Charles M. ("Charley") Thomson

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House of Representatives

State of Iowa
Ninety-First General Assembly
STATEHOUSE
Des Moines, Iowa 50319

COMMITTEES

Government Oversight, Chair Commerce Judiciary

APPROPRIATIONS SUBCOMMITTEE

Economic Development, Vice Chair

February 24, 2025

Via certified mail and first class mail, prepaid

Ms. Erica Johnson
Iowa Migrant Movement for Justice
PO Box 41006
Des Moines, IA 50311

Vanessa Marcano-Kelly
Board Chair
Iowa Migrant Movement for Justice
PO Box 41006
Des Moines, IA 50311

Iowa Migrant Movement for Justice c/o Denman CPA LLP 22nd Street, Suite 400 West Des Moines, IA 502661453

Re: Directive to produce certain documents and information pursuant to ICA §2.15

Dear Ms. Johnson:

I am writing to you in my capacity as Chairman of the House Government Oversight Committee (the "House Government Oversight Committee") of the Iowa House of Representatives. The House Government Oversight Committee is a standing committee of the Iowa House. This directive (this "Directive") is issued pursuant to ICA §2.15(e).

I am informed that the Iowa Migrant Movement for Justice ("IMMJ") is a not-for-profit organization that operates in the State of Iowa. I am certain that you are aware that "not-for-profit" status within the State of Iowa confers upon an organization certain financial and organizational benefits not accorded generally to all Iowa citizens.

I am in possession of an image of "Form 990" for IMMJ dated July 24, 2024. This document states that the "mission" of IMMJ is

TO BUILD A MOVEMENT FOR JUSTICE LED BY IMMIGRANTS AND REFUGEES IN IOWA BY PROVIDING HIGH-QUALITY LEGAL SERVICES AND COMMUNITY EMPOWERMENT THROUGH ORGANIZING.

With this stated organizational mission in mind, the House Government Oversight Committee requires that you provide the following information:

- 1. The names, job descriptions, salaries and dates of employment of all persons currently employed by IMMJ.
- 2. The names, job descriptions, salaries, and dates of employment of all persons currently employed by IMMJ who provide legal services.
- 3. A description of all legal services provided by IMMJ between January 1, 2019, and January 1, 2025, together with a list of the dates such services were provided, the persons to whom such services were provided, and the costs attributable to such services.
- 4. The names, addresses and amounts donated or granted of all persons or entities who have donated funds to or issued grants in favor of IMMJ between January 1, 2019, and January 1, 2025.
- 5. The names, addresses, amounts disbursed, and dates of disbursement of all funds disbursed by IMMJ to any person or entity between January 1, 2019, and January 1, 2025.
- 6. An image of the complete 990 forms (including all attachments) for IMMJ for 2022, 2023 and 2024.
- 7. The current membership list for IMMJ (this should include, for each member, the name, address, telephone number and email address).
- 8. A summary description of your organization's compliance with Rule 31.1 to Rule 49.5 of the Iowa Court Rules.

Please provided written confirmation of the receipt of this letter to the undersigned prior to 5:00 p.m., February 26, 2025.

The information required pursuant to this Directive shall be received by the Chairman of the House Government Oversight Committee on or before March 7, 2025, unless additional time is granted by the Chairman of the House Government Oversight Committee.

Please regard this Directive as formal notice regarding the duty to preserve all evidence related to this matter. It appears you possess documents, electronically stored information, and

other materials that may be relevant to the Committee's investigation. You are directed to IMMEDIATELY PRESERVE AND RETAIN ALL RELEVANT EVIDENCE in its current state. Any destruction, alteration, or failure to preserve such evidence will be considered spoliation and may result in severe consequences, including sanctions, adverse inference determinations, monetary penalties, and potential criminal liability. You are particularly cautioned that (a) no documents, emails, text messages, or other electronic communications are deleted, modified, or destroyed, (b) all physical records, including but not limited to contracts, reports, logs, and notes, are maintained in their original form, (c) any automatic or routine data deletion policies (e.g., email purging, overwriting backup files) are suspended to prevent loss of relevant information, and (d) employees, agents, or third parties under the your control are made aware of their duty to preserve evidence and comply accordingly. Inasmuch as this Directive places you on formal notice of its obligations, and any noncompliance will be viewed as willful misconduct.

Finally, you are directed not to discuss this Directive with any person or entity inside or outside of state government or notify any person or entity that you have been directed to provide the information.

Sincerely, Milliam Milliam

Representative Charles M. Thomson

Chairman

Iowa House Government Oversight Committee