

Rains of Africa Ministries: Mailing List and Donor Data Dilemma

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ABSTRACT

This case examines a non-profit, “Rains of Africa Ministries,” founded to provide water wells, build schools, and provide relief supplies for tribal villages in Africa. Founded in the United States by a well-known evangelist who for years utilized her weekly syndicated television program as a platform for fundraising, the organization has a rich history of success. Following the death of the founder, the board hired the deceased evangelist’s youngest son, a long-time vice president of the organization, as the new CEO. Donations fell significantly resulting in layoffs, a reduction in the number of wells dug, schools started, and relief supplies being sent to Africa. The ministry currently has an operating deficit projected for the year of several million dollars.

An opportunity has arisen to shore up finances through an asset previously never exploited: the ministry’s mailing list. The founding evangelist had maintained a strict policy of protecting the privacy of the mailing list and the associated data sets that indicated which appeal methodologies worked best with specific demographics of the list. Realizing the value of this asset, the oldest son of the founder approached his brother with an offer seemingly too good to refuse. As the head of successful marketing and research company, he wants to negotiate for the rights to buy, borrow, or rent the ministry mailing list in exchange for an amount of money that will restore the current operating deficit, as well as provide an ongoing source of income to the ministry. Teaching notes not included but are available for verifiable faculty from dwhitlock@SE.edu.

Keywords: ethics, nonprofits, ministry, mailing lists, donors, privacy, marketing

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OBJECTIVES

1. Assist students to understand the ethical decision-making process and demonstrate the ethical decision-making process relative to corporate governance.
2. Contrast the differences of legal issues and ethical practice.
3. To connect the concept of organizational sustainability, ethics, and corporate culture.
4. To assist students in understanding the ethics of privacy for customers and clients of organizations.

INTRODUCTION

In the mid-1950s, a young woman in rural Oklahoma attended a religious service of well-known revivalist Kathryn Kuhlman. Kuhlman noticed her and called her on stage, prophesying that she was anointed as a “refreshing rain on Africa,” and that though only 22 years of age, that she was destined for “great service in the Kingdom of God.” Such was the beginning of the ministry of Josephine Stephanie Bernard, better known as Rev. JoJo, the founder and CEO of Rains of Africa Ministries, a 501(c)3 corporation headquartered in Tulsa, Oklahoma.

Rev. JoJo’s ministry began humbly following the august prophesy of the famous Kathryn Kuhlman. Ms. Bernard’s father, who had been a traveling salesman, converted his panel truck into a traveling camper bus repainted to reflect the name of his daughter’s newfound ministry and purchased a large meeting tent for services from a circus headquartered in southeastern Oklahoma. Traveling from town to town, first in Oklahoma, Kansas, Missouri, and Arkansas, the ministry eventually attained a loyal national following that exploded after she was featured on an episode of the nationally syndicated television program of Oral Roberts. This led to increased visibility and a wider audience of supporters, one of whom was a wealthy widower in Dallas, who became a major donor to Rev. JoJo’s ministry.

The son of an itinerant preacher himself, Granville Owen Roberts, Jr. was a wealthy widower with no children or family members who had made a fortune as a wildcatter in Texas before retiring to a beautiful upscale gated community in Dallas. Mr. Roberts became a monthly donor to Rains of Africa Ministries, designated as “Rain Prayer Warriors” in the ministry. On a trip to the Dallas area, Rev. JoJo met Mr. Roberts, and the two became fast friends. Despite the age difference—Mr. Roberts was 30 years her senior—the two became constant companions and surprised the most of the ministry staff only two months after meeting, with the announcement they had eloped. He was 56 and she was 26.

The ministry was moved from Tulsa to Dallas, and Mr. Roberts became a board member of the ministry and its largest donor. Over the next five years, two sons were born to the couple, Granville Owen Roberts III, the older of the two, and Joseph Stephen Roberts. Over the next several decades, the two sons took very different career paths. Granville pursued a college degree out of state getting a bachelor of science with a double major in marketing and psychology, and launched several entrepreneurial firms. He became a successful business leader and CEO of a marketing research and development firm. Joseph pursued a degree in biblical studies at a fundamentalist Bible college and obtained a bachelor of Biblical studies degree with a major in ministry, and upon graduation was employed by Rains of Africa Ministries in Dallas, where he began in the donations intake department and worked his way up to Vice President for Advancement and Development of the ministry, reporting directly to his mother as her

designated heir-apparent. Rev. JoJo's husband died when she was 60, and then she unexpectedly died of a heart attack only three years later on a vacation in her summer home in Colorado.

DILEMMA

At the time of her death, her youngest son, Joseph, now known affectionately in the ministry and to the hundreds of thousands of ministry supporters as Rev. Joey, was named by the ministry board as CEO of Rains of Africa Ministries. Unlike his mother, who had a penchant for life's finer things, including designer clothes, beautiful jewelry, the Dallas mansion, Colorado summer home, a third home in Puerto Rico owned by the ministry, a private jet plane and a garage stocked with six classic cars, all owned by the ministry, Rev. Joey was a humble man who was not just beloved by ministry employees, but eschewed the trappings of wealth. He appeared to all as genuinely committed to the mission of Rains of Africa Ministries: "Reaching to the outermost with Living Water and a hand up." He had personally seen the impact that access to clean water through newly dug wells brought to the health and well-being of the villages they served. He had watched as those same villages were blessed with ministry-provided church buildings that also served as school houses, and the training, volunteers, and financial assistance that had been provided through his years associated with the ministry.

Upon assuming the leadership of the ministry, Rev. Joey sold most of the assets that he viewed as non-essential. He sold the family mansion, and used the resources to purchase a more modest home in a non-gated community. He sold the vacation homes in Puerto Rico and Colorado with the proceeds deposited directly into the ministry. He also liquidated the car collection and sold the company jet. The reduction of these expenses along with the influx of cash was a godsend in the early days following the unexpected death of the famous Rev. JoJo and helped offset the inevitable downturn in contributions that followed such a drastic change in leadership and donor relations.

However, Rev. Joey was not the fundraiser or personality his mother had been. His oldest brother, Granville, the entrepreneur seemed to have inherited his mother's personality and penchant for garnering excitement and support of others. While Rev. Joey instituted sound practices and policies for the ministry, and established new systems of control and accountability, donations began to decline, opportunities for speaking engagements began to dry up, and many of the ministries major donors began to pass away. In recent years, the ministry has had to reduce staff, reduce the amount of television time they were able to purchase, and much of the cash that had been generated in the early days of Rev. Joey's leadership through selling properties and assets were spent. But there was one asset that ministry had that had long been sought by individuals from other ministers, ministries, and even corporations: the ministry's mailing lists of donors and non-donors who had contacted and/or given to the ministry over the decades, along with all of the associated data.

One individual in particular had attempted to negotiate with the Rev. JoJo for many years to have access to, borrow, rent, or purchase the mailing list and the associated data on the donors. Oldest son and entrepreneur Granville had practically begged his mother and father and board members for the data, offering hundreds of thousands of dollars plus annual percentages of sales on business generated through the data. Despite some of his mother's propensities to rarely or never look away from any source of income (once a casino owner had tried unsuccessfully to give Joey a \$100,000 cash gift but he had refused. When his mother discovered it, she contacted

the casino owner and accepted the money, explaining to Joey, “The devil has had this money long enough. It’s time the good Lord got it!”), but she drew the line at her most valuable asset.

Believing that another ministry or cause or company could siphon off donors from her ministry, she closely guarded the data her ministry had developed over the decades. They not only had updated names, addresses, income data, giving histories, and demographic data on every person on their donor list, they had data sets that informed them of what methodologies (direct mail, television, radio, Facebook and other social media sites) reached each person best. They knew what key terms elicited the greatest responses, and even the best days of the week, and best weeks of the year to have their message arrive to each donor.

During a phone visit one evening between Granville and Joey, the younger brother was lamenting the poor condition of the ministry and Granville insisted on driving from his home in Santa Fe, New Mexico the next day. Upon meeting, Granville laid out a plan that consisted of three primary points. His own company, Higher Knowledge Associates (HKA) Inc., a wildly successful marketing and research firm, which was also engaged in a joint venture with Granville Roberts Investments (GRI), LLC., would:

1. Manage the ministry’s customer relationship management system for free, cutting monthly expenses for Rains of Africa Ministries by \$42,500.
2. Increase the monthly pledge for donations (which had been paid faithfully every month for decades) of HKA, Inc., from \$2,500 to \$5,000 and of GRI, LLC from \$1,000 to \$2,000.
3. For access to and use of the data managed on the CRM, any sales generated as a result by HKA, Inc., and GRI, LLC would donate an additional 50 basis points (0.50%) of those sales to the ministry.

Hesitant as to the ethics of selling donor mailing lists and more specifically, the data about the donors to Rains of Africa Ministries for the purpose of marketing by for profit companies, Rev. Joey called a meeting of his Chief Advancement Officer in charge of all donor relations and ministry appeals (the department in which all of the relevant information is housed), his Chief Financial Officer, and Chief Operating Officer. Rev. Joey presented the proposal from his brother Granville to them and asked them to prayerfully advise him.

Janista Cavella, the CFO immediately responded, “Pray? About what? About how fast we can provide Granville with a contract? This is the answer to prayers we’ve already been praying about!”

The CAO, Will Ironside was an otherwise gregarious fellow whose girth revealed the signs of middle age and a thousand donor dinners and receptions. He replied firmly but kindly, “This violates all kinds of trust we’ve built over decades with our donors. Rev. JoJo held firm on this through the years whenever there was any hint of using the list or the data for any purpose other than our ministry.” He later sent a copy of the ministry’s privacy policy no the use of their mailing lists and data to each of them as indicated in Exhibit 1 (Appendix).¹

¹ Though not addressing the ethics of using donor information for use by non-profits, McCort does touch on what could be considered “trust” in the relationship marketing strategies that non-profits should cultivate with their client-customers, writing, “The heart of a relational strategy is a long term, mutually beneficial commitment between organization and customer. As such, concern with those activities and expressions that engender commitment between parties is important. The proposed framework is very versatile. While it has been operationalized in the context of NCOs' communication with donors, other operationalizations for different contexts are readily possible. ...To be truly relational, it must be a core philosophy upon which all aspects of the organization are built (Daniel McCort, J. (1994). A framework for evaluating the relational extent of a relationship marketing strategy: The case.. *Journal of Direct Marketing*, 8(2), 64. <https://doi.org/10.1002/dir.4000080208>).

Janista shot back, “Her concern was that other ministries not eat into our market share...”
“That’s uncalled for,” Rev. Joey said calmly.

At this point the COO suggested that they follow Rev. Joey’s advice to pray about it, and to reconvene the next day to discuss. Late that evening, the CFO wrote a confidential memorandum by email to Rev. Joey, included in Exhibit 2 (Appendix).

Just before the meeting the next morning, the COO, Rev. Dr. Bishop Jordan, himself an ordained minister, caught Rev. Joey in his office.

“Mind if I say a few words?”

“Sure, come in,” Joey replied.

The Bishop, his preferred means of address quietly closed the door behind him and spoke in soft tones.

“You need to know a few things before our meeting. First, I’ve prayed and am convinced that we can figure out a way around your ethical concerns. Fact of the matter is, I agree in principle with Janista. This is the answer to our prayers and provides us a means to sustain the mission of Rains of Africa. I know it’s a fine line ethically, and I know you’re going to struggle with it. But if we don’t, I fear we will be charged with overseeing the end of the ministry and our mission after we’ve depleted what assets we can sell and after an ongoing and ever-increasing reduction in staff over the next few years...”

“But,” Joey started to object.

“But, nothing. Those are the facts, Joey.” His tone was kindly and fatherly. The Bishop was the age of his mother and had been by her side for decades. He had given up his own preaching ministry after Rev. JoJo had prophesied that he would receive the mantle to walk side by side with her to reach the continent for Africa. It was providential, as his own ministry, though successful, had plateaued and his church board had informed him that they intended to make a change in pastoral leadership over the next six months. He immediately joined the ministry and had been a loyal servant, behind the scenes, faithfully working to ensure all of the details of the ministry were attended so Rev. JoJo, and then Rev. Joey could focus on leadership and representing the public face of Rains of Africa.

He continued. “There really isn’t another alternative except to plan an exit of the ministry and do as much as we can over next three to three and a half years with what we have in personnel and assets. I know you want to avoid even the appearance of evil, Joey. And that makes this a tricky subject.²”

“So, it’s the beginning of the end, or violate my conscious and sustain the ministry indefinitely?”

The Bishop replied, “It’s the beginning of the end, or it’s a brand new start that God has providentially provided. I say God has opened a door. Walk through. But you need to know something else. Janista may be right about the need to go ahead with this proposal from Granville. But you must also know she isn’t necessarily an unbiased actor in this matter. You do know Granville gave her some financial projections, right?”

“Sure, yesterday when he dropped by the office to meet with me...”

² Lin-Hi, N., Hörisch, J., & Blumberg, I. (2015). Does CSR Matter for Nonprofit Organizations? Testing the Link Between CSR Performance and Trustworthiness in the Nonprofit Versus For-Profit Domain. *Voluntas: International Journal of Voluntary and Nonprofit Organizations*, 26(5), 1948. Retrieved March 3, 2020, from www.jstor.org/stable/43654878

“No sir. He’s been in touch with her the last six months. They are dating again. I’m not a prophet, nor the son of a prophet, but if I were, I’d predict they’ll be married before Christmas. Now that JoJo’s gone Home, nothing and no one is here to object.”

“Have legal draft a letter of opinion for us,” Joey asked and then as an aside that was neither approval nor disapproval but rather just gratefulness for letting him know he added, “...and thanks. I didn’t know.”

“I took the liberty of visiting with legal last night,” he smiled, and handed over the document. See Exhibit 3 (Appendix). “Perhaps there is an alternative that preserves good faith with our donors,” he finished as they rose to walk to the corporate conference room.³

DISCUSSION QUESTIONS:

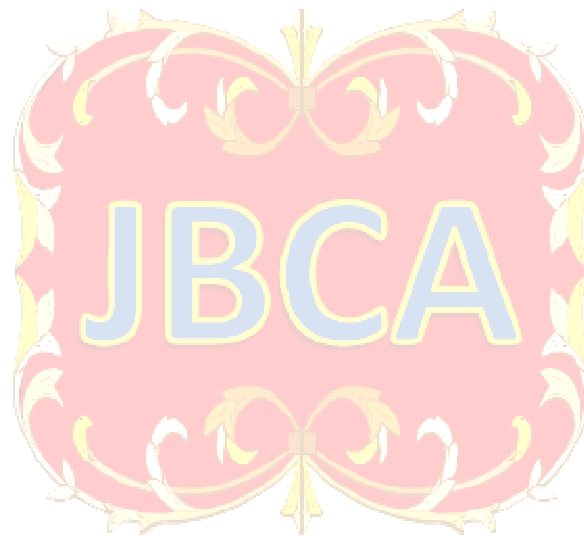
1. The Ethics Resource Center’s Code Construction and Content (<https://www.ethics.org/resources/free-toolkit/code-construction/>) that provides guidelines for writing an ethics code.
 - Be clear about the objectives the code is intended to accomplish.
 - Get support and ideas for the code from all levels of the organization.
 - Be aware of the latest developments in the laws and regulations that affect your industry.
 - Write as simply and clearly as possible. Avoid legal jargon and empty generalities.
 - Respond to real-life questions and situation.
 - Provide resources for further information and guidance.
 - In all its forms, make it user-friendly because ultimately a code fails if it is not used.

How could some of the issues faced by Rains of Africa have been clarified by such a Code? Was the information provided by the CAO in Exhibit 1 sufficient for making the decision to contract with Higher Knowledge Associates (HKA) Inc., and Granville Roberts Investments (GRI), LLC? How could that have been better clarified.
2. Compare and contrast how the CAO, the CFO, and the COO might have argued those terms in Exhibit One should be applied in this ethical decision?
3. Identify the likely ethical approaches of each of the following individuals in the case: The Chief Financial Officer, Janista Cavella; Chief Advancement Officer, Will Ironside; Chief Operating Officer Bishop Jordan; Chief Executive Officer, Joey Roberts, entrepreneur Granville Roberts. Identify each as Consequentialist/Utilitarianism, Deontological, or Virtue approaches and explain your reasoning.
4. Describe how the right to privacy might affect Rains of Africa in the decision regarding whether to allow the mailing list and their data to be used by Granville. Specifically, how would the ethical decision-making process affect the executives’ final decision
5. The importance of succession planning is also illustrated in this case. How might have the board of trustees better planned for succession for Rains of Africa Ministries?

³ As noted by Dawkins, “[C]haracteristic of good faith stakeholder engagement is that corporations confer with stakeholders about their concerns. The second aspect of conferring in good faith is to justify claims and demands with reason so as to indicate a desire to reach an agreement. Corporate leaders indicate a desire to participate actively in deliberations with stakeholders and a sincere desire to adjust differences and to reach common ground.” Dawkins, C. cedawkins@csupomona. ed. (2014). The Principle of Good Faith: Toward Substantive Stakeholder Engagement. *Journal of Business Ethics*, 121(2), 283–295. <https://doi.org/10.1007/s10551-013-1697-z>

APPENDIX**Exhibit 1: Rains of Africa Privacy Policy Statement on Mailing Lists and Associated Data**

Purpose	Ministry Use Only	For Other Use
Everyday business		X
For ministry marketing purposes	X	
For joint marketing efforts with other mission-minded organizations		X
For affiliates ministry purposes		X
For nonaffiliates marketing purposes ⁴	X	



⁴Opt in and opt out programs across mail, telephone, and Internet direct channels are addressed in Milne's and Rohm's "Consumer Privacy and Name Removal Across Direct Marketing Channels," article in *the Journal of Public Policy & Marketing*.

Exhibit 2: Email sent to Joey Roberts from Janista Cavella

TO: JROBERTS@ROAM.org
FROM: JCAVELLA@ROAM.org
RE: HKA/GRI Proposal

Joey,

As you know, I am primarily concerned with my fiduciary responsibilities ROAM, but I assure you, I am convinced of the sacredness of our mission and the rightness of what we do in reaching those who are desperate for help in Africa. I acknowledge that I have long been on the side of leveraging what is clearly our most valuable asset as a means for sustaining our worthy mission. My off-hand comment about your mother was uncalled for and reflects a lingering bitterness at what was her disapproval of my relationship with Granville so many years ago. For that I am sorry and pledge to work diligently to prevent a root of bitterness from growing. Still I must strongly advise that we pursue this an ongoing means of supporting our work in the face of declining revenues and the lack of television exposure we enjoyed during your mother's leadership of the ministry.⁵ Granville handed me a few projections of what he anticipates the percentage of sales his company would be able to donate back to ROAM in addition to the increased monthly pledges. Regarding concerns about privacy, we have no stated policy that is given to our donors regarding our use of data we collect. Besides, there are ways around any challenge as Google discovered in their conflict with the European Court of Justice. In my opinion therefore, we would not be breaching any privacy policies to pursue this course of action.⁶

This is an answer to our prayers.

Jan

⁵ Eben Harrell comments in the Harvard Business Review about the importance of succession planning, and this is certainly another aspect that might have helped avoid some of the present difficulties ROAM is facing. (<https://hbr.org/2016/12/succession-planning-what-the-research-says>).

⁶ It is noted that consumers rarely read any such disclaimers regarding their privacy or lack thereof, and most people are not aware of what information web sites collect or how it will be used (Nehf, James P..*Journal of Consumer Affairs*, Winter 2007, Vol. 41 Issue 2, p351-375, 25p; DOI: 10.1111/j.1745-6606.2007.00085.x). Likewise, legal regulations can be, as the CFO points out, worked around, as Google discovered when, in an effort to provide privacy protection to individuals in the EU and their right “to be forgotten,” Google implemented the European Court of Justice’s regulation in such a way to leave as much information in search results as possible, including flagging search results, and removing only the search results from those searches conducted and displayed in the EU. “This case demonstrates that although there are regulations in place to provide customers with a certain level of privacy, some organizations will find ways to minimally comply with regulations that do not align with their business strategy” (Greenaway, K. E., Chan, Y. E., & Crossler, R. E. (2015). Company information privacy orientation: a conceptual framework. *Information Systems Journal*, 25(6), 579–606. <https://doi.org/10.1111/isj.12080>).

Exhibit 3: Legal Department Memorandum to the CEO

Rains of Africa Ministries

Reaching to the outermost with Living Water and a hand up.

MEMORANDUM

TO: Rev. Joey Roberts, CEO
FROM: C. Cody Bragg, ROAM Legal Department
DATE: October 31, 2020
SUBJECT: Mailing Lists and Data Useage

In regard to the prospect of disseminating your mailing list, please be advised of the following:

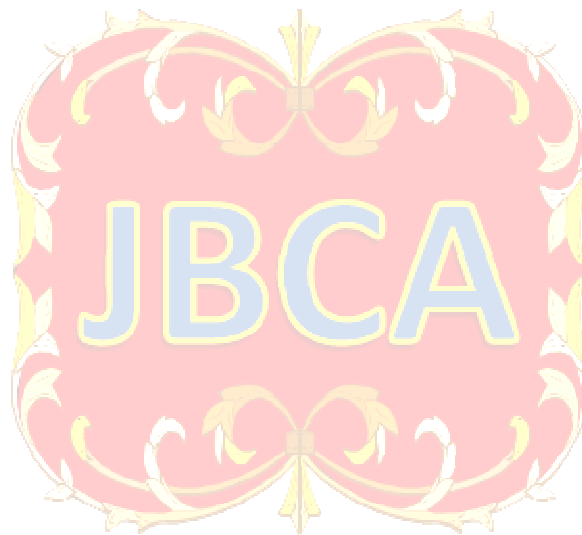
The U.S. Department of Health, Education, and Welfare created a code governing the use of personal information. The mailing list members must be notified. There can be no secret recordkeeping about those members. The information must be protected against misuse and must be reliable. Most importantly, there must be available some modus operandi for these members to prevent information obtained for one purpose from being used or obtained for a different purpose. The Department's code has made this clear for nonprofits that want to rent or exchange mailing lists with other organizations. This means, that if the names on your mailing list were obtained for use by ROAM, they may not be disseminated to a different organization with a different mission without providing those whose names are on that list a way to stop the exchange. In other words, if ROAM obtained this list for keeping in touch with its members, it must inform its members how to quash the sale if ROAM plans on using the information for a second use such as making money. Even should every member choose to allow the sale to go through, several precautions must be taken. There must be an "opt out" statement given for solicitations, and there must be a continuous process to delete names of members who choose to have themselves removed from the list.

If there are any member names from EU countries, ROAM must comply with the GDPR provisions⁷. Consent must be gained for using the data. For every new purpose that the personal information will be used, the company must seek a new allowance. If the party does not agree with a certain way, they may opt out, and the company cannot use their data in that way. A clear business purpose for using the data must be stated.

⁷ For an overview of the EU General Data Protection Regulation, see: Petersen's research, "What (and Why) You Need to Know About EU Data Protection Law." See Newman's and Crase's article on the ECPA, "What in the World is the Electronic Communications Privacy Act? An Overview of the ECPA Hurdles in the Context of Employer Monitoring" An excellent source on privacy and the Fourth Amendment's relationship to modern electronic privacy data is Aitchison's "Privacy in the Cloud: The Fourth Amendment Fog," as well as the two Supreme Court cases that appealed to "privacy rights" in the constitution: *Griswold v. Connecticut*, and *Roe v. Wade*. See Lindgren's "The Doctor Requirement: *Griswold*, Privacy, and At-Home Reproductive Care," in *Constitutional Commentary* for example. These two cases that appeal constitutionally to the right of privacy are being interpreted more broadly by federal circuit courts than what the Supreme Court's precedent intended where related to informational privacy theory and the Fourth Amendment; see Pittman's "The Elusive Constitutional Right to Informational Privacy," the *Nevada Law Journal*.

For members from Canada, ROAM must comply with the PIPEDA provisions as well as comply with everything mentioned thus far. To do this, the Department of Health, Education, and Welfare has issued a “Safeguards Rule”. This rule states that each company must develop a written security plan that describes how the company will protect the information. As part of this plan and to accomplish its goal, the company must designate an employee to coordinate the security program. It must identify risks to the information and evaluate current safeguards. It must monitor and test this program, and adjust the program according to circumstances.

My personal advice on the matter is to talk to our members immediately and offer them some benefit for letting ROAM use their names. The FTC has guidelines for making effective disclosures found here: <https://www.ftc.gov/system/files/documents/plain-language/bus41-dot-com-disclosures-information-about-online-advertising.pdf>.



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Petersen, K. (2018). GDPR: What (and Why) You Need to Know About EU Data Protection Law. *Utah Bar Journal*, 31(4), 12–16.

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