



The Hunger Industrial Complex



ILLINOIS
Family
Institute

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About the Author

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His work as an investigator prompted him to establish the Truth Alliance Foundation (TAF) and to dedicate the rest of his life to the protection of children. He hopes that the TAF will expand to facilitate the protection of children all over the United States and around the world.

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Part 1

HOW AMERICA MANUFACTURED A
FOOD INSECURITY CRISIS
PAGE 3-9

Part 2

HOW FEDERAL FOOD PROGRAMS
UNDERMINE OUR INSTITUTIONS AND CULTURE
PAGE 10-17

Part 3

THE SIX-FIGURE
CHARITY RACKET
PAGE 18-23





How America Manufactured a Food Insecurity Crisis

Part 1

Have you ever wondered why, in the freest, most prosperous, most economically booming country in the world—the United States—1 in 8 people receive food stamps due to poverty, while we still report that 1 in 7 people face chronic food insecurity?

I wonder. I wonder how this could be true.

I started looking into this when I found that food banks in our area, many of them housed in churches, began providing largely anonymous delivery services to people who supposedly need food but are afraid to visit the food bank facilities for fear of being discovered by **Immigration and Customs Enforcement (ICE)** agents. Reportedly, they are afraid they will be met at the local food pantry by federal agents, arrested, and deported.

So what's happening is that the food banks—which are substantially funded by the **United States Department of Agriculture (USDA)**—are trying to make it easier for illegal aliens to evade capture and deportation by **Homeland Security**. Ultimately, one federal agency is effectively undermining another's mission.

These contradictions pushed me to look deeper into how our hunger relief system really operates. How big is the hunger problem in America? Who controls the system? And why would those running the show attach themselves to the ICE resistance movement?

My attempt to answer these questions led me to discoveries I didn't expect: a vast, opaque system built on subjective measurements, corporate tax incentives, and federal monopolies—all operating with little oversight despite being funded with billions in taxpayer dollars. The more I investigated, the more the numbers stopped adding up. The stories didn't match reality. And the people running this system are getting very, very rich.

Trying to investigate the food bank system is like auditing

a ghost. These organizations operate under 501(c)(3) nonprofit status, which shields them from most state regulation. They receive billions in federal commodities through **The Emergency Food Assistance Program (TEFAP)** and state grants, yet their allocation decisions are made behind closed doors in meetings that aren't public.

The system is deliberately opaque. Food banks report to the **IRS** using Form 990, but those filings don't reveal allocation formulas, they don't publish board meeting minutes, and they don't provide details on travel and meeting expenses. They also don't publish conference transcripts or list salaries for individual employees, except for officers. Additionally, they don't show whether federal demographic formulas are actually followed. They are entirely exempt from any **Freedom of Information Act (FOIA)** requests, even though they are nearly entirely funded by federal subsidies and corporate donations driven by increased tax write-offs.

States designate food banks as TEFAP distributors through contracts that are not easily accessible to public scrutiny. The entire system operates in a regulatory gray area: too nonprofit to be regulated like a business, too government-affiliated to be pure charity, too politically connected to face serious oversight.

This opacity isn't accidental. It's structural and protects a system that has grown into a \$4.9 billion industry based on a 'hunger' measurement that might not accurately reflect reality.

For nearly 30 years, the United States has relied on a single annual survey to assess "food insecurity" by asking households about their anxiety, worry, and perceptions of food access over the past year. This method forms the foundation of the \$4.9 billion charitable food industry. Still, it does not measure hunger or actual food deprivation—only self-reported emotional states that are entirely subjective and unverified.

The **Current Population Survey Food Security Supplement (CPS-FSS)**, conducted by the **U.S. Census Bureau** and



sponsored by the USDA, asks households 10-18 questions about their feelings and experiences related to food. A household is classified as food insecure based on just three affirmative responses to questions such as:

“Were you worried whether food would run out before getting money to buy more?” (measuring anxiety, not actual shortage)

“Could you afford to eat balanced meals?” (measuring subjective perception of affordability, not actual nutrition)

“Did you cut meal size or skip meals?” (behavioral claim, unverified and subject to 12-month recall bias)

There is no objective standard for defining a *“balanced meal,”* no nutritional assessment, no caloric measurement, and no medical verification. A household reporting that they *“sometimes worried”* food would run out is classified the same as one where adults regularly skip meals. Both are labeled *“food insecure.”*

The 2006 National Academies Panel that reviewed this measure concluded: *“The survey does not directly measure the physiological condition of hunger”* and recommended that USDA stop using the word *“hunger”* entirely—a recommendation ignored by the food industry that still uses *“hunger”* in marketing materials 19 years later.

If food insecurity measurement were meaningful, we would expect increased **Supplemental Nutrition Assistance Program (SNAP)** participation and expanded food bank distributions to decrease food insecurity rates. Instead, all three numbers move together, rising and falling with economic conditions rather than showing inverse patterns.

2001-2010: SNAP doubled from 6.1% to 13.0%; food insecurity surged from 10.7% to 14.5%; food bank usage tripled from 4.4% to 12.0%

2010-2019: All three declined together as the economy recovered

2023: Food bank usage (14.9%) exceeds food insecurity (13.5%)—mathematically

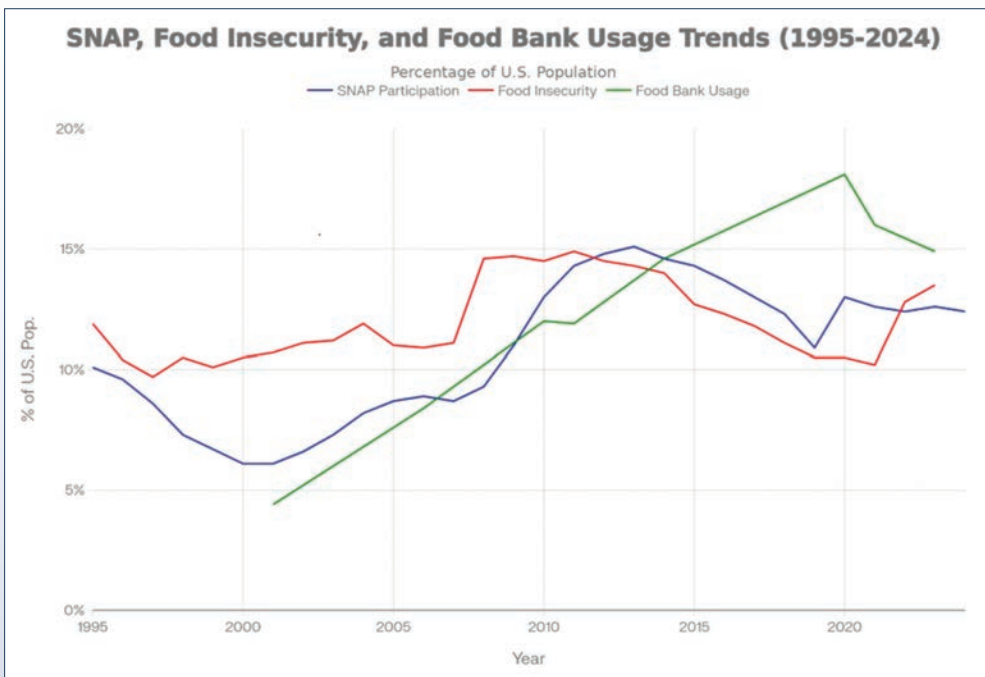
impossible if these systems served only the food insecure (see graph below)

The correlation is clear: +0.593 between SNAP and food insecurity, +0.815 between SNAP and food bank usage. These are not inverse relationships that would show “solutions.” They are responses to the same underlying poverty, and the system has no incentive to eradicate poverty, only to manage it profitably.

Feeding America’s national leadership earns \$7 million annually in compensation. Regional food bank leaders make between \$250,000 and \$500,000. Marketing vendors take in \$37.6 million each year to persuade donors that hunger is getting worse, using carefully crafted stories about *“worried families”*—technically false and emotionally compelling claims.

The food insecurity measurement provides a perfect cover. It is subjective enough that it can’t be proven false, broad enough (50 million Americans now classified as food insecure) to support ongoing growth, and essentially unaffected by whether real hunger is addressed.

Food insecurity, as measured, is not a reliable, objective way to assess actual hunger. It is a subjective collection of self-reported feelings, perceptions, and recalled behaviors—none of which are verified—and all of which may encourage exaggeration. After 30 years of measurement, \$4.9 billion spent annually, and a network of 60,000 food banks, food insecurity remains worse than when measurement began.





An objective person must conclude that claims of increasing food insecurity are false — not because they are factually incorrect, but because of their misleading purpose. They are intentional justifications designed to benefit a self-sustaining industry that profits from perpetuating hunger rather than eliminating it.

The modern food pantry movement didn't originate from a planned, evidence-based response to hunger. Instead, it emerged as a spontaneous reaction to economic shocks in the 1970s and 1980s, then grew into a lasting, parallel food system that now helps tens of millions of people each year—without significantly reducing food insecurity.

The earliest food pantries in the United States were simple “*emergency cupboards*” run by churches and community groups during the economic turmoil of the 1970s. They were local, volunteer-driven, and explicitly temporary—meant to help a family through a job loss or crisis. Around the same time, the first food banks appeared as warehouse-style intermediaries that could collect surplus food from manufacturers and wholesalers and distribute it to those small pantries and soup kitchens.

In 1979, these regional food banks formed a loose national alliance called **Second Harvest**, which was later rebranded as Feeding America.

The infrastructure started with **President Reagan's** 1981 executive order that distributed surplus government cheese. The Temporary Emergency Food Assistance Program (TEFAP) formalized this in 1983, designating states to contract with “*eligible recipient agencies*”—food banks, churches, community groups—to distribute USDA commodities to those in need.

At this stage, food banks were only one distribution channel among many. But Reagan-era social welfare cuts created surging demand for emergency food assistance, and food banks positioned themselves as the professional solution: they had warehouses, logistics networks, and volunteer infrastructure that churches and community organizations lacked.

When Reagan attempted to phase out TEFAP in 1988 as agricultural surpluses declined, the food bank lobby had become influential enough to prevent him. **The Hunger Prevention Act of 1988** permanently authorized USDA food purchases for TEFAP and established a separate \$40 million program specifically for “*soup kitchens and*

food banks.” This marked the first time food banks were recognized as a distinct infrastructure in federal legislation.

Second Harvest—later renamed **Feeding America**—organized the lobbying campaign. They proved they could mobilize votes in Congress.

The 1990 Farm Bill, under **President George H.W. Bush**, made TEFAP permanent by removing the word “Temporary” from its name. This meant guaranteed infrastructure. States began consolidating their TEFAP contracts with Second Harvest food banks rather than managing numerous smaller distributors.

The main point was operational efficiency: Why work with 50 churches and community pantries when you could partner with a single regional food bank to manage downstream distribution? Food banks could receive truckloads of USDA commodities, store them in temperature-controlled warehouses, and then redistribute them to smaller “partner agencies.”

But efficiency came with a price: consolidation led to monopolization. By the early 1990s, churches and independent pantries that previously received TEFAP commodities directly from state agencies now had to go through Second Harvest food banks. The food banks had become gatekeepers.

President Clinton's 1996 welfare reform—the **Personal Responsibility and Work Opportunity Act**—reduced federal benefits, leading millions to rely on food banks. TEFAP funding, which had been uncertain, was made mandatory again because Congress acknowledged that food banks had become the main safety net.

By 1996, the **National Academy of Medicine** later noted, Second Harvest “*had secured contracts as the primary distributors of USDA TEFAP foods.*” The transition was complete. What had been a diverse network of emergency food providers in 1983 was now a centralized system controlled by a single national organization and its state-level affiliates.

Here's something most people don't realize about “*hunger relief:*” large food corporations have been receiving payments—through significant tax write-offs—to donate surplus food inventory since 1976. Is this charity? Or subsidized waste management disguised as philanthropy?

When a food company has surplus inventory that won't



sell—damaged products, overstock, items nearing expiration—they face a choice:

Option 1: Throw it away. They write off the cost as a business loss. If they paid \$100 for that inventory, they deduct \$100. That’s it.

Option 2: Donate it to a food bank. Under tax code Section 170(e)(3), they can deduct not only their cost but also their cost plus half of the profit margin they would have earned if they had sold it.

Here’s the formula in plain English:

Cost: \$100

What they would have sold it for (fair market value): \$160

The “markup” or “gain”: \$60

If they throw it away: \$100 deduction

If they donate it: \$100 + half of \$60 = \$130 deduction

That’s a 30% larger tax write-off for donating compared to discarding. In some cases, where markups are higher, the benefit can exceed 50%.

This isn’t an accident. Congress intentionally created this tax incentive in 1976 to encourage food donations. However, what it truly resulted in was a strong financial motivation for companies to build relationships with food banks — not because they care about hungry people, but because those relationships lead to larger tax deductions.

Before 1969, businesses could deduct the full fair market value of donated inventory, even when it greatly exceeded their cost. This was too generous and led to abuse, so Congress limited it in 1969 to allow deductions only equal to the cost.

Result? Food donations dropped sharply. It costs more to store and transport the products to the charity than to throw them away. Why would a company spend more on donating something when they get the same tax deduction by discarding it? Suddenly, “waste” became cheaper than “charity.”

To address this, Congress established the enhanced deduction formula (cost plus half the gain, capped at twice the cost), specifically for donations that help “the ill, needy, or infants.” The aim was noble: to encourage corporations to donate rather than discard.

What Congress received was a system where corporations could write off the same food at artificially inflated prices—prices that had nothing to do with actual food bank market prices or the real cost of providing food to hungry people.

The **Obama administration** established the legal framework for the monopoly. The 2008 Farm Bill raised TEFAP entitlement funding to \$250 million each year, adjusted for inflation. More importantly, Congress repeatedly extended the enhanced food donation tax deduction through annual “*extender*” bills.

In 2015, Obama signed the **Protecting Americans from Tax Hikes (PATH) Act**, which made the enhanced deduction permanent and extended it to all types of businesses. The tax incentive that makes corporate donations to food banks 30-50% more valuable than discarding food is now permanent in the tax code.

This wasn’t coincidental timing. **Douglas O’Brien**—who would later become the Vice President of Programs at the **Global FoodBanking Network**—spent the Obama years at USDA. From 2009 to 2013, he served as **Chief of Staff** to **Deputy Secretary Kathleen Merrigan** at the **Department of Agriculture** under **Secretary Tom Vilsack**. In 2013-2014, he was **Acting Under Secretary for Rural Development**, overseeing a \$30 billion portfolio. In 2015, he joined the **White House Domestic Policy Council**, where he led the **White House Rural Council**.

O’Brien was deeply involved in the USDA system during the renewal of TEFAP extenders, the expansion of food bank programs in the 2014 Farm Bill, and the enactment of the PATH Act, which made enhanced deductions permanent. He understood thoroughly how federal commodity programs worked with the Feeding America network.

Here’s why understanding the structure matters. There are actually two separate food streams in the hunger relief system.

Corporations can donate surplus food directly to any food bank, food pantry, or soup kitchen they choose. For example, your local grocery store donating day-old bread to your church’s food pantry is a direct corporate donation that qualifies for an increased tax deduction.

Feeding America doesn’t oversee these donations. Food banks—whether part of the Feeding America network



or independent—all compete for these corporate partnerships. A local food manufacturer can choose to donate to a Feeding America food bank, an independent food bank, or directly to a small community pantry.

The tax incentive established the financial structure that made these donations attractive, but it did not establish a monopoly on corporate contributions.

The real control comes through The Emergency Food Assistance Program (TEFAP), a federal program in which USDA purchases food from American farms and manufacturers and distributes it through state agencies to local food banks.

Here's how the monopoly works:

The USDA spends billions of dollars on food each year through TEFAP. While the base appropriations range from \$450 million to \$470 million annually, supplemental purchases made through the **Commodity Credit Corporation** and other agricultural support programs have increased total TEFAP food expenditures to between \$1.5 billion and \$2.5 billion in recent years.

State agencies oversee distribution: Each state appoints a “*State Distributing Agency*” responsible for determining which food banks receive TEFAP commodities. In Illinois, that agency is the **Department of Human Services (IDHS)**.

State agencies select “**eligible local agencies.**” In other words, states determine which food banks and emergency food providers are authorized to receive and distribute TEFAP food. In practice, this means states almost exclusively designate Feeding America network food banks as TEFAP distributors.

Feeding America captures 97% of TEFAP: About 97% of Feeding America’s partner food banks receive and distribute TEFAP foods. The network received over 1.5 billion pounds of TEFAP food in FY 2023-24—roughly one-quarter of all food distributed through its member food banks.

Feeding America itself describes TEFAP as “*the backbone of the charitable food system.*” Without federal TEFAP commodities, the entire food bank network would have considerably less food to distribute.

Independent food banks and small community pantries are mostly excluded from TEFAP distribution. If you’re not part of the Feeding America network, you probably can’t

access federal commodities. You’re limited to competing for corporate donations and local fundraising.

This creates a two-tier system: Feeding America food banks receive federal commodities AND corporate donations, while independent food banks depend solely on private-sector contributions.

The result: Feeding America doesn’t dominate all food sources, but it does oversee the federal food pipeline that guarantees a steady, reliable, year-round supply.

The TEFAP monopoly becomes even more concerning when you think about how states allocate these federal commodities within their borders.

In Illinois, IDHS directly contracts with seven food banks to serve as TEFAP distributors statewide. The federal government requires TEFAP allocations to follow a specific formula (60% based on the poverty population, 40% based on the unemployment rate). However, there is limited oversight to ensure that states and coordinating organizations adhere to these formulas or that political factors do not influence the allocation process.

By the late 1990s and early 2000s, Feeding America and its member banks had fully adopted a corporate partnership model. The amount of food passing through the system surged—about 60 percent now comes from corporate and retail donors, with another quarter from USDA TEFAP purchases. Research indicates that roughly 60% of the food distributed by food banks falls into clearly unhealthy categories, such as sugary drinks, sweets, salty snacks, and highly processed foods. This is not a system built around nutrition; it is a system centered on moving surplus.

As the volume increased, so did the money—and the salaries. Feeding America now operates with hundreds of millions in annual revenue and maintains brand and compliance control over a network moving roughly 5 billion pounds of food each year. But the question nobody asks is: who is getting paid to manage this “charity”?

Feeding America National Office:

- CEO **Claire Babineaux-Fontenot**: \$1.1 million per year
- 19 officers: All over \$270,000 per year
- Remaining 386 employees: Average over \$150,000 per year
- Total compensation for top leadership: Over \$7 million annually



Greater Chicago Food Depository:

- CEO **Kate Maehr**: \$475,000 per year
- 10 officers: All over \$225,000 per year
- Remaining 357 employees: Average \$70,000 per year
- Total compensation for top leadership: Over \$3.4 million annually

To put this in perspective: as of 2023, the highest-paid government employee for the **State of Illinois** was a physician earning \$382,500. Kate Maehr, running a “charity,” makes more than the state’s top doctor.

These salaries are just the beginning. Marketing budgets and vendor contracts cost tens of millions annually to produce emotionally charged messages about “*hungry children*” and “*record food insecurity*.” Feeding America paid marketing vendors \$37.6 million in one year to maintain the narrative that hunger is worsening and that food banking is the crucial solution.

All of this rests on one crucial assumption: that hunger is worsening, food insecurity is at crisis levels, and the system needs constant expansion. But as we’ve seen, the data tells a different story—food insecurity rates haven’t improved despite 30 years and billions of dollars invested in this system. The industry needs the problem to continue because solving it would remove the justification for these budgets, salaries, and the entire structure.

While Feeding America solidified its domestic TEFAP monopoly, it quietly launched an international branch: the **Global FoodBanking Network (GFN)**, founded in 2006 and based in Chicago. GFN’s early leadership included members from the nonprofit sector — among them **Beth Saks**, who had served as Feeding America’s CFO from 1994 to 1999 and became GFN’s CFO in 2008.

However, the organization’s character changed significantly in 2015 when Lisa Moon became President and CEO. Moon’s background was not in hunger relief; it was in national security. She had worked at the **U.S. Department of Defense** and the **Center for Strategic and International Studies (CSIS)**, one of Washington’s leading defense and foreign policy think tanks, before shifting to “*food security*” at the **Chicago Council on Global Affairs**. She is now a David Rockefeller Fellow of the **Trilateral Commission**, a high-level international relations group promoting cooperation among the U.S., Europe, and Japan.

When Douglas O’Brien left the Obama White House in 2017, he joined GFN as Vice President of Programs. His role: export the TEFAP model to more than 50 countries.

Under Moon and O’Brien, GFN grew from 20 to over 50 countries, reaching more than 40 million people. The corporate partners remain the same ones funding Feeding America: **General Mills, Kellogg’s, PepsiCo, Cargill**.

The model is the same: positioning food banks as the professional infrastructure that connects corporate donors (seeking tax benefits) to governments (aiming to transfer hunger relief to NGOs) and to hungry people.

GFN hosts an annual Global Summit—formerly known as the **Food Bank Leadership Institute**—where 300-400 food bank CEOs from around the world learn “best practices.” These practices include board governance structures that enable recipient organizations to control allocation, government integration strategies that make food banks essential to TEFAP-style programs, and corporate partnership frameworks that generate tax-advantaged donations.

Target regions for expansion—Sub-Saharan Africa, South and Southeast Asia, India—align perfectly with U.S. strategic interests in countering Chinese influence. Food banking isn’t just charity; it serves as a soft-power infrastructure that connects American multinationals to foreign governments through a network built initially with U.S. federal commodity programs.

What happened to the American food bank system between 1981 and 2015 was not the organic growth of community mutual aid. It was systematic federal integration with no public oversight or accountability:

[1988: Federal legislation singles out food banks as a distinct infrastructure](#)

[1990: Program made permanent, favoring established organizations](#)

[1993-1996: States consolidate contracts, creating regional monopolies](#)

[2002: State associations formalize recipient control over allocation](#)

[2008: Farm Bill dramatically increases TEFAP funding](#)

[2015: PATH Act permanently locks in corporate tax incentives](#)

[2017: Obama USDA officials join GFN to export the model globally](#)



The food bank monopoly was established through federal policy, backed by state contracts, and spread by former national security and USDA officials who fully understood what they had created: a privatized system for distributing government commodities and corporate surplus, controlled by politically connected nonprofit leaders with conflicting interests.

Historical data reveal a harsh truth: a larger charitable food system hasn't reduced hunger. Instead, it has established a stable system where:

Corporations receive tax deductions and improve their reputation by donating products they were likely planning to discard anyway.

Large agribusiness suppliers benefit from guaranteed government purchase contracts through USDA programs that direct food to food banks.

Politicians create a dependable story, a photo backdrop to support increased spending, and patronage opportunities to reward supporters.

Feeding America and its affiliates gain funding, visibility, and policy influence by positioning themselves as the indispensable intermediary between “the generous” and “the hungry.”

Meanwhile, churches and individual donors are told that supporting this system is the best way to care for the poor.

The small, relational, community-based charity model that defined the earliest pantries has been replaced by a national logistics and branding operation.

The tax code and federal food programs didn't cause hunger. However, they established the framework that enables political insiders to manipulate the system meant to resolve it. The real scandal isn't the tax breaks or federal commodities. It's what gets built on top of the system, who controls it, how much they are paid, all without public oversight, despite the whole system being funded by government money.

This hunger industrial complex was built from the top down. It's intentionally opaque. It's highly profitable for those who operate it. It measures success by subjective feelings rather than objective results. And it's now gone global.

Looking back over the last 50 years, the pattern is clear. What began as emergency charity has evolved into an institutionalized, corporatized, and politicized system. Its scale is impressive, and its logistical capabilities are real. However, its track record of actually reducing the issues it aims to solve is dismal.

The growth of Feeding America and the food pantry movement does not indicate that we are finally ending hunger. Instead, it reveals that we have become used to managing poverty with surplus calories rather than addressing the underlying structural, political, and economic forces that cause it.

When food banks in my area started providing delivery services to help illegal aliens avoid ICE, I began asking questions. Those questions led me to uncover a system built on fraudulent measurements, corporate tax scams, federal monopolies, board conflicts of interest, and national security officials exporting American “solutions” worldwide.

Did we ever really have 1 in 7 Americans suffering from chronic food insecurity? I don't believe so. But we definitely have a hunger industrial complex, which has become completely controlled by progressive political insiders, makes billions by claiming there's a hunger crisis, and disguises itself as a charitable effort.

It's far past time to remove government funding from the system, to get rid of the phony corporate giving that allows executives to posture as philanthropists, and bring the real charity work back to local churches.

The small, relational, community-based charity model that defined the earliest pantries has been replaced by a national logistics and branding operation.



Part 2

How Federal Food Programs Undermine Our Institutions and Culture

On October 31, 2024, in the waning days of the **Biden administration**, the **U.S. Department of Agriculture** published a final rule modifying four major food distribution programs: the **Commodity Supplemental Food Program (CSFP)**, the **Food Distribution Program on Indian Reservations (FDPIR)**, the **Emergency Food Assistance Program (TEFAP)**, and **Disaster Household Distributions**.

On paper, the changes looked technical: *eliminate mandatory identity verification, remove household address collection, expand income eligibility up to 300 percent of the federal poverty guidelines, and tighten confidentiality rules* so information from applicants can *rarely be shared with immigration enforcement*.

Considered in isolation, this sounds like ordinary bureaucratic tinkering.

In context, it marks the *culmination of a twenty-year, coordinated strategy spanning multiple administrations, federal agencies, private foundations, and non-governmental organizations to build a permanent system that supports illegal immigration by methodically dismantling verification requirements across federal benefit programs*.

This investigation shows:

- A **coordinated interagency strategy**, orchestrated through White House policy councils, to synchronize regulatory changes across USDA, DHS, HHS, and the Education Department.
- **Forty to fifty billion dollars annually in federal food assistance** flows into illegal alien households, as part of a **\$150–200 billion** total annual assistance costs for illegal alien households once education, healthcare, criminal justice, and housing are included.

- **Strategic planning by progressive think tanks** whose blueprints were implemented almost verbatim by sympathetic administrations.
- A **complete inversion of American assimilation policy**, replacing the old melting pot model with a state-sponsored system of permanent ethnic separation and grievance politics.
- A **system that undermines American sovereignty**, in which illegal aliens serve as the invasion force and federal benefits form the logistics network.

This is not a normal immigration policy. It is an *orchestrated national transformation disguised as humanitarian assistance*.

Traditional conquest involves defeating an enemy's army, occupying territory, and imposing political control. Modern asymmetric, or *hybrid warfare* often aims for the same outcomes through non-military means—economic, social, institutional, informational, and cultural.

When I served as an intelligence analyst in the Air Force, we were trained to recognize patterns of coordinated action that achieve strategic objectives without overt use of force. Look at the current illegal immigration crisis through that lens, and all major dimensions are operating at once.

Economic warfare.

America now spends on the order of \$150–200 billion each year supporting illegal alien populations: tens of billions on K–12 education, \$40–50 billion on food assistance, tens of billions more on emergency medical care, criminal justice, housing, and social services. That is roughly a quarter of our annual defense budget—diverted into supporting people who are not supposed to be here.

Social warfare.

The system deliberately pits:

- Citizens who followed immigration law against illegal aliens receiving benefits.



- Taxpayers against recipients.
- States trying to enforce immigration law against federal agencies blocking them.
- Communities forced to absorb demographic change against a federal government that never asked their consent.

This erosion of social cohesion serves the interests of anyone who wants a weaker, more divided America.

Institutional warfare.

Agencies created to serve Americans have been quietly repurposed:

- USDA facilitates benefit access regardless of immigration status.
- DHS spends more energy on constraining enforcement than carrying it out.
- HHS expands services for unauthorized populations.
- Education policy and Supreme Court precedent mandate services for illegal aliens while providing no reimbursement to the states forced to provide them.

The institutions themselves have been turned against their original mission.

Information warfare.

No federal agency tracks illegal alien participation in benefit programs. In many programs, it is literally illegal to ask. Costs are buried in aggregate totals. Serious attempts to quantify the burden are unfunded, discouraged, or smeared. Media frame enforcement as cruelty, and illegality as compassion. A system built on secrecy, selective data, and moral blackmail cannot be held accountable.

Cultural warfare.

Over ten million illegal aliens entered during the Biden administration alone. Combine that with the existing foreign-born population and their U.S.-born children, and you have roughly 90 million people—about 27 percent of the country—who are either immigrants or children of immigrants added in just over half a century. *This is the fastest large-scale cultural transformation in history, carried out without democratic consent.*

The question is not whether this meets the definition of hybrid warfare. It is whether it arose accidentally or by

design. The regulatory history points to design. I discuss this type of warfare in my latest article, *A War By Other Means*.

On the books, the law is clear.

- *The Food and Nutrition Act states that SNAP benefits are for U.S. citizens and “qualified aliens”—lawful permanent residents, refugees, asylees, and a few other categories legally present.*
- *The Child Nutrition Act uses similar language.*
- *The Immigration and Nationality Act broadly bars illegal aliens from most federal public benefits, with narrow exceptions for emergency services.*

These statutory prohibitions remain in force. Congress has not repealed them.

Yet through a series of administrative actions, agencies have rendered these restrictions effectively unenforceable. The tool is something advocacy organizations began pushing in the 1990s: the “firewall” doctrine—the idea that benefit programs must be hermetically sealed off from immigration enforcement.

The logic went like this: if illegal alien parents fear that applying for food aid for their U.S.-born children could expose them to deportation, those “eligible” children will go hungry. The solution, they said, was to build a wall: no questions about status, no sharing of information, no cooperation with ICE.

Step by step, that doctrine was embedded into law and policy:

1. Benefit offices were instructed not to ask about the status of non-applicant household members.
2. Rules were established to prevent any data sharing with immigration enforcement.
3. Documentation requirements were weakened or removed, so status could not be inferred from what people could or could not produce.
4. Finally, even basic identity verification—showing *who* is receiving benefits—was downgraded to flexible “processes” and self-attestation.

Each step was marketed as protecting “eligible” recipients. In practice, each step protected ineligible recipients. And the people designing it knew precisely what they were doing.



The key to understanding the current system is understanding its history.

The **Personal Responsibility and Work Opportunity Reconciliation Act of 1996** drew a bright line: *illegal aliens are ineligible for federal benefits, except in emergencies*. It required verification of citizenship and immigration status. For a brief moment, benefit programs and immigration law were aligned.

But the law left one major loophole: **U.S.-born children of illegal aliens** are citizens. That meant “mixed status households” could receive benefits on behalf of their citizen children even if the parents were deportable. That wedge became the entry point for everything that followed.

The **Agriculture Risk Protection Act of 2000** quietly removed the requirement to verify immigration status for all household members in SNAP. *Only the person claiming benefits had to be checked*. An illegal alien mother could apply on behalf of her citizen children without her own status ever being questioned.

In **2002**, USDA issued a key policy memo instructing states to tell applicants that SNAP information would not be shared with immigration *authorities “for immigration enforcement purposes.”* This came during a Republican administration while the country was fixated on Afghanistan and terrorism, not the southern border. Career bureaucrats, not elected officials, drafted the memo. Almost no one noticed.

That memo established the first formal firewall: benefit programs would not help immigration enforcement. Every later expansion rested on that foundation.

The **2008 Farm Bill** codified what had been administrative policy. It explicitly prohibited the use of SNAP information for immigration enforcement and restricted what could be shared with DHS.

Then came the **Healthy, Hunger-Free Kids Act of 2010**, which did two critical things:

- It created the **Community Eligibility Provision (CEP)**, allowing schools in high-poverty areas to serve free meals to all students without individual applications or verification. In those schools, there is no way to know which children come from illegal alien households because you are not allowed to ask.

- It enshrined a new philosophy: verification, documentation, and individual applications were not integrity measures—they were “barriers.” The law’s language is saturated with calls to “simplify,” “streamline,” “eliminate applications,” and “reduce documentation.”

Once verification is redefined as a problem rather than a safeguard, fraud and abuse are no longer viewed as threats to the program. They become acceptable collateral damage.

The Minnesota **Feeding Our Future** scandal shows how this design works in practice.

Between 2018 and 2022, a nonprofit claimed to be feeding tens of thousands of children a day through federal child nutrition programs (SFSP and CACFP). In reality, they stole roughly **\$250 million**. They invented meal sites, inflated headcounts, and laundered the money into luxury cars, real estate, international travel, and, in some cases, support for foreign terrorist groups.

Why was it so easy?

- The 2010 Act had already expanded the programs and treated verification as a “barrier.”
- During COVID, USDA waivers stripped away the remaining controls: no area eligibility, for-profit restaurants allowed as sponsors, off-site distribution, grab-and-go meals, and minimal documentation.
- When the Minnesota Department of Education tried to cut them off, Feeding Our Future sued, accusing the state of discrimination against the Somali community. A judge ordered payments to resume.
- State officials told auditors that under federal guidance, they essentially needed to prove knowing fraud before they could act—but lacked investigative authority to gather that proof.

The Minnesota Legislative Auditor’s blunt conclusion: the agency’s “actions and inactions created opportunities for fraud.”

The significance is not just the dollar figure. *This was the same program structure that this investigation documents as sustaining illegal alien households: open access, minimal verification, and an “equity” narrative that paralyzes oversight. The system worked exactly as designed.*



The **Deferred Action for Childhood Arrivals (DACA)** program in 2012 was a proof-of-concept: the executive branch could effectively override statutory immigration restrictions by creating a new quasi-legal status class without Congress.

The *Trump administration attempted to reassert some integrity with an updated **public charge rule***, counting use of SNAP, non-emergency Medicaid, and housing assistance when deciding green card eligibility. The idea was simple: there should be consequences for heavy reliance on benefits.

The reaction was ferocious: lawsuits from advocacy groups and blue states, nationwide injunctions from friendly judges, bureaucratic slow rolling, and open resistance from parts of the administrative state. The message was clear—any move toward enforcement would face unified institutional opposition.

The COVID emergency gave agencies what they needed: a justification to waive nearly every verification safeguard in the name of crisis response.

- In-person interviews replaced by remote certification.
- Proxy pickups without ID.
- Reduced documentation.
- Extended certification periods.

All labeled “temporary.”

But as in so many other areas of government, temporary measures quickly became the new normal for those who benefited from them.

The Biden years turned scattered pieces into a coordinated machine.

- **January 20, 2021 – EO 13985 (“Advancing Racial Equity”)**: Agencies were ordered to identify and remove “barriers” to access. Immigration status verification was explicitly treated as a barrier.
- **March 2021 – USDA memo**: Field offices were instructed to ensure that “fear of immigration-related consequences does not prevent eligible individuals from seeking nutrition assistance” and to reassure applicants that information would not be shared with immigration authorities.
- **July 2021 – Public charge rule rescinded**: The last significant disincentive for benefit use was removed.

The public charge rule made it more difficult to obtain a green card if the applicant received SNAP, WIC, or other public benefits.

- **September 2021 – DHS enforcement priorities and “sensitive locations” memo**: ICE was effectively barred from making arrests in or near food banks, shelters, schools, and other social service sites—precisely where illegal aliens go to access benefits.
- **December 2022 – Consolidated Appropriations Act**: Pandemic EBT made permanent; Summer EBT created; CACFP expanded for “emergency shelters,” a euphemism for facilities housing illegal alien families.
- **February 2023 – EO 14091 (“Further Advancing Racial Equity”)**: Reinforced the equity directive and extended it to “others who have been historically underserved, marginalized, and adversely affected”—couched language that plainly includes illegal aliens.
- **October 2024 – USDA Food Distribution final rule**: The capstone—identity verification hollowed out, address collection banned, income thresholds pushed into the middle class, confidentiality tightened to wall off any information from immigration enforcement.

These regulatory changes did not emerge from a faceless bureaucracy. Identifiable officials directed them with documented roles.

Susan Rice, as Domestic Policy Advisor (2021–2023), brought the “whole-of-government” approach she had used as National Security Advisor. She created the interagency coordination structure that synchronized regulatory changes across USDA, DHS, HHS, and the Department of Education.

Alejandro Mayorkas, as DHS Secretary, implemented the massive parole programs that admitted over 700,000 Venezuelans, Cubans, Haitians, and Nicaraguans outside normal immigration channels. He expanded protections for “sensitive locations” and issued enforcement priority memos that effectively turned DHS into a processing and distribution center.

Tom Vilsack, returning as USDA Secretary for a second tour, executed the October 2024 Food Distribution rule that removed identity verification and walled off program data from immigration enforcement. He had laid the groundwork during the Obama years by expanding SNAP eligibility and creating “equity” initiatives that treated



verification as a barrier.

Xavier Becerra, as HHS Secretary, expanded Medicaid and CHIP access while building the “unaccompanied minor” shelter infrastructure. As California Attorney General, he had sued the Trump administration over 100 times; at HHS, he weaponized the department as logistics support for illegal alien resettlement.

Neera Tanden, who succeeded Rice as Domestic Policy Advisor in 2023, had previously served as president of the Center for American Progress—the same think tank whose policy blueprints the USDA rule tracks almost verbatim. She maintained Rice’s coordination structure while bringing direct ties to the progressive funding networks.

The Obama administration had established the framework.

Valerie Jarrett, as Senior Advisor with direct control over DHS, USDA, and HHS policy coordination, initiated the inter-agency “equity” initiatives that became the foundation for verification removal. **Cecilia Muñoz**, Director of the Domestic Policy Council and former Vice President of the National Council of La Raza (now UnidosUS), translated the advocacy organization’s agenda directly into administrative policy. **Jeh Johnson**, as DHS Secretary, implemented DACA, limited ICE enforcement priorities, and established the original “sensitive locations” policy that the Biden administration later expanded.

None of this “just happened.” It followed detailed blueprints drafted before Biden took office.

Government employees rarely invent major policy shifts on their own. The real design work is usually done upstream, at think tanks and foundations.

Center for American Progress (CAP), founded by John Podesta, produced key documents—“Building an Equitable Immigration System” and “Expanding Access to Nutrition Programs”—that called for exactly the changes later adopted: removing address requirements, expanding income eligibility, strengthening confidentiality, and treating verification as a civil-rights problem. The October 2024 USDA rule tracks these recommendations almost line for line.

Migration Policy Institute (MPI), headed by former Clinton INS commissioner Doris Meissner, provided a 127-page transition memo to the incoming Biden team. It contained agency-specific recommendations; roughly three-quarters were implemented. The USDA section (pages 23–29) laid

out precisely the changes that appeared in the final USDA rule.

A concentrated group of mega foundations finances this policy engine:

- **Open Society Foundations (George Soros)**
- **Ford, MacArthur, Carnegie, Rockefeller, and others**

Together, they supply an estimated **\$500+ million per year** to an interconnected web of advocacy groups that:

- Draft policy blueprints
- Lobby agencies and Congress
- Generate “evidence” supporting their proposals
- Coordinate public comment campaigns
- Sue to block enforcement or reverse rules they dislike

What looks like a spontaneous chorus of voices is, in reality, a paid, orchestrated network.

Under all the policy rhetoric, there is a simple question: how do illegal alien households actually live here year after year?

The answer is food, housing, healthcare, and schooling—much of it underwritten by taxpayers.

Taken together, federal food programs deliver **\$40–50 billion** annually to households headed by illegal aliens:

- **SNAP:** Mixed status households (illegal parents, U.S.-born children) receive \$600–800 per month in benefits calculated for the entire household. Annual cost: tens of billions.
- **WIC:** Pregnant illegal alien mothers and their children enroll with the weakest verification of any federal program; documentation is “requested but not required.”
- **School meals:** Under *Plyler v. Doe*, schools cannot ask about immigration status. The Community Eligibility Provision allows entire schools to serve free meals without individual applications.
- **Pandemic EBT/Summer EBT:** Benefits automatically issued based on school meal eligibility, with no new verification.
- **CACFP and SFSP:** Emergency shelters and open summer sites provide meals with no enrollment and no questions asked.



- **TEFAP/CSFP/FDPIR:** The October 2024 rule makes verification practically impossible while broadening who counts as “needy.”

The breakdown of that \$40–50 billion estimate: SNAP accounts for \$28–38 billion, based on **Pew Research** data showing 3.9 million U.S.-born children living in illegal alien-headed households, with benefits calculated for entire households averaging four people at \$600–800 per month.

School meals add \$5–6 billion, covering approximately 4.6 million students from illegal alien households at 80–85 percent participation rates.

WIC contributes \$1.2–1.5 billion, serving an estimated 1.1–1.3 million participants, including illegal alien mothers and their children.

The remaining \$2–3 billion comes from Summer EBT, CACFP emergency shelter programs, the **Summer Food Service Program**, and commodity distribution. These figures align with estimates from the Federation for American Immigration Reform (\$32 billion for food assistance) and the Center for Immigration Studies (\$35–45 billion range).

No official federal data exists because agencies are prohibited from tracking citizenship status in benefit programs—a deliberate design feature, not an oversight.

On top of that sits the nonprofit distribution network. **Feeding America** and its 200-plus member food banks control about 97 percent of TEFAP distribution. TEFAP commodities now account for roughly a quarter of all food they move; corporate donations and retail “rescues” add the rest. State contracts and federal formulas have given these regional food banks de facto monopolies. As I documented in *How America Manufactured a Food Insecurity Crisis*, this consolidation has created *regional monopolies in which executives command salaries far exceeding what one would expect from charitable organizations, while the actual poor they claim to help remain poorly served.*

The people handing out food and helping with applications are not just kindhearted volunteers. They are, overwhelmingly, government-funded intermediaries:

- **Catholic Charities USA** – ~\$2.9 billion annual budget, about 60 percent government.
- **Church World Service** – hundreds of millions in government grants, over 80 percent of revenue.

- **Lutheran Immigration and Refugee Service, International Rescue Committee, HIAS, World Relief, U.S. Committee for Refugees and Immigrants** – many between 60 and 99 percent government-funded.

They present themselves as faith-based or humanitarian charities. In reality, *they function as federal contractors implementing government objectives under religious or nonprofit labels.*

Their standard operating pattern:

1. Receive per capita grants to resettle newcomers.
2. Immediately enroll them in SNAP, WIC, Medicaid, and other programs where eligible.
3. Plug them into the local Feeding America member food bank and related pantries.
4. Provide ongoing “navigator” services to maintain and expand benefit use.

For illegal aliens and gray zone populations, these networks provide a de facto sanctuary: services without question, and a buffer between the individual and any federal official who might enforce the law.

Immigration alone did not create this crisis. *We have had large waves of immigrants before. What changed was the removal of assimilation as a goal and its replacement with state-sponsored non-assimilation.*

Under the old model:

- Immigration was legal and documented.
- Public schools explicitly tried to “Americanize” children—English-only instruction, civic education, patriotic curriculum.
- There was no welfare state. Immigrants worked or turned to family and church.
- Naturalization required English and knowledge of the American government.

The message was clear: *“You are in America now. Become American.”*

Today, the message is almost the opposite.

- Bilingual education keeps children in their home language for years.
- “Culturally responsive teaching” emphasizes preserving home cultures instead of adopting American norms.



- History is framed as an unbroken story of oppression; the Founders are taught primarily as racists and slaveholders.
- Government services, ballots, and public life operate in multiple languages. Learning English is optional.
- Identity politics elevates ethnic and racial identity and sexuality over national identity, and assimilation is recast as cultural erasure.

Overlay this with a generous welfare state and cheap communication with home countries, and you get permanent enclaves rather than integrated citizens. People can live physically in the United States while remaining culturally, politically, and even economically anchored somewhere else.

That is what makes this not simply an “immigration problem” but an **assimilation crisis**. It is cultural conquest without tanks. The territory is still called the United States, but the people living in it increasingly do not share a common story, language, or belief in the founding principles that made self-government possible here.

This system may look chaotic, but strategically it serves identifiable interests.

- **China and Russia:** A United States that spends \$200 billion a year supporting illegal populations, fights over resource allocation and identity politics, and cannot muster a consensus on basic border control is less able to counter foreign adversaries. Large numbers of illegal border crossers also make it easier to hide foreign agents in the crowds.
- **Cartels:** Smuggling networks profit from the demand created by our policies. Knowing that migrants will be fed, housed, and rarely deported makes their product—illegal passage—more valuable. The more illegal border crossers, the more mules available to them to transport contraband.
- **Sending countries:** Mexico, Central American nations, and others shed unemployed and discontented citizens while collecting billions in remittances and retaining political leverage through diaspora communities.
- **Criminal fraud networks:** The same “remove barriers” architecture that hosts illegal immigration also makes

large-scale theft possible, as in the Feeding Our Future case.

- **The global progressive movement:** Demographic transformation advances its long-stated goal of eroding national identity in favor of transnational “human rights” frameworks and permanent client constituencies.

Beyond the policy debate, there are constitutional questions as well.

Separation of powers.

Congress wrote laws restricting benefits to citizens and lawfully present aliens. The executive branch has not openly repealed these statutes; it has simply chosen not to enforce them and has built administrative structures that make enforcement practically impossible. That is a de facto repeal by executive action, in direct conflict with the President’s duty to “take care that the laws be faithfully executed.”

Appropriations.

When Congress appropriates funds for “eligible low-income individuals,” immigration status is part of the eligibility criteria. Spending those funds on populations Congress has explicitly excluded stretches appropriations beyond their legal purpose—raising serious concerns under the Antideficiency Act. This federal law forbids agencies from spending or obligating funds beyond what Congress has appropriated.

Equal protection.

Legal immigrants wait years for green cards and are held to strict rules, while illegal aliens gain effective access immediately through citizen children. Citizens are subject to more scrutiny than people in the country illegally. States that try to enforce the law are punished; those who ignore it are rewarded. Whatever the legal theories, the inequity is apparent.

What emerges from this investigation is not a random patchwork of mistakes, but a deliberately engineered system.

- White House policy councils and “equity” structures coordinated multi-agency regulatory changes from 2021–2024.
- Think tanks financed by mega foundations supplied the detailed plans.



- Federal food and benefit programs provided the cash and in-kind support.
- NGOs and faith-based contractors provided the ground-level delivery while insulating officials from direct contact with illegal recipients.
- The education and information systems worked to delegitimize American identity and recast enforcement as bigotry.

The October 2024 USDA rule is not a footnote. It is the final tightening of a plan designed to make legal eligibility unverifiable and to leave illegal beneficiaries untouchable—at least through normal administrative channels.

When a criminal organization in Minnesota can steal a quarter-billion dollars in two years using the same system, that is not an anomaly. The vulnerabilities are not incidental; they are built in.

This is why it is a mistake to treat what is happening as merely *“immigration policy gone wrong.”* It is an orchestrated national transformation, carried out through benefit programs and regulatory changes that most citizens will never read. It is complicity in the asymmetric warfare being waged against us, a war that our own officials and institutions are facilitating against the legal and cultural foundations of our country.

I don’t know who, if anyone, is knowingly complicit. They knowingly created the system to circumvent the laws, promote mass illegal immigration, and help them remain here. I don’t know if they were intentionally aiding in the hybrid warfare that has been underway against us for decades.

The facts are now plain enough. The remaining questions are political and moral:

- Do Americans recognize that they are in a struggle over who governs this country and on whose behalf?
- Are they willing to identify not only foreign adversaries, but domestic collaborators—officials, organizations, and funders who are witting or unwitting accomplices that built and maintained this system?
- And do they possess the will to dismantle it and restore an order in which laws mean what they say, and borders are more than lines on a map?

Recognition is the first step. This article is offered as evidence to aid in that recognition.

The architects identified in this report—from Jarrett, Muñoz, and Johnson in the Obama years to Rice, Mayorkas, Vilsack, Becerra, and Tanden in the Biden administration, backed by Soros and the progressive foundation network—did not stumble into this outcome by accident. *They are not merely “helping the poor.” They are using food programs, housing subsidies, health care, and schools as instruments in a long campaign to change who we are as a nation.*

Is this what you really want?

What should be particularly disturbing to every person of faith in this country is the coopting of support services for the benefit of a progressive political agenda, an agenda largely hostile to Christian principles, and an agenda that is aiding our enemies more than the genuinely poor.

I showed in the *How America Manufactured a Food Insecurity Crisis* how the food program to alleviate hunger is not working. You can see why in the regulations.

The program is supposed to be limited to the needy, but it has been transformed to benefit even the middle class. Are the actual poor being helped? I’m sure some are, but how many are we missing? *How much better would it be if churches stopped their involvement in the government’s programs and addressed hunger and other needs as they were biblically charged?*

I don’t see in the bible any instruction for us to ask Caesar for the money or resources to help the poor. Do you?

Then why are we in partnership with the government? Why are we working with their delivery services, the TEFAPs, when the bosses’ salaries are way out of line for a supposed charity, their hidden mission undermines our beliefs, and those who are genuinely hungry are not being helped?

What happens next will depend on whether we Americans, whether we Christians, still remember that this is our country—and are willing to act like it.





Part 3

The Six-Figure Charity Racket

How Food Bank Executives Get Rich Managing “Free” Food

In Part 1: *How America Manufactured a Food Insecurity Crisis*. I explained how what was supposed to be a multi-billion-dollar charitable food distribution service had turned into a monopoly with inflated salaries for top executives. Additionally, **Feeding America** and its network of regional food banks operate with almost no public oversight, despite being funded almost entirely by taxpayer dollars and tax-deductible personal and corporate donations.

The lack of oversight shows.

When you compare what food-bank executives earn to the work these organizations actually do, the picture that emerges isn’t one of modest, volunteer-driven charity. It’s a professional system of administration and logistics with executive pay that warrants serious scrutiny.

Let’s begin with what the **IRS** Form 990 filings reveal. The table below displays the compensation of the CEO of the national umbrella organization for **The Emergency Food Assistance Programs (TEFAPs)**, Feeding America, and the six regional food banks that serve as the nearly exclusive distributors of TEFAP commodities—the federal food purchased by the **USDA** and distributed through state agencies.

Organization	Region	CEO Compensation	Total Revenue
Feeding America	National	\$1,113,502	\$5.2 Billion
Greater Chicago Food Depository	Cook County	\$490,419	\$242 Million
Northern Illinois Food Bank	Suburban/Northern	\$383,782	\$205 Million
Central Illinois Foodbank	Springfield	\$216,251	\$20 Million
St. Louis Area Foodbank	Metro East	\$213,075	\$99 Million
Eastern Illinois Foodbank	Peoria/Urbana	\$138,567	\$28 Million
Tri-State Food Bank	Southern IL	\$112,339	\$31 Million

Source: IRS Form 990 filings, FY2024–2025

Feeding America’s 2024 filing reports approximately \$5.05 billion in revenue and about \$7.41 million in compensation for top leadership. **Greater Chicago Food Depository’s** latest filing shows revenue of around \$242 million and pay of roughly \$2.31 million for its top officers. **Northern Illinois Food Bank’s** recent reports also indicate revenue in the \$180 million range and CEO pay in the high-\$300,000 range. These organizations form the core of Illinois’s charitable food infrastructure and oversee large amounts of food, money, and public attention.

The CEOs in the Chicago area earn significantly more than several of their downstate counterparts. While this difference alone doesn’t prove misconduct, it does raise an obvious question: why has executive pay increased so sharply in organizations whose public image centers on distributing donated and taxpayer-supported food? And why is it so high in the first place?

But CEO pay is just the start. At the Greater Chicago Food Depository, the Form 990 filings show a substantial executive layer below the top leadership. Total compensation for senior officers exceeds \$2.3 million annually. **Katherine Maehr’s** pay has increased significantly since 2020, and several officers now earn well over \$250,000 a year.

Officer & Title	FY 2024/25	FY 2023	FY 2022	FY 2021	FY 2020
Katherine Maehr (CEO)	\$490,419	\$473,192	\$414,818	\$408,242	\$386,331
Jill Rahman (COO)	\$411,272	\$400,541	\$341,509	\$335,282	\$335,282
Jill Zimmerman (Philanthropy)	\$363,933	\$359,770	\$300,184	\$297,850	\$291,040
Sheila Creggin (VP Ops)	\$353,845	\$348,749	\$291,454	\$287,386	\$280,115
Joni Duncan (VP Culture)	\$348,778	\$344,633	\$285,495	\$282,172	\$251,098
Mary Pelican (VP Finance)	\$341,864	\$337,806	\$284,552	\$281,749	\$267,399
Amy Laboy (VP Programs)	\$253,353	\$252,801	\$232,385	\$231,030	\$229,930
Joseph Rodriguez (VP Logistics)	\$249,393	\$245,149	\$233,209	\$233,060	\$186,327

Source: IRS Form 990, Schedule J, FY2020–2025



The titles themselves reveal part of the story: Vice President of Culture. Vice President of Philanthropy. Vice President of Policy, Advocacy & Engagement. Vice President of Research Evaluation & Business Analytics. These are not warehouse-floor roles. They are managerial and administrative positions within an organization that still heavily relies on the language of emergency charity for its public image.

The broader financial pattern is also significant. During the pandemic years, charitable food revenue increased dramatically. At Greater Chicago Food Depository, revenue rose sharply during the COVID emergency and later declined from its peak, but executive compensation did not decrease proportionally. The same general pattern is evident at the Northern Illinois Food Bank: pandemic-era revenue spikes have lessened, yet senior pay remains high. The main conclusion is not that every dollar is unjustified, but that temporary “crisis” conditions helped establish a higher long-term compensation baseline across the sector.

At its core, a food bank functions as a warehousing and distribution system. It receives products, stores them, sorts them, tracks them, and moves them to downstream agencies. This does not make food bank executive roles identical to private-sector distribution center leadership. Food-bank officers also manage fundraising, grant compliance, donor relations, public policy, and public messaging. However, the logistics comparison remains fair in one key aspect: these organizations are not just charities in the old neighborhood-church sense. They are large institutional supply chain operations.

Therefore, comparisons to private-sector logistics pay should not be ignored. Bureau of Labor Statistics wage data for transportation, storage, and distribution managers in the Chicago area show compensation significantly lower than what several senior food-bank officers currently earn.

Anyone who has worked in both the private sector and NGOs knows that private-sector jobs are more difficult, have greater operational consequences, and face higher accountability. They are therefore more stressful than the nonprofit roles being compared. That makes the current compensation structure at large food banks more—not less—worthy of examination.

So what does the private sector pay the people who run these operations?

Organization	Role	Total Comp (2025/26)	Source
Greater Chicago Food Depository	CEO	\$490,419	IRS Form 990
Northern Illinois Food Bank	CEO	\$383,782	IRS Form 990
Walmart Distribution Center	General Manager	\$218,317	Glassdoor, 90 th percentile
Costco Depot/Distribution	General Manager	\$207,471	Glassdoor, 90 th percentile
Target Distribution Center	General Manager	\$198,350	Glassdoor, 90 th percentile
Average Chicago Logistics Hub	General Manager	\$102,474	Salary.com

Read that again. A **Walmart General Manager** is the top leader at a facility responsible for billions of dollars in inventory and hundreds of employees. That person earns \$218,317, which is at the high end for that role. Meanwhile, the Vice President of Operations at the Greater Chicago Food Depository—who has a much less demanding logistical role—earns \$353,845. That’s \$135,000 more than the top executive at a for-profit organization. Remember, the Walmart manager works under high accountability, in a competitive environment where inefficiency can lead to lost market share and potential job loss. The food bank VP, on the other hand, operates in a system where “revenue” comes mostly from donors and government grants, with almost no accountability. That’s why these salaries don’t seem like compensation for sacrifice; they appear to be tribute from a protected system.

According to the **Bureau of Labor Statistics**, *several of these officers earn double or triple what comparable private-sector logistics professionals earn*, while the rest fall into a compensation range most Americans would never associate with a food charity.

If you want a single number that captures this system, it’s this: how much product value does each manager oversee per dollar of their compensation?

Entity	Type	Annual Value	Manager Pay	Value per \$1 Pay
GCFD	Non-Profit	\$241.5M	\$490,419	\$492
NIFB	Non-Profit	\$180.4M	\$383,782	\$470
Walmart DC	For-Profit	~\$2.9B	\$218,317	\$13,285
Costco Depot	For-Profit	~\$8.0B	\$207,471	\$38,559

Walmart DC value derived from ~\$385B U.S. revenue across 115 regional centers. Costco generated ~\$192B in U.S. revenue across ~24 depots.

Here’s another way to view the income of each officer at the Greater Chicago Food Depository: what is the



percentile of their salary compared to all workers across the United States?

Greater Chicago Food Depository: Executive Compensation vs. National Income Percentiles for All U.S. Workers

Officer & Title	FY 2024/25 Salary	National Percentile (All U.S. Workers)
Katherine Maehr (CEO)	\$490,419	Top 1%
Jill Rahman (COO)	\$411,272	Top 2%
Jill Zimmerman (Philanthropy)	\$363,933	Top 2%
Sheila Creghin (VP Ops)	\$353,845	Top 2%
Joni Duncan (VP Culture)	\$348,778	Top 2%
Mary Pelican (VP Finance)	\$341,864	Top 2%
Amy Laboy (VP Programs)	\$253,353	Top 4%
Joseph Rodriguez (VP Logistics)	\$249,393	Top 4%
National Income Benchmarks (2025 CPS/SSA Data)		
Top 1% Threshold (National)	\$450,100	99th
Top 5% Threshold (National)	\$210,351	95th
Top 10% Threshold (National)	\$155,042	90th
Median Individual Income (National)	\$53,010	50th

Source: Nonprofit salaries from IRS Form 990 filings (FY 2024/25). National income percentile thresholds from DQYDJ analysis of U.S. Census Bureau Current Population Survey and Social Security Administration wage data, 2025. Covers 154+ million individual workers nationally.

Every officer at the Greater Chicago Food Depository earns more than 95% of what all working Americans earn. The CEO is in the top 1%. They run a taxpayer-supported food bureaucracy that still markets itself as a charity.

Most people think that when food is donated to a food bank—whether by corporations or the federal government—it is free for local pantries and soup kitchens. That assumption is too simple.

In practice, food banks often charge downstream agencies various fees, usually called shared maintenance fees or program service fees, at least for some types of food and services. Northern Illinois Food Bank’s audited financial statements report over \$5.5 million in program service fees and describe these fees as stemming from its purchased and donated food program, including shared maintenance on donated food. That is a matter of record.

This fee structure should receive much more public attention than it currently does. Churches and small food pantries are often told, in effect, that they are part of a charitable partnership, even as substantial fee revenue is generated upstream in the distribution process. Even when those fees are lawful, they are part of the business model and must be disclosed transparently and clearly

understood by donors, legislators, participating agencies, **church officials, and members.**

The clearest federal rule I found regarding fees is 7 CFR 251.9(d), which states that states may not charge fees for the distribution of USDA Foods to eligible recipient agencies. USDA guidance also clearly states that TEFAP foods must be provided to recipients free of charge. However, these authorities do not automatically mean that every fee charged within the broader charitable-food system is unlawful. They do establish a boundary: USDA foods should not become an open revenue stream through direct distribution charges, and any fee arrangement involving TEFAP inventory should be carefully reviewed, contract by contract and policy by policy.

That distinction is important. Some food banks and related organizations clearly separate free USDA commodities from other donated food that may incur handling or maintenance charges. The Greater Chicago Food Depository’s audited financial statements confirm that USDA and certain TANF-funded commodities are distributed without service fees. Therefore, the most supportable criticism is not that all fees are illegal, but that the system is so unclear that local pantries, churches, and donors often cannot easily identify what they are paying for, which inventory is free, and which inventory generates upstream fee revenue.

That opacity matters because the public sees a simple story: corporations donate food, taxpayers fund emergency food programs, and food banks serve the poor. But behind that public story, there’s a more complex financial reality in which food can bring tax benefits, fee income, administrative costs, and organizational growth for those in the middle of the chain.

In Part I, I argued that a large portion of the food distributed through food banks consists of highly processed surplus categories that would not be anyone’s ideal of healthy nutrition. Whether or not every estimate in that category can be pinpointed precisely, the broader accounting issue is real. Food banks report donated food inventory using standardized per-pound valuation methods, which can produce very high program expense ratios on paper. This does not necessarily violate accounting rules, but it can make the organizations appear more efficient than an ordinary reader might assume based on the underlying quality or market value of the food itself.



This matters because watchdog-style efficiency claims are often used to defend large administrative structures and growing executive pay. If the system's estimated performance relies heavily on valuation methods the public does not understand, public discussion is already biased.

The Illinois system needs special attention. Illinois now relies on a limited network of regional food banks to distribute TEFAP-related assistance across all 102 counties. It used to have seven listed TEFAP organizations, but the counties formerly served by the **Peoria Area Food Bank** have been absorbed into the **Eastern Illinois Foodbank**. The system has become more centralized, with fewer organizations controlling access to USDA food and food supplied by companies within the state.

Feeding Illinois serves as the statewide organization for the network, with its board composed of leaders from member food banks. This setup does not inherently suggest wrongdoing. However, it means that the same group of institutional leaders serves both the operational organizations and the coordinating association. This should naturally raise questions about independence, transparency, and oversight.

Those questions became more urgent after a recent audit of Feeding Illinois identified a material weakness in internal controls. "Material weakness" is not a minor bookkeeping issue. It means the auditor found a deficiency serious enough to indicate a reasonable possibility of a material misstatement in the financial reporting. Even without accusing of corruption, that finding alone is enough to prompt further investigation into how both state and charitable funds are managed.

On October 30, 2025, **Governor Pritzker** issued Executive Order 2025-08, allocating \$20 million in state support to food banks in anticipation of increased demand due to federal policy changes. That is a matter of public record. Regardless of one's opinion about that decision, it is fair to note that Illinois chose to direct additional resources through the existing food-bank infrastructure rather than a more decentralized approach. That is a policy choice critics are entitled to scrutinize.

The same is true of disclosure.

IRS Schedule I instructions require providing identifying information for domestic organizations that receive more than \$5,000 in grants or assistance. I cannot confidently

assert, without stronger evidence, that every omission or restriction in public disclosures is intentional. However, I can say that large food-bank organizations often make it significantly harder than it should be for an average member of the public to trace where assistance went, in what amount, and to which downstream entities. For institutions managing huge amounts of charitable and public resources, that lack of transparency is a valid concern.

One of the clearest lessons from this investigation is that the modern food-bank system is not best understood as a loose collection of local charities. Instead, it is a large, centralized, bureaucratic network with executive pay, fee income, government partnerships, accounting practices, and professional administration. The public is encouraged to picture church basements and volunteers sorting cans. However, the financial records tell a more institutional story.

The most valid criticism of this system is not that every executive is corrupt, or that every maintenance fee is illegal, or that every food bank officer acts in bad faith. It is that a network designed to deliver food to the poor has become highly centralized, heavily bureaucratic, and insufficiently transparent. The compensation remains high. The fee structures are real. Oversight is weak. Reporting is hard to understand. And when more public funds become available, they are often spent in the same established channels.

That is enough to justify a serious public debate.

What I reported in my previous article is even more significant for that debate. An analysis of the indicators used to measure hunger levels in this country shows that the food pantry network and the **SNAP** program are ineffective at reducing hunger. Even as food distribution to local recipients rises or falls and as the SNAP program expands or shrinks, these changes don't influence the reported hunger indices.

In other words, the programs are not working. They are not solving the problem.

That should come as no surprise to anyone familiar with the changes in the system over the years. While the TEFAP system was created to address a temporary increase in hunger caused by rising poverty due to economic disruptions in the 70s, it has become a permanent system no longer tied to poverty measures.

The hunger industrial complex not only pays its executives



like corporate CEOs but also systematically erodes every safeguard meant to ensure that food reaches those who truly need it. Under federal TEFAP regulations (**7 CFR 251.5(b)**), states set income eligibility at up to 300% of the Federal Poverty Level. In Illinois, the limit is exactly at that maximum. For 2026, this means a family of four earning up to \$99,000 a year qualifies for free government food. A household of five can earn \$116,040 and still access the program. Regardless of what defenders of the current system claim, such a high threshold greatly expands the definition of “*emergency food assistance*” beyond its original intent. A program designed to address urgent material needs now covers many households that wouldn’t traditionally be seen as experiencing a true food emergency.

But even that absurdly generous threshold is meaningless in practice because food pantries receiving TEFAP commodities are explicitly prohibited from verifying income. The Illinois DHS procedures manual states directly that “*distribution sites are prohibited from verifying income.*” No pay stubs. No tax returns. No financial documentation of any kind. Eligibility is established entirely by self-attestation — a person signs a sheet saying they qualify, and the pantry is legally barred from challenging it. In practice, a pantry may have every reason to doubt a claim and yet still lack the tools to test it meaningfully. One Food Bank’s TEFAP manual spells it out: “**Food pantries, soup kitchens, and homeless shelters are NOT ALLOWED to ask for social security cards, pay stubs, or income data.**”

Then the Biden administration delivered the final blow to accountability. On October 31, 2024, the USDA’s **Food and Nutrition Service** issued a final rule titled “*Food Distribution Programs: Improving Access and Parity,*” codifying the change at § 251.5(b)(3) to specify that length of residency, address, or identification documents shall not be used as eligibility criteria when determining household eligibility.

Effective December 30, 2024, regulations at **7 CFR 251(b)(3)** prohibit state agencies from requiring applicants or participants to provide their address or identification documents — such as a photo ID, mail, residency proof, or similar documents — to receive USDA Foods.

As of the final days of the **Biden Administration**, a person receiving federally purchased food at a TEFAP

distribution site cannot be asked to prove their identity, residence, or income. The only information a pantry can collect is a name, city, and county, household size, and a signature attesting to income eligibility. No verification, no identification, no address confirmation. It is not permitted to verify who the person is.

This regulatory demolition was not accidental, and the timing was not coincidental. Whatever the official reason for the rule change, its actual impact was to further weaken already fragile screening. It established a system where food can be distributed with little to no documentary proof of identity, residence, or income — a framework that critics can rightly argue is more vulnerable to exploitation, more susceptible to politicization, and more difficult to monitor.

When I first began this investigation, it was because food banks in my area — mainly funded by the USDA through TEFAP — started making anonymous food deliveries to people who were reportedly afraid to visit the food bank for fear that **ICE** agents might pick them up and deport them. Whether called humanitarian outreach or institutional resistance to immigration enforcement, the result was the same: food distribution practices were being changed in ways that made legal scrutiny harder.

One federal agency — the USDA — is now effectively undermining the mission of another — **Homeland Security**. They did this by eliminating every verification mechanism that could have identified who was receiving the food, where they lived, and whether they were legally in the country.

Additionally, the system has been entirely separated from its original purpose. Whether described as humanitarian outreach or institutional resistance to immigration enforcement, the outcome was the same: food distribution methods were being altered in ways that made legal review more challenging. The hunger industrial complex doesn’t need hungry Americans; it simply needs names — any names — signing the attestation sheets.

The contradiction at the heart of this system is brazen.

In 1996, Congress enacted the **Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA)**, codified at 8 U.S.C. § 1611. Section 401 of PRWORA states that aliens who are not “*qualified aliens*” are ineligible for any “*Federal public benefit*” as defined in 8 U.S.C. § 1611(c).



The statute’s definition of *“Federal public benefit”* includes *“any retirement, welfare, health, disability, public or assisted housing, postsecondary education, food assistance, unemployment benefit, or any other similar benefit for which payments or assistance are provided to an individual, household, or family eligibility unit by an agency of the United States or by appropriated funds of the United States.”*

TEFAP food is purchased with federal funds allocated by the USDA and distributed to individuals as food assistance. It is, at minimum, a federal benefit program, which prompts a clear question: how can a government program enforce immigration restrictions when identity, residence, and income are hardly documented at the point of distribution?

In July 2025, the Trump USDA clarified that PRWORA’s restrictions are important and that illegal aliens should not receive government funding. The **Attorney General** also revoked the old 2001 order that had been used for years to soften or bypass those restrictions in community programs.

Yet, just weeks before the current administration took office, the outgoing Biden USDA published a final rule, effective December 30, 2024, codifying at § 251.5(b)(3) that neither length of residency, address, nor identification documents shall be used as eligibility criteria when determining household eligibility for TEFAP food.

That is the real scandal. Defenders can point to regulatory cover all they want, but a system based on self-attestation and minimal verification makes meaningful screening nearly impossible in practice. Congress drew the lines. The bureaucracy blurred them. This is not stewardship. It is administrative sabotage disguised as compassion.

At minimum, this regulation deserves serious legal and policy scrutiny because it weakens the usual safeguards a reasonable person would expect in any publicly funded, needs-based distribution system. However, it hasn’t been challenged — because those who control the system don’t want it to be. They want the names on the sign-in sheets. They want the numbers that justify the next round of grants, the next executive salary boost, the next \$37.6 million marketing campaign about “record hunger.”

According to a USDA study, approximately 67% of food pantries and 65% of emergency kitchens in the United States are faith-based. It was churches and faith

communities that established the food pantry system in this country. When hunger suddenly became an emergency in the 1970s, it was people of faith who stepped up first — not because they were paid, or because a 501(c)(3) board told them to, but because we are called to serve the poor.

But what are we called to do when a system we started becomes so twisted and distorted that it no longer resembles what we helped to create? What are we called to do when the food we collect is controlled by a network of insiders who pay themselves half a million dollars annually, charge our pantries for food that was initially free, use inflated valuations to produce fake efficiency ratings, and then deploy what we’ve built in a manner that violates federal immigration law — all while telling us we should be thankful for the privilege of participating?

We are not called to go along with that. We are called to something better.

The system has become irretrievably corrupt. It cannot be reformed from within because the people who control it — from Feeding America’s national office to the Feeding Illinois network to the six regional hubs that control the distribution of federal food in this state — have no interest in reform. Reform would require accountability, which means lower salaries, published fee schedules, verified eligibility, and an honest assessment of whether 30 years and billions of dollars annually have actually reduced hunger. They will never allow that honest assessment to happen voluntarily.

Every church-run pantry in America should withdraw from the TEFAP system. Step away from the federal food, the Shared Maintenance Fees, the self-attestation sheets, and the regulations that dictate what you can and cannot ask of the people you’re trying to help.

Return to what worked: every church member shopping for food and bringing it to their pantry for distribution to people who are confirmed to be in genuine need — and who, because the government is no longer standing between you and them, can be offered spiritual encouragement and guidance along with their groceries.

Some churches might find a better solution. But any solution that involves government control of the food your congregation provides is the wrong choice. The hunger industrial complex has taken what the faith community built out of love and turned it into a multi-billion-dollar racket.

It’s time to take it back.

What happens next will depend on
whether we Americans, whether we Christians,
**still remember that this is our country –
and are willing to act like it.**



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