



**Empowering
America's Businesses
Since 1978**

**2018
Annual Report**

Black Hawk Economic Development, Inc.

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Black Hawk Economic Development, Inc.

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Black Hawk Economic Development, Inc.

HISTORY AND INTRODUCTION

As Black Hawk Economic Development, Inc. is about to enter its fortieth year serving small businesses and communities, we take a step back to reflect upon the genesis of the Organization and its pioneer founders.

In preface to our reflection, it is believed, although founded with great optimism, the founding members could not have envisioned how successful the Organization would become nor its national footprint and the countless number of people and lives impacted beyond the employees of the Rath Packing Company and its original six county service territory from which a large number of Rath employees commuted from.



As the Organization's original name disclosed, Black Hawk County Economic Development Committee, Inc., incorporated on October 4, 1978 as a 501 (c) 4, not-for-profit organization, was founded as an innovative economic development initiative that involved the collaborative efforts of The Rath Packing Company, its employee-owners and community leaders. The specific initiative, upon founding, was to retain The Rath Packing Company, one of Waterloo, IA's oldest and largest employers for nearly one hundred years. Rath Packing Company's operations in Waterloo started in 1890's and by the 1950's the Company was a giant in the meat industry with over 5,000 employees and world renown through its premier brand—Rath Black Hawk. As the Collaborators or Committee fully understood at that time, at stake was the livelihood of thousands of families dependent upon employment at Rath Packing and the loss of one of longest standing and largest employers in the community - all on the eve

of what was to become the mid-1980's agriculture recession and loss of more than 15,000 total manufacturing jobs in the community within a couple of short years. Leading the financial risks were the employees who sacrificed wages to allow the Organization and City of Waterloo to obtain grant funds from the EDA and HUD, respectively, to be used in the efforts to retain the Company.

During the first years of the Organization's existence, it worked closely with the Committee with the intention and hope that their efforts would preserve the Company and its brand that was such a big part of Waterloo and its history.

Although, the long collaborative effort to retain Rath Packing Company eventually succumbed in 1985 following its' bankruptcy in 1984, due in large part to the economic downturn of the 1980's and record high interest rates, the Organization's Members continued to embrace the founding members commitment to its founding principles – creation/retention of jobs through financial and technical assistance to businesses, the first of which was made possible by the grant funds received from the U.S. Department of Commerce, Economic Development Administration in 1979.

*Photo credit: Rath Advertisement from Life Magazine March 15, 1954; Bringin' Home the Bacon by Rebecca Conrad, Tallgrass Historians and City of Waterloo

Black Hawk Economic Development, Inc.

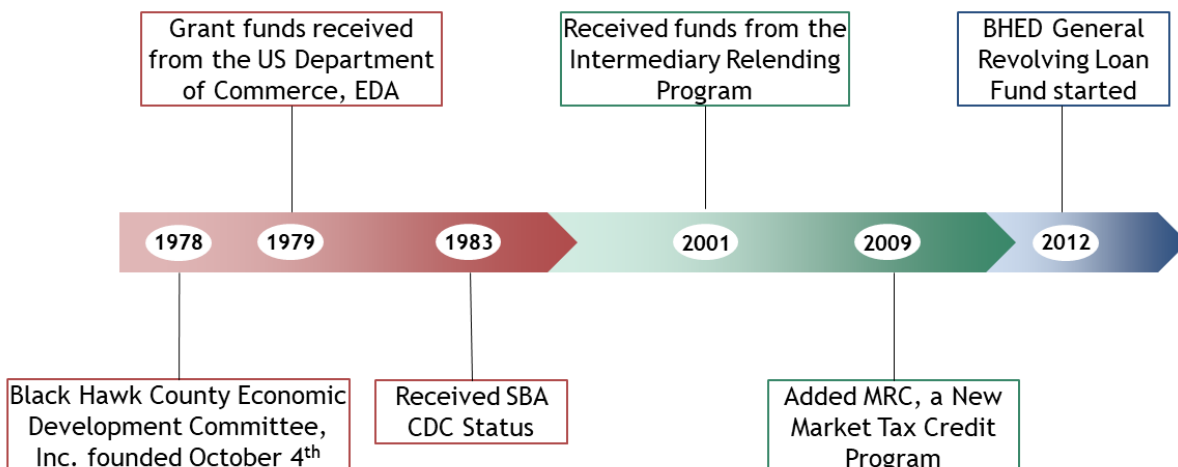
The Organization's mission was subsequently further supported through designation as a Certified Development Company (504 Program) by the U.S. Small Business Administration in 1983, and became an Intermediary Relending Program Lender under the U.S. Department of Agriculture in 2001. Under the Certified Development Company (CDC) designation the Organization's service territory eventually expanded to encompass the entire State of Iowa, while the Intermediary Relending Program service area built upon the EDA service area through the addition of three additional Iowa Counties in addition to the original six county service territory.

In 2009, the Organization's national footprint was realized through the addition of the New Market Tax Credit Program as a result of its function as the controlling entity and manager of Midwest Renewable Capital, LLC. And in 2012, the Organization launched its General Loan Fund Program, a self-funded loan program with less red tape.

During the 2017-2018 fiscal year, the Organization provided direct financial assistance in the form of loans to 17 businesses totaling \$8,106,500 through the Organization's EDA Revolving Loan Fund Program, SBA 504 Loan Program, USDA IRP Loan Program and BHED General Loan Fund Program. These 17 loans are expected to result in total project investments of \$20,434,722 and creation and/or retention of over 191 jobs within two years of project funding.

In addition, the Organization, as controlling entity and manager of Midwest Renewable Capital, LLC, assisted in deployment of \$46 million of NMTC allocation to four businesses located in Arkansas, Kansas and Illinois. These four Midwest Renewable Capital projects are expected to result in total project investments of over \$131 million and creation and/or retention of 815 jobs in the four projects qualified low income census tracts.

As the Organization approaches its fortieth year, the Organization will continue to build upon its strong presence and reputation in economic and community development on a local, state, and national basis. The Organization will also continue to collaborate with the various businesses, financial institutions, government agencies and community and economic development partners in the furtherance of its efforts to enhance the economic well being and standard of living of all served. In addition, new, as well as existing, economic and community development strategies will continue to be evaluated on an on-going basis in order to maximize realization of the Organization's goals and objectives.



Black Hawk Economic Development, Inc.

FOUNDING BOARD OF DIRECTORS - MEMBERS

Our sincere gratitude to all for their vision...

Robert Abbas
Cedar Falls Planning
Commission
Cedar Falls, IA

George Bennett
Hawkeye Institute of
Technology
Waterloo, IA

Kathy Braun
Junior League
Waterloo, IA

Percy Burt
Reverend
Waterloo, IA

Pat Callan
Job Service of Iowa
Waterloo, IA

Hugh Copeland
I.N.R.C.O.G.
Waterloo, IA

Galen Cox
Job Service of Iowa
Waterloo, IA

Jon T. Crews
Mayor
Cedar Falls, IA

Lynn Cutler
Board of Supervisors
Waterloo, IA

Earl Everett
Small Business
Waterloo, IA

Jerry Franke
Waterloo Planning
Commission
Waterloo, IA

Keith Kullmer
Mayor
La Porte City, IA

Homer Leymaster
Doerfer Engineering
Cedar Falls, IA

Dave Mazur
Black Hawk County
Manpower
Waterloo, IA

Dale Mercer
Community Development
Waterloo, IA

Lee Miller
University of Northern Iowa
Cedar Falls, IA

Frank Mollenhoff
Goodwill Industries, of
NE Iowa, Inc.
Waterloo, IA

Tom Moss
Community Development
Office
Evansdale, IA

Leo Roof
Mayor
Waterloo, IA

Sam Scherf
Cedar Falls Chamber of
Commerce
Cedar Falls, IA

Jack Seeber
U.A.W
Waterloo, IA

Bill Slade
John Deere Waterloo
Tractor Works
Waterloo, IA

Charles Soladay
Rath Packing Company
Waterloo, IA

Gene Taylor
Mayor
Hudson, IA

Lyle Taylor
Local P46
Waterloo, IA

James Thele
I.N.R.C.O.G.
Waterloo, IA

Margarite Tredwell
Waterloo Chamber of
Commerce
Waterloo, IA

Black Hawk Economic Development, Inc.

MISSION STATEMENT

To actively engage in sustainable economic and community development activities for the benefit of all constituents.

GOALS AND OBJECTIVES

The goals and objectives of the Organization are to promote an increase in the standard of living and quality of life for all constituents through strategic, inclusive and sustainable economic and community development activities:

Economic Activities -

- New business start-up, expansion and retention programs and activities that promote:
 - Entrepreneurship
 - Public/Private partnerships
 - Capital investment
 - Job opportunities — new, enhanced, retained
 - Diversification and expansion of economic base
 - Business recruitment
 - Minority-owned business and career opportunities
 - Exports and import substitution

Community Activities -

- Quality of life initiatives that promote:
 - Economic opportunity
 - Healthcare — Access
 - Community wellbeing
 - Development/rebuilding of low income rural areas
 - Development/rebuilding of low income urban areas
 - Capital Investments
 - Public/Private partnerships
 - Community enhancement
-

And further supported in large part with the various partnerships and collaborations with special recognition to:

Midwest Renewable Capital, LLC

Cedar Valley Growth Fund I, Inc.

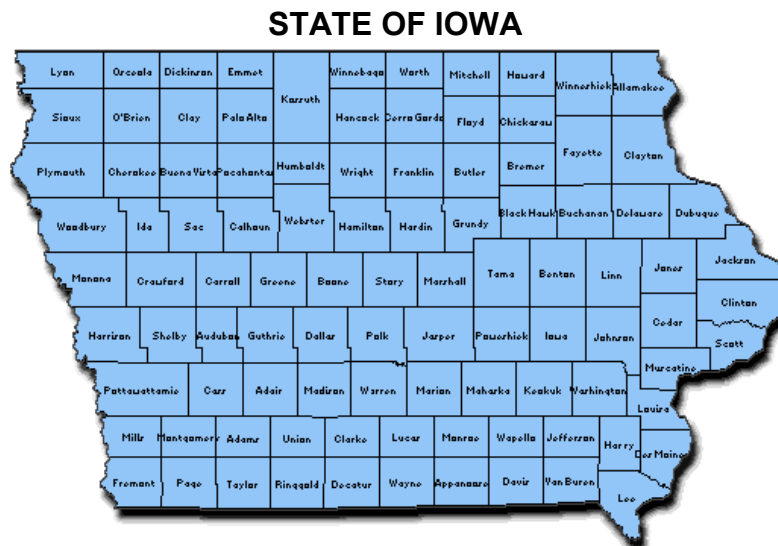
Black Hawk Economic Development, Inc.

IOWA OPERATIONS AND ASSISTANCE

Economic and Community development programs and initiatives designed to meet the needs of Iowa small businesses and communities since 1978:

- Revolving Loan Fund (RLF)
- SBA 504 Loan Program (SBA)
- Intermediary Relending Loan Program (IRP)
- General Loan Program (GEN)
- Technical Assistance
- Assistance with other economic development programs

- * Local
- * State
- * Federal



AREA OF OPERATION

RLF Program — Black Hawk, Bremer, Buchanan, Butler, Chickasaw and Grundy counties

IRP Program — Rural Benton, Black Hawk, Bremer, Buchanan, Butler, Chickasaw, Floyd, Grundy and Tama counties

SBA Program — All of Iowa

GEN Program — All of Iowa

Black Hawk Economic Development, Inc.

THE YEAR IN REVIEW 2017-2018



“As we approach the Organization’s fortieth year in October 2018, we reflect upon those that preceded us and the Organization’s accomplishments. Never in the founding members dreams could they have envisioned the full magnitude of what they created – a cosmic scale event touching the lives of countless people on such a grand scale”.

*Luke Lesyshen
President
September 2018*

Number of Loans	
RLF Loans	8
SBA 504 Loans	9
IRP Loans	-
BHED Loans	-
Total Loans	17

DOLLARS (\$) APPROVED

Total Dollars Approved		\$8,106,500
IRP Program Loans	\$ -	
RLF Program Loans	584,500	
SBA 504 Program Loans	7,522,000	
BHED Program Loans	-	

PROJECT INVESTMENTS

Total Project Investments		\$20,303,184
IRP Program Loans	\$ -	
RLF Program Loans	1,080,000	
SBA 504 Program Loans	19,223,184	
BHED Program Loans	-	

JOBS CREATED/RETAINED (Estimated)

Total Jobs Created/Retained		191
IRP Program Loans	-	
RLF Program Loans	100	
SBA 504 Program Loans	91	
BHED Program Loans	-	

Black Hawk Economic Development, Inc.

2017-2018 NOTEABLES

Black Hawk Economic Development Continued Growth



BHED assets exceed \$50 million as of August 15, 2018

BHED/MRC Expanded Footprint

Midwest Renewable Capital expanded it's footprint to include Illinois as the 15th state housing projects.



SelectUSA Summit



"BHED goes Major League"
Tahirah Elliott and Stephanie Koenen with
Baltimore Orioles Mascot
SelectUSA Summit, Washington, D.C.
International Investment Summit June 2018

BHED went to the "major leagues" at the 2018 Summit. The Organization met with international clients on the following projects:

- Distribution Centers
- Environmental
- Manufacturing
- Medical Facilities
- Software Development

Total Loans Servicing as of September 30, 2018

SBA 504 Program:	\$ 47,999,442
RLF Program:	\$ 2,165,215
BHRLF (General) Program:	\$ 757,423
IRP Program:	\$ 100,377
MRC NMTC Program:	\$287,512,476
Total:	\$338,534,933



Black Hawk Economic Development, Inc.

GENERAL LOAN FUND PROGRAM SINCE 2012

The General Loan Fund Program (GEN Program) is a financial assistance program founded in 2012. As the purpose of the program was to broaden the types of businesses or organizations served and the means to serve them, the program is administered similar to the Organization's RLF and IRP Programs, albeit, fewer regulations.

Eligible businesses/organizations include both for-profit and not-for-profit, and eligible use of funds include purchase of land and buildings, building construction/improvements, purchase and installation of equipment and fixtures and working capital.

The GEN Program is administered statewide in Iowa.

Since the beginning, in 2012, the General Loan Fund Program has funded ten loans totaling nearly \$1,509,000.

	2017-2018 Goals	2017-2018 Actual	2018-2019 Goals
Number of Loans	2	-	5
Dollars Loaned	\$150,000	-	\$200,000
Total Project Costs	\$450,000	-	\$600,000
Job Creation/Retention	60	-	80



Although, the general loan fund program did not complete a new project during the year, the program remained active through loan administration activities in support of the small businesses in the loan portfolio.

Black Hawk Economic Development, Inc.

REVOLVING LOAN FUND PROGRAM SINCE 1978

The Organization's Revolving Loan Fund Program (RLF Program) is a small business financial assistance program founded with the assistance of the U.S. Department of Commerce–Economic Development Administration. The purpose of the program is to provide “gap financing” to for-profit small businesses in North Central Iowa. Gap financing is typically defined as subordinated financing and can be thought of in terms of “filling” the short fall or “gap” between the required equity portion of a financial package and bank/credit union financing. Under the RLF Program, emphasis is placed on providing gap financing to businesses in the industrial/manufacturing sectors although all for-profit businesses may apply with specific exceptions.

Eligible project costs include purchase of real estate, building improvements, machinery and equipment purchase and installation, and working capital. RLF Program assistance is provided on a competitive basis. Eligible areas include Black Hawk, Bremer, Buchanan, Butler, Chickasaw and Grundy counties.

	2017-2018 Goals	2017-2018 Actual	2018-2019 Goals
Number of Loans	10	8	12
Dollars Loaned	\$600,000	\$584,500	\$600,000
Total Project Costs	\$1,800,000	\$1,080,000	\$1,800,000
Job Creation/Retention	240	100	240



“Working with BHED has allowed me to pursue my goal of providing a more modern and technological location for my academy. They have worked with me through the entire process and made the transition easy. Thank you to BHED for making my goals a reality.”

*Deb McFarland
Waterloo Barber College
President*

Black Hawk Economic Development, Inc.

REVOLVING LOAN FUND PROGRAM ACTIVITY SUMMARY 1978 - 2018

NUMBER OF LOANS AND LOAN GUARANTEES

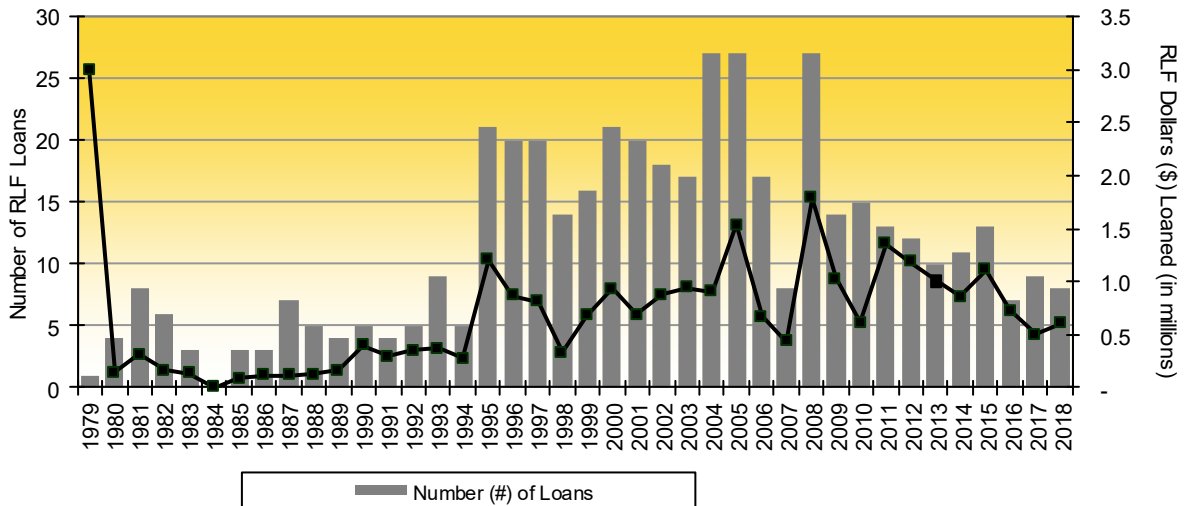
Total Loans & Guarantees		457
RLF Program Loans	447	
RLF Program Loan Guarantees	10	

DOLLARS (\$) APPROVED

Total Dollars Approved		\$27,808,299
RLF Program Loans	\$ 27,409,252	
RLF Program Loan Guarantees	399,047	

PROJECT INVESTMENTS AND JOBS CREATED AND/OR RETAINED

Total Project Investments	\$194,989,722
Total Jobs Created/Retained	15,332.5



2017-2018 RLF Program activity constrained by highly competitive commercial lending environment.

Black Hawk Economic Development, Inc.

SBA 504 PROGRAM SINCE 1983

The SBA 504 Loan Program is an U.S. Small Business Administration (SBA) economic development program administered on a local level by a *Certified Development Company*, such as Black Hawk Economic Development, Inc. The SBA 504 Loan Program is designed to provide direct financing for long-term fixed assets under new business start-up, expansion and retention projects. Under the Program an eligible business may obtain up to a total of 80-90% financing for a project.

Eligible businesses must be for-profit, and manufacturing, service, professional and retail businesses are generally eligible. Eligible project costs include purchase of real estate, building construction/improvement, and purchase/installation of machinery and equipment that meet certain useful life requirements. Program assistance is provided on a statewide basis.

	2017-2018 Goals	2017-2018 Actual	2018-2019 Goals
Number of Loans	15	9	18
Dollars Loaned	\$11,000,000	\$7,522,000	\$9,000,000
Total Project Costs	\$28,160,000	\$19,223,184	\$22,500,000
Job Creation/Retention	170	91	138.5



"Black Hawk Economic Development and Collins Community Credit Union worked together to make the SBA loan application an easy process. Their attention to detail and timeliness was greatly appreciated."

*Kyle Porter
Porter Moving Company
President*

Black Hawk Economic Development, Inc.

SBA 504 LOAN PROGRAM ACTIVITY SUMMARY 1983 - 2018

Number of Loans Approved

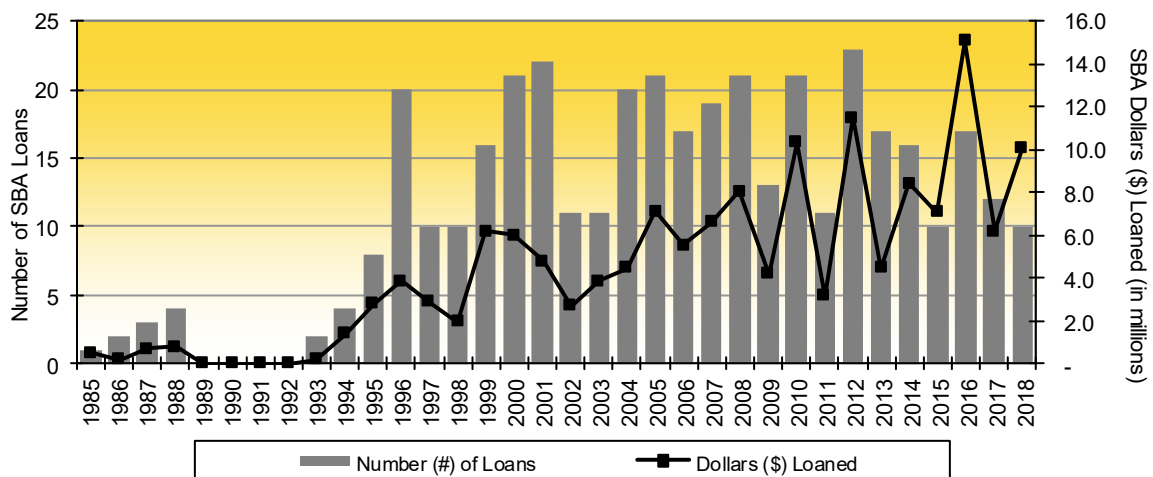
Total Approvals		393
SBA 504 Loans, Funded & Pending Funding	340	
SBA 504 Loans Withdrawn/Cancelled/Expired	53	

Dollars (\$) Approved

Total Dollars Approved		\$150,102,000
SBA 504 Loans, Funded & Pending Funding	\$125,670,000	
SBA 504 Loans Withdrawn/Cancelled/Expired	24,432,000	

Total Project Investments and Jobs Created and/or Retained

Total Project Investments	\$429,407,657
Total Project Investments Not Completed	\$13,081,516
Total Jobs Created/Retained <i>(Actual, Est., and Net of not completed projects)</i>	3,906.3



2017-2018 SBA 504 Program activity slowly rebounding as economic recovery is underway and loan interest rates are competitive.

Black Hawk Economic Development, Inc.

INTERMEDIARY RELENDING PROGRAM SINCE 2001

The Intermediary Relending Program is an economic development program designed to promote rural small business development and community enhancement projects. Under the program, BHED funds were leveraged with funds from U.S. Department of Agriculture (USDA) to capitalize the Organization's Intermediary Lending Program (IRP) Fund. The IRP Program operates similar to the Revolving Loan Fund Program in terms of gap financing.

Eligible businesses must be for-profit, and manufacturing, service, professional and retail businesses are generally eligible. In addition certain community based organizations and governmental entities may be eligible. Eligible project costs include purchase of real estate, building construction/improvement, and purchase and installation of machinery and equipment. Businesses may also use the funds for working capital. In view of the limited funds available, IRP Program assistance is provided on a competitive basis.

Eligible Iowa counties include rural Benton, Black Hawk, Bremer, Buchanan, Butler, Chickasaw, Floyd, Grundy and Tama.

	2017-2018 Goals	2017-2018 Actual	2018-2019 Goals
Number of Loans	1	-	2
Dollars Loaned	\$50,000	-	\$150,000
Total Project Costs	\$150,000	-	\$450,000
Job Creation/Retention	20	-	60



Black Hawk Economic Development, Inc.

IRP LOAN PROGRAM ACTIVITY SUMMARY 2003 - 2018

Number of Loans Funded

Total Loans Funded **19**

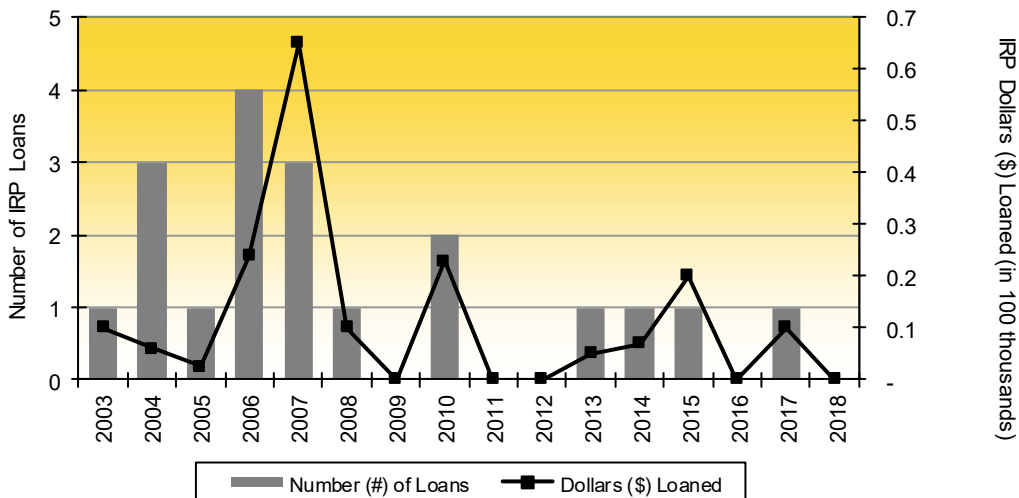
Dollars (\$) Funded

Total Dollars (\$) Funded **\$1,401,000**

Total Project Investments and Jobs Created and/or Retained

Total Project Investments **\$6,438,814**

**Total Jobs Created/Retained
(Actual and Estimated)** **243.5**



2017-2018 IRP Program activity continues to be suppress due to portfolio size.

Cedar Valley Growth Fund I, Inc.

Cedar Valley Growth Fund I, Inc., established in 2009, is a 501 (c) (3) not-for-profit corporation. The corporation was sponsored by Black Hawk Economic Development, Inc. in an effort to increase the availability of capital and technical assistance to area small businesses. Cedar Valley Growth Fund I, Inc. was designed to provide near equity loans to both existing and new business start-ups under a revolving loan fund program similar to BHED's Revolving Loan Fund Program, but with less regulations. Income derived from the CVGFI RLF Program is in-turn used to provide professional technical assistance to area small businesses free or at a nominal cost, to fund a micro-venture fund, to replenish the RLF fund and for direct administrative costs. During the Summer of 2015, CVGFI expanded its service area to nationwide.



"The mission of Cedar Valley Growth Fund I, Inc. is to enhance the quality of life in areas of need, and on a nationwide basis, through responsible innovative economic development initiatives."

A promotional graphic for "THE DEB & LULU SHOW" on KBBG-FM 88.1. The graphic is enclosed in a black border. At the top, the title "THE DEB & LULU SHOW" is written in large, bold, yellow-outlined letters. Below the title are two circular portraits. The left portrait shows a woman with dark curly hair and glasses, wearing a white shirt and a gold chain, holding a sign that says "WORD!". Below her portrait is the name "Deb" in yellow. The right portrait shows a woman with long brown wavy hair, wearing a leopard print top, holding a microphone. Below her portrait is the name "Lulu" in yellow. In the center, between the two portraits, is a white circle containing the KBBG-FM 88.1 logo. At the bottom of the graphic, the text "TUNE IN FRIDAY'S 7am-9am" is written in large, bold, black-outlined letters.

"Thank you to Cedar Valley Growth Fund I for the financial assistance, as it helped keep KBBG-FM 88.1 on the air, allowing us to continue serving our community."

*Deborah L. Berry, President
KBBG
Waterloo, IA*

Midwest Renewable Capital, LLC

NEW MARKET TAX CREDIT PROGRAM

In 2009, BHED joined efforts with Midwest Renewable Capital, LLC (MRC), Grimes, IA to pursue allocations of tax credits under the federal New Market Tax Credit Program (NMTC). NMTC tax credits are in turn sold to investors, who through the purchase of tax credits assist in capitalization of a pool of loan funds that are in turn used to make qualified equity investments to an active qualified low income community business in a qualified low income census tracts. Since 2009, MRC has received a total of seven federal allocations totaling \$370 million and two state allocations of over \$4,737,370. MRC's triple bottom line selection criteria targets projects with the potential for excellent growth, significant community impacts, and positive environmental returns (renewable and clean energy projects), with a focus on rural areas.

BHED functions as the Manager and Controlling Entity of Midwest Renewable Capital and performs the administrative, loan servicing, and compliance functions.

During BHED's fiscal year, four New Market Tax Credit projects were funded totaling \$46,500,000. These four projects are expected to result in total project investments of over \$131,463,771 and creation and/or retention of 815 jobs in the Nation's qualified low income census tracts.

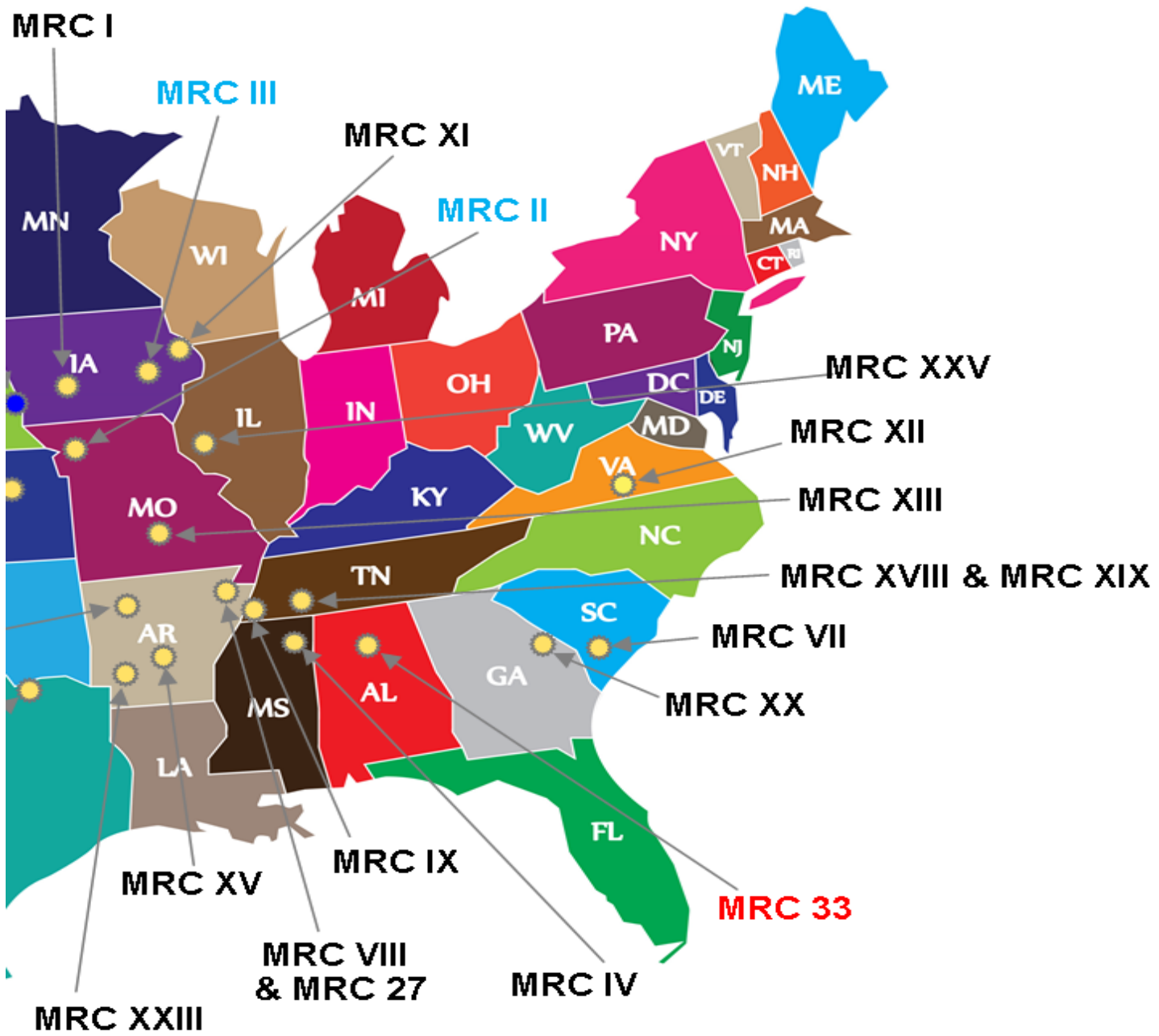


"In the furtherance of private capital for public good..."



Midwest Renewable Capital, LLC

PROJECT LOCATIONS



PROGRAM TO DATE (Actual and Projected)

MIDWEST RENEWABLE CAPITAL, LLC

Total Dollar (\$) Awards	\$ 374,737,370
Total Dollars (\$) Loaned	\$ 296,969,976
Total Dollars (\$) QEI	\$ 356,737,370
Total Project Costs (\$)	\$ 1,662,086,874
Direct Jobs Created and/or Retained in Census Tract	5,506

Black Hawk Economic Development, Inc.

BOARD OF DIRECTORS



Nate Clayberg ~
Board Member since 2017
Member of the
Loan Committee
Personnel Committee



~ Lorie Davis
Secretary/Treasurer
Board Member since 2009
Member of the
Executive Committee



Joyce Dunlay ~
Board Member since 2011
Member of the
Audit Committee
Executive Committee
Loan Committee



~ Carol Jahnke
Board Member since 1995
Member of the
Audit Committee
Personnel Committee



Bob Krogh ~
Board Member since 1987
Member of the
Loan Committee
Personnel Committee



Black Hawk Economic Development, Inc.

BOARD OF DIRECTORS

~ **Luke Lesyshen**
President
Board Member since 2017
Member of the
Audit Committee
Executive Committee
Loan Committee
Nominating Committee



Brian Quirk ~
Vice-President/Asst. Sec
Board Member since 1993
Member of the
Executive Committee



~ **Tony Thompson**
Board Member since 2008
Member of the
Executive Committee



ReShonda Young ~
Board Member since 2017
Member of the
Nominating Committee

Black Hawk Economic Development, Inc.

THE ORGANIZATION

As of September 30, 2018

OFFICERS

Luke Lesyshen President
 Brian Quirk Vice President/Asst. Secretary
 Lorie Davis Secretary/Treasurer

BOARD OF DIRECTORS

Nate Clayberg Luke Lesyshen*
 Lorie Davis* Brian Quirk*
 Joyce Dunlay* Tony Thompson*
 Carol Jahnke ReShonda Young
 Robert Krogh

**Denotes member of Executive Committee*



MEMBERS

Nate Clayberg*	Brenda Gibson	John Mardis	Marge Schurman*
Jeff Danielson	Carol Jahnke	Adrienne Miller*	Bob Seymour*
Lorie Davis	Robert Krogh*	Jon Mixdorf*	Tony Thompson
Bill Dotzler, Jr.	George Lake	Chris Mueller	Connie Tolan
Karen Dunlap	Cindy Lantow	Brian Quirk	ReShonda Young
Joyce Dunlay*	Luke Lesyshen*	Chuck Rowe	
Amy Dutton	Steve Lindaman*	Adam Schaefer	

**Denotes member or alternate member of the Loan Committee*

STAFF

Nathan Barr	Commercial Loan Assistant
Stephen Brustkern	Executive Director
Jennifer Furman	Administrative Assistant
Dee Ann Glover	Loan Officer
Stacy Hageman	Administrative Assistant
Stephanie Koenen	Compliance Manager
Kimberly Loy	Accountant
Eric Nottger	Economic Development Specialist
Meghan Schildgen	Administrative Assistant

2017 — 2018 Number of Meetings	
Board of Directors	8
Executive Committee	4
Loan Committee	9
Nominating Committee	1
Personnel Committee	1

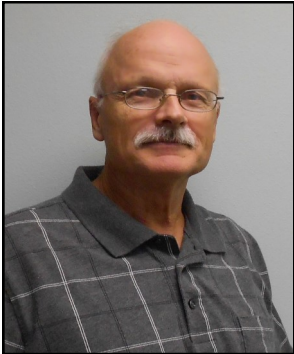
Committees	
Board of Directors	
Executive Committee	
Loan Committee	
Nominating Committee	
Personnel Committee	
Audit Committee	

Black Hawk Economic Development, Inc.

STAFF



~Nathan Barr
Since 2018
Commercial Loan Assistant



Steve Brustkern ~
Since 1990
Executive Director



~ Jennifer Furman
Since 2013
Administrative Assistant



Dee Ann Glover ~
Since 2012
Loan Officer



~ Stacy Hageman
Since 2006
Administrative Assistant



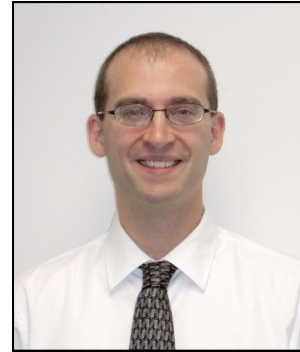
Stephanie Koenen ~
Since 2015
Compliance Manager

Black Hawk Economic Development, Inc.

STAFF



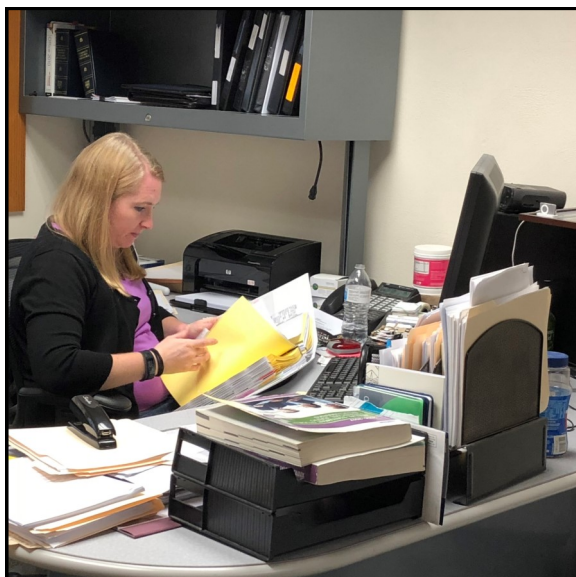
~ **Kimberly Loy**
Since 2018
Accountant



Eric Nottger ~
Since 2009
Economic Development Specialist



~ **Meghan Schildgen**
Since 2015
Administrative Assistant



Above: Nathan Barr Left: Stephanie Koenen

The assistance programs offered and administered by Black Hawk Economic Development, Inc. are provided on a nondiscriminatory and equal opportunity basis.

**Equal
Opportunity
Employer**

