
AIR FORCE TECHNICAL SERGEANT (“TSgt”))
JENNIFER SMITH)
on behalf of herself and others similarly situated,)
Plaintiff and Class Representative)
)
v.)
UNITED STATES AIR FORCE,)
Defendant)
)

COMPLAINT

1. This administrative complaint seeks a remedy for systemic and intentional sexual discrimination against Jennifer Smith and other similarly-situated active duty women in the Air Force.
2. This action is brought by military member Jennifer Smith, a patriot who has served this nation with honor for seventeen years, on her own behalf and on behalf of the class of women in the Air Force.
3. This complaint is being submitted pursuant to Title 10, United States Code Section 1561.
4. The sexual discrimination remains ongoing to date.
5. In 1995, Jennifer Smith, an 18-year old high school graduate, enlisted as an Airman Basic (E1). Her years of service have been exemplary. She deployed overseas on five occasions to Iraq, Kuwait, Korea and Germany. Her performance has merited constant promotions, most recently to Technical Sergeant (“TSgt”).

6. Her last three performance reviews and most recent Air Force fitness evaluation are attached as Exhibit A. In every instance, she has received the highest marks possible. As stated in her most recent performance review issued on April 18, 2012, TSgt Smith “goes above and beyond.” Her superior, Capt Joseph P. Witt, recommended that the Air Force “promote to MSgt now!” Capt Witt explained TSgt Smith “brilliantly led FS ops desk as NCOIC...”
7. In her prior performance review issued on February 11, 2011, a different supervisor, Lt. Col. Jason L. Plourde, described TSgt Smith as follows: “gifted mentor... energetically [managed] EFS [program] to fly 1K flags in combat by F-16 pilots – JBB patriotism & morale skyrocketed.” Lt. Col. Plourde also pressed for immediate promotion: “ready now for HARM/MAJCOM ARM duty – must promote now!”
8. During her years of dedicated service to this nation, TSgt Smith has earned three Air Force achievement medals, and four Air Force commendation medals. The certificates evidencing the awarding of the medals, and the Air Force’s description of the significance of the various medals, are attached as Exhibit B.
9. TSgt Smith’s patriotism and dedicated service to this nation have occurred in an environment intentionally made hostile to women by the Air Force

leadership. The following sets forth a summary of the type of discrimination that TSgt Smith has endured. This summary is not intended to be, and is not, exhaustive of what TSgt Smith has endured. TSgt Smith is available to be interviewed by investigators assigned by the Air Force. TSgt Smith requests that her counsel Susan L. Burke be present during these interviews.

10. TSgt Smith encountered an environment hostile to women immediately upon joining the Air Force in 1995 at age 18. TSgt Smith initially was stationed at Pope Air Force Base in North Carolina, but shortly thereafter was deployed to Sembach Air Base in Germany. When she arrived in Germany, her Master Sergeant met her, took her out, and required her to participate in a drinking game called “coining.” He bought her 10 shots of alcohol, and observed as she became completely intoxicated. Smith, knowing she was intoxicated in a foreign land, asked the Master Sergeant to bring her back to her living quarters. When they arrived at the barracks, Smith thanked him for walking her back, and said goodnight. He responded, “you’re not going anywhere, bitch.” He then pushed into the room, dropped his pants, and told her to “come over here and touch it, cunt.” At that point, as TSgt Smith verbally and physically resisted the

sexual assault, several other Airmen were able to get into the room and took TSgt Smith physically away from the attacking Master Sergeant.

11. TSgt Smith subsequently learned that the Air Force was well aware that the Master Sergeant routinely assaulted young servicewomen. Despite this knowledge, the Air Force did nothing other than warn TSgt Smith to try to avoid being alone with the Master Sergeant, who outranked her in the chain-of-command. Rather than disciplining men who harass and assault their female peers, the Air Force turns a blind eye to misconduct and instead retaliates against female Air Force personnel whenever they seek to defend themselves or otherwise mitigate the severe hostility of the Air Force environment.
12. That is precisely what occurred here. Several weeks after the incident, TSgt Smith was standing by a desk when the Master Sergeant saw her and stated “they never should have let these bitches in the Air Force.” TSgt Smith responded, “the only bitch here is you.” The Air Force verbally reprimanded TSgt Smith for her comment, yet did absolutely nothing to prevent the Master Sergeant from continuing to create a hostile and dangerous environment for TSgt Smith and other female servicemembers.
13. From 2001 to 2002, the Air Force assigned TSgt Smith to the 80th Fighter Squadron located in Kunsan Air Base in Korea. During this tour, TSgt

Smith was subjected to and immersed in the hostile environment that the Air Force intentionally and knowingly permits to flourish, particularly in fighter pilot squadrons. High-ranking Air Force officers routinely participate in creating a hostile environment to women.

14. As but one example, TSgt Smith reported to the Vice Commander of the Wing, who is second in charge at Kunsan Air Base, for a routine records review. During the meeting, the Vice Commander told her to “relax” and offered her alcohol. He also instructed her to take off the top portion of her uniform. She refused and left his office.
15. As yet another example, TSgt Smith was walking outside of a club when the fighter pilots walking by were doing a “sweep.” This entailed a fighter pilot throwing TSgt Smith over his shoulder, and carrying her to a bar where he placed her on top of a table. The fighter pilots engaged in what is known as a “naming” ceremony, which involves loudly and drunkenly singing songs that included lyrics hostile and offensive to women.
16. TSgt Smith adapted herself to this hostile environment, recognizing the reality that complaining or objecting to the Air Force’s creation of a hostile environment would end her military career. TSgt Smith’s willingness to keep quiet about sexual assaults and harassment and instead work docilely

in an environment openly hostile to women was rewarded. TSgt Smith rose through the ranks, earning commendations and awards.

17. Enduring the Air Force's openly sexist and hostile environment became more difficult for TSgt Smith as she grew older, and was forced to observe young female servicemembers being subjected to the same humiliating and demeaning sexism that she had been enduring.
18. In 2008, when TSgt Smith was stationed at Shaw Air Base in South Carolina awaiting her deployment to Iraq with the 55th Fighter Squadron, she found pornographic materials in her squadron. Specifically, TSgt Smith found in her office two pornographic self-made books known as "Doofer" books, as well as several commercially-available pornographic magazines.
19. TSgt Smith brought the pornographic materials to her Director of Operations, Lt. Col. Phillip T. Hamilton, and expressed her anger about the hostile environment. TSgt Smith advised Lt. Col. Hamilton that the young female servicemembers should not have to endure this type of sexism and hostile environment in their professional workplace. Lt. Col. Hamilton admitted that the materials created an environment hostile to women, and promised TSgt Smith that he would take her complaint seriously and remove the materials.

20. TSgt Smith advised Lt. Col. Hamilton that she was concerned about retaliation if it became known that she had objected to the hostile environment. Lt. Col. Hamilton promised TSgt Smith confidentiality.
21. Lt. Col. Hamilton failed to remedy the hostile environment and breached his promise of confidentiality. Instead, he merely told Capt Joshua Arki to place the “Doofer” books in the vault intended to be used to safeguard intelligence. Capt Joshua Arki clearly knew that TSgt Smith’s complaint precipitated the incident, as he changed his conduct towards her and began to act in retaliatory manner.
22. In 2010, the Air Force ordered TSgt Smith to deploy to Iraq with the 55th Fighter Squadron, the same fighter squadron about which she had complained to no avail in 2008. TSgt Smith was concerned that the openly hostile environment towards woman was negatively impacting her ability to perform as an effective non-commissioned officer (“NCO”), and expressed those concerns to Master Sergeant Adaly Lightsey. Nothing was done. Instead, in May 2010, the Air Force deployed TSgt Smith to Iraq with the 55th Fighter Squadron as part of an advanced deployment (called ADVON). Upon arrival in Iraq, she learned that she had cysts on her cervix and needed medical care. Her superior officer, Commander Lt. Col. Douglas Demaio, advised her of the diagnosis but failed to keep it

confidential, instead sharing it with others in the unit. The squadron unit included only six female enlisted and 35 officers (all pilots).

23. The flight surgeon and the unit as a whole harassed TSgt Smith about the cysts. Amidst a group of co-workers, TSgt Smith was subjected to extreme harassment when the flight surgeon lewdly suggested in front of a group of four male pilots that “we can just throw [TSgt Smith] on the table and I can do it right here if someone can find me a speculum.”
24. The Air Force continued to subject TSgt Smith to severe sexual harassment throughout her deployment. This sexual harassment included violent sexual assault. Approximately two months after TSgt Smith deployed to Iraq, at approximately 8pm in the evening, TSgt Smith was working out in the gym, which was located on the portion of the Forward Operating Base that housed Air Force personnel. TSgt Smith encountered hostility from a male, who cursed at her when she used the leg press machine. TSgt Smith left the gym without finishing her workout, disturbed by the hostility. As she was leaving the gym, and turning left towards her quarters, the man from the gym grabbed her from behind and physically dragged her behind the gym where it was dark. The man was tall – approximately 6’3” – and he pushed her up against the wall and groped her. He had his arm under her neck, lifting her feet off the ground. He said “I could kill you right now,

bitch, and no one is going to miss you.” He also called her a “cunt.” He was pressing her up against the wall and assaulting her and she briefly blacked out from the shock. When she came to her senses, he shifted and lost his balance. TSgt Smith was able to break free, and ran away as fast as she could. She went to work the next day and did not say anything about it.

25. TSgt Smith did not report the attack because she was knowledgeable about the reality of what occurred to those who reported rape and sexual assault in the Air Force. She knew that the Air Force would blame her, the victim, and reprimand her for not having a “battle buddy” with her at all times. TSgt Smith knew that reporting rape and sexual assault in the military led to destruction of the victim’s career, and often subjected the victim to isolation and retaliatory violence and harassment.
26. The Air Force had taken no or ineffective steps to ensure that victims (whether male or female) were kept safe if they reported being raped or sexually assaulted while being deployed in Iraq.
27. The Air Force failed to take even rudimentary measures to prevent sexual assaults, such as ensuring that the locks on the showers for female personnel worked. Female Air Force personnel were forced to shower with the shower curtain partly open to prevent anyone from sneaking up on them.

28. The Air Force failed to provide operational locks on the female living quarters, putting them at constant risk. TSgt Smith woke up one morning and found a contractor standing over her, staring at her. TSgt Smith engaged in various measures of self-help, such as leaning mops against the door so that she would be alerted if someone entered.
29. The Air Force failed to provide a safe recreational environment for deployed female personnel. For example, TSgt Smith used the swimming pool provided for military personnel on her day off. She would swim laps and then relax in the sun. One day, she was at the pool with another swimmer, a man she did not know but saw regularly when she swam laps. (He was likely a TACP or Combat Controller.) Suddenly, approximately 16 male Army personnel came into the pool and surrounded her on all sides. They began harassing her, saying “we’ve been out in the field for quite a while and it’s been a long time since we’ve seen a woman.” TSgt Smith was terrified but unable to get free as she was surrounded. The other swimmer saw the situation, and intervened to save her from the harassment. He pretended they knew each other, saying “hey mamma, it’s time to go, we are gonna be late.” He quickly walked her to her car and told her never to come to the pool alone again.

30. TSgt Smith also had to endure being exposed repeatedly to pornographic videos. Prior to the pilots departing to their jets, they would play a pornographic video on the classified briefing monitor called “Sweet Lemonade...The Horse Dance Song.” On one occasion, a pilot let the song loop over 50 times in one night on the classified monitor “to see how long it would play.” Numerous female Airmen were subjected to such misconduct.
31. In short, the Air Force subjected female Air Force personnel to a hostile and unsafe environment in Iraq. This hostility and lack of safety was not attributable to the ongoing war itself, but instead attributable to the Air Force’s permissive and encouraging attitude towards blatant sexual harassment and retaliation against those who reported harassment. TSgt Smith stoically served this nation and endured the Air Force’s hostile environment, keeping quiet and avoiding retaliation.
32. Upon her return to the United States, TSgt Smith was suffering from the emotional after-effects of being sexually assaulted in an environment where reporting the sexual assault was too dangerous, both for her physical safety and for her career aspirations.
33. On January 19, 2012, TSgt Smith was back at Shaw Air Base, engaged in her job responsibilities, which involved managing pilot training for the 20th

Fighter Wing. As TSgt Smith used the Operations Group computer server for professional purposes, she was bombarded with sexually hostile documents and videos. TSgt Smith spoke with MSgt Disree Moore about the offensive material. MSgt Moore responded to the effect that “this is nothing new and even if you or I complained to MEO or the IG, nothing would happen.” MSgt Moore suggested that she and TSgt Smith report the matter on to the lowest level possible, namely by reporting to a pilot at the 55th Squadron. TSgt Smith complied and sent an email to Capt Michael Richard, and asked to speak with him regarding the material she found on the servers. See Exhibit C. During her discussion with Capt Richard, TSgt Smith asked that he ensure that all the sexually hostile imagery was removed from the official government Air Force Operations Group computer server.

34. TSgt Smith reported to Capt Richard that she had been sexually assaulted in Iraq, and that she had not reported the assault because she feared for her physical safety. TSgt Smith explained that she was no longer willing to tolerate the hostile environment to women, and that she wanted Capt Richard to remove the documents from the government computers and brief all pilots that this type of offensive material can be detrimental to a cohesive fighter unit.

35. Capt Richard promised TSgt Smith that he would eliminate the sexually offensive documents and ensure that TSgt Smith did not continue to be subjected to such hostility. TSgt Smith trusted in Capt Richard's professionalism, as he had achieved the competitive standing of weapons officer, and had always acted in a professional manner during TSgt Smith's deployment to Iraq. TSgt Smith assumed that her reporting had led to the documents being removed from the servers.
36. Months later, on July 19, 2012, TSgt Smith encountered pornographic magazines in an area frequented by the 77th Fighter Squadron pilots. See Exhibit D for a sample. She then went to the 55th squadron and found one of the original "Doofer" books found in 2008. Upon being subjected yet again with offensive material, TSgt Smith became concerned that Capt Richard had not fulfilled his promise to her, and his clear duty under the law. TSgt Smith checked the Operations Group Server, and found that none of the documents had been removed.
37. TSgt Smith reported these facts to Master Sergeant Tinita Harris, her superintendent. Together, the two Air Force women made an appointment with Chief Master Sergeant Darell Ford to talk about the hostile environment. TSgt Smith gave Chief Master Sergeant Ford the original Doofer book and identified the server addresses so that this offensive

material would be provided to Colonel Shaun McGrath, Operations Group Commander for the Fighter Squadron.

38. Chief Master Sergeant Ford did not contest the existence of the hostile environment. Instead, he characterized the sexism and hostility as “part of the mentality” in the Air Force, and admitted that he would be “surprised” if anything were done about it.
39. Thereafter, Chief Master Sergeant Ford advised TSgt Smith and Master Sergeant Harris that he had shown the materials to Colonel Shaun McGrath. According to Chief Master Sergeant Ford, Colonel McGrath was “shocked” and committed to removing the hostile material from the official government servers.
40. Rather than responding as required by law, the Air Force has done absolutely nothing. As of October 23, 2012, TSgt Smith checked the Operations Group server for the 55th, 77th and 79th Fighter Squadrons, and the materials are all there. Nothing has been removed.
41. The materials are voluminous and indisputably hostile to women. The written materials are attached as Exhibits E-S. The materials also make clear that the Air Force views these materials as part of a “tradition” and mocks those who object to this “tradition.” For example, Exhibit E and

Exhibit M include variations of a song entitled “The S&M Man” (Tune – The Candy Man) with the following lyrics:

Who can take two ice picks, Stick ‘em in her ears
Ride her like a Harley While you Fuck her in the rear...

Who can take a machete, Whack off all her limbs
Throw her in the ocean, and try to watch her swim

Who can take a chainsaw, Cut the bitch in two
This half is for me, And the other half’s for you...

Who can take one ice pick, Stick it in her ear
Sit back and watch her bleed to death, While you have another beer

Who can take a lady, Throw her in the road
Shove a grenade up her cunt, and watch the bitch explode...
Who can take two jumper cables, Connect ‘em to her tits
Start up the engine, And electrify the bitch

Who can take a cheese grader, strap it to his arm
Ram it up her cunt, and make pussy parmesan...

Chorus: The S&M man, The S&M man
The S&M man cause he mixes it with love
And makes the hurt feel good (The hurt feel good)

At the end of the lyrics, the Air Force openly mocks those who would complain about the illegal hostile environment, stating “NOTE: IF OFFENDED REFER TO BLANKET APOLOGY LETTER, AND IF YOUR NOT A FIGHTER PILOT, THEN BEAT IT, YA FUCK!”

See Exhibit M at page 80.

42. TSgt Smith and other female Air Force personnel should not be forced to endure such a hostile environment as a price to be paid for volunteering to defend this nation.
43. The Air Force has been on notice for years regarding this hostile environment, yet has taken no effective steps to stop the constant and blatant illegalities. Instead, as admitted by the Air Force here, sexual assault and harassment are “part of the mentality” of the Air Force.
44. High-level Air Force officials participate openly in this illegal conduct. Attached as Exhibit F is a videotape that shows 20th Operations Group Vice Commander, Lt Col Benjamin Bradley, 79th Fighter Squadron Commander, Lt Col Jason Plourde and Capt Chris Clark, 20th MX Group Officer who manages the 79th Fighter Squadron MX with over 300 subordinates enlisted, singing an offensive song. The other men participating include Capt Oliver Lause, Maj Paul Perry, Capt Howard Turner and Maj Andrew B. Congdon.
45. TSgt Smith and other female Air Force personnel endure this illegal and harmful environment every day they put on their uniform. This illegal and harmful environment pervades the entirety of the Air Force.
46. Among other things, the Air Force actually used taxpayer dollars to maintain squadron bars that are fully stocked with alcohol, which the pilots

begin to drink as early as 1300 (1:00pm) during duty days, which typically end at 1630 (4:30pm). TSgt Smith and others were repeatedly exposed for hours to pilots singing drinking songs from Dos Gringos (a group of F16 pilots who sell music/CDs on the side), and pilots consuming alcoholic beverages.

47. The drinking has caused substantial problems. For example, one enlisted NCO briefer from the Survival Evasion Resistance and Escape unit complained that the pilots were drinking heavily during these briefings, which are conducted in classified briefing rooms (essentially vaults). This NCO briefer noted that all of the drinking sets a poor professional example for his airmen, one of whom was underage.
48. Among other things, the Air Force actually used taxpayer dollars to buy official Air Force “coins” that degrade and demean women. A copy of this official Air Force coin is attached as Exhibit G.
49. Further evidence of the pervasiveness of the Air Force’s hostile attitude towards women can be seen in a patch designed for the 55th Fighter Squadron, titled “Chicks Dig Weasels,” and depicting the F16 airframe’s Weasel mascot poised to penetrate a partially naked woman with a rocket. The image is attached as Exhibit H.

50. Some of the most disturbing content has been stored in collections of Songbooks from the 55th, 77th, and 79th Fighter Squadrons, which have been used to record traditions and songs, most of which contain obscene, violent and misogynistic language and pornographic images. See Exhibit I, “Fighter Pilot Songs – Combat Songbook; Fuck Songs and Trash Tunes,” which includes the song “Bye Bye Cherry” containing the following lyrics:

Back your ass against the wall, here I come balls and all, bye bye
cherry.

I know I ain’t got a lot, but what I got will fill your twat, bye bye
cherry.

I took her to my cottage in the wild woods,
And there I took advantage of her childhood.
Oh my God, it was nice, cherry bye bye.

Won’t your mother be disgusted when she finds your cherry has been
busted, Bye bye cherry,

Wrap your legs a little tighter, I can feel my load is getting’ lighter.
Shake your ass and wiggle your tits ‘til my little pecker spits,
Cherry bye bye.

See also Exhibit J, “Unofficial Fighter Pilots Songbook,” which contains a song titled “SIT ON MY FACE” containing the following lyrics:

OH, WOULD YOU LIKE TO SIT ON MY FACE
SPREAD YOUR ASS ALL OVER THE PLACE
PUT MY NOSE IN A FRAGRANT PLACE
OR WOULD YOU RATHER SUCK MY HOG!

See also Exhibit K, “Wild Weasel Songbook,” and Exhibit L, “The Tiger Songbook,” which introduces one section of “Classic Songs (Songs Every Fighter Pilot Should Know)” with the following line:

“How do all fighter pilot songs start? Da, da... da, da.....Tits!!!”

And see Exhibit M, “The Fighter Pilot’s Handbook,” which includes the song “A QUICK SONG” with these lyrics:

Oh, the nipples on her tits are as big as plums
And the wiggle in her walk will make a dead man cum.
She’s a mean motherfucker, and a great cocksucker,
She’s my girl, she FUCKS!!!!

51. One document, a so-called “hook-up manual” titled “The Wingman’s Handbook,” describes the role of a “Wingman” as someone who is “willing to throw himself upon the cruel mercies of a brazen man-hater, just so his buddy can hook up with a sorority girl with big gazongas.” The document goes on to explain the various ways a man can distract a woman’s friend—referred to as the “CB” (Cock Blocker)—long enough for his buddy to “complete his bombing run” and “bomb his target back to the bedroom.” See Exhibit N.
52. Another example of Air Force leadership contributing to a hostile work environment for women can be seen in a flyer for a “Superpower drink off” “naming” event held on base at the 55th Fighter Squadron Bar on base, attached as Exhibit O. The flyer includes references to TSgt Smith’s colleagues and superiors, including Lt. Col. Peter Fry (previous 20 FW Alert Commander), Lt. Col. Hamilton (who she reported the documents to), and Capt Arki (who was charged with destroying the “Doofer” books).

The first page includes a picture of a young woman with a cartoon text bubble next to her mouth which says “Super Power Drink OFF!!!!!!!!!!!!!! Winner gets me!!!”

53. New Fighter Pilots fill out “Naming Bios” as part of their tradition or heritage. One such “bio” form, attached as Exhibit P, includes a series of questions, including one that reads “MULTIPLE CHOICE (Circle one): Tits or Ass.”
54. The Air Force condones the use of sexist and degrading language such as “bitch” to insinuate weakness and degrade its female members. The Air Force personnel prepared a false Leave/TDY Coordination Form for a 77th Fighter Squadron Instructor Pilot, Maj Jared Hand. This false Form repeatedly denigrates women. For example, one question and answer states: “Q: Is this leave use or lose leave? A: Yes, but only because I am a little bitch who likes to talk too much.” See Exhibit Q.
55. Exhibit R contains pictures of an Air Force sanctioned event in which TSgt Smith’s colleagues are dressed in sexually explicit costumes. For example, TSgt Smith’s former Flight Commander, Maj McAfee, is dressed in a prisoner costume that includes a fake erection.
56. Exhibit S includes a sample of the array of perverse and offensive images stored on the server that TSgt Smith must access on a daily basis while

performing her work duties, including two images that glorify sex with underage girls. The entire Operations Group located at Shaw (more than 400 persons) have access to these servers.

57. The Air Force has harmed TSgt Smith and all of these women, causing them emotional pain and suffering, mental anguish, loss of enjoyment in life, injury to professional standing, and injury to character and reputation.
58. TSgt Smith and other similarly-situated women have been subjected to every form of sexual harassment contemplated by AFI36-2706 (October 5, 2010), including but not limited to, verbal slurs and inferences, nonverbal gestures, pictures and notes, unwanted physical contact, unwanted touching, and physical advances. See AFI36-2706 (October 5, 2010).
59. TSgt Smith is bringing this complaint on her own behalf and on behalf of all similarly-situated women in the Air Force. She and the class have been persistently subjected to a hostile environment in which women are denigrated and mocked.
60. TSgt Smith and the class have been deprived of their Constitutional rights, including but not limited to their rights of equal protection, due process and free speech.
61. TSgt Smith and the class have been consistently subjected to Air Force misconduct that violates Title 10 of the United States Code.

62. TSgt Smith and the class have been consistently subjected to Air Force misconduct that violates the Air Force's own internal rules and regulations.
63. TSgt Smith and the class have been seriously harmed by the hostile environment and its impact on their health and well-being, as well as on their military careers. The Air Force's environment is so exceedingly hostile to women that many suffer from post-traumatic stress disorder as a result.
64. TSgt Smith has retained Susan L. Burke as counsel qualified to represent the class of women harmed by the Air Force's hostile environment. TSgt Smith is prepared to pursue remedies available in the federal judicial system in the event that the Air Force does not respond adequately and promptly to the grave and ongoing injustices.
65. TSgt Smith and the class seek the fullest extent of remedies available to them, including but not limited to injunctive relief, equitable relief, damages, attorneys fees and costs, and such other relief as may be fashioned to redress the grave harms inflicted upon them.
66. This administrative complaint is being transmitted via FedEx on October 24, 2012 for overnight delivery. The Air Force should respond to TSgt Smith's counsel, Susan L. Burke, Burke PLLC, 1000 Potomac Street, NW,

Suite 150, Washington DC 20007. Ms. Burke is reachable via telephone at 202.386.9622 or via email at sburke@burkepllc.com.