



Unity

Jan. 30, 2024

Candidate Information and Legal updates

Use Your Voice - VOTE

FEA-Europe is in the midst of a biannual election. **Voting** is the cornerstone of any thriving democracy, serving as the bedrock upon which the foundations of a just and representative government are built. Its importance cannot be overstated, as it empowers members to actively participate in shaping the course of **their** Association. Elections provide members with the opportunity to voice their opinions, choose their leaders, and influence the direction of policies that impact their lives.

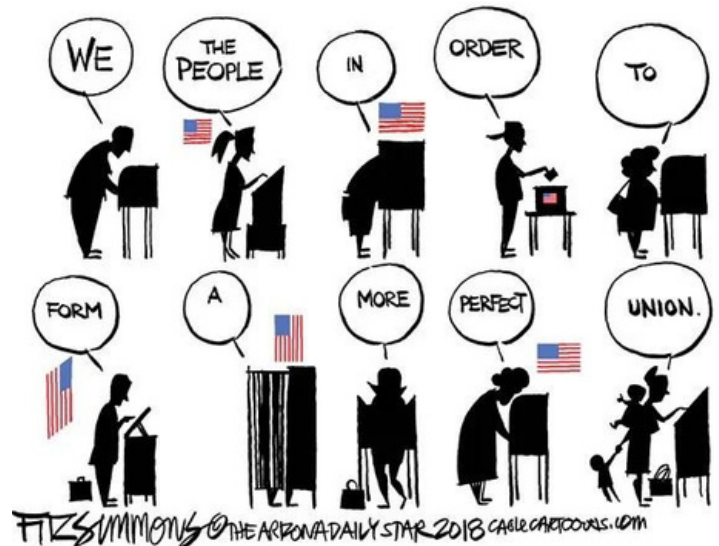
One of the primary reasons voting is crucial lies in its ability to foster a sense of civic responsibility and engagement. When members exercise their right to vote, they contribute to the collective decision-making process, reinforcing the democratic values that underpin the Association. In doing so, they become active stakeholders in the governance of their Association, ensuring that the leadership is reflective of the diverse perspectives within the population.

Beyond individual impact, the collective power of votes can drive change. Elections provide an avenue for marginalized voices to be heard, promoting inclusivity and representation. By voting, members contribute to the creation of an Association that is responsive to the needs of the entire population, rather than just a select few.

In last year's election for Area Director, FEA Europe members had a return rate of only **EIGHTEEN PERCENT** of Europe's membership. We can, and must do better.

USE YOUR VOICE - VOTE!

Graphic of the Week



Follow the directions on the ballot and return it in the envelopes provided to the individual running the election, usually the FRS. While we will never be a perfect union, we will be a stronger union with your input.



General Disclaimer

The following candidate information is provided by the individual candidates running for the positions listed below. This material does not constitute endorsement or recommendation by FEA, any FEA local or area, or by the NEA.”

- **Europe-Wide** Human & Civil Rights Coordinator
- **Division Representative**
- **Division** Human & Civil Rights Coordinator
- **Division** Delegates to the NEA Representative Assembly

Europe-wide Candidate Information

FEA-Europe Human & Civil Rights Coordinator

(elect one for a two-year term)

DiAnna Martinez, Teacher, K-5 AAPS, Vogelweh Elementary School

I have held school level representative positions to include FR, FR-HCR, and I am presently the FRS at my school. I have been the HCRC for Europe East Division 1 for four years and have worked closely with the Europe HCRC during that time in order to ensure members throughout Europe have had HCR representation.

Nancy Harb Almendras, Teacher, AP Literature/English 12, Wiesbaden High School

My background as District Rep in the Okinawa and Heidelberg Districts, my frontline position as FRS, my participation as delegate at the FEA-NEA Representative Assemblies and NEA Diversity Cadre gives me the experience to successfully represent members. I am transparent and have assisted members writing grievances and EEOs, including addressing difficult issues with management. I am involved with the NEA Arab-American Caucus and Educators for Palestine. We work to ensure that the concerns of students and teachers of all ethnicities are advocated by NEA and were successful recently at NEA-RA. I'm a member of an oppressed group and uniquely suited for HCRC-Europe. Educators for Palestine currently advocates that NEA, the largest labor union in the US, demands that our government call for an immediate ceasefire so that Palestinian children may receive an education, which they've been denied for months.

Olga Sims, Teacher, World History 9-10, Stuttgart High School

Olga Sims was born in the Soviet Union. Upon graduation from high school, she pursued a bachelor's degree in Asian studies from Moscow State Institute of International Relations, Russian Federation. Ms. Sims moved to the United States and continued her education at George Mason University in Virginia. She graduated from George Mason University with a master's degree in education. Ms. Sims continued her professional studies and obtained an educational specialist degree in school leadership and administration with a concentration on special education leadership from Regent University. Currently, Ms. Sims is working on her doctoral degree in exceptional education executive leadership. Ms. Sims started her educational career as a paraprofessional serving students with disabilities in 2006. She became a special education teacher in 2007 and taught students with learning and intellectual disabilities in Virginia for seven years. In 2014, Ms. Sims moved to Las Vegas, Nevada, and worked as a teacher of students with mild disabilities.



Europe-West Candidate Information

Division Representative

(elect one for a two-year term)

Jessica Yucel, Spangdahlem High School



Jessica Yucel is a DoDEA graduate, having attended Geilenkirchen Elementary School, AFNORTH MHS, and Ankara Elementary / High School. After obtaining degrees in Secondary Education and Educational Leadership, she began teaching in Arizona before beginning her career with DoDEA. During her tenure at Bitburg and then Spangdahlem High School, she assumed leadership roles as an active member of the Continuous School Improvement / Instructional Leadership Team and as the AVID Site Coordinator. She added on leadership roles within FEA by becoming an FR and then an FRS, as well as president of her local Association. After four years as an FRS, she was appointed to the position of Division Representative for Europe West by the Europe Area Council. She hopes to continue her role as the Division Rep to provide strong and impactful advocacy for educators across Europe West.

Division Human & Civil Rights Coordinator

(elect one for a two-year term)

Doug Lechner, SHAPE Elementary School



I am serving in my 4th year as the SHAPE Elementary Human & Civil Rights Coordinator. I have also served in multiple leadership roles at SHAPE Elementary including 7 years as grade level chair, 1 year as CSI co-chair, and 2 years on the Instructional Leadership Team.

Delegate to the NEA Representative Assembly

(elect two for a one-year term)

Anita Lang, Lakenheath High School



As a member of the European Area Council, and both the NEA and FEA Board of Directors, I have worked to ensure that educators rights are protected. I believe that educator voice is the most important piece to making a successful union. By attending the NEA Representative Assembly, I can use my voice to determine how members' dues will be spent, moving the profession in a positive direction. I have also worked hard to be a good steward of members' money and as a delegate, I will vote to spend dues money in ways that maximize the benefits of our public school students. I take this responsibility very seriously. I am willing to share my experiences with anyone interested in participating at the RA in the future. Locals can send delegates too!

Europe-East 2 Candidate Information

Division Representative (elect one for a two-year term)

Stephen James, Netzaberg Middle School



I have had the privilege and good fortune to serve as the Division Representative for Europe East 2 (Bavaria, Stuttgart, and Ansbach) for the last 6 years. In that time, I have had the opportunity to work with building level leaders such as FR's, FR-HCR's and FRS. Supporting and collaborating with such a talented and dedicated bunch inspires and sustains me as we all strive together to support you every day and beyond. I know that passion and diligence that you bring to your students every day, and I believe that you should expect nothing less from your FEA representatives. At every level, FEA shows unwavering commitment to you and your mission. I have strived to serve you with the same commitment and passion that you show to your students, their families and your colleagues every day. I humbly ask for the opportunity to do so again.

Olga Sims, Teacher, 9-10 World History, Stuttgart High School

Olga Sims was born in the Soviet Union. Upon graduation from high school, she pursued a bachelor's degree in Asian studies from Moscow State Institute of International Relations, Russian Federation. Ms. Sims moved to the United States and continued her education at George Mason University in Virginia. She graduated from George Mason University with a master's degree in education. Ms. Sims continued her professional studies and obtained an educational specialist degree in school leadership and administration with a concentration on special education leadership from Regent University. Currently, Ms. Sims is working on her doctoral degree in exceptional education executive leadership. Ms. Sims started her educational career as a paraprofessional serving students with disabilities in 2006. She became a special education teacher in 2007 and taught students with learning and intellectual disabilities in Virginia for seven years. In 2014, Ms. Sims moved to Las Vegas, Nevada, and worked as a teacher of students with mild disabilities.

Division Human & Civil Rights Coordinator (elect one for a two-year term)

Olga Simms, Stuttgart High School

Olga Sims was born in the Soviet Union. Upon graduation from high school, she pursued a bachelor's degree in Asian studies from Moscow State Institute of International Relations, Russian Federation. Ms. Sims moved to the United States and continued her education at George Mason University in Virginia. She graduated from George Mason University with a master's degree in education. Ms. Sims continued her professional studies and obtained an educational specialist degree in school leadership and administration with a concentration on special education leadership from Regent University. Currently, Ms. Sims is working on her doctoral degree in exceptional education executive leadership. Ms. Sims started her educational career as a paraprofessional serving students with disabilities in 2006. She became a special education teacher in 2007 and taught students with learning and intellectual disabilities in Virginia for seven years. In 2014, Ms. Sims moved to Las Vegas, Nevada, and worked as a teacher of students with mild disabilities.

Kim Mahi, Speech-Language Pathologist, Hohenfels Schools



Hello, my name is Kim (she/her) and I have had the privilege of serving as my building level HCRC for the last several years. I represented FEA at the Minority/Women Leadership Training in 2022 and co-taught the course "Barriers Into Bridges: Building our cultural humility practice/community" in 2023. Using a lens of cultural humility means we must be willing to look across all levels of impact, including intrapersonal, interpersonal, and institutional. This means taking a step back to reflect on our own identities and values and building a community of mutual respect, which gives us the opportunity to all move forward together. If given the opportunity to serve, I will do my best to

support this amazing community of professionals, and to help move us toward a just and equitable world. Thank you for your service and consideration.

Europe-East 2 Candidate Information

Delegate to the NEA Representative Assembly

(elect two for a one-year term)

Olga Sims, Teacher, 9-10 World History, Stuttgart High School

Olga Sims was born in the Soviet Union. Upon graduation from high school, she pursued a bachelor's degree in Asian studies from Moscow State Institute of International Relations, Russian Federation. Ms. Sims moved to the United States and continued her education at George Mason University in Virginia. She graduated from George Mason University with a master's degree in education. Ms. Sims continued her professional studies and obtained an educational specialist degree in school leadership and administration with a concentration on special education leadership from Regent University. Currently, Ms. Sims is working on her doctoral degree in exceptional education executive leadership. Ms. Sims started her educational career as a paraprofessional serving students with disabilities in 2006. She became a special education teacher in 2007 and taught students with learning and intellectual disabilities in Virginia for seven years. In 2014, Ms. Sims moved to Las Vegas, Nevada, and worked as a teacher of students with mild disabilities.

Europe-East 1 Candidate Information

Division Human & Civil Rights Coordinator

(elect one for a two-year term)

Nancy Harb Almendras, Teacher, AP Literature/English 12, Wiesbaden High School

My background as District Rep in the Okinawa and Heidelberg Districts, my frontline position as FRS, my participation as delegate at the FEA-NEA Representative Assemblies and NEA Diversity Cadre gives me the experience to successfully represent members. I am transparent and have assisted members writing grievances and EEOs, including addressing difficult issues with management. I am involved with the NEA Arab-American Caucus and Educators for Palestine. We work to ensure that the concerns of students and teachers of all ethnicities are advocated by NEA and were successful recently at NEA-RA. I'm a member of an oppressed group and uniquely suited for HCRC-Europe. Educators for Palestine currently advocates that NEA, the largest labor union in the US, demands that our government call for an immediate ceasefire so that Palestinian children may receive an education, which they've been denied for months.



Europe-East 1 Candidate Information

Division Representative

(elect one for a two-year term)

Christopher Bradeen, Teacher, 5th Grade, Landstuhl Elementary School



After serving five years in the United States Navy, I joined DoDEA in 2009 – teaching first through sixth graders. I have eleven years of faithful service and experience as a Faculty Representative Spokesperson in three schools and two years as the Okinawa (AEAO) Elementary Vice President. I have fought tirelessly for educators’ rights and fair treatment under the Bargaining Agreement, DoDEA policies, and the law. My wealth of knowledge and professionalism includes leadership, conflict resolution, and breaking down barriers. Additionally, I proudly represented our educators by attending the FEA Leadership Summit in San Francisco. I currently assist multiple union leaders throughout our organization to receive the relief sought by their staffs despite facing challenging administration. I passionately believe that with the right mediation, perspective, and communication there is always a solution to promote fairness and equity for our professional educators, which in turn benefits our students.

David Tran, Teacher, 8th Grade Science, Wiesbaden Middle School

- 8th grade science teacher N.C.
- Biology teacher-Kinnick High School
- Teacher/Assistant Principal MC Perry
- Assistant Principal Kinnick High School
- Principal Kinnick High School
- Principal SHAPE American M/HS
- Principal Ankara E/HS
- 8th grade science teacher Wiesbaden Middle School

Nancy Harb Almendras, Teacher, AP Literature/English 12, Wiesbaden High School

My background as District Rep in the Okinawa and Heidelberg Districts, my frontline position as FRS, my participation as delegate at the FEA-NEA Representative Assemblies and NEA Diversity Cadre gives me the experience to successfully represent members. I am transparent and have assisted members writing grievances and EEOs, including addressing difficult issues with management. I am involved with the NEA Arab-American Caucus and Educators for Palestine. We work to ensure that the concerns of students and teachers of all ethnicities are advocated by NEA and were successful recently at NEA-RA. I'm a member of an oppressed group and uniquely suited for HCRC-Europe. Educators for Palestine currently advocates that NEA, the largest labor union in the US, demands that our government call for an immediate ceasefire so that Palestinian children may receive an education, which they've been denied for months.

VOTE

Europe-East 1 Candidate Information

Delegate to the NEA Representative Assembly

(elect two for a one-year term)

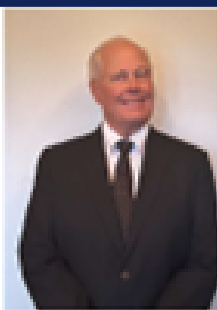
Nancy Harb Almendras, Teacher, AP Literature/English 12, Wiesbaden High School

My background as District Rep in the Okinawa and Heidelberg Districts, my frontline position as FRS, my participation as delegate at the FEA-NEA Representative Assemblies and NEA Diversity Cadre gives me the experience to successfully represent members. I am transparent and have assisted members writing grievances and EEOs, including addressing difficult issues with management. I am involved with the NEA Arab-American Caucus and Educators for Palestine. We work to ensure that the concerns of students and teachers of all ethnicities are advocated by NEA and were successful recently at NEA-RA. I'm a member of an oppressed group and uniquely suited for HCRC-Europe. Educators for Palestine currently advocates that NEA, the largest labor union in the US, demands that our government call for an immediate ceasefire so that Palestinian children may receive an education, which they've been denied for months.

DiAnna Martinez, Teacher, K-5 AAPS, Vogelweh Elementary School

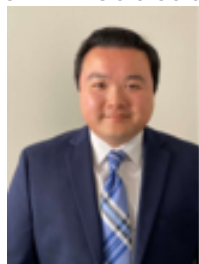
I have held school level representative positions to include FR, FR-HCR, and I am presently the FRS at my school. I have been the HCRC for Europe East Division 1 for four years and have worked closely with the Europe HCRC during that time in order to ensure members throughout Europe have had HCR representation.

FEA Europe's Stellar Legal Team



Bill is a retired USAF Lt. Colonel. He finds his MBA and M.ED. (Guidance Counseling) useful in ensuring FEA members have their pay/debt issues resolved. Bill has spent the last 25 years litigating pay/debt grievances representing over 2,000 members in over 100 arbitration hearings, resulting in payments, refunds, interest, and TSP lost earnings of more than \$25,000,000! His two famous quotes: "There are two kinds of DoDEA teachers... those who know they have pay problems and those who don't know they have pay problems!" and, "Don't mess with my forms!" (BFreeman@nea.org)

Will became an FEA Associate General Counsel four years ago. He has assisted Bill in 14 arbitrations. He has prevailed in a complicated debt collection arbitration involving 21 members. As a former DoDEA student, he has a great respect for DoDEA educators and is honored to represent them. (WillFreeman@nea.org)



Alex joined FEA in 2016. Alex majored in Political Science as an undergraduate before receiving his law degree from the University of Connecticut School of Law. For the past seven years, Alex has served as General Counsel for FEA Europe. Before FEA, he interned with NEA Government Relations. (Anguyen@nea.org)

Jan began her career as an English teacher at Ellsworth AFB. She was a DoDEA local hire assigned to 5 preps at RAF Greenham Common in 1988. Jan has spent the last 34 years protecting FEA member's due process rights and advising FEA leadership. As one DoDEA lawyer put it, "Jan Freeman is like Doris Day with spurs!" (JFreeman@nea.org.)



FEA-Europe Legal Update- PAY

New and Updated Pay Problem Package By Bill Freeman, FEA- Europe General Counsel

As most of you are aware, FEA and DoDEA have a new Collective Bargaining Agreement (CBA) as of 8/1/23. As a result, FEA revised the Pay Problem Package we have been sending out to members for the last 20 years. The **Updated Pay Problem Package** is our best attempt to comply with all new requirements of the new CBA.

There is an *easy way to differentiate* between the old and Updated Packages: Every page of the Updated Pay Problem Package reflects “Under 2023 CBA.” Please make sure each of you discard the old Package and save the Updated Package for ready access. The best way I know is to keep it in your personal email account. Many debt notices go out in the summer, when many of you do not have access to your FRS’s for advice. These debt notices come with tight deadlines, so make sure you can access the Updated Pay Problem Package no matter where you are. If you need a copy of the new Package, contact your FRS for one as soon as possible.

Please review page one of the new Package as soon as possible. It is a short overview of how to handle every kind of Pay Problem you may encounter.

Goodbye Grievance is the Best Reason to be in FEA By Will Freeman, FEA-Europe Associate Counsel

In my four years of working on pay cases and arbitrating them, I have seen countless horror stories. The worst come from retirees and those who have long since separated from DoDEA or transferred out of FEA Areas. Without any evidence or Due Process, the Government has started collecting 25 percent from retirement pay and/or Social Security payments. They have also collected entire IRS Refunds and destroyed credit ratings, making it impossible to obtain a loan for a house or car. In one case, they came after a \$50,000 alleged debt that was 10 years old and turned out to be a complete sham. Imagine what it was like for the retiree, working 40 years to depend on an annuity, only to have 25 percent taken away each month.

The absolute worst cases involve former educators who did not file and elevate a Goodbye Grievance before they left. They still have substantial rights, but no real way of enforcing them, In short, they are left to the mercy of the Government. You can imagine how that has gone.

Here is our best advice: file and elevate a Goodbye Grievance BEFORE you retire. Do the same if you are separating or transferring to Europe South, Puerto Rico, or DDESS. Your FRS has the **NEW** Pay Problem Package with the forms and instructions.

This is the **single best thing** you can do to ensure protection from future collection attempts. Regardless of what you may have heard, Arbitrator Sands and many others have upheld the GBG as a “critical lifeline.” We have never lost one of these. We have seen debts for more than \$100,000. And there is no statute of limitations on collecting “debts” owed the Federal Government.

Maintaining a Safe and Healthful Work Environment

by Alex Nguyen, FEA-Europe General Counsel

In August, a new contract went into effect for FEA Europe members; the first new contract since 1989. While some of the language contained within the new contract is similar to the language from the previous contract, many articles contain new language. One area of the contract that contains new language is Article 15, Section 4 regarding the use of school facilities. This section in the new contract specifies many of the same obligations by DoDEA from the previous contract, in that, *“The Agency recognizes its responsibility to provide and maintain a safe and healthful work environment and to follow government guidelines regarding environmental conditions for federal buildings. The Agency therefore commits to make reasonable efforts in this regard to contain asbestos and provide sanitary facilities, adequate lighting, ventilation, heating, and air conditioning.”*

The language of the new contract goes further than that of the previous contract, adding that, *“The Agency will take appropriate action to provide a work area free of weapons, explosives, and threatening behavior.”* Given what we have seen in some of our schools over the past few years, and especially this year, this new language could turn out to be vital for our members. The key component of the new language is that according to Article 15, Section 4 of the contract, **DoDEA acknowledges that its responsibility to provide a safe and healthful work environment includes the duty to provide a work area free from threatening behavior.**

Threatening behavior can constitute many things and take many forms. Unfortunately, since the beginning of the school year, several instances of teachers being subjected to threatening behavior in the workplace have been reported. From verbal threats to physical violence, educators have faced unsafe conditions due to threatening behavior, oftentimes, from students. If you feel that you have been subjected to threatening behavior and have not been provided with a safe and healthful work environment, please let your FRS know so they can put your administration on notice that an unsafe work environment exists. Our hope is that upon learning that their school is an unsafe work environment, your administration does the right thing and takes the necessary steps to remedy the situation, fulfilling **DoDEA’s obligation to ensure that your school is a safe place to work.** However, if your administration continues to fail to take the appropriate actions to provide a safe workplace, the school’s FRS should report that to the FEA UniServ attorney who covers your school. The health and safety of our members is of vital importance and one of the highest priorities for the Association. If DoDEA is failing in their contractual obligation to provide you with a safe and healthful workplace that is free of threatening behavior, please let us know so that we may provide advice and guidance on what steps should be taken next.

WHY YOU NEED AN FEA ATTORNEY TO ADVISE YOU IF ACCUSED OF CHILD MALTREATMENT

by Jan Freeman, FEA-Europe General Counsel

You may think, “this would never happen to me!” However, in the 50-100 pre-action investigations per year occurring in DoDEA Europe, most members have **NO PRIOR DISCIPLINE!** When FEA Attorneys have their initial conversation with an accused member, commonly member’s first words are: I have never had anything happen like this before and I have **NO** idea what this is about!” Members experience fear, anger, dismay, frustration, and hopelessness. There are often tears, anxiety, and medical consequences involved. In short, it is a horrific experience in EVERY way! But I am pleased to report that most members, by the end of the initial consultation with an FEA Attorney, indicate they feel supported and appreciative.

Of course, every case/situation is vastly different. However, these are a few issues your FEA Attorney will help you navigate.

Your Right to Remain Silent - Should I waive my right not to incriminate myself (remain silent) and voluntarily participate in a FAP investigation?

Considerations:

Potential criminal charges

If you have been accused of touching (no matter how minor) a student, a Criminal Authority **will** most likely be involved. This triggers your constitutional right to remain silent. You cannot be forced to give a statement to CID, the Military Security Police (MSP), OSI or host nation criminal authorities. Although these entities have the right to call you in (or take you in) for questioning and you must go with them, you cannot be compelled to answer questions beyond identification. Should this occur, you should **invoke your right to remain silent** and contact your FEA Attorney ASAP! FEA Attorneys are trained and experienced in guiding members through this process.

You may be entitled to FEA/NEA Educators Employment Liability (EEL) Insurance. EEL insurance entitles you to have reasonable criminal attorney's fees paid if you are either exonerated or not charged. Numerous members have their criminal attorney's fees paid promptly each school year. **CAVEAT: ACCUSED MUST BE A MEMBER AT TIME OF THE INCIDENT TO QUALIFY FOR EEL INSURANCE**

Potential DoDEA discipline (letter of reprimand, suspension without pay, removal)

The Family Advocacy Program (FAP) is a DoD activity charged with (among other things) protecting children in an institutional setting (school). FAP has no authority or jurisdiction over FEA members. They cannot require you to participate in their investigation. FAP investigators (they call themselves “assessors”) generally are unqualified and inexperienced social workers who have little/no knowledge of due process. More importantly, FAP investigators are not bound by the rules of evidence nor are they required to consider the alleged abuser’s due process rights. For example, they do not give the accused abusers prior notice of clear details regarding the accusations, and they do not give accused abusers information regarding other witness statements or allow them to

face their accusers with cross examination. In addition, they often engage in fishing expeditions designed (either intentionally or not) to illicit incriminating evidence against you or a confession. For example, FAP assessors ask highly personal medical and experience questions that may be used to determine you are not telling the truth.

Although apparently FAP does not “volunteer” your statement to anyone, MSP, CID, OSI and host nation criminal authorities can legally obtain this information for use against you in criminal proceedings. In a prior case, (against legal advice) a member voluntarily gave up their right to remain silent and met with the FAP assessor for questioning. DoDEA later suspended the teacher without pay. In the arbitration hearing contesting the suspension, DoDEA flew the FAP assessor (who had returned to conus with her sponsoring spouse) back to Germany for the hearing. The FAP assessor gave harmful testimony against the educator. She testified that the educator “seemed” guilty and that she believed the teacher was lying. She talked about him being nervous and visibly upset. I, of course, objected to her testimony. In the end, FEA won the arbitration, and the suspension was overturned. However, you must consider the possibility of the FAP assessor being called to testify against you in either a criminal case or an arbitration over your discipline when you decide whether to participate in the FAP investigation.

FAP has no jurisdiction/authority over you and any participation in a FAP assessment would be strictly voluntary.

Let me be clear, I am aware of teachers participating in the FAP process, the FAP committee finding “no substantiation” and the teacher returning to the classroom. The problem is no one can predict what will happen in any case. If we had a crystal ball and could predict what would happen, we would, of course, know exactly what you should do. As it is, you must make your decision as to whether to voluntarily participate without knowing the outcome. **The FEA Attorney will carefully guide you through the decision-making process based on your fact pattern.**

Another factor to consider: If FAP substantiates the claim against you, you have a right to appeal the FAP determination. However, the FAP appeal process is unclear and not governed by due process. FEA Attorneys will assist you with filing a FAP Appeal as well as represent you in any DODEA proposed discipline case.

If FAP substantiates your claim, they will enter your name into their internal tracking system/Central Registry (CR). This may place you in another Catch 22. DoDEA HDQS (EUPERSEC) is currently checking the FAP CR when determining whether a teacher passes or fails their required security clearance. This places you in an impossible Catch 22. You either voluntarily waive your rights to due process or are fired!

This is patently unfair and unjust. FEA opposes DoDEA abdicating their responsibility of investigating accusations and affording teachers their constitutional and contractual due process and is committed to fighting this practice!

As you can see, this process is incredibly complicated with many potential minefields. You will need the advice of an FEA Attorney to assist you in successfully navigating the process!