



Department of Administration
Office of Small Business Development

Tom Barrett
Mayor

Sharon Robinson
Director of Administration

Nikki Purvis
Director

VIA EMAIL (prenticejr@plfreeman.com)

November 23, 2020

P.L. Freeman Co.
Prentice Freeman
2836 N. Brookfield Road Suite 5
Brookfield, WI 53045

RE: Notice of Findings

Dear Mr. Freeman:

As you know, on November 1, 2019, the Office of Small Business Development (OSBD) received a formal complaint regarding P.L. Freeman Co.'s certification and the firm's utilization of multiple NAICS codes. The complaint specifically alleged that your firm could not self-perform work under multiple trades, as you do not personally hold the appropriate licensing in these trades. Additionally, the complaint further alleged that PL Freeman often provides labor rates as opposed to hard costs to self-perform work. Since then, this office conducted an investigation that included a site visit and in-person interview; held several phone calls; requested historical documentation such as contract and payroll records, correspondence from local Unions, licenses and credentials; inquired about the firm's operation.

After careful review of the information obtained during our review and the initial complaint, this office has adjusted the assigned NAICS codes to the following:

- 238160 Roofing Contractors

Per the email dated July 21, 2020, you confirmed your experience as a journey level Roofer, and as a result, your firm will retain this code.

We removed the following NAICS Codes:

- 238220: Plumbing, Heating, and Air-Conditioning Contractors
- 238210: Electrical Contractors

As indicated in your email dated December 16, 2019, Alex and Mike hold the expertise in their respective fields as Master Plumber and Master Electrician. However, you did not provide documentation affirming your expertise in either field, and as a result, your firm relies on the credentials of others to perform these services. To qualify for this program, the 51% majority owner

should have demonstrated control, meaning general knowledge and technical experience related to the primary industry classification. In addition, there should be documentation by the 51% majority owner of adequate knowledge of each major operating aspect independent of outside expertise.

To be clear, this office is not disputing the legality of the firm's hiring and use of licensed individuals to provide and perform the abovementioned services. However, we are affirming that based on SBE program standards, PL Freeman is not permitted to use the aforementioned codes participation requirements on city let contracts and city-funded private development projects.

Thank you for your patience and cooperation during this lengthy process. If you have questions regarding these changes, please contact me at npurvi@milwaukee.gov.

Best,

A handwritten signature in black ink, appearing to read "Nikki Purvis", with a stylized flourish at the end.

Nikki Purvis
Director

cc: Kathy Block, Assistant City Attorney
Russell Karnes, Gimbel, Reilly, Guerin & Brown LLP
Certification file