No. 08-205

In The

Supreme Court of the United States

CITIZENS UNITED,

Appellant,

v.

FEDERAL ELECTION COMMISSION,

Appellee.

On Appeal From The United States District Court For The District Of Columbia

BRIEF OF *AMICI CURIAE* THE WYOMING LIBERTY GROUP AND THE GOLDWATER INSTITUTE SCHARF-NORTON CENTER FOR CONSTITUTIONAL LITIGATION IN SUPPORT OF APPELLANT ON SUPPLEMENTAL QUESTION

BENJAMIN BARR
Counsel of Record
GOVERNMENT WATCH, P.C.
619 Pickford Place N.E.
Washington, DC 20002
(240) 863-8280

COCKLE LAW BRIEF PRINTING CO. (800) 225-6964
OR CALL COLLECT (402) 342-2831

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Page

CASES

TABLE OF AUTHORITIES – Continued

TABLE OF AUTHORITIES – Continued

TABLE OF AUTHORITIES – Continued

Page

TABLE OF AUTHORITIES – Continued

Page

INTEREST OF *AMICI CURIAE*[1]

The Wyoming Liberty Group believes that the great strength of Wyoming rests in the ambition and entrepreneurialism of ordinary citizens. While limited government is conducive to freedom, unchecked government promotes the suppression of individual liberty. In a state where the people are sovereign, the Group's mission is to provide research and education supportive of the founding principles of free societies. Its mission is to facilitate the practical exercise of liberty in Wyoming through public policy options that are faithful to protecting property rights, individual liberty, privacy, federalism, free markets, and decentralized decision-making. The Wyoming Liberty Group promotes the enhancement of liberty to foster a thriving, vigorous, and prosperous civil society, true to Wyoming's founding vision. The issues presented in this case are of interest to the Wyoming Liberty Group because they involve the fundamental, and threatened, right of citizens to freely participate and share their point of view in the electoral and political process.

The Scharf-Norton Center for Constitutional Litigation is part of the Goldwater Institute, which is a tax exempt educational foundation under section

---

[1] This brief is filed with the written consent of all parties. No counsel for any party authored this brief in whole or in part, nor did any person or entity, other than *Amici* or their counsel, make a monetary contribution to the preparation or submission of this brief.

501I(3) of the Internal Revenue Code. The Goldwater Institute advances public policies that further the principles of limited government, economic freedom and individual responsibility. The integrated mission of the Scharf-Norton Center for Constitutional Litigation is to preserve individual liberty by enforcing the features of our state and federal constitutions that directly and structurally protect individual rights, including the bill of rights, the doctrine of separation of powers and federalism. To ensure its independence, the Goldwater Institute neither seeks nor accepts government funds, and no single contributor has provided more than five percent of its annual revenue on an ongoing basis.

SUMMARY OF ARGUMENT

1. This Court cannot entrust administrative agencies to fairly supervise and regulate the political speech of our citizens.

2. This Court's historical dedication to balancing tests assures inconsistent, regulation-friendly results.

3. Were this Court to return to the simple command of the First Amendment, it would assure that all speakers, regardless of ideological conviction, would receive the protection promised to them under the First Amendment.

ARGUMENT

This brief concerns the silencing of political dissent in the United States through provisions of the Federal Election Campaign Act ("FECA"), 2 U.S.C. § 431 *et seq*., and the Bipartisan Campaign Reform Act ("BCRA"), 2 U.S.C. § 431b(b)(2) and (c). While enjoying a new statutory label today (electioneering communications ban), the drive to cleanse our national political debate of "impure" speech remains constant, and cherished liberties threatened. The Wyoming Liberty Group and the Goldwater Institute fully recommend that this Court reverse its key holdings in *Austin v. Michigan State Chamber of Commerce*, 494 U.S. 652 (1990) and *McConnell v. FEC*, 540 U.S. 93 (2003), such that strict, objective protection for political expression will once again carry the day.

The First Amendment struggles to survive its harshest night. In a Republic where the people are sovereign, the prolonged dismantlement of free speech remains a curiously persistent inclination of America's ruling elite. From the start of this nation, Federalists quelled government criticism with the Sedition Act of 1798 that openly claimed its purpose as smothering the "unbridled spirit of opposition to government." Geoffrey R. Stone, PERILOUS TIMES: FREE SPEECH IN WARTIME FROM THE SEDITION ACT OF 1798 TO THE WAR ON TERRORISM (2004). Our national commitment to respecting the unbridled spirit of dissent remains extant, if somewhat battered. Viva our unbridled spirit of dissent.

This Court's unwieldy number of balancing tests decide whether speech, as the dated First Amendment states, will not be infringed, or whether the beckoning howl of egalitarianism, oft-fabricated fears about the appearance of corruption, or anxiety over the "distorting" effects of speech are sufficient to eliminate that guarantee. *See* Cass Sunstein, *The Future of Free Speech*, The Little Magazine (2001) (explaining that "a well-functioning system of free expression" requires that "people should be exposed to materials that they would not have chosen in advance"), James Bopp Jr., *Silencing Debate*, National Review Online, April 24, 2007, Stephen Breyer, ACTIVE LIBERTY, 46 (2005) (arguing that the First Amendment seeks to "facilitate a conversation among ordinary citizens that will encourage their informed participation on the electoral process"). These tests remain plum intellectual exercises – affording the speech-cleansing class their own bully pulpit to sermonize about the virtues of pleasant speech. As this Court elongates its free speech formulas, citizens of average means are stripped of their ability to speak, being financially unable to hire boutique election law attorneys just so they might participate in the electoral process and speak. *See, e.g., Committee to Elect Sekhon for Congress and Daljit Kaur Sekhon*, MUR 5957 (SOR's F.E.C. June 2 and 24, 2009) (demonstrating the FEC's real debate about whether it would be appropriate to severely penalize a first time, inexperienced candidate for failure to file paperwork with the Commission correctly).

Some justices of this Court may be aggravated with the FEC when they establish speech rules that leave citizens confused and unable to speak easily. Members of this august bench have flung about weighty Rorschach tests for some time, asking whether speech could be banned because of self-styled "compelling" justifications, *FEC v. Massachusetts Citizens for Life*, 479 U.S. 238 (1986), 252 (1986), or upholding "significant interferences" of speech due to "sufficiently important interests," *Nixon v. Shrink Missouri Government PAC*, 528 U.S. 377 (2000), and examining when "empirical information" might compel rationing speech for citizens' best interests, *id*. (Breyer, J., concurring).

The hour grows late for this Court to end its compulsion to promulgate obscure and liberty-depriving constitutional standards. Should this Court fail to offer citizens a proper remedy, the Constitution proves futile. "The Republic endures and this [Court] is the symbol of its faith." Chief Justice Charles Evans Hughes, Cornerstone Address, United States Supreme Court Building (1932). This Court may continue to balance and weigh, fiddling collectively while the Republic burns, or boldly reclaim its place as a guarantor of our rights.

I. Historic Truths: The Powerful Few Forever Seek to Silence Dissent

Since the enactment of the Tillman Act in 1907, Americans have witnessed the progressive decay of

their security to speak their minds freely about contested political controversies. 34 Stat. 864 (1907). Americans have not always been cognizant of their eroding liberties. Popular patriotism abounds and the ever-sensible Federal Election Commission finds itself charitable enough to deem some forms of political opposition "permissible." Viva the spirit of moderated dissent.

It was the British Crown who first developed an effective prototype of the FEC's electioneering communications ban. English licensing laws outlawed the publication of seditious writings – communications that expressed a harmful opinion about public officials. Robert Allen Rutland, THE BIRTH OF THE BILL OF RIGHTS, 1776-1791 (1983). Within this scheme, the Archbishop of Canterbury held the power to decide whether writings would be licensed. Speech favorable was, in today's vernacular, deemed a "permissible electioneering communication."

John Lilburne, the famed Puritanical dissenter, spent considerable time incarcerated for a simple crime – political activism. Luke Owen Pike, HISTORY OF CRIME IN ENGLAND, VOL. II (1876). Lilburne directed the Levellers, which produced controversial political pamphlets and provided for their distribution. Today, Lilburne and his experiences before the Star Chamber are widely credited with the development of many taken-for-granted constitutional protections.

After deciding to distribute impermissible electioneering communications, the Crown arrested Lilburne for his import of "scandalous" books. Roger Foster, COMMENTARIES ON THE CONSTITUTION OF THE UNITED STATES (1896). The Star Chamber fined him some 500 pounds along with an order of pillory. With shoulders that "swelled almost as big as a penny loafe," Lilburne was lashed, gagged until bled, and sent to Fleet Prison. T.B. Howell, A COMPLETE COLLECTION OF STATE TRIALS AND PROCEEDINGS FOR HIGH TREASON AND OTHER CRIMES AND MISDEMEANORS, VOL. III (1816). Lilburne would find the remainder of his life plagued by insistent interference with his opinions, all because he dared criticize public officeholders.

The unfortunate lessons of history have not proved themselves an effective vaccine against mankind's dark temptations to stifle speech. After early experiences with the federal Sedition Act of 1798, countless other government bodies worked tirelessly to purify the political process. During World War I, the Montana legislature passed its own Sedition Act in 1918, punishing speech critical of the government that was disloyal, scurrilous, or abusive. *See, e.g., Ex parte Starr*, 263 Fed. 145 (1920); *State v. Wyman*, 56 Mont. 600 (1919); *State v. Smith*, 57 Mont. 563 (1920). Most of the punished speech criticized war efforts and military operations. For example, a traveling salesman received a sentence of 7.5 to 20 years for describing wartime food restrictions as a "joke." *See* Montana Sedition Project, University of Montana

School of Journalism. Other convictions were premised on citizens stating that the United States had "no business being there." *Id.*

More recently, after reform candidates lost in Iran, officeholders grew tired of their subjects' chorus of dissent. From the perspective of Iran's governing class, dissent found its home in the breeding grounds of scandalous ideas, and played no favorable role in electoral debate. The governing elite of Iran did an apt job defending their shutdown of debate, reasoning that it amounted to "psychological warfare." British Broadcasting Company, *Ahmadinejad re-election sparks Iran clashes* (June 13, 2009). Regardless of time or place, the governing elite will find inventive causes to demonstrate that dissenting opinions are not the stuff citizens should be trusted with. Fortunately, Americans have a clear remedy against such poppycock.

Incumbent officeholders, whether in Lilburne's England or here in the U.S., are not largely known for their well-tolerated acceptance of public criticism. Understandably, those who seek to stomp out speech never label their efforts as such. Labels matter. From the governing posts of the powerful few, cautionary edicts flow, explaining government's noble duty to protect citizens from ideas deemed injurious. Dangerous ideas can amount to just about anything – from anti-papist pamphlets, to Iranian political protests, to films critical of presidential candidates. Wherever in the world the frenzied drive to cleanse public debate of improper ideas thrives, there is also

the toxic seed of paternalism, and paternalism gives way to the death of civil liberties.

Citizens in the U.S. are privileged to live in a nation where government-sponsored clubbings, shootings, and midnight raids are not the norm. But they remain unfortunate to face the steady decline of protection for the First Amendment. For more than thirty years, the FEC has micromanaged how citizens may associate, what they may say, when they may say it, and how they must communicate their message, if such a message is fortunate enough to be deemed "permissible." Were it bad enough that citizens in a free republic found their speech micromanaged by a federal agency, the fact that this Commission applies its regulations haphazardly makes the need for clear instruction and remedy from this Court even more apparent. *See, e.g.,* Supplemental Explanation and Justification for Political Committee Status, 72 Fed. Reg. 5595 (F.E.C. Feb. 7, 2007) (detailing comprehensive rules for triggering political committee status), *cf.* Advisory Opinion Request 2009-13 and accompanying documents, Black Rock Group (F.E.C. May 27, 2009) (illustrating the Commission's inability to agree upon what triggered political committee status – even with years of detailed rulemaking efforts); Explanation and Justification for Definitions of "Solicit" and "Direct," 72 Fed. Reg. 13926 (F.E.C. March 20, 2006); Revised Explanation and Justification for Candidate Solicitation at State, District, and Local Party Fundraising Events, 70 Fed. Reg. 37649 (F.E.C. June 30, 2005), *cf.* In the

Matter of Senator John McCain, Statement of Reasons (SOR) Hans A. von Spakovsky, MUR 5712 (F.E.C. March 2, 2007) (detailing the Commission's head-over-heels, inconsistent approach to interpreting solicitation restrictions); Explanation and Justification for Electioneering Communications, 70 Fed. Reg. 75713 (F.E.C. Dec. 21, 2005); Notice of Proposed Rulemaking, Electioneering Communications, 72 Fed. Reg. 50261 (F.E.C. Aug. 31, 2007) (including absurd examples of true speech bans including a candidate dressing up like "Rocky" the prizefighter); Explanation and Justification for Electioneering Communications, Final Rule, 72 Fed. Reg. 72899 (F.E.C. Dec. 26, 2007).

Sanctioning the FEC's continued promulgation of prolix and vague speech regulations with related fly-by-night enforcement must end. This practice trades respect for the common citizen's capacity to make independent judgments for the artificial safety of having government assume this role and protect them. When citizens dare find the courage to speak up and criticize public officeholders, the mind numbing complexity and shifting standards of the Commission are certain enough to silence most. In acquiescing to the trampling of political debate, this Court has permitted sedition of the worst variety – the certain elimination of our greatest bulwark of liberty, the freedom of speech.

II. This Court Cannot Design a Workable Standard to Weed Out "Impure" Speech

Hoping to achieve utopian speech designs, this Court pushes forward to fashion the unattainable. With implausible hope, this Court has reasoned that fair and balanced speech standards might help prevent corruption, or its appearance, while letting necessary speech thrive. *See, e.g., Buckley v. Valeo*, 424 U.S. 1, 80-81 (1976) (express advocacy standard); *FEC v. Massachusetts Citizens for Life*, 479 U.S. 238 (1986) (three part test to allow some non-profits to fund express advocacy); *Austin v. Michigan State Chamber of Commerce*, 494 U.S. 652 (1990) (upholding speech restrictions based on nebulous qualifications like whether the speaker's message proved too effective); *McConnell v. FEC*, 540 U.S. 93 (2003) (indistinctly describing a new class of banned speech, the so-called "functional equivalent" of express advocacy, while eschewing the development of objective standards); *FEC v. Wisconsin Right to Life*, *Inc.*, 127 S. Ct. 2652 (2007) (expounding the functional equivalent formula, with no resulting consensus among election law experts about that standard). This Court stretched the implausible to the absurd by reasoning that agencies would reasonably apply its speech standards. These views are mistaken. *See* Notice of Proposed Rulemaking, Electioneering Communications, 72 Fed. Reg. 50261 (FEC's proposal for interpreting *Wisconsin Right to Life* by including forty banned speech examples including Rocky the prizefighter); Explanation and Justification for

Electioneering Communications, 72 Fed. Reg. 72899 (describing an elaborate two-prong, eleven-factor electioneering communications standard while honestly claiming to adhere to Chief Justice Roberts' notice that the Commission could not rely on an "open-ended rough-and-tumble" of factors).

From the sun-scorched deserts of Arizona to the majestic peaks of Wyoming, citizens respecting dissent ask this Court to realize that which is already known: Enough is enough. Enough believing that impure, unconventional, and successful speech must be rationed. *Austin*, 494 U.S. 652. Enough inventing speech standards that do anything less than provide absolute protection to speakers. *McConnell*, 540 U.S. 93. For too long, this Court has stayed aboard the wrong jurisprudential train in belief that the pursuit of cleansed political speech might be realized. One of history's most eloquent dissenters, Dietrich Bonhoeffer, offers this Court a sound remedy to its confusion, "If you board the wrong train, it is no use running along the corridor in the other direction." Renate Wind, DIETRICH BONHOEFFER, A SPOKE IN THE WHEEL (1992).

Reformers and creative bureaucrats do not have difficulty establishing veritable parades of horribles to overrun civil liberties. This Court has struggled with these justifications and often granted them priority over individual liberties. "The great danger of the judiciary balancing process is that in times of emergency and stress it gives Government the power to do what it thinks necessary to protect itself,

regardless of the rights of individuals." Jeffrey D. Hockett, NEW DEAL JUSTICE: THE CONSTITUTIONAL JURISPRUDENCE OF HUGO L. BLACK, FELIX FRANKFURTER, AND ROBERT H. JACKSON (1996). This nation's history illustrates that laws established in times of dire emergency are all too common and all too oppressive. The Congress and this Court's response to most of these situations has been a litany in getting them dead wrong. *See, e.g., Mutual Film Corporation v. Industrial Comm'n of Ohio*, 236 U.S. 230 (1915) (upholding Ohio's Board of Censors that approved films to be shown in the state); the Espionage Act of 1917 (imprisoning the poet E.E. Cummings for stating that he lacked a hatred for Germans); the Montana Sedition Act of 1918 (punishing more than forty citizens up to twenty years in prison for criticizing war efforts); the Sedition Act of 1918 (incarcerating one businessman because he intimated President Wilson was "yellow"); the Palmer Raids (arresting thousands of members of the Industrial Workers Union due to their unconventional views); the Smith Act of 1940 (imprisoning members of the Communist Party for conspiring to teach the principles of Marxism-Leninism, which this Court upheld in *Dennis v. United States*, 341 U.S. 494 (1951)); the Universal Military Training and Service Act of 1948 (prohibiting the destruction of draft cards, upheld by this Court in *U.S. v. O'Brien*, 391 U.S. 367 (1968)); *Roth v. U.S.*, 354 U.S. 476 (1957) (where this Court sustained bans on obscene speech where the communication appealed to a person's prurient interest); *Buckley*, 424 U.S. 1 (upholding limits on

speech due to fears of corruption, or its "appearance"); *Austin*, 494 U.S. 652 (expanding the notion of corruption to place limits on the "corrosive and distorting effects" of too effective speech). Viva the spirit of unbridled dissent.

Given the historical record of the powerful few seeking to silence unconventional messages, and the repeat failure of any government agency to administer speech standards in an equitable manner, this Court cannot justify its continued reliance on slippery speech standards left to the whimsical discretion of bureaucrats. "Subject opinion to coercion: whom will you make your inquisitors? Fallible men, governed by bad passions, by private as well as public reasons." Samuel Eagle Forman, THE LIFE AND WRITINGS OF THOMAS JEFFERSON (1998).

The Framers of the Constitution boldly risked the embrace of wide-open public debate, understanding the risk "that free speech might be the friend of change and revolution. But they also knew that it is always the deadliest enemy of tyranny." Justice Black, NEW DEAL JUSTICE. Today, this Court has the opportunity to regain its sacred trust in reclaiming the protection of the First Amendment while offering citizens the surest protection against the stifling of dissent and the rise of despotism.

III. A Return to First Principles: Favoring Unbridled Dissent

Since this Court has refused to recognize that the First Amendment completely withdraws from government all power to ban, regulate, or curb the free flow of ideas, its development of shifting, undetermined, and peculiar speech tests prove impracticable. As this Court tinkers with the evolution of its speech tests, citizens hoping to exercise their free speech right find uncertainty and guesswork as the norm in deciding whether they may speak without state reprise.

In today's political climate, citizens hoping to band together and speak with feverish passion about government injustices must discern the point at which their speech crosses the line where it becomes impermissible. This sort of permissibility inquiry derives its legitimacy from this Court's longstanding speech balancing tests, asking such page-turners as whether a communication could effect an election or unfairly chastise the character, qualifications, or fitness of a candidate for office. These standards cloud hopeful speakers with uncertainty, guaranteeing confusion and hedging and trimming by speakers.

This Court's experimentation with balancing tests for free speech rights remains deeply flawed. Clear guidance must be given both to citizens and government agencies that protracted and intricate speech standards will not survive constitutional scrutiny. With the FEC's implementation of a two-prong,

eleven-factor speech standard for determining "permissible" electioneering communications in response to *Wisconsin Right to Life*, this Court must give serious pause to the feasibility of its political speech jurisprudence.

When "governing decisions are unworkable or are badly reasoned, this Court has never felt constrained to follow precedent." *Payne v. Tennessee*, 501 U.S. 808, 827 (1991) (quoting *Smith v. Allwright,* 321 U.S. 649 (1944)). This Court has long since abandoned absolute protection of political speech in favor of shifting standards, hoping that the friendly regulators at the FEC might honorably apply them. Rather than hope upon hope that the next best standard might somehow protect speech, the time has arrived for this Court to overrule *Austin* and *McConnell*; thereby returning clarity to First Amendment jurisprudence and establishing a preference in favor of liberty.

The First Amendment offers the broadest protection "to assure (the) unfettered interchange of ideas for the bringing about of political and social changes desired by the people." *Roth v. United States*, 354 U.S. 476, 484 (1957). Changes *by the people*, and how *the people* elect to communicate those changes, are to be respected by this Court by stringent application of the First Amendment, not decades of nuanced skullduggery and "best speech practices" by speech bureaucrats.

With the advent of *Buckley*'s review of the FECA, this Court jumped headfirst into the business of

crafting exceptions to protection of political speech. But it did so with limited departure and with hopes that its express advocacy formulation would be easily applied, protective of speech. That amounted to the express advocacy speech standard, permitting limited regulation of communications that in express terms advocated the election or defeat of a clearly identified candidate. The *Buckley* formulation rested on a simple rule: "distinction between discussion of issues and candidates and advocacy of election or defeat of candidates may often dissolve in practical application." *Id.* at 42. While *Buckley* involved a strained reading of the First Amendment, citizens could understand the boundaries and be able to produce a great deal of speech without running afoul of the law.

The *Buckley* Court respected the fact that speech critical of candidates and communications caustic during the time of an election remained protected because the First Amendment has its "fullest and most urgent application" during these shortened, crucial time periods. *Monitor Patriot Co. v. Roy*, 401 U.S. 265, 272 (1971). Where the First Amendment was once thought to vigorously guard the sanctity of political speech, erosion of that protection has steadily occurred since this Court's pronouncement of exceptions post-*Buckley*, 424 U.S. 1.

It is important to note that while the *Buckley* Court hoped its objective and narrow express advocacy standard would prove easy to apply and protective of speech, the FEC pushed the test to its most absurd lengths. In doing so, the Commission

found itself on the losing end of many free speech challenges. *See FEC v. CLITRIM*, 616 F.2d 45 (2d Cir. 1980) (Kaufman, Chief Judge, concurring) ("This danger is especially acute when an official agency of government has been created to scrutinize the content of political expression, for such bureaucracies feed upon speech and almost ineluctably come to view unrestrained expression as a potential 'evil' to be tamed, muzzled, or sterilized. . . . The possible inevitability of this institutional tendency, however, renders this abuse of power no less disturbing to those who cherish the First Amendment and the unfettered political process it guarantees. *Buckley* imposed upon the FEC the weighty, if not impossible, obligation to exercise its powers in a manner harmonious with a system of free expression. Our decision today should stand as an admonition to the Commission that, at least in this case, it has failed abysmally to meet this awesome responsibility"). As time progressed, regulators learned to be creative in extending the express advocacy standard to capture protected speech outside of its boundaries and to muzzle citizens' speech. Beyond *Buckley*, as detailed earlier, came *Austin*, *McConnell*, and other harms to the otherwise robust protection deserved by the First Amendment. 494 U.S. 652; 540 U.S. 230.

This Court asked whether *Austin* and *McConnell* should be overturned and whether that would be necessary for the proper disposition of this matter. The answer to the Court's inquiry is in the affirmative. It is apparent that eliminating the

speech-protective standards of *Buckley* gave speech-censors free rein to search for reasons to ban disfavored speech. These included examinations of the intent and effect of speech, *Buckley*, 424 U.S. at 43 (speech intent standards blanket with "uncertainty whatever may be said," and "offer[ ] no security for free discussion"), its proximity to an election, *Wisconsin Right to Life* (timing is irrelevant for purposes of regulation), or its "real" hidden message, *id.* (rejecting reliance on election expert's interpretation of speech). These standards put great confidence in the ability of the regulating class to effectively cleanse the political process of odious speech. But the First Amendment demands humble restraint, not the prideful exercise of wanton authority. This truth is recognized in *Buckley* – citizens, not roving clean-election-speech squads, are best equipped to decide the merits of public arguments presented. Only the humble restraint required by the open sphere of free expression will preserve liberty. And to surrender this right would be to surrender the foundation of our sovereignty. We must exercise with diligence our right of free expression lest we otherwise offer government "a guardianship of [our] public mind." *Thomas v. Collins*, 323 U.S. 516, 530 (1945) (Jackson, J., concurring).

CONCLUSION

For the foregoing reasons, the decision of the United States District Court for the District of Columbia should be reversed and clarification given to the speech-protective appeal to vote test described in *Wisconsin Right to Life*.

Respectfully submitted,

BENJAMIN BARR
Counsel of Record
GOVERNMENT WATCH, P.C.
619 Pickford Place N.E.
Washington, DC 20002
(240) 863-8280