# IN THE
# Supreme Court of Virginia

**RECORD NO. 090303**

CLAUDE M. SCIALDONE,

*Appellant,*

v.

COMMONWEALTH OF VIRGINIA,

*Appellee.*

---

**RECORD NO. 090305**

BARRY R. TAYLOR, and
EDWARD JONES, s/k/a EDWARD S. JONES,

*Appellants,*

v.

COMMONWEALTH OF VIRGINIA,

*Appellee.*

## CONSOLIDATED REPLY BRIEF OF APPELLANTS

Marvin D. Miller, Esq. (VSB No. 1101)
Heather Golias, Esq. (VSB No. 74921)
THE LAW OFFICES OF MARVIN D. MILLER
1203 Duke Street
Alexandria, VA 22314
Tel. (703) 548-5000
Fax (703) 739-0179
m2junior@aol.com

*Counsel for Appellants*

LANTAGNE LEGAL PRINTING 801 East Main Street Suite 100 Richmond, Virginia 23219 (804) 644-0477
A Division of Lantagne Duplicating Services

## TABLE OF CONTENTS

**Page(s)**

TABLE OF AUTHORITIES ..... ii

ASSIGNMENTS OF ERROR ..... 1

QUESTIONS PRESENTED ..... 1

STATEMENT OF THE CASE ..... 1

STATEMENT OF THE FACTS ..... 2

ARGUMENT ..... 5

**I. A CLAIM OF ERROR IS PRESERVED FOR APPEAL BY AN OBJECTION MADE WITH THE GROUNDS THEREFOR AT A TIME WHEN THE TRIAL COURT HAS AN OPPORTUNITY TO RULE** ..... 5

**II. AN ACCUSED MAY NOT BE SUBJECTED TO SUMMARY CONTEMPT PROCEEDINGS WHEN THE ALLEGED CONTEMPT REQUIRES EVIDENCE AND FURTHER PROOF OF EVENTS NOT IN THE COURT'S PRESENCE** ..... 11

CONCLUSION ..... 15

CERTIFICATE OF SERVICE ..... 17

## TABLE OF AUTHORITIES

**Cases** **Page(s)**

*Burdett v. Commonwealth*,
103 Va. 838, 48 S.E. 878 (1904) ..... 12

*Cooke v. United States*,
267 U.S. 517 (1925) ..... 12

*Davis v. Commonwealth*,
219 Va. 395, 247 S.E.2d 681 (1978) ..... 12

*Elliot v. Commonwealth*,
267 Va. 396, 593 S.E.2d 270 (2004) ..... 9

*Fisher v. Pace*,
336 U.S. 155 (1949) ..... 12

*Gilman v. Commonwealth*,
275 Va. 222, 657 S.E.2d 474 (2008) ..... 12

*Helms v. Manspile*,
277 Va. 1, 671 S.E.2d 127 (2009) ..... 11

*Higginbotham v. Commonwealth*,
206 Va. 291, 142 S.E.2d 746 (1965) ..... 12

*In re Chaplain*,
621 F.2d 1272 (4th Cir. 1980) ..... 12

*In re Oliver*,
333 U.S. 257 (1948) ..... 14

*International Union v. Bagwell*,
512 U.S. 821 (1994) ..... 12

*Lewis v. Commonwealth*,
211 Va. 80, 175 S.E.2d 236 (1970) ..... 9

**Page(s)**

*Nusbaum v. Berlin*,
273 Va. 385, 641 S.E.2d 494 (2007) ..... 8

*Parker v. Commonwealth*,
14 Va. App. 592, 421 S.E.2d 450 (1992) ..... 9-10

*Widdifield v. Commonwealth*,
43 Va. App. 559, 600 S.E.2d 159 (2004) ..... 7

*Wright v. Commonwealth*,
53 Va. App. 266, 670 S.E.2d 772 (2009) ..... 11

**Statutes**

Va. Code § 8.01-384 ..... 5-6, 9-11

Va. Code § 18.2-456 ..... 12

**Rules**

Va. S.Ct. Rule 1:1 ..... 8

Va. S.Ct. Rule 3:2 ..... 10

Va. S.Ct. Rule 5A:18 ..... 5, 8, 10-11

Va. S.Ct. Rule 5:25 ..... 5, 8, 10-11

## ASSIGNMENTS OF ERROR

Appellants adopt the Assignments of Error in their opening brief.

## QUESTIONS PRESENTED

Appellants adopt the Questions Presented in their opening brief.

## STATEMENT OF THE CASE

Scialdone, Taylor and Jones adopt the Statement of the Case in their opening brief and respond to the Commonwealth's brief.

The printout offered in the trial of Frankie Cecil Dulyea was, in fact, the chat room rules in effect at the time of the offense. (A. 41).[1] Although accurate, it was not the original printout provided by the Dulyea's; the right rules, but the wrong copy.

There is no dispute that the trial court summoned witnesses and documents before it said that Scialdone, Taylor and Jones were in contempt. Even then, the court did not determine whether it was civil or criminal contempt, nor what statute was at issue. (A. 198, 200). Scialdone responded that there was no factual basis for contempt, and Taylor noted his exception on behalf of all three. (A. 201-02).

Thereafter, the judge ordered that various documents from the law office be brought to the court. The judge released the jury for the day at

---

[1] The Joint Consolidated Appendix is referenced as "A."

approximately 3:59 p.m. in order to reconvene the contempt trial upon the arrival of the documents. (A. 204-05, 210). At 4:44 p.m., Taylor returned with the documents and the contempt trial resumed. (A. 210).

During the ensuing trial, the court also sent Suttlage, along with a deputy, to the law office to print more exhibits. Suttlage made it clear that she was alone when she printed the document at issue. She did not recall if it had a date when and did not white out anything on it. (A. 87, 91).

The Commonwealth does not dispute that the trial court considered and decided the legal merits of whether summary contempt proceedings in the nearly three and one-half hour trial using witnesses and exhibits about events occurring at a law office, outside of the presence of the court, violated the due process right of Scialdone, Taylor and Jones.

## STATEMENT OF THE FACTS

At Frank Cecil Dulyea's trial, Scialdone offered into evidence the actual chat room rules as they existed at the time of the alleged offense. (A. 41). Scialdone's error was in not asking the witness to identify the rules on the printout as the same rules that the witness had viewed at the time at issue. Had Scialdone done so, the witness would have confirmed that the printout contained the same rules. (A. 41).

Unfortunately, the chat room rules were not properly authenticated

and offered. The result was the approximately three and one-half hour contempt trial of Scialdone, Taylor, who was not present during the Dulyea trial, and Jones.

The jury was excluded from the courtroom when the contempt trial began, then was released for the day while Scialdone, Jones and Suttlage were ordered to remain at court and Taylor was directed to return with documents from the nearby law office. (A. 208). The court reconvened the contempt trial at 4:44 p.m. and concluded it at 6:18 p.m. on July 12, 2006. (A. 210, 237).

It is undisputed that during that trial, the court elicited testimony from Scialdone, Taylor, Jones, and Suttlage. Scialdone, Taylor and Jones were placed under oath without notice that they were on trial, or for what. Taylor and Jones were sequestered outside the courtroom for portions of the trial.

Taylor was ordered out of the courtroom while Suttlage testified, then Suttlage was excluded. (A. 187). After Taylor testified, Suttlage was ordered back to the courtroom, and both she and Taylor were questioned. (A. 191-93). After that testimony, the court acknowledged that she did not know who had done what. The judge sequestered Taylor and Suttlage, and brought Jones into the courtroom to testify. (A. 193). After Jones' testimony, he was sequestered with the other witnesses and Scialdone was

interrogated under oath. (A. 195-96).

No one was told whether this was a civil or criminal contempt proceeding, nor given notice of the accusations that they faced. After considering the testimony elicited from the witnesses and the documents summoned to court, the trial judge concluded the July 12th proceedings without saying whether the contempt was civil or criminal, nor what statute applied.

During the Dulyea trial on July 13, 2006, the court again admitted that she did not know who had done wrong; therefore, unless one of them came clean, they were all tainted. (A. 245-46). Not until the conclusion of the Dulyea trial on July 14, 2006 did the court announce who it had decided had done what. (A. 242-53). The court immediately left the bench without giving Scialdone, Taylor and Jones an opportunity to argue the impropriety of the court's actions. (A. 6, 11, 17, 62).

On July 17 and 18, 2006, before entry of the contempt order on July 19, 2006, the trial court was presented with a written argument asserting the due process issues presented to the Court of Appeals and this Court. On July 26th, the trial court announced that it had considered the issues raised in the previously filed pleadings and had concluded that they had no legal merit. (A 277-79)

## ARGUMENT

### I. A CLAIM OF ERROR IS PRESERVED FOR APPEAL BY AN OBJECTION MADE WITH THE GROUNDS THEREFOR AT A TIME WHEN THE TRIAL COURT HAS AN OPPORTUNITY TO RULE.

The en banc Court of Appeals erroneously held that a litigant must state the objection, the grounds therefor, and, contrary to Rule 5A:18, Rule 5:25 and Va. Code § 8.01-384, must also ask for various forms of specific relief to preserve an objection for appeal. The prosecution ignores the long-standing law of this Commonwealth and improperly suggests that this Court rewrite the Code.

The prosecution misstates the facts to support its position. On July 12, 2006, on the first occasion when the trial judge attempted to hold Scialdone, Taylor and Jones in contempt, she did not say for what conduct. (A. 198). She did not indicate whether the contempt was civil or criminal. She did, however, confess that she did not know who had done what. (A. 198). The Commonwealth's argument that an objection should have been made at this time is without merit.

On July 13th, the trial judge again admitted that she did not know who had done what. She said that Scialdone, or Taylor or Jones had created the dateless document and "until one of you comes clean, you are all tainted with the same stench." (A. 245-46). The judge did not indicate

what, if anything, she was finding as to whom. There was no basis to make an objection at that time.

On July 14th, Scialdone, Taylor and Jones were able merely to take exception to the trial court's ruling as the judge was leaving the courtroom. The judge had read a prepared ruling and immediately left the bench. (A. 6, 11, 17, 62). On the first occasion in which the judge indicated what she was finding as to whom, the Appellants had no opportunity to object or state the grounds therefor.[2]

On July 17th, Scialdone and Taylor did state their objections and the grounds, and on July 18th, Jones did the same. (A. 5-14, 17-21). The National Association of Criminal Defense Lawyers ("NACDL") also filed objections and the grounds on behalf of the Appellants. (A. 22-30). These objections were made at a time when the trial court had an opportunity to rule, prior to entry of the final order of contempt. (A. 31). The trial judge considered the objections filed by Appellants and the NACDL and found that they had no legal merit. (A. 277-79).

The prosecution claims that on July 24th the Appellants made no objection to the form of procedure employed by court. That is incorrect.

---

[2] *See* Va. Code § 8.01-384(A) ("if a party has no opportunity to objet to a ruling or order at the time it is made, the absence of an objection shall not thereafter prejudice him...on appeal").

Each Appellant filed his objection to the summary proceeding and stated the due process grounds for that objection prior to entry of the final order and the July 24th hearing. (A. 5-14, 17-30). Their motions and the NACDL amicus brief were pending before the trial court on July 24th.

In addition to misstating the facts, the prosecution mischaracterizes the Appellants' claim. Appellants have not argued that their motions "were adequate to preserve the procedural bar issue for appeal." Cmmw. Br. 19.[3] The issue preserved is the denial of due process in an improper summary proceeding. (A. 7-9, 12-14, 19-21). Scialdone, Taylor and Jones did ask the trial court to "recognize...specific procedural rights."

This case is distinguishable from *Widdifield v. Commonwealth*, 43 Va. App. 559, 600 S.E.2d 159 (2004), on which the prosecution relies. Cmmw. Br. 20. In *Widdefield*, the trial judge sentenced the defendant to two years, to which his attorney merely stated "I'm not sure that's how it works." That question failed to state an objection together with the grounds therefor. The court was not afforded an opportunity to rule. 43 Va. App. at 562-63, 600 S.E.2d at 161-62. The trial judge in this case was given such opportunity and did, in fact, rule on Appellants' objections and grounds.[4]

---

[3] The Brief of the Commonwealth is referenced as "Cmmw. Br."

[4] The prosecution's speculation about the punishment that Appellants could face in a plenary proceeding shows a gross misunderstanding of the facts, the evidence, and

(A. 277-79).

This case similarly is distinguishable from *Nusbaum v. Berlin*, 273 Va. 385, 405-06, 641 S.E.2d 494, 505-06 (2007), in which the attorney twice disclaimed a desire to have the trial court rule on his objections.[5] The trial court in *Nusbaum* was not afforded an opportunity to rule on the objections, unlike the trial court in this case, who found the objections to the summary proceeding to be without legal merit. (A. 277-79).

The trial judge thought that when she "saw what [she] <u>believed</u> to be unethical conduct...[she] had an obligation to determine <u>if</u> [Appellants] were <u>trying</u> to perpetrate a fraud on the court." (A. 278) (emphasis added). She found, contrary to settled law, that the summary proceeding was proper, that the objections and grounds stated by Scialdone, Taylor and Jones were not persuasive and that there was not a substantial likelihood of prevailing on appeal. (A. 277, 279).

While the Commonwealth acknowledges that the purpose of Rule 5A:18, and Rule 5:25, is "to afford the trial court an opportunity to rule

---

the parties' positions. Cmmw. Br. 20. It is not relevant to the issues before this Court.

[5] On January 12, 2006, the trial court found Nusbaum guilty of contempt. 273 Va. at 396, 641 S.E.2d at 499 At the March 21 and 27, 2006 hearings, Nusbaum sought only to "preserve[] any right of appeal" and disclaimed any desire to have the judge rule on his objections. At the conclusion of the March 27th hearing, the judge entered the final order. *Id.* at 397, 641 S.E.2d at 499-500. Regardless of the application of Rule 1:1 to *Nusbaum*, Scialdone, Taylor and Jones, unlike Nusbaum, asked the trial judge to rule on their due process and summary contempt objections and she did. (A. 7-9, 12-14, 19-21, 277-79). Nusbaum did not ask, and the judge did not rule; that is not this case.

intelligently on the issues presented," it suggests, without any support in the law of this Commonwealth, that the specific objection and grounds required to ask for a mistrial must have been made in this case. Cmmw. Br. 23-24. This Court would have to unconstitutionally rewrite Va. Code § 8.01-384 and overturn long-standing precedent to reach that conclusion.

To ask for a mistrial, a litigant must make it clear to the trial court that "the prejudicial effect of the impropriety [could] not be removed by the instructions of the trial court." *See Lewis v. Commonwealth*, 211 Va. 80, 83, 175 S.E.2d 236, 238 (1970). In *Parker v. Commonwealth*, 14 Va. App. 592, 595-96, 421 S.E.2d 450, 452-53 (1992), the defendant preferred a cautionary instruction and did not state the specific grounds for a mistrial.

Similarly, in *Elliot v. Commonwealth*, 267 Va. 396, 419-21, 593 S.E.2d 270, 284-85 (2004), the defendant called an impeachment witness instead of stating the specific grounds for a mistrial. Having failed to state the specific grounds for a mistrial, Parker and Elliot could not argue, for the first time on appeal, what they did not afford the trial court an opportunity to rule on intelligently.

Scialdone, Taylor and Jones did not lead the trial court to believe that the claimed error was corrected, as by the cautionary instruction in *Parker* or the impeachment witness in *Elliot*. Appellants did not have to state the

specific objection and grounds for a mistrial, contrary to the prosecution's misplaced reliance on *Parker*. Cmmw. Br. 24-25. In this case, as "in most instances[,] simply stating an objection 'without more' [wa]s sufficient to achieve the goal of the 'contemporaneous objection' rule." Cmmw. Br. 24.

This Court need not alter its longstanding precedent on the specific objection and grounds required for a mistrial in order to hold that Scialdone, Taylor and Jones preserved the issues raised in this appeal. The hypothetical posited by the Commonwealth as to mistrials, for that reason, is misguided. Cmmw. Br. 26.

The Commonwealth's hypothetical as to equitable and/or legal remedies sought in a civil lawsuit also has no application here. Cmmw. Br. 27. Va. S.Ct. Rule 3:2(c)(i) on civil actions states that "[i]t shall be sufficient for the complaint to ask for the specific relief sought." The requirements of a civil complaint have no bearing on whether an objection and grounds were stated to preserve an issue for appeal under Rules 5A:18 and 5:25.

The plain and ordinary meaning of Va. Code § 8.01-384(A), similar to these rules, requires a litigant to state the objection and the grounds <u>or</u> the relief sought, but does not require all three. Contrary to this obvious and rational meaning, construed from the four corners of the statute, the Commonwealth suggests that Va. Code § 8.01-384(A) merely eliminated

the requirement that a litigant note his exception to the court's ruling on his objection and the grounds stated therefor. *See Wright v. Commonwealth*, 53 Va. App. 266, 278-79, 670 S.E.2d 772, 778 (2009); Cmmw. Br. 29.

The purpose of this statute was to make it less difficult to preserve an issue for appeal, not more difficult, as would be the effect of the argument offered by the prosecution. As this Court recently held in *Helms v. Manspile*, 277 Va. 1, 7, 671 S.E.2d 127, 130 (2009), Va. Code § 8.01-384(A) is controlling over Rule 5:25. Scialdone, Taylor and Jones were not required by Va. Code § 8.01-384(A) to state the specific relief sought so long as they made their objection and the grounds known, as occurred here, and afforded the trial court an opportunity to rule.

Form should not take precedence over substance. This Court should find that the Appellants, consistent with Rule 5A:18, Rule 5:25, Va. Code § 8.01-384(A), and the case law of this Commonwealth, preserved the issues raised in this appeal.

## II. AN ACCUSED MAY NOT BE SUBJECTED TO SUMMARY CONTEMPT PROCEEDINGS WHEN THE ALLEGED CONTEMPT REQUIRES EVIDENCE AND FURTHER PROOF OF EVENTS NOT IN THE COURT'S PRESENCE.

Despite the settled law of this Commonwealth, the prosecution claims that cases decided by this Court and the Virginia Court of Appeals do not define what constitutes a summary proceeding, and that cases decided by

the United States Supreme Court do not apply in Virginia. Cmmw. Br. 30, 40. The issues raised in this appeal are controlled by existing precedent. The Commonwealth's contention is without merit.

As recently as last year, this Court outlined the distinction between summary and plenary contempt proceedings in *Gilman v. Commonwealth*, 275 Va. 222, 657 S.E.2d 474 (2008). In *Gilman*, this Court recited the long-standing precedent that:

> A contempt of court may be direct or indirect. Generally, a direct contempt is one committed in the presence of the court. *See* [*International Union v.*] *Bagwell*, 512 U.S. [821,] 832 [(1994)]; *Davis v. Commonwealth*, 219 Va. 395, 397, 247 S.E.2d 681, 682 (1978); *Burdett v. Commonwealth*, 103 Va. 838, 845-46, 48 S.E. 878, 880-81 (1904). An indirect or constructive contempt is one that has occurred outside the presence of the court. *See Bagwell*, 512 U.S. at 833; *Davis*, 219 Va. at 397-98; *Burdett*, 103 Va. at 845-46, 48 S.E. at 880-81.
>
> ...
>
> A petty, direct contempt may be subject to summary adjudication. *Bagwell*, 512 U.S. at 832; *Cooke v. United States*, 267 U.S. 517, 534 (1925); *see Higginbotham v. Commonwealth*, 206 Va. 291, 294, 142 S.E.2d 746, 749 (1965); Code § 18.2-456. In a summary adjudication, no evidence or further proof is required because the court has observed the offense. *Cooke*, 267 U.S. at 534; *see Fisher v. Pace*, 336 U.S. 155, 159-60 (1949); *In re Chaplain*, 621 F.2d 1272, 1275 (4th Cir. 1980).

*Gilman*, 275 Va. at 227-28, 657 S.E.2d at 476.

When "no evidence or further proof is required" because the direct contempt was "committed in the presence of the court," the court may use a summary proceeding. In this case, the trial judge required evidence and

further proof, which she collected in the form of witness testimony and exhibits created at her direction and under the supervision of her deputy. The use of a summary proceeding was unconstitutional.

The trial judge made clear on July 14, 2006, the first time that she announced who she found had done what, that she required evidence and further proof of conduct that occurred outside of her presence. She said that when she "saw what [she] believed to be unethical conduct...[she] had an obligation to determine if [Appellants] were trying to perpetrate a fraud on the court." (A. 278) (emphasis added). She could not decide whether the conduct was contemptuous absent the three and one-half hour trial.

As to Jones specifically, the trial judge admitted during the course of that lengthy trial that: "I kept going, What name is this? I couldn't figure out what it was until it was shown to me what it says." (A. 195) (emphasis added). Evidence and further proof was required. The prosecution ignores the admissions made by the trial judge, such as these, to argue without any support in the record that the alleged contempt occurred in the presence of the court. Cmmw. Br. 31. It did not.

The Commonwealth further contorts the record to suggest that the "lengthy hearing," at which Scialdone, Taylor and Jones had no notice that they were on trial or what statute was at issue, was their opportunity to be

heard in mitigation. Cmmw. Br. 32-33. The prosecution does not dispute that the Appellants received no notice, but instead argues that the exhibits and testimony upon which the trial judge based her contempt finding, which she announced on July 14th, were merely mitigation.[6] (A. 278). That contention is not supported by the record.

The notion suggested by the prosecution that the "efficiency" of the three and one-half hour trial is at issue in this appeal also is a misnomer. Cmmw. Br. 36. In *Pounders v. Watson*, 521 U.S. 982 (1997), on which the prosecution relies, the Court held that:

> the summary contempt exception to the normal due process requirements, such as a hearing, counsel, and the opportunity to call witnesses, "includes only charges of misconduct, in open court, in the presence of the judge, which disturbs the court's business, where all of the essential elements of the misconduct are under the eye of the court, are actually observed by the court, and where immediate punishment is essential to prevent 'demoralization of the court's authority' before the public."

*Id.* at 988 (citing *In re Oliver*, 333 U.S. 257, 275 (1948)). There can be no need for immediate punishment to prevent the demoralization of the court's authority when the court herself requires evidence and further proof, as by the testimony of witnesses summoned to court and the creation of exhibits,

---

[6] The Commonwealth's continued resort to the case law of other state courts is misguided. Cmmw. Br. 34-36. The precedent of Virginia courts, as well as that of the United States Supreme Court, which has been applied by Virginia courts, is dispositive. This Court should not look to the law of a foreign state, as the prosecution suggests, when binding Virginia law applies.

produced at her direction, to decide whether a contempt occurred and if so by whom.[7]

The full panel of the Court of Appeals found that Scialdone, Taylor and Jones were entitled to the due process protections of a plenary contempt proceeding, and the en banc Court of Appeals did not disagree. (A. 74-76L, 76Q-76S, 86-96). This Court should find that the use of a summary proceeding in a case of an alleged indirect contempt, as occurred here, was unconstitutional.

This Court should find that Scialdone, Taylor and Jones were entitled to due process, including notice of the charge, the right to counsel, the right to be present during trial, the right to confront witnesses against them, and the right to prepare and present a defense. The Appellants were denied these rights. (A. 74-76L).

## CONCLUSION

This Court should reverse the erroneous 5-4 decision of the en banc Court of Appeals.

---

[7] The Commonwealth's claim that "the court here was immediately aware of the presentation of the fraudulent document and the disrespectful comment," is disingenuous. Cmmw. Br. 37. The trial judge admitted that she thought it was her duty to "determine if [Appellants] were trying to perpetrate a fraud on the court," and that, as to the screenname, she "couldn't figure out what it was until it was shown to [her] what it says." (A. 195, 278) (emphasis added).

Respectfully submitted,

CLAUDE M. SCIALDONE
BARRY R. TAYLOR
EDWARD S. JONES
By Counsel

MARVIN D. MILLER
V.S.B. No. 1101
Law Office of Marvin D. Miller
1203 Duke Street
Alexandria, VA 22314
Phone: (703) 548-5000
Facsimile: (703) 739-0179

## CERTIFICATE OF SERVICE

I hereby certify pursuant to Rule 5:26(d) that fifteen copies of the foregoing Consolidated Reply Brief of Appellants were filed in the Office of the Clerk of the Supreme Court of Virginia and that three copies of the foregoing were mailed, first class, postage prepaid to Donald E. Jeffrey, III, S.A.A.G., and Gregory W. Franklin, A.A.G., Office of the Attorney General, 900 East Main Street, Richmond, Virginia 23219, Phone: (804)736-2071 on this 17th day of August, 2009.

I hereby certify that an electronic copy of the foregoing Consolidated Reply Brief of Appellants was in PDF format on CD on the same date to the Office of the Clerk of the Supreme Court of Virginia.

Counsel for the appellants respectfully requests oral argument on the issues presented in this appeal.

MARVIN D. MILLER
V.S.B. No. 1101
Law Office of Marvin D. Miller
1203 Duke Street
Alexandria, VA 22314
Phone: (703) 548-5000
Facsimile: (703) 739-0179