

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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**CALIFORNIA VALLEY MIWOK** )  
**TRIBE, formerly SHEEP RANCH OF** )  
**ME-WUK INDIANS OF CALIFORNIA,** )  
) )  
**Plaintiff,** )  
) )  
**v.** )  
) )  
**UNITED STATES OF AMERICA,** )  
) )  
**GALE A. NORTON, Secretary of the** )  
**Interior,** )  
) )  
**and** )  
) )  
**MICHAEL D. OLSEN, Acting** )  
**Assistant Secretary-Indian Affairs,** )  
) )  
**Defendants.** )

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**No. 1:05CV00739  
Judge James Robertson**

**DEFENDANTS' REPLY TO PLAINTIFF'S OPPOSITION  
TO DEFENDANTS' MOTION TO DISMISS**

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Attachment A (Letter dated March 26, 2004 from Superintendent, BIA’s Central California Agency)

Attachment B (Declaration of Raymond Fry, Tribal Operations Officer at BIA’s Central California Agency, dated September 21, 2005)

Attachment C (Declaration of Raymond Fry, dated September 21, 2005)

Attachment D (Declaration of Janice Whipple - DePina, Awarding Official, BIA’s Central California Agency, dated September 21, 2005)

Attachment E (Declaration of Scott Keep, Assistant Solicitor, Branch of Tribal Government and Alaska, Indian Affairs Division, Office of the Solicitor, U.S. Department of the Interior, dated September 22, 2005)

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**INTRODUCTION**

The crux of the Plaintiff’s Opposition to Defendants’ Motion to Dismiss is that the February 11, 2005, letter to Yakima Dixie from Michael D. Olsen, the Acting Principal Deputy Assistant Secretary - - Indian Affairs [copy attached to Plaintiff’s Opposition] constitutes the “decision” of the Department of Interior which Plaintiff challenges here and, in effect, is the sole material operative fact in this dispute, according to Plaintiff. Specifically, the Tribe argues that this February 11, 2005, decision refused to recognize: (1) the Tribe’s proposed constitution; (2) Sylvia Burley as Tribal Chairperson; and (3) the Tribal forum created by Tribal Resolution R-1-

02-04-2004 (see paras. 49a and b; 53 through 58 of Complaint). In Plaintiff's opinion, the February 11, 2005, letter amounts to a "final agency action" within the meaning of 5 U.S.C. § 704, because Interior's regulations, 25 C.F.R. Part 2 (2005), do not provide for an administrative appeal from a decision of the Assistant Secretary - Indian Affairs (or from a decision of the Principal Deputy Assistant Secretary), unless the decision itself explicitly states that it is subject to an administrative appeal. The February 11, 2005, letter does not so state. The erroneous premise that the February 11, 2005, letter amounts to the controlling, operative decision of the BIA is the underlying basis for the Tribe's entire Opposition.

By contrast, Defendants' position is that the March 26, 2004, letter to Ms. Burley from Superintendent Dale Risling of the Central California Agency is the **controlling material operative action**; it is the BIA/Interior decision from which all of Plaintiff's claims flow. *See* copy of the March 26, 2004, letter designated as Attachment A hereto. This letter specifically refused to recognize the tribal constitution and recognized Sylvia Burley as "a person of authority" within the Tribe, as opposed to Tribal Chairperson. The Tribe alleges in its Complaint (paras. 49 a and b) that BIA failed to recognize not only the tribal constitution, but also another tribal governing document, Tribal Resolution R-1-02-04-2004, which created the tribal forum. Thus, Mr. Olsen's statement that the BIA did not recognize the tribal forum was compelled by the March 26, 2004, decision. The March 26, 2004, letter expressly states that upon the expiration of the 30 - day administrative appeal period the decision would become "final for the Department," if no timely appeal was filed. *See* letter at 3-4. In other words, Mr. Olsen's February 11, 2005, letter was not a new decision, but reflected the finality of the Interior Department's decision of March 26, 2004. Indeed, Mr. Olsen was merely acting

consistently with the March 26, 2004, decision when he concluded that Yakima Dixie's "... **appeal of the BIA's recognition of Sylvia Burley as Tribal Chairman has been rendered moot by the BIA's decision of March 26, 2004, a copy of which is enclosed, rejecting the Tribe's proposed constitution.**" [Emphasis added.]. In the March 26, 2004, letter, the BIA made clear that the Federal government did not recognize Sylvia as Tribal Chairman. Rather, the BIA would recognize her as "a person of authority within the California Valley Miwok Tribe." Olsen explains his statement that the BIA could not defer to any "tribal dispute resolution process" (that is, any tribal forum) was premised on the BIA's March 26, 2004, unappealed final decision that the California Valley Miwok Tribe was not an "organized" tribe. In short, the three claims asserted by the Tribe all flow from the March 26, 2004, decision. See the text of the February 11, 2005, letter and Defendants' Memorandum in Support Of Motion to Dismiss of August 5, 2005, at 3-4 on this fundamental point. See also Attachment E hereto (Declaration of Scott Keep, and Exhibit 1 appended thereto).

### **SUMMARY OF ARGUMENT**

The Court does not have subject matter jurisdiction over this lawsuit, the essence of which is a current, ongoing, internal tribal dispute over organizational, leadership and membership issues. Plaintiff's Opposition does not refute Defendants' argument that the Complaint fails to state a claim upon which relief may be granted (pursuant to FRCP 12(b)(6)) because the Plaintiff failed to exhaust its administrative remedies.

## ARGUMENT

### **I. THE COURT LACKS SUBJECT MATTER JURISDICTION OVER THIS CASE BECAUSE IT IS, IN ESSENCE, AN ONGOING INTERNAL TRIBAL DISPUTE.**

Plaintiff flatly denies there is any ongoing internal tribal dispute which lasted beyond the February 11, 2005, letter and accuses the government of being “misguided, disingenuous, or both” for making this assertion. Pl. Opp. at 16.<sup>1/</sup> However, the existence of a present-day internal tribal dispute is clearly documented. On September 2, 2005, Yakima Dixie, moved to intervene in this proceeding. He asserts he is an “hereditary chief” of the Tribe and the “Spokesperson for the ‘Putative Members of the Tribe.’” Intervenor’s Memorandum at 2. He contends he is only one of three people entitled to participate in the organization of the Tribe as of 1998, but that Ms. Burley “. . . consciously ignores the role that Mr. Dixie should play in this important process.” Intervenor’s Memo. at 9. Most importantly, Mr. Dixie states he had five meetings with BIA officials of the BIA Sacramento Area Office after the February 11, 2005, letter, including one meeting attended by Superintendent Troy Burdick of the Central California Agency for the purpose of attempting to organize the Tribe. Intervenor’s Memo. at 6-8. Mr. Dixie has requested that the BIA identify those “individuals who have the inherent right to organize the Tribe.” Interv. Memo. at 8. Although invited to attend all five meetings, Ms. Burley did not attend any of them, and instead had two attorneys and/or her husband represent her. Id.

In sum, there has been an internal tribal dispute over organizational issues (which encompass leadership and membership issues) - - that is, over the threshold organizational issue

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<sup>1/</sup> Plaintiff effectively concedes there was a longstanding internal tribal dispute prior to February 11, 2005.

of which individuals may participate in the organization of the Tribe - - and this dispute is currently ongoing. See also Declaration of Raymond Fry, Tribal Operations Officer, BIA CentralCalifornia Agency (designated as Attachment B hereto) which provides substantial additional support for the Defendants' contention that there is a current internal tribal dispute which is ongoing.

We reiterate that, as a general rule, federal district courts lack jurisdiction over internal tribal disputes involving organizational, leadership, or membership issues. See the decisions cited in the Defendants' Memorandum in Support of Motion to Dismiss at 10. Plaintiffs fail to address any of this compelling authority that requires dismissal of this action. The current internal tribal dispute encompasses all three above types of issues. This ongoing internal tribal dispute necessarily leads to the conclusion that the Court lacks subject matter jurisdiction over this lawsuit.

## **II. THE PLAINTIFF DOES NOT REFUTE DEFENDANT'S FAILURE TO EXHAUST ADMINISTRATIVE REMEDIES ARGUMENT**

The crux of the Plaintiff's response to Defendants' FRCP 12(b)(6) argument to dismiss for failure to state a claim based upon plaintiff's failure to exhaust administrative remedies is that no administrative appeal from the February 11, 2005, Olsen letter was available and hence the government's failure to exhaust administrative remedies argument is not applicable. Again, our position is that the **controlling material operative action** is Superintendent Dale Risling's March 26, 2004, letter to Ms. Sylvia Burley embodying the Superintendent's decision not to recognize the Tribe's proposed constitution (and implicitly all other tribal governing documents, such as Tribal Resolution R-1-02-04-2004, which established a tribal forum) and not to

recognize Ms. Burley as Tribal Chairperson.<sup>2</sup> The language of Mr. Olsen's February 11, 2005, letter clearly establishes that Mr. Olsen was merely **following** the **March 26, 2004 decision**. For example, in advising Mr. Dixie that the Department did not recognize the Tribe's forum, Mr. Olsen wrote: "In light of the BIA's office of March 26, 2004, that the Tribe is not an organized tribe, . . . the BIA does not recognize any tribal government, and therefore, cannot defer to any tribal dispute resolution process at this time." The February 11, 2005, letter does not amount to a new, independent "decision" by the BIA, as opposed to merely an acknowledgment of the prior, controlling March 26, 2004, decision from which plaintiffs did not appeal.<sup>3</sup> Moreover, in a May 20, 2004, letter to the California Gambling Control Commission, Mr. Scott Keep of the Office of the Solicitor in Washington, D.C. (Division of Indian Affairs, Branch of Tribal Government and Alaska), made it clear that the BIA's March 26, 2004, letter from the Superintendent of the Central California Agency to Ms. Burley's had decided her "status."

The March 26, 2004, letter explicitly informed Ms. Burley that she could take an administrative appeal from this decision; the letter states, in pertinent part, as follows: "This decision may be appealed to the Regional Director, Pacific Regional Office, Bureau of Indian Affairs, 2800 Cottage Way, Sacramento, California 95825." (March 26, 2004, letter at 3). Neither Ms. Burley nor the Tribe ever filed an appeal from the March 26, 2004, decision. See

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<sup>2</sup>Paragraph No. 49b of the Complaint specifically alleges that the BIA refused to recognize this particular tribal resolution.

<sup>3</sup>Ms. Burley and the Tribe lack standing to challenge the February 11, 2005, Olsen letter. The Olsen letter was directed at Yakima Dixie to resolve his administrative appeal. It was not directed at Ms. Burley or the Tribe. It dismissed Mr. Dixie's appeal. It did not determine the rights or affect the interests of Ms. Burley or the Tribe. As a result, neither Ms. Burley nor the Tribe has standing to challenge the Olsen letter.

Attachments D and E to Defendant's Memorandum of August 5th. In short, Ms. Burley/the Tribe failed to exhaust their administrative remedies. In this Circuit, the failure to exhaust administrative remedies is properly pled under FRCP 12(b)(6). Hidalgo v. Federal Bureau of Investigation, 344 F. 3d 1256, 1258-1259 (D.C. Cir. 2005); Johnson v. District of Columbia, 368 F. Supp. 2d 30, 36 (D.D.C. 2005). Although Interior's regulations give rise to the "non-jurisdictional" type of exhaustion of administrative remedies, we reiterate that the exhaustion of remedies is a "condition precedent" to filing this suit under the Hidalgo and Johnson decisions. The facts of this particular case, taken together with these two decisions, compel the conclusion that the Complaint should be dismissed for Plaintiff's failure to exhaust administrative remedies.

**A. Requirements for a FRCP 12(b)(6) Dismissal.**

Plaintiff argues that dismissal under FRCP 12(b)(6) ". . . . is proper only whether there is either a 'lack of a cognizable legal theory' or the absence of sufficient facts alleged under a cognizable legal theory," citing two Circuit Court of Appeals decisions neither of which are from this Circuit. Neither Hidalgo nor Johnson support this proposition. Rather, both decisions stand for the principle that a lawsuit may properly be dismissed under FRCP 12(b)(6), if the plaintiff failed to pursue the available administrative appeal process. In other words, these two cases require the pursuit of the available administrative appeal process as a "condition precedent" to filing a lawsuit in this Court. The Interior Department's regulations provide for an appeal from a decision of the Superintendent of a BIA Agency, such as Superintendent Risling's March 26, 2004, decision. See 25 C.F.R. 2.6.

**B. Defendants' Reliance Upon the Avocados Plus Decision.**

Plaintiff contends the government's reliance upon Avocados Plus, Inc. v. Veneman, 370

F.3d 1243, 1248-1248 (D.C. Cir. 2004) is “misguided.” This is because the analytical approach adopted in Avocados Plus (for making a determination as to whether dismissal of a lawsuit because of a plaintiff’s failure to exhaust administrative remedies is warranted) need not be utilized “if there is no administrative remedy [available].” Pl. Opp. at 17. This argument is based upon the erroneous premise that the February 11, 2005, Olsen letter is the “decision” which gave rise to the claims in this case. The reality is that the March 26, 2004, letter constituted the “decision” because it had a “ ‘direct and immediate effect upon the day-to-day’ ” interaction between the Tribe and the Department of the Interior (See Independent Petroleum Ass’n of America, 235 F. 3d at 594-595) and because it was treated by the Office of the Solicitor as the BIA’s decision on Ms. Burley’s status (See Declaration of Scott Keep, Attachment E hereto). By virtue of Interior’s regulations (25 C.F.R. Part 2 (2005)), the March 26, 2004, decision became the “final agency action” for the Department of the Interior upon the expiration of the 30-day period for filing an administrative appeal from this decision which Plaintiff failed to file.

As an alternative to its “no administrative remedy” argument, Plaintiff should have responded to Defendants’ application of the two-part analysis from the Avocados Plus decision. Instead, Plaintiff contends that exhaustion would “serve no purpose because 1) there are no[material] facts in dispute and 2) it would be inadequate because of agency bias.” Pl. Opp. at 18. Clearly, there are material facts in dispute. Defendants deny that the Olsen letter was the Interior “decision” rejecting the tribal constitution and tribal forum; rather, Superintendent Risling’s March 26, 2004, letter was the Interior decision from which the three claims in this lawsuit flow. Indeed, the Olsen letter does not address the issue of the Tribe’s constitution, and addresses Ms. Burley’s status and the tribal forum in the context of the March 26, 2004, letter

only. Moreover, we note that Yakima Dixie's recitation of material facts differs markedly from plaintiff's version of the facts. See Declaration of Raymond Fry, Tribal Operations Officer at the BIA's Central California Agency, appended hereto as Attachment B; Intervenor's Memorandum at 2-9, and Declaration of Yakima K. Dixie attached as Exhibit 1 to Intervenor's Memorandum.

Plaintiff's argument in support of "agency bias" is that it would be "futile to require an administrative review of an unlawful act through a process culminating with the person who committed the act." [Emphasis added]. Again, this argument is based upon the erroneous premise that Olsen letter was Interior's "decision" not to recognize the proposed tribal constitution, not to recognize Sylvia Burley as Tribal Chairperson and not to recognize the tribal forum created by Tribal Resolution No. 1-02-04-2004. Moreover, Olsen decided Mr. Dixie's appeal in Ms. Burley's favor. Mr. Dixie challenged the Department's recognition of Ms. Burley as Tribal Chairman. Mr. Olsen dismissed the appeal because it had been "rendered moot" by the March 26, 2004, letter and because it was untimely. Olsen's handling of the Dixie appeal demonstrates that he is not biased, contrary to Plaintiff's implication.

Interior's regulations created only a "non-jurisdictional" type of exhaustion requirement. This means that the second part of the Avocados Plus analysis applicable to a "non-jurisdictional" exhaustion requirement is taken from the text of the Supreme Court's decision in McCarthy v. Madigan, 503 U.S. 140, 147-148 (1992). See Defendants' Memorandum in Support of Motion to Dismiss at 20-21. The three elements of this second part of the analysis do not refer to "agency bias." Rather, the Plaintiff tribe must show that the appellate administrative entity to which plaintiff could have appealed the March 26, 2004, decision - - namely, the Regional Director of the BIA's Pacific Regional Office (see Attachment A at 3) - - was

“biased.” See 503 U. S. at 149-150. The Plaintiff has made no such showing.

Plaintiff asserts: “Administrative bias is further demonstrated with Defendants’ recent unilateral modification of the Tribe’s 638 contract, equivocal behavior following the modification, and continued interference with the Tribe’s funding from the state of California.”Pl. Opp. at 19. The reference to “equivocal behavior” refers to the Tribe’s argument that the BIA only “partially revoked” the July 19, 2005, suspension of the 638 contract between the Tribe and the BIA. We submit that the August 19, 2005, letter from the BIA Central California Agency’s Awarding Official amounted to a complete revocation of the suspension. See Declaration of Janet Whipple-DePina, Awarding Official at the BIA’s Central California Agency, copy appended and designated as Attachment D.

The reference to “continued interference with the Tribe’s funding from the state of California” refers to the monies received from the “Revenue Sharing Trust Fund” (RSTF) created by the State of California. See the copies of the August 4, 24, and 29, 2005, letters from the California Gambling Control Commission (hereafter “Commission”) to the Tribe attached to the Plaintiff’s Opposition. This Fund consists of the required (under the Tribal-State Gaming Compact) contribution of a portion of the annual gaming revenues received by each of those Indian tribes in California conducting gaming activities for distribution to the “non-gaming” Indian tribes in California. On August 4, 2005, the Commission informed the Tribe that in light of the July 19, 2005, letter from Ms. Whipple-DePina, it had decided “not to release the current RSTF quarterly distribution to the California Valley Miwok Tribe for the quarter ending June 30, 2005, and any subsequent distributions.” The Commission stated that its “trustee status under the Compact demands that we ensure the RSTF contributions go to the tribe for the benefit of

the Tribe and not merely to an individual member.” The Commission then stated: “We have not received any direction in this regard from the from the BIA . . .” [Emphasis added]. In addition, the Commission stressed that any withheld distributions would be sent to the Tribe together with “appropriate accrued interest” after the “current situation is resolved.” On August 24, 2005, the Commission reversed its position, noting that despite the “ongoing leadership and organizational dispute” [Emphasis added.], Ms. Burley is the person with whom the BIA “conduct[s] “business, at least with respect to the PL 93-638 contract.”

Although acknowledging the August 19, 2005 reinstatement of the contract, on August 29, 2005, the Commission reversed its August 24, 2005, position primarily on the grounds that it interpreted the Awarding Official’s July 19, 2005, letter as effectively stating that the BIA no longer recognized Sylvia Burley as “a person of authority” within the Tribe. However, this interpretation of the August 19, 2005, letter is wrong. See Declaration of Janice Whipple-DePina, copy designated as Attachment D. The August 29, 2005, letter also states that the Commission’s reversal of position between August 24, 2005, and August 29, 2005, occurred after “several conversations with the Bureau of Indian Affairs (BIA) regarding their views of Ms. Burley’s status . . .” However, the fact is that one BIA official, Raymond Fry, spoke with the Commission prior to August 24, 2005. See Declaration of Raymond Fry, copy appended as Attachment C. The Chief Legal Counsel for the Commission, Cy Ricard, asked for any documentation relating to Ms. Burley’s status and Mr. Fry provided such information. Mr. Fry told Mr. Ricard that the Commission had to ““make its own call”” as to whether to release distributions of RSTF monies to the California Valley Miwok Tribe. At no point did he urge or encourage the Commission to not release the RSTF monies to the Tribe.

On August 24, 2005, the Chief Legal Counsel for the Commission telephoned Ms. Janice Whipple-DePina, Awarding Official at BIA's Central California Agency. He requested a copy of the August 19, 2005, modification of the Tribe's "638" contract. Ms. Whipple-DePina provided him with a copy of the modification and a copy of the August 19, 2005, letter transmitting the modification to Ms. Sylvia Burley. At the end of the conversation, Mr. Ricard informed Ms. Whipple-DePina that the Commission had just decided to reverse its August 4, 2005, decision to not release the current quarterly distribution of RSTF monies to the Tribe. See Attachment D. On that same day, the Commission sent a letter to Ms. Burley stating that the Commission had decided to release the current quarterly distribution to the Tribe.

Between August 24, 2005, and August 29, 2005, the Deputy Attorney General of California, Marc. A. LeForestier, (on behalf of the Gambling Control Commission) spoke by telephone with Mr. Scott Keep, Assistant Solicitor, Branch of Tribal Government and Alaska, Division of Indian Affairs, Office of the Solicitor, Department of the Interior, Washington, D.C. to clarify Ms. Burley's "status." Mr. Keep made general comments about BIA's practices in other instances where tribal leadership or organizational disputes created doubts about how to properly distribute funds to a tribe. However, Mr. Keep "did not presume to tell Mr. LeForestier that the Commission should withhold from the Tribe the current quarterly distribution of gaming monies, which [Mr. Keep] recognized was a decision that only the Commission could make." See the Declaration of Scott Keep, para. 10/identified as Attachment E).

**C. No Violation of Section 476(h) of the Indian Reorganization Act Shown.**

We reiterate that the March 26, 2004, decision did not violate Section 476(h) of the Indian Reorganization Act; our argument on this point is found at pages 21 to 32 of Defendants'

Memorandum of August 5, 2005. Plaintiff's Opposition totally ignores our position on this issue. We urge the Court to find that Plaintiff's failure to respond to our detailed argument on this matter shall be deemed as Plaintiff's concession that Defendants' position on Section 476(h) is correct. Lance v. United Mine Workers of America 1974 Pension Trust, 355 F. Supp.2d 358, 362 (D.D.C. 2005) (court may treat arguments not addressed in plaintiff's opposition to motion to dismiss as conceded); Bancoult v. McNamara, 227 F. Supp.2d 144, 149-50 (D.D.C. 2002) (court deemed motion to dismiss conceded when plaintiff failed to oppose it); and Red Lake Band of Chippewa Indians v. Swimmer, 740 F.Supp. 9, 11 n.2 (D.D.C. 1990) (arguments not addressed in defendant's motion to dismiss deemed admitted).

#### CONCLUSION

For the foregoing reasons, we respectfully request the Court to dismiss this lawsuit with prejudice.

Dated this 22<sup>nd</sup> day of September, 2005.

Respectfully submitted,

Electronically signed \_\_\_\_\_  
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Attachments