is suspected with or prior to DLT stopping payment on the claim as described in Paragraph 24(a). On or about June 27, 2020, a separate notice was initiated that refers claimants to an Amazon-Lexis tool or successor tool to verify the claimant's identity and eligibility for UI-All.
- 36. DLT continued the Fraud Hotline operated by Maximus until June 30, 2021. As of July 1, 2021, claimants who have had UI-All benefits suspended due to suspected fraud on the account shall be advised to contact the DLT Call Center to

assist the claimant with verifying the claimant's identity and unfreezing the UI-All benefits

- 37. The DLT Call Center shall be operated by individuals with the ability to resolve most problems in one phone call on business days (at least four hours on each Monday through Friday, excluding holidays). The days and times for the DLT Call Center shall be posted on the DLT website. DLT shall ensure that the DLT Call Center staff has the capability to verify the identities and unfreeze benefits and to attend to all calls concerning fraud and certification issues such that the average hold time on such calls before the call is answered by a staff person is consistent with paragraph 39, *infra*. If the matter (either fraud or certification) is not resolved with the initial call, DLT will initiate a follow-up call with the claimant within seven (7) business days. The parties acknowledge that DLT may not be able to resolve a claimant's matter if the claimant fails to cooperate with DLT.
- 38. DLT will continually monitor the call center, including collecting the following data points, for fraud calls and UI-All calls (including certification issues), or if not separately maintained, for all calls:
  - a. Total number of calls, including calls handled/completed and calls abandoned, reported each day;
  - b. Total number and percent of calls abandoned and average hold time before abandonment, reported each day;
  - c. Average hold time before answer, including maximum hold time each day.

- d. In light of DLT's practice that a call center representatives handle only one call at a time, the length of the call is not a measure that is relevant to this case.
- 39. DLT will strive to have UI-All calls to the call center average no longer than a twenty (20) minute hold time before answer by a call center representative. While working to meet a twenty (20) minute average hold time, DLT shall take steps to reduce call hold time and call abandonment. Such steps may include but will not be limited to any of the following or other reasonable, appropriate measures as determined by the Director (hereinafter "reasonable, appropriate measures"):
  - a. Assign additional staff to cover phones for all available work hours, including overtime.
  - b. Increase the amount of available overtime for staff.
  - c. Add other staffing resources via loan from other DLT units (within the same local union) to assist.
  - d. Increase the hours of operation of the DLT call center and post the increased hours on the DLT website.
  - e. Provide a call-back system that enables the claimant to choose to have the call returned without losing the claimant's place in line.
- 40. During the term of this Stipulation, Plaintiffs' counsel may bring to the attention of Defendant's designee(s), by email at the time the issue arises, those instance in which Plaintiffs' counsel represents that a claimant was terminated from UI without timely and adequate notice. Once Plaintiffs' counsel has provided

Defendant's designee(s) with the information necessary to review, Defendant will review the matter and respond as soon as practicable but in any event with a status within seven (7) business days.

41. During the term of this agreement, DLT has agreed that UI-All claimants may obtain a UI Status Letter in which DLT provides information about the status of their UI benefits to the District Court for those claimants who have pending eviction cases. A copy of the UI Status Letter is attached as Exhibit E.

### III. PROGRESS REPORTING

- 42. Notice of first deployment of new notices:
  - a. Advance notice: DLT will notify Plaintiffs' Counsel no later than ten (10) days in advance of the intended or anticipated date of first deployment of new notices subject to this agreement, provided that DLT shall not delay the implementation of any notice solely for the purpose of notification; and
  - b. Confirmation: DLT will notify Plaintiffs' Counsel no later than ten (10) days after the date the new notices were deployed in DLT's system.
- 43. DLT will provide Plaintiffs' counsel each month with data regarding;
  - a. the number of fraud stops each month;
  - b. the number of confirmed fraud claims each month; and
  - c. the number of claims that were determined to be legitimate each month.
- 44. While striving to achieve an average hold time of no longer than twenty (20) minutes, DLT will provide Plaintiffs' counsel every two weeks with a report

containing all of the data collected in paragraph 38, including, for the first report, a description the of reasonable, appropriate measures (hereinafter "the call data report") and in subsequent reports, any changes in the reasonable appropriate measures, except that DLT may increase the interval between reports as follows:

- a. DLT may provide the call data report every month after the DLT has achieved an average weekly call hold time between thirty (30) minutes to sixty (60) minutes for a period of four consecutive weeks. DLT shall advise Plaintiffs' counsel of its intention to alter the time period for reporting and the basis therefor and
- b. DLT may provide the call data report every quarter after the DLT has achieved an average weekly call hold time under thirty (30) minutes for a period of four consecutive weeks. DLT shall advise Plaintiffs' counsel of its intention to alter the time period for reporting and the basis therefor.

### IV. GENERAL PROVISIONS

- 45. No provision herein shall infringe upon any claimant recipient's right to contest, compromise or appeal an unemployment determination pursuant to the federal regulations or Rhode Island Administrative Procedures Act.
- 46. Except to the extent set forth herein, the terms and conditions of this Stipulation shall become effective upon the date of entry of the Stipulation of Settlement by the Court.
- 47. This Stipulation is final and binding upon the parties, their successors, and assigns.

- 48. The Parties recognize and acknowledge that the only consideration for signing this Stipulation are the terms stated herein and no other promise, agreement, or representation of any kind has been made to any party by any person or entity whatsoever to cause any party to sign this Stipulation of Settlement.
- 49. This Stipulation of Settlement constitutes a compromise settlement of disputed and contested matters between the Parties. It shall not be construed as an admission of any sort by any of the Parties, nor shall it be used as evidence in a proceeding of any kind, except as necessary to administer and/or enforce the terms of this Stipulation of Settlement.
- 50. This Stipulation of Settlement constitutes an integrated Stipulation of Settlement, containing the entire understanding of the Parties with respect to the matters addressed herein and, except as set forth in this Stipulation of Settlement, no representations, warranties, or promises, oral or written, have been made or relied on by the Parties. This Stipulation of Settlement shall prevail over any prior communications between the Parties or their representatives relative to matters addressed herein. This Stipulation of Settlement may not be changed unless the change is in writing and signed by the Parties or by order of the Court.
- 51. The Parties warrant and represent that they have read and understand the foregoing provisions of this Stipulation and that they and their respective signatories are fully authorized and competent to execute this Stipulation on their behalf.

### V. ENFORCEMENT

52. Plaintiffs may move for enforcement of this Stipulation, including the remedy of extension of the Court's jurisdiction, based on a showing of systemic non-compliance by Defendant with the terms of this Stipulation. Prior to bringing any such motion, Plaintiffs will be required to provide written notice to Defendant detailing any claim of systemic non-compliance. Within fifteen (15) business days thereafter, or at such time as the parties mutually agreed upon, the parties shall confer by telephone or inperson in a good faith effort to resolve the dispute. If the parties are unable to resolve the dispute, Plaintiffs may file a motion for enforcement with the Court.

53. In the event that Plaintiffs move for enforcement of this Stipulation, including the remedy of extension of the Court's jurisdiction, Defendant shall not object to the standing or mootness of the Plaintiffs to make that motion or to seek relief generally applicable to all persons similarly situated, nor shall Defendant interpose facts concerning the standing or mootness of the Plaintiffs to bring such motion, nor shall Defendant object to the intervention or adding of such other additional claimant Plaintiffs who have applied for unemployment insurance payments who seek to enforce the Stipulation.

### VI.JURISDICTION

- 54. This Stipulation shall take effect upon execution by the parties and entry by the Court.
- 55. The Court shall retain jurisdiction for a period of fifteen (15) months from the entry of the Stipulation by the Court, unless otherwise extended by the Court after

adjudication and a finding of the Defendant in systemic non-compliance. Absent such extension, the Court's jurisdiction herein shall automatically terminate unless upon a motion by the Plaintiffs alleging systemic noncompliance. Defendant reserves the right to object to the motion.

56. This Stipulation and all obligations herein shall terminate, and this Stipulation shall have no force and effect retrospectively or prospectively five (5) years from the effective date of this Stipulation or first deployment of the notices, whichever date shall last occur. This is self-executing and does not require any affirmative action by the Defendant before the Court.

### VII. ATTORNEYS' FEES AND COSTS

57. The parties agree to the payment of attorneys' fees and costs in the amount of \$145,000.00 in attorneys' fees and \$400.00 in costs, representing a compromise of attorneys' fees and costs and Plaintiffs, counsel, their firm, business, and/or the ACLU that they are employed by or affiliated with, waive their right to seek and be awarded attorney's fees and costs under 42 U.S.C. § 1988 or any other statute, regulation or common law for legal services and expenses incurred up to and including the date of entry of the within Stipulation and without prejudice to a further application for attorneys' fees and costs for services and expenses incurred after the date of entry of the within Stipulation in connection with seeking or obtaining compliance with its terms through Court proceedings, but excluding routine monitoring to confirm Defendant's compliance with the terms and time

frames set forth herein. Said payment shall be made by the Defendant within ninety

(90) days) of entry of this Stipulation of Settlement by the District Court as follows:

To Ellen Saideman:

\$75,400.00 in fees and \$400.00 in costs; and

To Lynette Labinger: \$69,600.00 in fees.

58. The sharing of the tribunal-approved award with the American Civil Liberties

Union Foundation of Rhode Island is consistent with this Court's decision in *Inmates* 

of RI Training School v. Martinez, 465 F. Supp. 2d 131 (D.R.I. 2006) and Rhode Island

Rules of Professional Conduct. 5.4(a)(4).

59. The parties agree that Defendant's unemployment insurance program is

governed by federal law and regulations and that Defendant must at all times comply

with federal and state law. Accordingly, this Stipulation and Order of Settlement is

subject to any applicable changes in federal law or regulations. Nothing in this

agreement prohibits the Defendant from seeking a modification by consent of the

parties of by Order of the Court, upon which Defendant shall bear the burden of proof,

on the basis that there has been a change in federal or state law or federal regulation.

Dated: November <u>4</u>, 2021

Plaintiffs, by their attorneys,

/s/ Ellen Saideman

Ellen Saideman, Esq. (Bar No. 6532)

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/s/ Lynette Labinger_
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FOUNDATION OF RHODE ISLAND
Defendant, by his attorney
/s/ Brenda Baum
Brenda Baum (Bar No. 5184)
Assistant Attorney General
Department of Attorney General
State of Rhode Island
150 South Main Street
Providence, RI 02903
401-274-4400 (ext 2294)
bbaum@riag.ri.gov
D. WEDD
ENTER:
UNITED STATES JUDGE
Data d.
Dated:

### EXHIBIT A

### NOTICE OF TEMPORARY STOP OF UNEMPLOYMENT INSURANCE

The Department of Labor and Training has placed a temporary stop on your unemployment insurance benefit payments because your claim was flagged as showing signs of potentially fraudulent activity.

### Why has my claim been temporarily stopped?

Like many states across the country, Rhode Island has seen a significant increase in fraudulent unemployment insurance claims. A fraudster may file a fake claim in someone else's name or a fraudster may hijack a legitimate claim and re-direct the payments to a fraudulent account. To make sure that legitimate claimants are receiving unemployment insurance payments, we are temporarily stopping flagged accounts.

### My claim is legitimate. What can I do to reactivate it and continue collecting payments?

To unfreeze your benefits, please verify your identity with the Department by completing a short online questionnaire, available on the Department's website at <a href="https://verify.dlt.ri.gov/">https://verify.dlt.ri.gov/</a>. Using this online tool is the quickest way to unfreeze your account. If you cannot use this tool you may call DLT's dedicated fraud line at (401) 375-2196.

This questionnaire is timed at three minutes. To ensure you have enough time to complete it, please be prepared to provide personal identifying information. This may include, but is not limited to:

- Your name
- Social Security Number
- Date of Birth
- Residential Address, and
- Banking information (including your routing and account numbers).

Please attempt to use the online tool before calling. It is the quickest and easiest way to unfreeze your account.

### AVISO DE PARADA DE PARADA TEMPORAL DEL SEGURO DE DESMPLEO

El Departamento de Trabajo y Capacitacion ha suspendido temporalmente sus pagos de beneficios del seguro de desempleo porque su reclamo fue marcado como mostrando signos de actividad potencialmente fraudulenta.

### Por que de detuvo temporalmente mi reclamo?

Como muchos estados en todo el país, Rhode Island ha visto un aumento significativo en las reclamaciones fraudulentas de seguro de desempleo. Un desfraudor puede presentar una reclamación falsa a nombre de otra persona o un desfraudor puede secuestrar una reclamación legitima y redirigir los pagos a una cuenta fraudulenta. Para asegurarnos de que los reclamantes legitimos reciban pagos del seguro de desempleo, estamos deteniendo temporalmente las cuentas marcadas.

### Mi reclamo es legitimo. Que puedo hacer para reactivarlo y seguir cobrando pagos?

Para descongelar sus beneficios, verifique su identidad con el Departamento completando un breve cuestionario en línea, disponibile en el sitio web del Departamento en <a href="https://verify.dlt.ri.gov/">https://verify.dlt.ri.gov/</a>
Usar esta herramienta en línea es la forma mas rápida de descongelar su cuenta. Si no puede usar esta herramienta, puede llamar a la línea dedicada al fraude de DLT al (401) 375-2196.

Este cuestionario tiene una duración de tres minutos. Para asegurarse de tener suficiente tiempo para completarlo, por favor de tener en mano, información de identificación personal. Esto puede incluir, pero no se limita a:

- Tu nombre
- Numero de seguridad social
- Fecha de nacimiento
- Direccion residencial y
- Informacion bancaria (incluidos sus números de cuenta y de ruta)

Por favor, intente utilizar la herramienta en línea antes de llamar. Es la forma mas rápida y sencilla de normalizar su cuenta.



### **English**

**Important!** This document contains **important information** about your rights, responsibilities and/or benefits. It is critical that you understand the information in this document, and we will provide the information in your preferred language at no cost to you. **Call (401) 415-6772** for assistance in the translation and understanding of the information in this document.

### **American Sign Language**

Important! Please visit here for ASL version of this document: <a href="https://www.youtube.com/channel/UCQuwujfqdfDDY3cLU3n">https://www.youtube.com/channel/UCQuwujfqdfDDY3cLU3n</a> yH w/videos

### Spanish / Español

**ilmportante!** Este documento contiene <u>información</u> <u>importante</u> sobre sus derechos, responsabilidades y/o beneficios. Es importante que usted entienda la información en este documento. Nosotros le podemos ofrecer la información en el idioma de su preferencia sin costo alguno para usted. **Llame al (401) 415-6772** para pedir asistencia en traducir y entender la información en este documento.

### Chinese - Traditional / 繁體中文

**重要須知!**本文件包含**重要資訊**,事關您的權利、責任,和/或福利。請您務必理解本文件所含資訊,而我們也將使用您偏好的語言,無償為您提供資訊。**請致電 (401) 415-6772** 洽詢翻譯及理解本文件資訊方面的協助。

### Vietnamese / Việt

Lưu ý quan trọng! Tài liệu này chứa thông tin quan trong về quyền hạn, trách nhiệm và/ hoặc quyền lợi của quý vị. Việc hiểu rõ thông tin trong tài liệu này là rất quan trọng, và chúng tôi sẽ cung cấp miễn phí cho quý vị thông tin này bằng ngôn ngữ mà quý vị ưa dùng. Hãy gọi (401) 415-6772 để được hỗ trợ về việc thông dịch và hiểu thông tin trong tài liệu này.

### Tagalog / Tagalog

Mahalaga! Naglalaman ang dokumentong ito ng mahalagang impormasyon tungkol sa iyong mga karapatan, responsibilidad at/o benepisyo. Napakahalaga nauunawaan mo ang impormasyong nakapaloob dokumentong ito, at ibibigay namin nang libre ang impormasyon sa pinili mong wika. Tumawag sa (401) 415-6772 upang humingi ng tulong sa pagsasaling-wika at pagunawa sa impormasyong nasa dokumentongito.

### العربية / Arabic

مهم! يحتوي هذا المستند على معلومات مهمة حول حقوقك ومسؤولياتك و/أو فوائدك. من الأهمية بمكان فهم المعلومات الواردة في هذا المستند، وسنو فر المعلومات بلغتك المفضلة دون تحملك أي تكلفة. اتصل على الرقم للحصول على مساعدة في ترجمة المعلومات الواردة في 407-415 (401). هذا المستند و فهمها

### French / Français

Important ! Ce document contient <u>des informations</u> <u>importantes</u> sur vos droits, vos responsabilités et/ou vos allocations. Il est essentiel que vous compreniez les informations contenues dans ce document, et nous vous fournirons gratuitement ces informations dans la langue de votre choix. Appelez le (401) 415-6772 pour obtenir de l'aide pour traduire et comprendre les informations contenues dans ce document.

### Haitian Creole / Kreyòl Ayisyen

**Enpòtan!** Dokiman sa a gen <u>enfòmasyon enpòtan</u> ladan konsènan dwa, responsablite ak/oswa avantaj ou yo. Li ap vrèman enpòtan pou ou konprann enfòmasyon yo ki nan dokiman sa a, epi n ap ba ou enfòmasyon sa yo nan lang ou prefere a gratis. **Rele (401) 415-6772** pou jwenn asistans pou tradui ak pou konprann enfòmasyon ki nan dokiman sa a.

### Portuguese / Português

Importante! Este documento contém <u>informacões</u> <u>importantes</u> sobre os seus direitos, responsabilidades e/ou benefícios. É essencial que compreenda as informações constantes neste documento, as quais disponibilizaremos, gratuitamente, na língua à sua escolha. Contacte o número (401) 415-6772 para solicitar ajuda para traduzir e compreender as informações contidas neste documento.

### Russian / русский

**Важно!** В настоящем документе содержится <u>важная информация</u> о ваших правах, обязанностях и/или преимуществах. Крайне важно, чтобы вы поняли информацию, содержащуюся в данном документе, а мы бесплатно предоставим вам эту информацию на выбранном вами языке. Позвоните по телефону (401) 415-6772 для получения помощи в переводе и понимании информации, содержащейся в данном документе.

### Korean / 한국어

중요! 본 문서는 귀하의 권리, 책임 및/또는 이익에 관한 중요한 정보를 포함하고 있습니다. 귀하가 본 문서에 있는 정보를 이해하는 것은 대단히 중요하며, 귀하가 원하는 언어로 정보를 제공받으실 수 있습니다. (401) 415-6772 로 전화하여 본 문서에 있는 정보의 번역 및 이해를 위해 도움받으시길바랍니다.

### EXHIBIT B

Babel notice and Spanish translation to be provided to UI claimants.

### DEPARTMENT OF LABOR AND TRAINING CENTRAL ADJUDICATION UNIT PO BOX 20067 CRANSTON, RI 02920-0941

### NON-MONETARY APPOINTMENT LETTER

XX/XX/XXXX

Ms. Jane Doe 123 Main Street Warren, RI 02885

Re: Unemployment Insurance Claim - Adjudication Appointment

Dear Ms. Doe:

The Department of Labor and Training needs to interview you about your eligibility for unemployment insurance. We are scheduling an appointment to take a statement from you in order to determine your continued eligibility to collect benefit payments. If you are currently collecting benefits, they will continue until a final decision has been made and sent to you.

The issue that needs to be discussed is:

Examples—your employer says that you quit

Your employer says that you were fired for misconduct Your employer says that you refused a request to return to work

We need to make a decision about whether you are entitled to unemployment benefits. If you do not participate in an interview, that decision will be made without your input.

A department representative will contact you at the phone number listed on your claim to take your statement on the date listed below. The call will be placed between the times listed below by a DLT representative from a Rhode Island (area code 401) phone number:

Date: XX/XX/XXXX

Time: 8:00am - 10:00am

DLT will call you at: (XXX) XXX-XXXX

### PLEASE BE SURE TO UNBLOCK AND ANSWER THE PHONE!

IT IS VERY IMPORTANT THAT YOU KEEP THIS SCHEDULED TELEPHONE APPOINTMENT BECAUSE A DECISION WILL BE MADE WITHOUT YOUR PARTICIPATION IF YOU DO NOT ATTEND THIS TELEPHONE APPOINTMENT. You have the right to present any information you believe will help you on this call. You may do so by having witnesses available on your behalf or by presenting any evidence you would like to submit. You also have the right to be represented by counsel.

This appointment can be rescheduled if you have a good cause reason to do so. You may request another date/time by contacting the Central Adjudication Unit at (401) 462-9027 before the scheduled time listed above.

If the phone number listed is not correct or you do not have a phone number where you can be contacted on that day, please call the Central Adjudication Unit office at (401) 462-9027 and choose Option 1 to discuss your appointment.

It is important that you continue to use UI Online or TeleCert to continue to request weekly unemployment insurance payments each week until you receive a final decision regarding this matter. If your claim is approved and you have not certified for payments while your matter was pending, you may not be eligible to collect for those missing weeks.

IMPORTANT: You have the right to have these documents translated or interpreted for you at no cost. To request that they be translated or interpreted please contact the unemployment insurance service center at (401) 415-6772.

ADD SPANISH LANGUAGE INFO Re: Language Access

ADD BABEL INSERT

### EXHIBIT C

# Record Certification errors - Screen shots

System-under-maintenance: User attempt to certify during a Maintenance window, they can retry later

**DLT | Ul Online** Request Benefits

Create Pin

Reset Pin

Language •

Our system is currently inaccessible due to daily system maintenance. Please check back shortly.

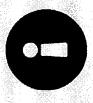
Please check back shortly. WM(22 Our system is currently inaccessible due to daily system maintenance.

asked questions and information regarding UI Service Center operating call (401) 415-6772 or visit <a href="https://www.dlt.ri.gov/UI">www.dlt.ri.gov/UI</a> to find answers to frequently If you have questions about your unemployment insurance claim, please hours.



Query-not-valid: Form submitted is invalid, (e.g. user is attempting to bypass front end validation)

DLT: UI Online Requestermine Create Pin React Pin Reac



greater than your benefit amount, and you may not be eligible for a payment this week. Rhode Island Your certification has been successfully recorded; however, you have entered law prohibits the payment of unemployment benefits for any week in which earnings are equal to a Your certification has been successfully recorded. However, you have entered earnings equal to or claimant's benefit rate.

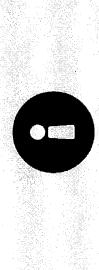
earnings equal to or greater than your weekly benefit rate which means you may answers to frequently asked questions and information regarding UI Service benefits for any week when earnings are equal to or greater than a claimant's not be eligible for a payment this week. RI law prohibits the payment of UI Center operating hours. insurance claim, please call (401) 415-6772 or visit <u>www.dlt.ri.gov/UI</u> to find If you think there was a mistake or have quėstions about your unemployment benefit rate. Please certify again next Sunday for next week's payment.

## Certification-not-recorded: some technical error

**DLT | UI Online** Request Benefits

Create Pin

Reset Pin



Your request cannot be completed at this time. Please try again in 24 hours. If you are still unable to

Your request to certify cannot be completed at this time. Please contact the call certify after your second attempt, please call to speak with a UI Claims Specialist at 401-415-6772.

system or speak with a call center representative about your claim. center at (401) 415-6772 to either certify your payment using the automated

Please visit www.dlt.ri.gov/UI to find answers to frequently asked questions and information regarding UI Service Center operating hours.

### Benefit-expired: **DLT** UI Online

Request Benefits

Create Pin

Reset Pin

Your certification has been successfully recorded. However, your benefit year has ended. If you are still in need of assistance, you will need to file a new claim to have your eligibility determined.

eligibility determined. continue collecting unemployment, you will need to file a new claim to have your ended. Claims are active for a 12-month period before they expire. If you wish to Your certification has been successfully recorded; however, your benefit year has

WM(8

visit www.dlt.ri.gov/UI to find answers to frequently asked questions and

information regarding UI Service Center operating hours.

questions about your unemployment insurance claim, please call (401) 415-6772 or

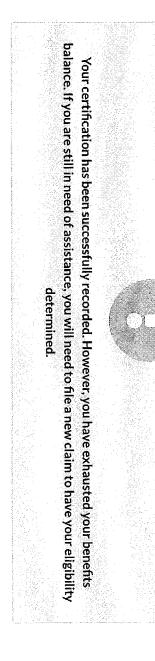
If you think there was a mistake about the end of your benefit year or have

### **DLT** UI Online Request Benefits

Create Pin

Balance-of-credit-exhausted: user has exhausted balance

Reset Pin



any possible extensions. time. Prior to collecting any further benefits, you will have to refile your claim either online or depleted, the claim can no longer be paid unless there are extended benefits available at that beginning of a claim on their Monetary Determination notice. Once those funds have been balance. Claims have a total available balance of credits which are provided to claimants at the Your certification has been successfully recorded; however, you have exhausted your benefits by calling the UI Service Center to determine if you are eligible for further payments, including

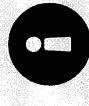
a new claim or get information regarding UI Service Center operating hours. call (401) 415-6772 or visit www.dlt.ri.gov/UI to find answers to frequently asked questions, file If you there was a mistake or have questions about your unemployment insurance claim, please

## DLT | UI Online Request Benefits

Create Pin

Reset Pin

Adverse-answers-received: user has answer one or more questions adversely



Your certification has been recorded. However, you may not be eligible because of your following

 You have indicated that you were not able to work full-time. Rhode Island law prohibits the payment of unemployment benefits for any week in which you were not able to work full-time.

answers:

- You have indicated that you were not available to work full-time. Rhode Island law prohibits the payment of unemployment benefits for any week in which you were not available to work full-time.
- You have indicated that you do not agree to the Attestation. You must agree to the Attestation statement in order to receive benefits.
- You have indicated that you do not agree to the Earnings Certification statement. You must agree to the Earnings Certification statement in order to receive benefits.

questions and information regarding UI Service Center operating hours. please call (401) 415-6772 or visit <a href="www.dlt.ri.gov/UI">www.dlt.ri.gov/UI</a> to find answers to frequently asked If you think there was a mistake or have questions about your unemployment insurance claim,





# Combinations: any error message from above, plus user has submitted adverse questions

**DLT | UI Online** Request Benefits

Create Pin

Reset Pin

Language



in need of assistance when you next certify, you will need to file a new claim to have your eligibility Your certification has been successfully recorded. Your benefit year ends next week. If you are still determined.

## In addition, your following responces will affect your ability to claim benefits:

- You have indicated that you were not able to work full-time. Rhode Island law prohibits the payment of unemployment benefits for any week in which you were not able to work full-time.
- You have indicated that you were not available to work full-time. Rhode Island law prohibits the payment
  of unemployment benefits for any week in which you were not available to work full-time.
- You have indicated that you do not agree to the Attestation. You must agree to the Attestation statement in order to receive benefits.
- Earnings Certification statement in order to receive benefits. You have indicated that you do not agree to the Earnings Certification statement. You must agree to the

## Verification errors-Screen shots

## Ineligible-user: stop code 8

DLT | UI Online Request Benefits Create Pin

Reset Pin

Based on the information available in the system, you are not eligible to Based on your information, you are ineligible to certify for weekly claims at this time

that you have an active Temporary Disability Insurance or Temporary certify for weekly UI payments at this time because our records indicate Caregiver Insurance claim.

www.dlt.ri.gov/UI to find answers to frequently asked questions and unemployment insurance claim, please call (401) 415-6772 or visit If you think there was a mistake or have questions about your information regarding UI Service Center operating hours.

WM(15



Language

### Bye-not-matched

**DLT | UI Online** Request Benefits

Create Pin

Reset Pin

Based on the information that you have provided, we are unable to accept Based on the information you provided, we are unable to accept your certification. Please make sure that the personal information you are providing is accurate and try again.

www.dlt.ri.gov/UI to find answers to frequently asked questions and unemployment insurance claim, please call (401) 415-6772 or visit If you think there was a mistake have questions about your your certification at this time. Please make sure that all of the personal information regarding UI Service Center operating hours. information you entered is accurate and try again.

## Dob-not-matched

**DLT | UI Online** Request Benefits

Create Pin

Reset Pin

The date of birth you have provided does not match the Social Security Number (SSN) on file. Please make sure that the personal information you are providing is accurate and try again

are providing is accurate and try again. Number (SSN) on file. Please make sure that the personal information you The date of birth that you have entered does not match the Social Security

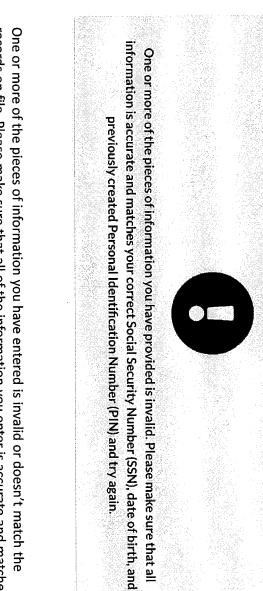
unemployment insurance claim, please call (401) 415-6772 or visit If you think there was a mistake or have questions about your information regarding UI Service Center operating hours. www.dlt.ri.gov/UI to find answers to frequently asked questions and

### Pin-not-matched

**DLT | UI Online** Request Benefits

Create Pin

Reset Pin



your correct SSN, date of birth and previously created PIN and try again. records on file. Please make sure that all of the information you enter is accurate and matches

call (401) 415-6772 or visit www.dlt.ri.gov/UI to find answers to frequently asked questions and think there was a mistake or have questions about your unemployment insurance claim, please For information about how to create or reset a PIN, please visit this link: information regarding UI Service Center operating hours.

I

#### Pin-not-present

**DLT | Ul Online** Request Benefits

Create Pin

Reset Pin

create a PIN, which you will use to certify. To create a PIN select 'Create Pin' on the navigation bar, at the top of the page

Our records indicate that you have not yet created a Personal Identification Number (PIN). Please

select "Create PIN" on the navigation bar at the top of the page. Please create a PIN, which will be used to certify for your weekly benefits. To create a PIN, Our records indicate that you have not yet created a Personal Identification Number (PIN).

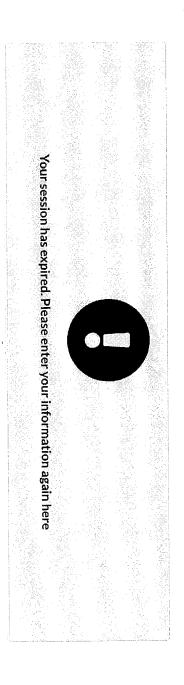
questions and information regarding UI Service Center operating hours. claim, please call (401) 415-6772 or visit www.dlt.ri.gov/UI to find answers to frequently asked If you have think there was a mistake or have questions about your unemployment insurance For more information about how to create or reset a PIN, please visit this link:

#### Session-expired **DLT** | UI Online

Request Benefits

Create Pin

Reset Pin



Your session has expired. Please enter your information again here.

as the system only allows you a fixed amount of time submit your request. Please make sure that you have all of your information available when you certify for a payment WM(19

UI Service Center operating hours. visit www.dlt.ri.gov/UI to find answers to frequently asked questions and information regarding If you have questions about your unemployment insurance claim, please call (401) 415-6772 or

### Ssn-not-matched

**DLT | UI Online** Request Benefits

Create Pin

Reset Pin

sure that the personal information you are providing is accurate and try again. We were unable to find a record for the provided Social Security Number (SSN). Please make

questions and information regarding UI Service Center operating hours. please call (401) 415-6772 or visit www.dlt.ri.gov/UI to find answers to frequently asked If you think-there was a mistake or have questions about your unemployment insurance claim,



We are unable to find a record for the provided Social Security Number (SSN). Please make sure that

the personal information you are providing is accurate and try again.

Language •



## User-already-certified

**DLT | UI Online** Request Benefits

Create Pin

Reset Pin

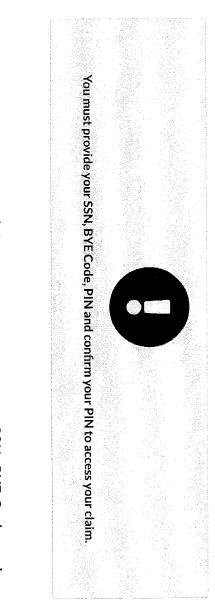
You have already certified for a payment this week. Please call again on, or after, next Sunday to certify for your next payment.

again on, or after, next Sunday to certify for your next payment. You have already certified for a payment this week. Please use the system

unemployment insurance claim, please call (401) 415-6772 or visit If you think there was a mistake or have questions about your www.dlt.ri.gov/UI to find answers to frequently asked questions and information regarding UI Service Center operating hours.

## user-not-verified: program code invalid

**DLT | UI Online** Request Benefits Create Pin Reset Pin



all of this information accurately and try again. PIN and then confirm your PIN. Please make sure that you have entered In order to access your claim, you must enter your SSN, BYE Code and

www.dlt.ri.gov/UI to find answers to frequently asked questions and unemployment insurance claim, please call (401) 415-6772 or visit If you think there was a mistake or have questions about your information regarding UI Service Center operating hours.

## Pin Reset Success- Screen shots

Create Pin

Reset Pin



Language

#### EXHIBIT D



State of Rhode Island Department of Labor and Training Center General Complex 1511 Pontiac Avenue Cranston, Rhode Island 02920

June 5, 2020

#### NOTICE OF TEMPORARY STOP OF UNEMPLOYMENT INSURANCE

The Rhode Island Department of Labor and Training hereby informs you that your unemployment insurance has been temporarily stopped due to the possibility of fraud associated with this account.

#### Why has my account been temporarily stopped?

Like many states across the country, Rhode Island has seen a significant increase in fraudulent unemployment insurance claims. A fraudster may file a fake claim in someone else's name or a fraudster may hijack a legitimate claim and re-direct the payments to a fraudulent account. To make sure that legitimate claimants are receiving unemployment insurance payments, we are temporarily stopping flagged accounts.

Your account was flagged as showing potential signs of fraudulent activity.

My unemployment insurance claim is legitimate. What can I do to lift the temporary stop? Please contact the Department to resolve your claim.

You can contact us via phone at (401) 234-4280 where you will be directed to select an option to address this issue or you can contact us at <a href="www.dlt.ri.gov">www.dlt.ri.gov</a>. The dedicated option of this phone line is reserved to address temporary stoppage due to the possibility of fraud. Please do not call this number and select this option with other questions about unemployment benefits.

If your claim is legitimate, your benefits will be reinstated and you will receive back benefits for the time the stop was in place.

I never filed an unemployment insurance claim. What should I do? If you did not file a claim, please visit <a href="https://risp.ri.gov/fcu/FUICI.php">https://risp.ri.gov/fcu/FUICI.php</a>.

You may also contact the Fraud Unit by phone (401) 462-1522, email at <u>**DLT.investigations@dlt.ri.gov</u>**; by fax at (401) 462-8474; or by mail at: RI Department of Labor and Training UI/TDI Fraud Unit, 1511 Pontiac Ave. Cranston, RI 02920.</u>

Anyone may report alleged fraud anonymously. However, please know that if you choose to provide your contact information, it will remain strictly confidential.

#### What if I cannot contact the Department regarding my legitimate unemployment insurance claim?

The Department is working hard to individually contact all suspected fraud claimants. If you cannot get in contact with the Department, you will receive a phone call from the Department asking to verify your unemployment insurance claim.

If you have any questions regarding this Notice, please contact the Department at (401) 234-4280.

**IMPORTANT:** You may have this document translated or interpreted at no cost to you by contacting the Unemployment Insurance Service Center at 401-415-6772 and selecting one of the following language options: Spanish, Portuguese, Cambodian, or Hmong. If you need assistance in a language that is not listed, please contact 401-415-6772 and a representative will assist you.

**IMPORTANTE:** El documento puede ser traducido en Espanol sin costo. Lllame al 401-415-6722.

#### EXHIBIT E

Babel notice and Spanish translation to be provided to UI claimants.

DLT-LO 34 (rev 03/05)



STATE OF RHODE ISLAND

#### Department of Labor and Training

P. O. Box 20310

Cranston, RI 02920-0943

#### **CLAIMANT INFORMATION DATA SHEET**

Name:					
Address:					
Date:					
Dear Ms.					
A review of your	claim for Un	nemployment Insurar	nce benefits	s indicates	the following
You have no wages avai	lable to be eligib	ole for Unemployment Insura	nce benefits.		
Date Claim Filed:					
Benefit Year Ending:					
Weekly Benefit Rate:	Week	kly Dependent Allowance:	Total	Weekly Benefit	t Amount:
Total Credits:					
Date of First Payment:					
Last Paid For:					
Balance of Credits:					
Claim Status:	Active	Inactive			
Remarks:					
This letter is provided to	the claimant for	r informational use only.		AR .	e to have n <mark>g</mark> .
~	. 0 .				

Katherine Catanzaro

Administrator, Operations Management

**Department of Labor and Training Representative**