**IN-HOUSE PRO BONO IN PRACTICE PROFILE: FREDDIE MAC**
*February 2019*

The Pro Bono Program at Freddie Mac** began in 1991 when a group of Legal Division employees organized to obtain leadership endorsement of pro bono legal services and to partner with Legal Services of Northern Virginia (LSNV). At the time, LSNV offered important elements for the Legal Division's fledgling pro bono efforts, including substantive training, malpractice coverage, administrative and screening services, and direct services to individual clients. The partnership has continued for nearly three decades as a cornerstone of the Legal Division's Pro Bono Program.

Freddie Mac's Pro Bono Program has thrived with unwavering support from division leadership, including a general counsel who strongly supports the program, regularly participates in the Legal Division's Pro Bono Working Group meetings, and has an extensive personal history of participation in pro bono. "We have a duty as officers of the justice system to provide no-cost legal services to our neighbors who cannot afford to pay even discounted legal fees," said Ricardo A. Anzaldúa, Executive Vice President, General Counsel and Corporate Secretary of Freddie Mac. "That is why the pro bono policy of Freddie Mac's Legal Division is inclusive in encouraging all Legal Division employees, not only lawyers, to spend up to 50 hours of Freddie Mac work time per year delivering pro bono legal services."

Today, Freddie Mac's Pro Bono Program hosts seven clinics annually at its headquarters and undertakes direct representation pro bono matters for nonprofit organizations and individual clients at a variety of sponsoring organizations. Because the Legal Division is a multi-disciplinary law department with a broad range of expertise, the Pro Bono Program has benefitted from employees in diverse fields who have applied their unique skills in a variety of ways, including litigating complex asylum cases without partnering with outside counsel and developing a records retention policy that serves as a model for other organizations.

In 2011, Freddie Mac became a signatory to the **Corporate Pro Bono Challenge® initiative**, setting a goal of more than 50 percent participation in the Pro Bono Program by all Legal Division employees. This goal is included in the annual plan that senior management uses to evaluate the division's performance and, for the past three years, the division has exceeded this goal.

Being part of a mission-oriented company with a strong commitment to community service has also been important to the success of the Pro Bono Program. Recognizing this, the Legal Division recently created a social responsibility plan to formally integrate its Pro Bono Program, Diversity and Inclusion Program, and Community Service Program in order to further embed these initiatives in the Legal Division culture.

| **General Program Information** | |
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| Offices with Legal Staff | HQ: McLean, Virginia; Other offices: New York, NY and remote work locations. |

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| Size of Legal Department | 122 attorneys and 85 other Legal Division staff, including legal analysts, administrative staff, and other legal professional staff. |
| Pro Bono Leadership Structure | The Pro Bono Working Group promotes, enhances and oversees the Legal Division's Pro Bono Program. The Working Group operates under a charter and is led by two co-chairs, one of whom is the division's Senior Vice President and Principal Deputy General Counsel. Participation in the Working Group is not term-limited. The Working Group has representation across all of the division's departments and currently has 24 members (16 attorneys and 8 other division staff). Division leadership approves the annual budget and pro bono goals proposed by the Working Group.<br><br>The Pro Bono Working Group is responsible for:<br>• recruiting volunteers;<br>• planning and holding onsite clinics;<br>• evaluating new pro bono partners or projects;<br>• forming project-based committees to achieve Working Group objectives;<br>• evaluating achievement of annual goals; and<br>• coordinating with other organizations such as Pro Bono Institute, Association of Corporate Counsel National Capital Region (ACC NCR) and other bar associations, and the Northern Virginia Firms in Service, a consortium of law firms and corporate law departments. |
| Pro Bono Policy | The Legal Division adopted a pro bono policy in 1993. The current policy authorizes the Pro Bono Working Group to oversee and administer the Pro Bono Program. The policy addresses many topics, including the following:<br><br>• The policy defines pro bono work as the provision of legal and related services to clients who otherwise cannot afford such services and to approved program organizations that assist such individuals;<br>• Every employee of the Legal Division may spend up to 50 hours of Freddie Mac work time annually on pro bono matters for approved organizations and/or approved pro bono matters, with the ability to spend more time as needed for extended representation cases with supervisor approval;<br>• Matter management, such as conflict checks and records management, timekeeping, and appropriate use of Freddie Mac office resources for pro bono work;<br>• Reimbursement of certain out-of-pocket court fees and other costs and expenses related to pro bono; |

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| | • Compliance with applicable ethics and bar licensure requirements;<br>• Malpractice insurance; and<br>• Approval of new pro bono matters and sponsoring organizations for the Pro Bono Program. |
| Mandatory Pro Bono | Participation in pro bono activities is voluntary but encouraged. The Pro Bono Program receives strong support from the Legal Division leadership. |
| Communications | Recently, the Pro Bono Working Group launched an internal pro bono website. The website focuses on:<br>(i) raising awareness of how employees can be involved in the Pro Bono Program;<br>(ii) promoting meaningful engagement in pro bono activities to increase value for pro bono partners;<br>(iii) celebrating pro bono successes and leadership;<br>(iv) enhancing collaboration by featuring division employees with subject matter expertise and prior experiences to share with their colleagues; and<br>(v) facilitating program operations and administration such as clinic registration, timekeeping, and data collection.<br><br>The Working Group continues to develop additional resources that will be made available on the pro bono website, such as a research and document library to facilitate efficient representation and a form for submission of new pro bono matters.<br><br>The Pro Bono Program communicates with Legal Division employees by email about pro bono opportunities and sends calendar invitations to participate in onsite clinics. Sometimes, a program organization sends registration information directly to division employees if the pro bono opportunity is open to other companies or law firms. Most onsite clinics are sponsored by a department in the Legal Division, which helps raise awareness of the program and the opportunities for all division employees to participate, not just the attorneys.<br><br>At monthly Pro Bono Working Group meetings, an updated pro bono fact sheet is distributed to Working Group members that lists all pro bono opportunities, and this fact sheet is posted on the division's website and in common areas. The pro bono calendar of events is located on the Home Page of the website and also included in quarterly all-employee division town hall meetings. In addition, the |

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| | pro bono calendar will be integrated into a formal division-wide event calendar currently under development. |
| Recognitions/Awards | Both the Legal Division and the company recognize employees for their pro bono work, in several ways:<br><br>• Special events such as internal socials or pro bono fairs with pro bono partners are held to show appreciation to Pro Bono Program volunteers where successes and stories are shared with others in the division. Pro bono is highlighted at all-employee division meetings, with volunteers speaking about their experiences.<br>• Division leadership also sends division-wide emails recognizing the successes of pro bono volunteers, both teams and individuals. In addition to emails highlighting employees' successes, the website features success stories of and awards received by division employees for their pro bono work.<br>• While employees may choose to highlight pro bono participation in the annual employee evaluation process, there is no requirement to engage in pro bono activities. |
| Tracking Pro Bono | Historically, the Legal Division's internal timekeeping application contained an aggregate matter code for pro bono time. The division is developing a more robust reporting function to track additional information for pro bono timekeeping, including types of pro bono work performed and with which pro bono partners. |
| Partnerships | The Legal Division generally does not partner with outside firms to provide pro bono services, relying, instead, on its many experienced attorneys who can supervise or support less experienced attorneys and other division staff in handling these cases, particularly extended representation cases.<br><br>Freddie Mac has partnered with legal services organizations to identify pro bono opportunities and conduct pro bono clinics. |
| Professional Liability | Freddie Mac's malpractice insurance coverage extends to pro bono legal services. |
| Involvement of Paralegals and Staff | The division encourages all division employees—attorneys and other legal division staff alike—to participate in pro bono activities, including in onsite clinics and the other programs described below. |
| **Pro Bono Projects** | |
| *Consumer Law* | Since 2011, in coordination with ACC NCR, Freddie Mac has been hosting Consumer Law Clinics for Legal Services of Northern |

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| | Virginia (LSNV) onsite at Freddie Mac's headquarters. Attorneys receive training in the first part of the clinic and then meet with clients to advise on eligibility for bankruptcy relief or other assistance with consumer debt issues. Generally, between 15 and 20 clients are served in each clinic. Division staff who are not attorneys team up with attorneys to take notes, provide translation, complete forms, and perform other intake-related services. Division staff also handle registration and act as security escorts for the onsite clinics. |
| *Family law* | Since 2016, in coordination with ACC NCR, Freddie Mac has hosted LSNV's Uncontested Divorce Clinics onsite at Freddie Mac's headquarters. Attorneys receive training in the first part of the clinic and then meet with clients to advise on eligibility for an uncontested divorce. The format, number of clients served, and participation by division staff that are not attorneys are similar to the LSNV Consumer Law Clinics. |
| *Wills* | Since 2014, in partnership with Hunton Andrews Kurth*, Finnegan, Henderson, Farabow, Garrett & Dunner*, and the legal departments at Oath Inc.**, Verizon Communications Inc.**, and Hewlett Packard Enterprise Company**, Freddie Mac hosts at least one onsite wills clinic per year for LSNV. Attorneys work in pairs to prepare wills, powers of attorney, and health care directives for LSNV clients. Division employees who are not attorneys assist with document preparation, translation, and administrative activities associated with clinics. On average, four to six clients are served at each clinic in two shifts. |
| *Name and gender change* | Since 2012, Freddie Mac attorneys have participated in monthly offsite clinics at Whitman-Walker locations, and at an annual ACC NCR-sponsored clinic at a Northern Virginia location. Volunteer attorneys provide counseling and prepare documents to assist with the name and gender change processes. Volunteers who are not attorneys take notes and complete forms under the supervision of an attorney. |
| *Immigration* | • Since 2015, Freddie Mac legal teams have worked with the Capital Area Immigrants' Rights Coalition to obtain court orders for individuals and families granting asylum and/or special visas in immigration and related proceedings. As of February 1, 2019, Freddie Mac has successfully represented adult and juvenile immigrants in more than 12 cases. In each of these cases, the immigrant faced the substantial risk of serious harm or even death had they been returned to their home country. Each case involves litigation over several months and is therefore usually staffed with at least two |

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| | attorneys and two division employees who are not attorneys, often with additional assistance from other Legal Division volunteers. Division employees who are not attorneys assist with client interviews, translation during client meetings, research and factual investigation, and other administrative support.<br><br>• Beginning in 2018, volunteers participate in onsite and offsite clinics sponsored with Tahirih Justice Center, which promotes the safety and well-being of immigrant women and girls fleeing violence. Tahirih provides volunteers with onsite training, after which volunteers interview clients and prepare appropriate documents in full day clinics on asylum and related legal issues. There is no requirement for ongoing representation. Division employees who are not attorneys participate in onsite clinics by translating, taking notes, serving as security escorts, and photocopying documents.<br><br>• Freddie Mac attorneys have provided legal representation to Whitman-Walker Health clients on asylum and immigration matters. Whitman-Walker Health offers legal services to patients, people living with HIV, and members of the LGBTQ community. Division employees who are not attorneys assist with client interviews, translation during client meetings, research and factual investigation, and other administrative support. |
| *Nonprofit organizations* | • Freddie Mac provides legal services to Fairfax Court Appointed Special Advocates (CASA) as an organization. Legal Division employees have provided human resources consultation, analyzed legislation, and reviewed and drafted contracts (e.g., leases) as well as internal policies and procedures (e.g., record retention policy).<br><br>• Freddie Mac provides pro bono employment law advice to District Alliance for Safe Housing (DASH), the largest safe housing program for survivors of domestic and sexual violence in DC. |
| **Lessons Learned** | |
| *Seek management support.* | Support from leadership and supervisors at all levels is vital to launching and maintaining a robust in-house Pro Bono Program. Having department leaders sponsor on-site clinics or other pro bono work promotes engagement and participation within their groups. |

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| *Foster ownership of the pro bono program among volunteers.* | Freddie Mac's Pro Bono Working Group is a "vertically integrated" team consisting of personnel from all levels within the division, which leverages a diverse skill set and increases participation to generate momentum across the division. Personnel work with Pro Bono Program volunteers to determine the preferred service formats (e.g., brief advice and counsel, individual civil matters, hot lines, and/or clinics), and target client groups and/or preferred substantive areas (e.g., children and families, veterans, the elderly). |
| *One size cannot fit all.* | There is no one project that will appeal to all employees. Freddie Mac offers a menu of opportunities that vary from one-hour advice and counsel clinics onsite, to one-day clinics where legal documents are created and finalized, to ongoing representation cases that are handled in teams. Freddie Mac also periodically surveys its Legal Division about their pro bono interests in order to keep the program offerings aligned with employees' interests. |
| *Develop an infrastructure.* | Make it easy and seamless for employees to do pro bono work. Thoughtful policies and infrastructure (e.g., logistics and program operations) enhance participation and enthusiasm. |
| *Track achievements and recognize success.* | Recognize pro bono volunteers in employee communications, division meetings, and department gatherings as success begets participation and vice versa. The division collects success stories so we can report on the achievements of the Pro Bono Program to both division employees and across the company. Appreciation events with volunteers sharing their stories strengthen relationships within the division and with pro bono partners. Enhancing data collection and finding ways to quantify the program's "success" are helpful in guiding the program. |
| *Sometimes you have to start over.* | Freddie Mac's Pro Bono Program stretches back nearly three decades and was quickly recognized as a model for in-house legal departments. However, over the years, due to competing work demands and leadership transitions, employee participation rates dropped and the program languished for a period. A dedicated group of Legal Division volunteers, with the strong support of leadership, began rebuilding the Program in 2011. The volunteers surveyed division employees, expanded participation in the Pro Bono Working Group, broadened the pro bono opportunities, and raised awareness across the division. Since 2011, the Program has grown from hosting one onsite clinic a year, to seven onsite clinics and is now handling multiple extended representation cases. |

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