

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA**

**TRACEY P., RIC Z., RICHARD A.,** )  
**GERARD O., and RENAISSANCE** )  
**MANOR, INC.,** a Florida not-for-profit )  
corporation, )  
) )  
Plaintiffs, )  
) )  
v. )  
) )  
**SARASOTA COUNTY,** a political )  
subdivision of the State of Florida, and )  
**JOSEPH and MARIA SERNA** )  
) )  
Defendants. )

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No. \_\_\_\_\_ Civil Action

**COMPLAINT**

Plaintiffs, Tracey P., Ric Z., Richard A., Gerard O., and Renaissance Manor, Inc., bring this suit against the defendants, Sarasota County and Joseph and Maria Serna, and state as follows.

Introductory Statement

1. The plaintiffs, Tracey P., Ric Z., Richard A., Gerard O., are individuals with disabilities, and, together with Renaissance Manor, Inc., a not-for profit organization wishing to continue to house these individuals, sue the defendants for violating their rights to be free from discrimination under the Fair Housing Act, 42 U.S.C. § 3601 *et. seq.* and the Americans With Disabilities Act, 42 U.S.C § 12132 *et. seq.* The plaintiffs seek declaratory and injunctive relief, damages, attorneys' fees, and costs against Sarasota County for yielding to the prejudices and fears of neighbors about the presumed harm that people with disabilities would bring to their neighborhood, resulting in the loss and denial of affordable housing for individuals with disabilities in Sarasota

County. In addition, plaintiffs seek these same remedies against Joseph and Maria Serna, neighbors who are hostile to plaintiffs, for intimidating and interfering with the plaintiffs' right to live in the housing of their choice.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331, 1343 (federal question jurisdiction), 42 U.S.C. § 3613 (the Fair Housing Act), and 42 U.S.C. §12133 (the Americans With Disabilities Act).

3. Declaratory and injunctive relief are sought pursuant to 28 U.S.C. §2201, 42 U.S.C. §3613(c)(1)(the Fair Housing Act), and 42 U.S.C. § 12133 (the Americans With Disabilities Act).

4. Venue is proper in the United States District Court for the Middle District of Florida as all acts complained of occurred within this District.

Parties

5. Tracey P. currently lives at 413 Sevilla Street in North Port, Florida, and is a member of Tammi House, a supportive housing program operated by Renaissance Manor, Inc. Tracey P. is a person with a disability within the meaning of the Fair Housing Act and the Americans With Disabilities Act. Tracey P. brings this case anonymously because she is in recovery, and anonymity is an aspect of the recovery and therapeutic programs in which she actively participates. Tracey P. relies on her peers at Tammi House for support, and Tammi House is essential in aiding her in her recovery.

6. Ric Z. currently lives at 417 Sevilla Street in North Port, Florida, and is a member of Tammi House, a supportive housing program operated by Renaissance Manor, Inc. Ric Z. is a

person with a disability within the meaning of the Fair Housing Act and the Americans With Disabilities Act. Ric Z. brings this case anonymously because he is in recovery, and anonymity is an aspect of the recovery and therapeutic programs in which he actively participates. Ric Z. relies on his peers at Tammi House for support, and Tammi House is essential in aiding him in his recovery.

7. Richard A. currently lives at 417 Sevilla Street in North Port, Florida, and is a member of Tammi House, a supportive housing program operated by Renaissance Manor, Inc. Richard A. is a person with a disability within the meaning of the Fair Housing Act and the Americans With Disabilities Act. Richard A. brings this case anonymously because he is in recovery, and anonymity is an aspect of the recovery and therapeutic programs in which he actively participates. Richard A. relies on his peers at Tammi House for support, and Tammi House is essential in aiding him in his recovery.

8. Gerard O. currently lives at 417 Sevilla Street in North Port, Florida, and is a member of Tammi House, a supportive housing program operated by Renaissance Manor, Inc. Gerard O. is a person with a disability within the meaning of the Fair Housing Act and the Americans With Disabilities Act. Gerard O. brings this case anonymously because he is in recovery, and anonymity is an aspect of the recovery and therapeutic programs in which he actively participates. Gerard O. relies on his peers at Tammi House for support, and Tammi House is essential in aiding him in his recovery.

9. Plaintiff, Renaissance Manor, Inc. ("Renaissance Manor") is a not-for profit Florida organization with its principal place of business in Sarasota, Florida. Renaissance Manor provides affordable housing and supports to individuals with disabilities including those who have mental illness and/or are recovering from substance abuse and/or alcoholism.

10. Defendant, Sarasota County (hereinafter the "County") is a political subdivision of the State of Florida. The County is responsible for the acts of its agents and employees, including the County Commissioners, the County Department of Health and Human Services and its directors, the County Zoning Administrator, the County Building Official, and the County Zoning Board of Appeals. The County is also responsible for the enactment, enforcement, and application of the Sarasota County zoning code.

11. Defendants, Joseph and Maria Serna (hereinafter the "Sernas") are husband and wife and live adjacent to Tammi House at 421 Sevilla Street in North Port, Florida.

Statutory and Regulatory Framework:  
The Fair Housing Act and the Americans With Disabilities Act

12. In 1988, Congress amended the Fair Housing Act, 42 U.S.C. § 3601, *et. seq.*, to extend the guarantee of fair housing to individuals with disabilities.

13. Under the Fair Housing Act, the term "handicap" or disability means, with respect to a person, a physical or mental impairment which substantially limits one or more of such person's major life activities, a record of such an impairment, or being regarded as having such an impairment. 42 U.S.C. § 3602(h).

14. Under the Fair Housing Act, it is unlawful to discriminate against or otherwise make unavailable or deny a dwelling to any buyer or renter because of a handicap of that buyer, renter, or person residing in or intending to reside in that dwelling after it is sold, rented, or made available. 42 U.S.C. § 3604(f)(1).

15. The Fair Housing Act also makes it unlawful to discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provision of services or

facilities in connection with such dwelling, because of the handicap of that person or persons residing in or intending to reside in that dwelling after it is sold, rented, or made available. 42 U.S.C. § 3604(f)(2).

16. The federal regulations implementing the Fair Housing Act prohibit, as a discriminatory activity, assigning any person to a particular section of a community, neighborhood, or development, because of a person's disability. 24 C.F.R. § 100.70 (d)(4).

17. The federal regulations further make it unlawful, because of handicap, "to restrict or attempt to restrict the choices of a person by word or conduct in connection with seeking, negotiating for, buying or renting a dwelling so as to . . . discourage or obstruct choices in a community, neighborhood or development." 24 C.F.R. § 100.70(a).

18. The Americans With Disabilities Act requires that no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination of any such entity. 42 U.S.C. § 12132.

19. The federal regulations implementing the Americans With Disabilities Act prohibit a public entity from discriminating against a qualified individual with a disability in administering a licensing program in a manner that subjects qualified individuals with disabilities to discrimination on the basis of disability, nor may a public entity establish requirements for the programs or activities of licensees that subject qualified individuals with disabilities to discrimination on the basis of disability. 35 C.F.R. § 35.130(6).

20. The federal regulations also make it unlawful for a public entity, in determining the site or location of a facility, that has the purpose or effect of excluding individuals with disabilities

from, denying them the benefits of, or otherwise subjecting them to discrimination. 35 C.F.R. § 35.130(4)(i).

### Statement of Facts

#### **The County Has Admitted That Tammi House Is a Permitted Use Since Its Inception.**

21. From 1997 until November 2003, Ms. Sharon Mays-Tremain operated a supportive housing program called Tammi House for people recovering from substance abuse and/or individuals with mental illness. Tammi House was operated out of four single family homes all on the same back road in a residential neighborhood with addresses at 403, 405, 410, and 417 Sevilla Street in North Port Florida. Up to six individuals with disabilities lived in each home during this period.

22. During the time that Ms. Mays-Tremain operated Tammi House, it was not licensed by the State of Florida nor was it required to be.

23. Ms. Mays-Tremain's use of Tammi House to house up to six people in a single-family dwelling who were recovering from substance abuse and/or mental illness was a lawful and permitted use under the Sarasota County zoning code.

24. During the time that Ms. Mays-Tremain operated Tammi House, Sarasota County, its commissioners, agents and employees, were aware of Tammi House and the housing supports it provided, and deemed its use to be permitted and lawful under the zoning laws of Sarasota County.

25. During the time that Ms. Mays-Tremain operated Tammi House, Sarasota County, its commissioners, agents and employees, took no action against Tammi House or its owners and operators for violation of any zoning laws.

#### **Renaissance Manor Seeks Grants to Buy and Renovate Tammi House.**

26. In 2002, Renaissance Manor became interested in purchasing Tammi House, and in expanding the program to include two additional single-family homes, to be built on vacant lots adjacent to the existing homes on Sevilla Street, so as to meet the increasing need in Sarasota County for affordable and stable housing for people recovering from substance abuse and/or mental illness. The addresses of the two additional homes are 413 and 414 Sevilla Street.

27. In late 2002 and early 2003, Renaissance Manor sought federal and state grants, along with private financing to purchase the four homes ("Tammi House") and two vacant lots from Ms. May-Tremain, and to renovate and continue to operate them as supportive housing for individuals recovering from substance abuse and/or mental illness.

28. The State of Florida did not and does not require Renaissance Manor to have a license to operate an expanded program at Tammi House.

**The County Informs Renaissance Manor that Tammi House Is a Permitted Use.**

29. As a condition of receiving federal and state grants, Renaissance Manor had to verify to such funding sources that its housing proposal complied with the local zoning laws of Sarasota County.

30. In spring 2003, Renaissance Manor had several communications with Mr. Tate Taylor, the Zoning Administrator of Sarasota County, seeking from him a determination regarding the zoning for Tammi House for the purpose of securing government funding for the renovation and expansion of Tammi House.

31. As part of these communications, Renaissance Manor informed the Zoning Administrator, among other items, that: a) Renaissance Manor intended to expand Tammi House to include six homes in all, with up to six people recovering from substance abuse and/or with mental

illness living in each home; b.) Renaissance Manor intended to continue the Tammi House program of providing supportive housing to the residents; and, c.) The State of Florida did not require that the homes be licensed and none would be.

32. In response, on or about September 26, 2003, Mr. Tate Taylor, the County's Zoning Administrator, informed Renaissance Manor that its use was permissible and lawful, stating that "under the Federal Fair Housing Act, housing for homeless non-dangerous mentally ill residents in a living environment for unrelated residents who operate as the functional equivalent of a family is permitted." Mr. Taylor also explained that "one family or six unrelated individuals constituting a family may occupy each home" under the Sarasota County zoning code.

**Renaissance Manor Proceeds with Tammi House, Relying On the Zoning Administrator's Verification that Tammi House Is a Permitted Use.**

33. Thereafter, Renaissance Manor submitted the Zoning Administrator's verification that Tammi House complied with local zoning to the various government funding sources, and, as a result, received the grants it needed to purchase, renovate, and expand Tammi House.

34. In November 2003, Renaissance Manor used its government grants to acquire Tammi House from Ms. Mays-Tremain consisting of the four single-family homes. Renaissance Manor also purchased from Ms. Mays-Tremain the two adjoining vacant lots for the expansion of Tammi House. Renaissance Manor proceeded with the purchase and renovations of Tammi House in reliance on the zoning administrator's verification that Tammi House is a permitted use.

**Sarasota County Issues Building Permits To Renovate and Expand Tammi House.**

35. In spring 2004, the County reviewed the use of Tammi House again in connection with the issuance of building permits, and concluded, again, that the intended use was permitted.

Based on this conclusion, the County issued a series of building permits to Renaissance Manor for the construction of two new single-family homes on the vacant lots, and for the rebuilding of one of the original homes that had been part of the original Tammi House operated by Ms. Mays-Tremain. Subsequently, the County issued certificates of occupancy for each home as well.

36. Thereafter, in May 2004, Renaissance Manor began renovating three of the existing homes, replacing one of the homes entirely, and building two new homes on the vacant lots.

37. Throughout the renovations of the existing homes, the residents of Tammi House continued to live in their housing with Renaissance Manor as the new manager and owner of the homes. Ms. Sharon Mays-Tremain became an employee of Renaissance Manor, responsible for day-to-day management.

#### **The County Bows to Fears by Neighbors.**

38. In the spring of 2004, nearby neighbors of Tammi House, including the defendants, Joseph and Maria Serna, became aware of the expansion of Tammi House, and communicated fears and prejudices to County officials about the harm they believed people with disabilities would cause to their neighborhood.

39. Bowing to the community's fears and prejudices about people with disabilities and the presumed harm that an expanded Tammi House would bring to their neighborhood, the County Commissioners instructed certain zoning and building officials to prepare an internal report regarding the legality of the existing and expanded Tammi House program operated by Renaissance Manor. This report, dated July 7, 2004, concluded that five of the six homes should be prohibited, leaving only one to operate.

40. On July 21, 2004, without any new facts or circumstances besides the discriminatory animus expressed by certain members of the community, the County sent Renaissance Manor a letter wherein it arbitrarily reversed its previously-stated position on the permissibility of the use at Tammi House, and further stated that none of the six homes were permissible within the zoning code's definition of "family." The County, again without any new facts or circumstances besides the discriminatory animus expressed by certain members of the community, arbitrarily reclassified the six homes as "community residential homes." The letter further advised that there must be more than a thousand feet between one home and another (hereinafter the "spacing requirement"); that Renaissance Manor would only be allowed to operate one home by virtue of the spacing requirement; that Renaissance Manor had to cease operating the remaining five homes within 90 days of the date of the letter; and, that operation of the six homes violated the Sarasota County Zoning Ordinances.

41. At the time of the July 21, 2004 determination, the Sarasota County zoning code defined "family" to include six unrelated "individuals protected by the Fair Housing Act" and treated a home for such a group as a permitted use in a single family zoning district. Sarasota Zoning Code, Article 10.2.1 (October 27, 2003). Indeed, even the express "commentary" to the definition of "family" provides, in pertinent part: "family is a term used to regulate types of housing protected by the Fair Housing Act, which includes a requirement that homes providing care for the disabled and similar functions with six or fewer individuals must be treated the same way as single-family residences." *Id.*

**The County Ignores Repeated Requests To Waive Its Zoning Code.**

42. On or about July 28, 2004, Renaissance Manor, through its lawyer, reminded Ms. Humphries, the County Zoning Administrator, that the residents at Tammi House were individuals with disabilities protected under the Fair Housing Act, and constituted a permitted use under federal law (as well as the Sarasota County zoning code). Moreover, counsel admonished the County for misclassifying Tammi House; it was a "family," and not a "community residential home ("CRH"), and even if it were a CRH, the spacing requirement was illegal. Renaissance Manor also requested a reasonable accommodation pursuant to the Fair Housing Act by requesting that the County waive or not enforce the spacing requirement, or otherwise accommodate the existing use and expansion of Tammi House by treating its use as that of a family.

43. The County Administrator ignored the information provided by Renaissance Manor and its counsel, including the request for a waiver or accommodation in paragraph 42. Further, the County Administrator failed to respond to Renaissance Manor's request for a reasonable accommodation.

44. On or about August 19, 2004, Renaissance Manor appealed the July 2004 determination by the County Zoning Administrator to the County Board of Zoning Appeals.

45. On or about September 30, 2004, Renaissance Manor, through its attorney, made a request for a waiver or accommodation similar to that described in paragraph 42 to the County Board of Zoning Appeals, but the County Board of Zoning Appeals failed to respond to Renaissance Manor's request for a reasonable accommodation.

46. On or about October 4, 2004, the County Board of Zoning Appeals heard Renaissance Manor's appeal of the July 24 determination by the Zoning Administrator.

47. During the hearing, nearby neighbors of Tammi House expressed their opposition to the homes, which was grounded in prejudice and unsubstantiated fears about the harm that people with mental illness and/or those recovering from substance abuse and alcoholism would bring to the neighborhood.

48. The County Board of Zoning Appeals refused to consider the application of the Fair Housing Act whatsoever to the facts before it, and, relying on unsubstantiated fears expressed by neighbors to Tammi House, upheld the determination of the Zoning Administrator to classify Tammi House as a community residential home, restricting Renaissance Manor to operating only one home on Sevilla Street.

**The County's Conduct Is Illegal and Harms the Plaintiffs.**

49. The effect of the County's actions is to prevent the plaintiffs from residing at Tammi House or in any other home zoned for single-family use in Sarasota County.

50. Plaintiffs are aggrieved persons under the Fair Housing Act, 42 U.S.C. § 3602(d) and (i) who have been injured by the County's discriminatory conduct and have suffered damages, economic loss and a loss of civil rights. Further, plaintiffs constitute persons with a "handicap" under the Fair Housing Act, 42 U.S.C. § 3602(h).

51. The homes used by Renaissance Manor are dwellings within the meaning of the Fair Housing Act, 42 U.S.C. § 3602(b).

52. The effect of the County's actions is to deny needed housing opportunities to people recovering from substance abuse and/or alcoholism and individuals with mental illness.

53. The effect of the conduct of the County is to limit the housing opportunities of unrelated people with disabilities by denying them the right to live together as a group in any single-family residential district in Sarasota County.

54. The County's conduct- to misclassify Renaissance Manor's housing, impose a 1000-foot spacing requirement, and limit Renaissance Manor to only one of the six homes on Sevilla Street- is intentional discrimination, and motivated by *animus* against people with disabilities.

55. The County's conduct-to misclassify Renaissance Manor's housing, impose a 1000-foot spacing requirement, and limit Renaissance Manor to only one of the six homes on Sevilla Street-has the effect of denying housing opportunities to people with disabilities.

56. The County's conduct-to fail to consider any of the reasonable accommodation requests by Renaissance Manor in the application of zoning code- constitutes to a denial of Plaintiffs' reasonable accommodation request and denies Plaintiffs' an equal opportunity to live in the dwelling of their choice.

57. The County is treating the residents of Renaissance Manor in a discriminatory fashion, and is imposing far more stringent land use requirements on this group of unrelated disabled individuals living together in a single family district than it imposes upon individuals living together who are related by blood or marriage.

58. By arbitrarily and illegally classifying the premises utilized by Renaissance Manor as a community residential house, the County is making single family housing in the County unavailable to persons with mental illness as well as persons recovering from drugs and alcohol addiction.

59. The County has caused the individual plaintiffs to suffer damages including the threat and risk of losing their housing, emotional and mental anguish, embarrassment, humiliation, loss of their civil rights, and harm to their reputation. The County has caused plaintiff Renaissance Manor to be damaged through the loss of grants, contributions, support from funding sources, loss of rental income, and has damaged its standing in the community and among government agencies and public officials.

**The Sernas' Conduct Harms the Individual Plaintiffs.**

60. Defendants, Joseph and Maria Serna (hereinafter the "Sernas"), are husband and wife and live in a single-family home adjacent to the individual plaintiffs and other residents of Tammi House. The Sernas have lived in this home at least since the creation of Tammi House by Ms. Mays-Tremain in 1997.

61. Since the individual plaintiffs and other residents of Tammi House have been living near the Sernas, the Sernas have engaged in acts of intimidation and harassment toward the plaintiffs and the Tammi House residents, including, but not limited to, glaring and staring at the residents in a hostile manner, cursing at them, driving their car in the middle of Sevilla Street and blocking Tammi House residents from traveling on the road, standing in the middle of Sevilla Street to block the van belonging to Tammi House from proceeding, dumping waste water into the yards of Tammi House residents, and making false reports to the police and county agencies about Tammi House residents.

62. The Sernas are intentionally and maliciously harassing, intimidating and interfering with the plaintiffs and Tammi House residents to live and enjoy their homes, with the intent of chasing the Tammi House residents away from the neighborhood.

Claims for Relief

Count I: The Fair Housing Act and Defendant Sarasota County

63. The plaintiffs re-allege and incorporate herein by reference paragraphs 21- 59 above.

64. The defendant, Sarasota County, its agents and employees, are violating plaintiffs' rights under the Fair Housing Act, 42 U.S.C. § 3601, *et. seq.*, and its implementing regulations by:

- a. denying and otherwise making housing unavailable to the plaintiffs because of their disability;
- b. using the County zoning code as a pretext to exclude the plaintiffs because of their disability;
- c. enforcing discriminatory zoning rules and policies on the plaintiffs because of their disability;
- d. interfering with the right of the plaintiffs to live in the dwelling of their choice;
- e. failing to make reasonable accommodations in the zoning code to afford the plaintiffs an equal opportunity to use and enjoy the Sevilla Street homes; and,
- f. retaliating against plaintiff, Renaissance Manor, by withholding and/or terminating grant awards for which it is eligible because it is exercising its fair housing rights.

Count II: The Americans With Disabilities Act and Defendant Sarasota County

65. The plaintiffs re-allege and incorporate herein by reference paragraphs 21- 59 above.

66. The plaintiff, Renaissance Manor, is associated with, and/or provides housing to people with disabilities as defined in 42 U.S.C. § 12102(2).

67. The defendant, Sarasota County, is a public entity under 42 U.S.C. §12131(1).

68. The actions of defendant, Sarasota County, to exclude five of the Tammi House residences from North Port in Sarasota, Florida violates the rights of Renaissance Manor and the individual plaintiffs under the Americans With Disabilities Act, 42 U.S.C. §12132 *et. seq.*, and the regulations promulgated thereunder by:

- a. denying the individual plaintiffs and others with mental illness and/or those in recovery the opportunity to participate in or benefit from the supportive housing program offered by Renaissance Manor;
- b. using land use ordinances and methods of administering those ordinances with the purpose of subjecting Renaissance Manor and the individual plaintiffs to discrimination on the basis of their handicap;
- c. subjecting Renaissance Manor and the individual plaintiffs, on the basis of their disability, to discrimination;
- d. denying the individual plaintiffs and people with mental illness and/or those in recovery an opportunity to participate in a program in the most integrated setting appropriate to their needs;
- e. denying the individual plaintiffs and people with disabilities an equal opportunity to participate in or benefit from services and programs equal to those of people without disabilities;
- f. utilizing licensing and permit requirements to provide municipal code enforcement services that is not equal to groups of related non-disabled persons and groups of unrelated disabled persons who are not recovering alcoholics and drug addicts;

g. utilizing licensing and permit requirements, a requirement not imposed upon other groups of related non disabled persons, to deny plaintiffs because of the handicap of the residents of Renaissance Manor the enjoyment of any rights, privilege, advantage, or opportunity enjoyed by others receiving the aid, benefit or service.

Count III: The Fair Housing Act and Defendants Joseph and Maria Serna

69. The plaintiffs re-allege and incorporate herein by reference paragraphs 60-62 above.

70. The defendants, Joseph and Maria Serna, are violating the individual plaintiffs' rights under the Fair Housing Act, 42 U.S.C. § 3604 (f)(1) and 3617, and its implementing regulations, by discriminating against the individual plaintiffs because of their disability, and intimidating, coercing, harassing, and interfering with the right of the individual plaintiffs to live and enjoy their home-Tammi House.

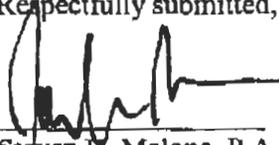
Relief Sought as to All Counts

**WHEREFORE**, the plaintiffs pray for the following relief:

- a. declare that Sarasota County acted unlawfully under the Fair Housing Act and the Americans with Disabilities Act;
- b. declare that the use of Tammi House in the form of all six homes on Sevilla Street owned and operated by Renaissance Manor is akin to any other single-family use, and a permitted use in Sarasota County by operation of the Fair Housing Act and Americans With Disabilities Act;
- c. enjoin Sarasota County from interfering with Renaissance Manor's operation of Tammi House comprising all six homes, and the right of the individual plaintiffs to live there;
- d. enjoin Sarasota County from denying to Renaissance Manor funds and awards that it has granted to it and for which it is eligible;

- e. enjoin Joseph and Maria Serna from interfering, harassing, intimidating the individual plaintiffs and other residents of Tammi House;
- f. award compensatory damages, attorneys fees' and costs to the plaintiffs by virtue of the conduct of all defendants;
- g. award punitive damages to the plaintiffs and against the defendants, Joseph and Maria Serna;
- h. award such other relief as this Court deems just and proper.

Respectfully submitted,

(fa)   
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