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NUCLEAR REGULATORY COMMISSION

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Docket Number: IA-05-052

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1 UNITED STATES OF AMERICA

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3 NUCLEAR REGULATORY COMMISSION

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5 ATOMIC SAFETY LICENSING BOARD PANEL

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7 -----:

8 In the Matter of :

9 DAVID GEISEN : Docket No.

10 ENFORCEMENT PROCEEDING : IA-05-052

11 JOINT STATUS CONFERENCE :

12 -----:

13
14 Wednesday,

15 October 25, 2006

16 via Teleconference

17
18 The teleconference came to order, pursuant
19 to notice, at 11:05 a.m.

20
21 BEFORE:

22 JUDGE MICHAEL C. FARRAR

23 JUDGE E. ROY HAWKENS

24 JUDGE NICHOLAS G. TRIKOUROS

25
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JUDGE FARRAR: Let's go on the record. We're starting the conference call in the Geisen proceeding on Wednesday, October 25th, just a little late because there was some confusion over the pass code.

This is Mike Farrar. I'm the chairman of the board. I'm here at NRC headquarters with my brother judges, Roy Hawkens and Nick Trikouros, and our law clerk, Meg Parrish.

For Mr. Geisen, whom do we have?

MR. HIBEY: Richard Hibey, Charles McAleer, Andrew Wise. Good morning, Your Honors.

JUDGE FARRAR: Okay. Thank you.

And for the staff?

MS. CLARK: Lisa Clark, Brett Cluken, Mary Baty and Michael Spencer.

JUDGE FARRAR: All right. Thank you all.

Before we get started into NRC business, I think October 20th was the date for filing motions in the Federal District Court criminal case.

Did that, in fact, happen?

MR. HIBEY: It did for the Defendant, Geisen.

JUDGE FARRAR: Okay. Is there any benefit

1 to us from knowing what those motions dealt with,
2 either just by their captions, or by seeing them? Or
3 would you rather we not see them?

4 MR. HIBEY: No. There's no problem in
5 disclosing, and if, for some reason, you have an
6 interest in reading them, no problem there either,
7 Your Honor. We filed a motion to sever from Mr.
8 Siemaszko. We filed a motion to dismiss counts on
9 grounds of multiplicity, multiplicitousness.

10 JUDGE FARRAR: Right.

11 MR. HIBEY: And we filed a motion to
12 compel the production of documents, and the parties
13 agreed that we could file out of time because the
14 issue hadn't ripened up until the deadline, a motion
15 for a bill of particulars, and we intend to be filing
16 that motion on Monday.

17 JUDGE FARRAR: Okay. All right.

18 If it's not a huge inconvenience, can you
19 just not file them formally, but just e-mail them to
20 the board?

21 MR. HIBEY: We will do that.

22 JUDGE FARRAR: Is that all right with the
23 staff? Any problem with that?

24 MS. CLARK: Oh, not at all.

25 JUDGE FARRAR: Okay. You know, they might

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1 help us with the handling of our side of the case, if
2 we know what's going on there.

3 When is the time for the Government to
4 reply?

5 MR. HIBEY: Frankly, I'm not sure. I
6 thought that when we set the time, we had agreed to a
7 time for the Government within which to respond.
8 However, when we looked at the order of the magistrate
9 judge, there was no such provision. So the
10 Government's either got ten days, or they may advise
11 us if they have more than that, in which case we'll be
12 accommodating in that regard.

13 JUDGE FARRAR: All right.

14 Ms. Clark, assuming you're working closely
15 with the Department of Justice, would you just send us
16 an e-mail, with a copy to Mr. Hibey, when you learn
17 what that date is.

18 MS. CLARK: Certainly. I actually spoke
19 with the Department of Justice about this yesterday,
20 and as of yesterday, they said they were looking into
21 what their response date would be. But they expected
22 it would be approximately ten to fourteen days.

23 JUDGE FARRAR: Okay; fine.

24 Then why don't you, after they--it doesn't
25 have to be contemporaneously--but after they get those

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1 papers filed, just e-mail them to us, the same as Mr.
2 Hibey's going to do.

3 MS. CLARK: Very well.

4 JUDGE FARRAR: Okay. All right.

5 Two questions. The reason why we
6 suggested, and we're glad you took our suggestion that
7 a conference call might be appropriate, is to find out
8 where you are on discovery and where the staff might
9 be on a possible stay motion.

10 So who wants to talk about the discovery
11 situation?

12 MR. McALEER: Well, Your Honor--this is
13 Charles McAleer--with respect to issues that we may
14 have regarding staff's discovery responses and
15 document production, I spoke yesterday with Ms. Clark.
16 We've been somewhat distracted by the stay motion,
17 issue, that the board will be discussing next, and
18 I've asked Ms. Clark, in order to allow for a full
19 discussion of those issues, and hopefully, an ability
20 to resolve them between counsel, if the staff would
21 consent to an extension of the time period for the
22 filing of any discovery-related motions by Mr. Geisen,
23 until November 10th, so that we could make a request
24 to the board.

25 And Ms. Clark, yesterday, indicated that

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1 that would be acceptable to her. We're certainly
2 willing to extend that same consent to staff, if they
3 wish to do so, and if they feel that further
4 discussions on their issues concerning Mr. Geisen's
5 discovery responses might be productive.

6 JUDGE FARRAR: And just to make clear,
7 there are issues going both ways, as I understand it?

8 MR. McALEER: Yes, sir, and I'm trying to
9 detail those in kind of summary written fashion for
10 staff, to make it easier to work through them, and I
11 would respectfully submit that, you know, a dialogue
12 between staff and us on that might be productive, and
13 I would certainly not want to submit a motion until
14 those discussions have run their course.

15 So we will be submitting to the board, if
16 the board wishes, a motion to extend that deadline
17 from this Friday to November 10th.

18 JUDGE FARRAR: All right. I'll put it on
19 one page--oh. Ms. Clark, I take it that would be
20 acceptable to you, that both sides have till November
21 10th?

22 MS. CLARK: Yes.

23 JUDGE FARRAR: Okay.

24 Then Mr. McAleer, why don't you, you know,
25 make it a one-pager, and without a whole lot of

1 reasons, just say, as was discussed with the board
2 during the, you know, conference call, and we will,
3 figuratively and literally, rubber stamp it, and
4 you'll be set.

5 MR. MCALEER: Thank you very much, Your
6 Honor. I will certainly do so.

7 JUDGE FARRAR: Okay. The second thing is
8 the stay motion and Ms. Clark, is that dependent on
9 the outcome of the discovery motions, or is that
10 independent--is it independent or dependent on the
11 outcome of the discovery motions?

12 MS. CLARK: Our motion is independent of
13 any outstanding discovery motions. So we are prepared
14 to file that on Friday.

15 JUDGE FARRAR: Okay. Two days from now.
16 The 27th.

17 MS. CLARK: Yes.

18 JUDGE FARRAR: Okay. I guess we didn't
19 know you'd be so far along, because we had some
20 thoughts on things. We wanted to make sure, when we
21 saw that each side was going to file 25 pages, we
22 wanted to make sure that the briefs were, you know,
23 most helpful to us, and if it's all right, we'd like
24 to share with you just some thoughts we had about
25 topics that needed to be covered in such a motion, and

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1 the reply.

2 The first thing is, we wouldn't want you
3 to spend a lot of time saying that even though you
4 lost the earlier stay motion, it's okay to file
5 another one, because I think the printed volume, page
6 561 of the May reports, we, in fact, tried to make
7 that very clear, that that was a denial of the stay
8 motion in those circumstances and that both parties
9 might find themselves faced with different
10 circumstances in the future, and would be free to file
11 a further stay motion.

12 I think footnote 127, the end of it, says
13 the same thing. So I think neither side should spend
14 a lot of time arguing whether this is a procedurally
15 legitimate motion. Our belief is it is. If somebody
16 wants to say it isn't, fine; but that's not what we
17 thought we'd be faced with.

18 Second, our preliminary view is we don't
19 see the case as just as simple as the staff saying,
20 okay, Mr. Hibey claimed the Fifth Amendment privilege
21 in discovery and so that entitles us to a stay. It
22 seems to me there's a response that the staff might
23 want to anticipate, which is both--first, before I go
24 into this, Mr. McAleer, Mr. Hibey, are you going to
25 oppose a stay motion?

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1 MR. HIBEY: Absolutely, Your Honor.
2 JUDGE FARRAR: Okay. We assumed that.
3 Then, it seems to me, Ms. Clark, they're
4 going to have an argument, that look, you brought the
5 case, it's your burden of proof, the penalty is
6 running, let's go to hearing. If he doesn't testify,
7 you're free to ask us to draw, which we are allowed to
8 do but don't have to do, to draw a negative inference
9 from him not testifying, at which point it seems to me
10 that staff has a response that not only--well, here's
11 what we want to address.

12 Not only is there room for a negative
13 inference, but is he allowed to file any testimony on
14 matters where he did not comply with your discovery
15 request?

16 So we wanted to make sure that it didn't
17 take four iterations of briefs for both sides to
18 address these issues. That it's an interesting point.
19 I don't think any of us have ever dealt with it. I
20 don't know if there are any Commission precedents.
21 But we wanted to make sure that if you're going to
22 devote 25 pages to briefs, that all these issues be
23 considered, rather than us have to call for
24 supplemental briefs.

25 So Ms. Clark, are those things that you

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1 can work into your brief by Friday? Or would you like
2 some more time to reshape it?

3 MS. CLARK: Well, first of all, I thank
4 you for giving us that advice, it's very helpful to--

5 JUDGE FARRAR: And it's things that came
6 to our mind. It's nothing we're committed to, we
7 don't know the answer, but we know if this were an
8 oral argument, we'd be asking those questions. So you
9 might as well address them. Go ahead.

10 MS. CLARK: Well, I can tell you that I
11 believe that these are all addressed as we have
12 drafted our filing.

13 JUDGE FARRAR: Okay.

14 MS. CLARK: So I think that we would have
15 no trouble incorporating all of these matters by
16 Friday.

17 JUDGE FARRAR: All right. Then we would
18 like to have you do that. If, in fact, it turns out
19 that you need, you know, till middle of next week or
20 something, just file, you know, a very brief motion,
21 and don't worry about the three days ahead of time.

22 You know, file it on Friday, that you're
23 not quite finished and you'll need till, you know,
24 next week, and assume that we will, you know, we will
25 grant that motion.

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1 And then Mr. Hibey, Mr. McAleer, how much
2 time, after you get this motion, will you need to
3 respond?

4 MR. HIBEY: We're prepared to respond by
5 Wednesday.

6 JUDGE FARRAR: You mean three days after
7 you get the brief? If the staff files Friday, you'll
8 respond by Wednesday?

9 MR. HIBEY: Yes, Your Honor.

10 JUDGE FARRAR: Well, good for you. That's
11 not the answer we expected but we're delighted to hear
12 it.

13 Well, why don't we do this, just in case
14 that doesn't happen as part of this conference. We
15 will give you up to a week after the filing of the
16 staff brief for you to file your response, and again,
17 if for some reason that proves insufficient, file a
18 one-page motion with us, even as late as the due date,
19 saying that, you know, you need two more days, or
20 whatever.

21 MR. HIBEY: We're grateful. Thank you.

22 JUDGE FARRAR: Okay. Thank you.

23 Well, that's very helpful. Meanwhile--

24 MR. HIBEY: May I inquire--

25 JUDGE FARRAR: Well, I was just going to

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1 say that both sides were gracious enough not to ask
2 where the motion to compel ruling is.

3 MR. HIBEY: No. I wouldn't do that.
4 It'll come when it comes.

5 JUDGE FARRAR: Well, it's very close, and
6 we'd like to say the same three days you just said.
7 And that might not be far off. I would think by--
8 we're hoping early next week, but certainly, by the
9 end of next week, you would have it.

10 MR. HIBEY: No. My question goes to the
11 motion that we're talking about.

12 JUDGE FARRAR: Okay. Go ahead.

13 MR. HIBEY: Do I understand, under your
14 rules, there's no reply brief?

15 JUDGE FARRAR: That's under the rules; but
16 you are allowed to seek permission to file a reply.
17 I would--

18 MR. HIBEY: Well, before you answer that,
19 may I ask another question?

20 JUDGE FARRAR: Certainly.

21 MR. HIBEY: That is, do you intend to take
22 oral argument, Your Honor?

23 JUDGE FARRAR: That always depends on--it
24 was partly in an effort to avoid that, that we wanted
25 to tell you, you know, here's what we're thinking,

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1 make sure you address these points. If you address
2 those points, then, you know, there's less need for
3 oral argument than there might be.

4 We sometimes go into a motion saying, you
5 know, there's going to have to be oral argument on
6 this, no matter what the briefs say, cause it's new
7 and complicated enough. This one, if the briefs
8 address all these issues, we could do it without
9 argument, but--

10 MR. HIBEY: Well, may I respectfully
11 request--

12 JUDGE FARRAR: Yes, sir.

13 MR. HIBEY: --that if the court determines
14 that it will take a reply brief from the staff on this
15 motion--

16 JUDGE FARRAR: Right.

17 MR. HIBEY: --that the court consider
18 granting a hearing. On the other hand, if the court
19 does not receive a request to file a reply brief, then
20 perhaps submission on the papers would be sufficient
21 and we will not ask for a hearing.

22 JUDGE FARRAR: Okay. Why don't we do
23 this. After your brief is in--well, let's see.

24 Staff, Mr. Hibey has laid down a--well,
25 you both have. I'm surprised you're ready by Friday.

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1 I'm surprised he's ready three days later.

2 If you do a reply brief when you file a
3 motion, point to something, you know, new, that you
4 could not have anticipated, either from our questions
5 today or from something in his brief, that you could
6 not have anticipated, and tell us how long a brief you
7 want to file and in what timeframe.

8 If he's going to do three days, I'm afraid
9 you're going to have to do pretty fast yourself.

10 And then Mr. Hibey, I would say we'll give
11 you 24 hours--if Ms. Clark does not get your
12 concurrence to that motion, then we'll give you, you
13 know, a day or two to file a response saying why they
14 shouldn't file a reply brief. We'll give you a quick
15 ruling and at that point you can renew your
16 suggestion--

17 MR. HIBEY: Yes. I mean, I can anticipate
18 what our position is in that regard. I don't want it
19 to stand in the way of the court receiving, the panel
20 receiving any briefing that it feels it desires. It's
21 just that I feel very strongly about this motion, very
22 strongly, and if, indeed, there is going to be a reply
23 brief, then I want to be heard. That's basically it.

24 JUDGE FARRAR: Well, there are two ways to
25 do that, and again, this was one of the reasons we

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1 raised these questions today, because we didn't want
2 to end up with, you know, back and forth with
3 surreplies and surrebuttals.

4 After they file a reply, why don't you
5 tell us whether you still want oral argument, or
6 whether you want to file a very brief response of your
7 own.

8 MR. HIBEY: Very well, Your Honor.

9 JUDGE FARRAR: You know, your choice.

10 But, you know, we usually favor oral
11 arguments in the sense of that's the way to really
12 probe things, plus we don't get out a whole lot, so--
13 that was facetious.

14 MR. HIBEY: We're available for any
15 excursion you wish to take.

16 JUDGE FARRAR: Okay.

17 Well, it looks like we could get this, one
18 way or another, under submission, well before
19 Thanksgiving. We do have some travel over that long
20 Veteran's Day weekend.

21 So depending on how fast all these things
22 come in--let's see, if the staff does in fact file
23 Friday and you file on November 1st, and the staff did
24 a reply by that Friday or Monday, the 3rd or 6th, we
25 could--no. Well, we could have argument on the 7th,

1 if that didn't interfere with anybody getting to the
2 polls. Or we could do it on the 15th.

3 MR. HIBEY: We're prepared to do it on the
4 7th.

5 JUDGE FARRAR: Ms. Clark, can you do that?

6 MS. CLARK: Yes. That's fine with the
7 staff.

8 JUDGE FARRAR: That would be such a fine
9 birthday present for me, to see all of you.

10 MR. HIBEY: We'll bring a cake.

11 JUDGE FARRAR: And cast my ballot.

12 All right. Then let's target--hold on a
13 second. Let me check with my colleagues to make sure
14 they're available then.

15 [Pause]

16 JUDGE FARRAR: All right. It turns out
17 all three of us are here that day. We could do an
18 oral argument in the afternoon. That assumes all the
19 briefs get in on the very accelerated schedule that
20 we're in. if anybody runs into problems that delays
21 it, then we would push it back to the middle of the
22 week of the 13th, which is the week before
23 Thanksgiving.

24 Let's tentatively say 1:00 o'clock on
25 November 7th for argument, if we get to that point,

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1 which could be either cause the staff files a reply
2 and Mr. Geisen wants the argument, or there's just two
3 briefs but we see something in it where we decide we
4 need argument.

5 MR. HIBEY: Your Honor, may I inquire
6 whether it would be accommodating to the court, if we
7 could do it at 2:30 on that day?

8 JUDGE FARRAR: Hold on.

9 [Pause]

10 JUDGE FARRAR: You said 2:30?

11 MR. HIBEY: Please.

12 JUDGE FARRAR: Yes. That's fine.

13 MR. HIBEY: Thank you, Your Honor.

14 JUDGE FARRAR: Is that okay with the
15 staff?

16 MS. CLARK: Yes, Your Honor.

17 JUDGE FARRAR: Okay. 2:30. And while
18 some of our arguments run longer than we anticipate,
19 I would assume with the briefs we have, and the fact
20 that we did the prior stay motion, this will be a
21 fairly focused, fairly tight argument. So I would
22 think an hour, hour and a half, max, would take care
23 of it.

24 MR. HIBEY: Yes.

25 JUDGE FARRAR: All right. Then we'll

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1 tentatively set argument, if we need it, if either of
2 the parties ask for it, or if we think we need it,
3 it'll be 2:30 in the afternoon of Tuesday, November
4 7th, for, say, an hour and a half maximum, and the
5 briefs will come in on the schedule, the very tight
6 schedule you all suggested, or some slight slippage
7 thereof, depending on where circumstances are.

8 Anything else we need to discuss?

9 MR. HIBEY: No, Your Honor.

10 JUDGE FARRAR: Okay. So we've talked
11 about getting the motions in the criminal case to us,
12 the consent motion for the November 10th discovery
13 matters, and again, I appreciate the efforts you all
14 are making to work those out among yourselves, and now
15 the stay motion.

16 So is there anything else, Ms. Clark?

17 MS. CLARK: Not from the staff.

18 JUDGE FARRAR: And Mr. Hibey?

19 MR. HIBEY: No, Your Honor.

20 JUDGE FARRAR: Well, we appreciate you all
21 taking the time, sorry for the confusion at the
22 beginning, but I think this was useful in setting the
23 direction of the case and moving it along.

24 So we will wait to hear from you, in
25 writing, and perhaps orally. Thank you. We'll recess

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1 the call.

2 MR. HIBEY: Thank you, Your Honor.

3 MS. CLARK: Thank you.

4 [Whereupon, at 11:36 a.m., the
5 teleconference was adjourned]

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Name of Proceeding: Conference

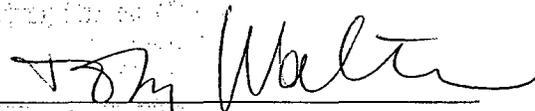
In the Matter of

David Geisen

Docket Number: IA-05-052

Location: via teleconference

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission taken by me and, thereafter reduced to typewriting by me or under the direction of the court reporting company, and that the transcript is a true and accurate record of the foregoing proceedings.



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