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March 11, 2010

Bob Anderson, Director
State of Wisconsin Department of Workforce Development
Equal Rights Division, Labor Standards Bureau
P.O. Box 7946
Madison, WI 53707-7946

Dear Mr. Anderson:

Manitowoc County entered into a Staffing Services contract with Triple P Incorporated, dba Peters Concrete Company, on March 23, 2007. Under this contract, Triple P was to provide services and labor to perform clerical, housekeeping, maintenance, and management at the Manitowoc County Expo Grounds and Ice Center in exchange for a management fee. At the outset, there was one full-time position, 3 half-time positions, and 2 seasonal positions. Other tasks and locations could be added by mutual agreement.

At the time the county entered into this contract, its Personnel Director advised its Public Works Director that Triple P would need to be licensed as an employment agency. The Public Works Director did not agree with this advice and took no action on it.

Recent events have caused the county to review its contract with Triple P. During this review, it was noted that Manitowoc County paid \$884,920.52 to Triple P during the period from May 2007 through February 12, 2010. This total was split between \$743,770.07 in employee costs and \$141,149.75 in administrative or management fees.

As part of the review, it was also noted that Triple was still not a licensed employment agency. Triple P was offered the opportunity to become licensed, but elected to terminate the contract when it learned that a licensed employment agency was willing to take on the contract.

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The county board has directed me to inform you of our involvement with Triple P, so that your organization may take such action as it deems appropriate. In that regard, please contact me if you have any questions or require any further information.

Very truly yours,



Steven J. Rollins
Corporation Counsel

cc: County Board Supervisors
Bob Ziegelbauer, County Executive
Sharon Cornils, Personnel Director
Jeff Beyer, Public Works Director