

1 Jun 2012

IN THE UNITED STATES COURT OF APPEALS  
FOR THE ARMED FORCES

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UNITED STATES  
*Appellee,*

v.

Senior Airman (E-4)  
**CHADRICK L. CAPEL, USAF**  
*Appellant.*

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USCA Dkt. No. 12-0320/AF  
Crim. App. No. S31819

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**APPELLANT'S BRIEF**

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**IN THE UNITED STATES COURT OF APPEALS  
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<i>Appellee</i>	)	
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<i>Appellant</i>	)	USCA Dkt. No. 12-0320/AF

**TO THE HONORABLE, THE JUDGES OF THE UNITED STATES  
COURT OF APPEALS FOR THE ARMED FORCES**

**Issue Presented**

**WHETHER THE EVIDENCE IS LEGALLY SUFFICIENT TO SUSTAIN  
APPELLANT'S CONVICTION FOR MAKING A FALSE OFFICIAL  
STATEMENT, ARTICLE 107, UCMJ, UNDER THIS COURT'S  
DECISION IN *UNITED STATES v. TEFFEAU*, 58 M.J. 62  
(C.A.A.F. 2002), AND *UNITED STATES v. DAY*, 66 M.J. 172  
(C.A.A.F. 2008).<sup>1</sup>**

**Statement of Statutory Jurisdiction**

The Air Force Court of Criminal Appeals reviewed this case pursuant to Article 66(c), UCMJ. This Court has jurisdiction to review this case pursuant to Article 67(a)(3), UCMJ.

**Statement of the Case**

On 23 April 2010, Appellant was tried by a special court-martial composed of a military judge sitting alone at Moody Air Force Base, Georgia. Contrary to his pleas, Appellant was found guilty of the following: (1) one specification of signing an

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<sup>1</sup> Appellant was convicted of signing a false official statement in violation of Article 107, UCMJ, as opposed to having made a false official statement. J.A. 19.

official document with intent to deceive, in violation of Article 107, UCMJ; (2) two specifications of stealing property of a combined value of \$955.99, in violation of Article 121, UCMJ; and (3) three specifications of obtaining services by false pretences, in violation of Article 134, UCMJ. J.A. 10-12, 35-36.

The military judge sentenced Appellant to a bad-conduct discharge, confinement for six months, forfeiture of \$200.00 pay per month for six months, and reduction to E-1. J.A. 37. On 11 June 2010, the convening authority approved the findings and sentence as adjudged, but awarded Appellant four days of illegal pretrial confinement credit.

On 16 December 2011, the Air Force Court of Criminal Appeals affirmed Appellant's convictions and sentence. *United States v. Capel*, No. ACM S31819 (A.F. Ct. Crim. App. Dec. 16, 2011). J.A. 1-9. The Court determined that the Government had presented factually and legally sufficient evidence that Appellant had signed a false official document. J.A. 5-6. The Air Force Court specifically noted that the evidence proved Appellant had signed a "Valdosta Police Department Witness Statement" and that the statement was false. *Id.* The Air Force Court did not analyze whether the witness statement was an "official" document for the purposes of Article 107, UCMJ. *Id.*

Appellant's petition for grant of review was filed with this Court on 14 February 2012, and was granted on 4 May 2012.

### Statement of Facts

Appellant and SSgt Troy Addison were friends and co-workers. J.A. 99. On 23 August 2009, Appellant spent the night at SSgt Addison's off-base apartment. J.A. 100-01. When SSgt Addison went to bed, he left his wallet, which contained a debit card, on the kitchen counter. J.A. 101.

Approximately one week later, SSgt Addison checked his bank account and noticed several debits that he had not made. J.A. 120. The debits consisted of payments to a local cable company, a local furniture retailer, an online computer retailer (Tiger-Direct.com), Best Buy, Verizon, and the City of Valdosta's water utility. J.A. 319-42. The payments made to the cable company, the furniture store, Verizon, and the City of Valdosta were credited to Appellant's account balances. J.A. 322-24, 330-41. All of the debits had occurred after 23 August 2009. J.A. 105.

SSgt Shaka Givens -- a friend of Appellant's -- testified that, in late August 2009, Appellant asked to use his computer. J.A. 50. SSgt Givens agreed, and noticed that Appellant was using it to purchase a laptop computer from an online retailer. J.A. 51. SSgt Givens also noticed that Appellant entered somebody else's personal information on the retailer's payment website. J.A. 52. Appellant left to pick up the computer from the retailer's off-base store; SSgt Givens could not recall whether Appellant was in uniform. J.A. 59.

Upon learning of the debits, SSgt Addison said he first contacted his bank. J.A. 120. He then completed a "fraud affidavit" and mailed it to the bank. J.A. 121. At some point after contacting his bank, SSgt Addison contacted his "shop chief," who contacted SSgt Addison's first sergeant. J.A. 107. Both his shop chief and the first sergeant advised SSgt Addison "to go downtown and file an official report." *Id.* SSgt Addison followed this advice and submitted an affidavit to the Valdosta Police Department, wherein he alleged fraud and identify theft. J.A. 108.

Detective Robert Renfroe -- an investigator with the Valdosta Police Department -- was assigned to the case. J.A. 149-151. Detective Renfroe interviewed SSgt Addison and began contacting the businesses where the debit card had been used. J.A. 152. Three months after receiving the initial report, Detective Renfroe contacted Appellant. J.A. 154. Rather than involve Appellant's military chain of command, Detective Renfroe left his business card on the door of Appellant's off-base apartment and asked him to call. *Id.* Appellant called Detective Renfroe later that day, and they made arrangements to meet at the local police station. J.A. 155.

Appellant arrived at the interview alone. He was in uniform because he was scheduled for his duty shift later that day. J.A. 344. Appellant denied having used SSgt Addison's

debit card. J.A. 162, 356, 374. During the interview, Detective Renfroe explained that he had proof of at least three felonies and that Appellant could go to jail for what he was suspected of having done. J.A. 370-71. The detective also explained that military law-enforcement authorities were not aware of the allegations. J.A. 400. Detective Renfroe added that it was his understanding that SSgt Addison's first sergeant had specifically declined to alert military law-enforcement authorities because "nothing [had] been proven yet." *Id.* Detective Renfroe added that he planned to notify the Air Force Office of Special Investigations (AFOSI) after his interview with Appellant. *Id.* The record is silent as to when Detective Renfroe notified AFOSI or other military authorities, or whether he notified them at all. At the conclusion of the interview, Detective Renfroe suggested that Appellant "might be able to work things out with Sergeant Addison." J.A. 163.

Appellant ultimately was arrested and detained overnight by civilian authorities. J.A. 315-16. During Appellant's court-martial, trial counsel informed the military judge that, at the point Appellant was arrested, military authorities were unaware of the arrest. J.A. 317. Specifically, trial counsel said

[t]here is no nexus at that point to anybody in the military. Nobody in the military knew anything about it. The accused testified he never told anybody in his unit other than sort of the casual acquaintances



and friends that he was in jail. In short, this has nothing to do with the military or the government.

*Id.*

At some point after Appellant posted bond, the civilian authorities declined to prosecute him. J.A. 173. On 5 April 2010, the Government preferred charges against Appellant, alleging, *inter alia*, one Article 107 specification of having signed an official statement ("a Valdosta Police Department Witness Statement") with intent to deceive. J.A. 10.

#### **Summary of Argument**

The Government failed to meet its burden of proving that the Valdosta Police Department Witness Statement was an "official" document for the purposes of Article 107, UCMJ. The circumstances leading up to and surrounding Appellant's statement do not bear a clear and direct relationship to his duties, as the alleged fraud was initiated off-base and involved civilian businesses and utilities. Further, the evidence established that there was not a substantial military interest in the investigation, as it (1) was initiated and conducted by civilian authorities, (2) was not conducted parallel to a military investigation, and (3) did not feature a predictable and necessary nexus to on-base persons performing official military functions on behalf of the command. The detective who took Appellant's statement was performing a non-military duty

akin to the 911 operator in *Day*, but unlike a 911 operator he had no obligation to pass on Appellant's statements to on-base persons performing military functions. Even when viewed in the light most favorable to the prosecution, the Government failed to prove beyond a reasonable doubt that Appellant signed an "official" record or document, or made any "official" statements to Detective Renfroe.

### Argument

**THE EVIDENCE IS LEGALLY INSUFFICIENT TO SUSTAIN APPELLANT'S CONVICTION FOR SIGNING A FALSE OFFICIAL DOCUMENT, IN VIOLATION OF ARTICLE 107, UCMJ, IN LIGHT OF THIS COURT'S DECISIONS IN *UNITED STATES v. TEFPEAU*, 58 M.J. 62 (C.A.A.F. 2002) AND *UNITED STATES v. DAY*, 66 M.J. 172 (C.A.A.F. 2008).**

### *Standard of Review*

This Honorable Court reviews convictions for legal sufficiency de novo. *United States v. Washington*, 57 M.J. 394, 399 (C.A.A.F. 2002).

### *Law*

"The test for legal sufficiency of the evidence is whether, considering the evidence in the light most favorable to the prosecution, any reasonable fact-finder could have found all the essential elements beyond a reasonable doubt." *Day*, 66 M.J. at 173 (citing *United States v. Turner*, 25 M.J. 324, 324 (C.M.A. 1987)). Article 107 states, "Any person subject to this chapter who, with intent to deceive, signs any false record . . . or

other official document, knowing it to be false, or makes any other false official statement knowing it to be false, shall be punished as a court-martial may direct." 10 U.S.C. § 907 (2008). Thus, for a conviction of Article 107 to stand, the Government must prove "[t]hat the accused signed a certain official document or made a certain official statement." MANUAL FOR COURTS-MARTIAL (M.C.M.), UNITED STATES, Part IV, ¶31.b(1) (2008 ed.) (emphasis added).

As this Court has explained, "[a] statement is 'official' if that statement is 'made in the line of duty.'" *Teffeau*, 58 M.J. at 68 (quoting M.C.M., Part IV, ¶31.c(1); see also *Day*, 66 M.J. at 174. Recognizing, however, that the meaning of the term "official" is expansive in military jurisprudence, this Court has explained that "[f]alse official statements are not limited to line of duty statements." *Day*, 66 M.J. at 174. In determining whether a statement or document is "official" for the purposes of Article 107 this Court examines "[t]he circumstances leading up to and surrounding the statements" at issue, *Teffeau*, 58 M.J. at 69, and asks "whether the statements relate to the official duties of either the speaker or the hearer, and whether those official duties fall within the scope of the UCMJ's reach." *Day*, 66 M.J. at 174. If those circumstances "bear a clear and direct relationship to [an accused's] duties . . . and reflect a substantial military

interest in the investigation[,]" then an accused's statements to civilian law-enforcement authorities can be considered "official." *Teffeau*, 58 M.J. at 69.

Applying this legal framework in *Teffeau*, this Court found that the accused's statements to civilian police were "official." *Id.* SSgt Teffeau was a Marine Corps recruiter whose duties included making weekly contact with recruits waiting to enter active duty. *Id.* at 64. SSgt Teffeau and a fellow recruiter made plans to visit two female recruits at one of the recruits' home. *Id.* SSgt Teffeau notified his supervisor that he and his co-worker would be traveling to a nearby town -- the town in which the recruits lived -- as part of their official duties. *Id.* The accused and the other recruiter, both of whom were in uniform, drove to the recruit's home in a government vehicle, stopping along the way to purchase alcohol. *Id.* While at the recruit's home, SSgt Teffeau, his co-worker, and one of the recruits consumed alcohol. *Id.* After drinking for nearly three hours, SSgt Teffeau and his co-worker changed out of their uniforms and left with one of the recruits for a nearby lake. *Id.* SSgt Teffeau drove the government vehicle, while his co-worker rode with the recruit. *Id.* On the way to the lake, the recruit lost control and skidded into a tree -- killing her and injuring SSgt Teffeau's co-worker. *Id.* Civilian police officers investigating the accident interviewed

SSgt Teffeau, who was in uniform during the interrogation and had been accompanied to the police station by his military supervisor. *Id.* at 67-68. During the interview, SSgt Teffeau made three false statements to the police.

This Court rejected "any absolute rule that statements to civilian law enforcement officials can never be official within the meaning of Article 107." *Id.* at 69 (citations omitted). Instead, the Court examined the circumstances surrounding SSgt Teffeau's statements and determined that they (1) bore "a clear and direct relationship to [his] duties as a recruiter" and (2) reflected "a substantial military interest" in the civilian investigation. *Id.* In affirming SSgt Teffeau's convictions, this Court specifically noted the following facts: (1) SSgt Teffeau knew the other recruiter and the two women as a result of his official duties; (2) he had implied to his supervisor that the meeting was related to his recruiting duties; (3) he had used an official Government vehicle to travel to the recruit's home; (4) he was in uniform when he went to meet the women; (5) the civilian police were aware of SSgt Teffeau's duties and status; (6) his military supervisor accompanied him to the police station; (7) SSgt Teffeau was in uniform when interviewed by civilian police officers; (8) the investigation concerned potential criminal misconduct involving a person subject to the UCMJ; (9) there was a parallel military

investigation into the incident; and (10) the subject of the civilian police investigation "was of interest to the military and within the jurisdiction of the courts-martial system." *Id.*

In *Day*, this Court applied *Teffeau* to statements made to civilian firefighters who worked for the Little Rock Air Force Base Fire Department and to a civilian 911 dispatcher. 66 M.J. at 174-75. After discovering his infant son was not breathing, AB Day told the 911 dispatcher and the two responding firefighters that he had found his son asleep face-down in his crib. *Id.* at 173.

This Court determined that AB Day's statements to the firefighters were "official." *Id.* at 175. The circumstances surrounding his statements showed that the firefighters were "charged with performing an on-base military function" and that the provision of on-base emergency services was of interest to the commander, who was charged with ensuring "the health and welfare of dependents residing in base housing over which he exercised command responsibility." *Id.*

This Court ruled, however, that the Government had not proven that AB Day's statement to the 911 dispatcher was official. *Id.* The unanimous Court explained that, "[i]n theory, statements made to an off-base 911 operator might implicate Article 107, UCMJ, in situations where, among other things, there is a predictable and necessary nexus to on-base

persons performing *official* military functions on behalf of the command." *Id.* at n.4 (emphasis in original).

#### *Analysis*

Here, the Government failed to prove beyond a reasonable doubt that the "Valdosta Police Department Witness Statement" signed by Appellant is "official" for the purposes of Article 107, UCMJ. Even when viewed in the light most favorable to the prosecution, the circumstances surrounding the statement do not bear a clear and direct relationship to Appellant's military duties, nor do the circumstances reflect a substantial military interest in an off-base investigation for off-duty criminal conduct. As a result, Appellant's Article 107 conviction is legally insufficient.

**A. The circumstances surrounding Appellant's statement do not bear a clear and direct relationship to his military duties.**

Unlike in *Teffeau*, the evidence presented at Appellant's trial does not establish that the circumstances leading up to and surrounding Appellant's written statement bear a clear and direct relationship to his military duties. The Government's theory of the case was that, while staying at SSgt Troy Addison's off-base apartment, Appellant transcribed SSgt Troy Addison's debit card information. J.A. 251. Appellant then used that information to pay for goods and services from off-base retailers and utilities. J.A. 251-59. Appellant obtained

all but one of the goods/services from off-base locations.<sup>2</sup> Further, there was no evidence presented that Appellant was in uniform at the time he made the purchases. On the contrary, SSgt Givens suggested that Appellant was off-duty at the time he purchased a laptop computer from BestBuy.com. J.A. 50, 59. None of the witnesses testified that Appellant was on duty or in uniform when he picked up the items he had ordered from online retailers. While Appellant knew SSgt Addison through his military duties and may have used Government equipment on one occasion to obtain a computer under false pretenses, the evidence presented at trial established that Appellant's crimes were committed irrespective of his duties, responsibilities, and status as an Airman.

**B. The circumstances surrounding Appellant's statement do not reflect a substantial military interest in the civilian police investigation.**

Even assuming *arguendo* that this Court finds a "clear and direct relationship" to Appellant's military duties, the circumstances surrounding his statement do not reflect a "substantial military interest" in the Valdosta Police Department's investigation. See *Teffeau*, 58 M.J. at 69. Unlike in *Teffeau*, there was no parallel, on-going military

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<sup>2</sup> Appellant was convicted of obtaining a desktop computer from Tigerdirect.com through false pretenses. J.A. 19. The desktop apparently was purchased from a Government computer, but the prosecution did not present any evidence that it was Appellant who placed the order, from which computer it was placed, or whether he was on duty or in uniform when the order was placed. J.A. 290.



investigation at the time of Appellant's interview. Similarly, the military apparently did not express an interest in the investigation until civilian authorities waived jurisdiction. Rather than immediately involve military authorities, SSgt Addison contacted his bank upon learning of the suspect charges. J.A. 120. He then completed a "fraud affidavit" and mailed it to the bank. J.A. 121. While SSgt Addison eventually reported the allegations to his supervisor and first sergeant, his military chain of command "told [him] to go downtown and file an official report." J.A. 107. There was no evidence that SSgt Addison was accompanied to the local police department by his military superiors or that they were involved in the reporting in any way.

Further indicative of the lack of military interest here are the steps taken by Detective Renfroe to interview and investigate Appellant. When the detective finally contacted Appellant -- more than three months after SSgt Addison's initial police report -- he did so without involving any military authorities, to include Appellant's chain of command or AFOSI. Instead, Detective Renfroe contacted Appellant directly, leaving his business card at Appellant's off-base apartment. J.A. 154. Appellant then voluntarily called Detective Renfroe and arranged to meet him at the police station. J.A. 155. When he arrived, Appellant was in uniform -- but apparently only because he was

going to work afterwards. J.A. 344. Appellant was not accompanied by any military personnel.

The Government did not present any evidence that military authorities ever conducted their own investigation or inquired into Detective Renfroe's investigation. This is true even though the detective testified that there was a three-month gap between the initial report of fraud and Appellant's interview. In fact, during the interview, Detective Renfroe specifically informed Appellant that Air Force law-enforcement authorities had not been notified of the allegations against Appellant. J.A. 400. The detective added that the military did not appear interested in the allegations "because . . . nothing's been proven yet." *Id.* These facts differ significantly from *Teffeau*, where military authorities escorted the accused to his first interview with police and then initiated a parallel investigation. 58 M.J. at 69.

Even trial counsel acknowledged the military's lack of interest in the civilian investigation at the time of Appellant's statement. In reference to Appellant's pretrial confinement at a civilian jail, trial counsel informed the factfinder that "[t]here is no nexus at that point to anybody in the military. . . . In short, this has nothing to do with the military or the government." J.A. 317. Similarly, during presentencing proceedings, assistant trial counsel noted that

this was a case where "a civilian detective is involved calling civilian records custodians at civilian businesses getting receipts." J.A. 318. Appellant acknowledges that this Court's "assessment of an appellant's guilt or innocence for legal sufficiency is limited to the evidence presented at trial." *Day*, 66 M.J. at 174 (citation omitted). While trial counsel's argument is not evidence, *United States v. Hayes*, 71 M.J. 112 (C.A.A.F. 2012), the points made, and not made, during that argument illustrate the lack of a substantial military interest in the civilian investigation.

In addition to a lack of proof as it relates to a "substantial military interest," there was insufficient evidence that would establish a "predictable and necessary nexus to on-base persons performing *official* military functions on behalf of the command." *Day*, 66 M.J. at 175 (emphasis in original). Unlike a civilian firefighter charged with responding to on-base emergencies, Detective Renfroe had no affiliation with or responsibility to the military. He was not carrying out the commander's interest in preserving good order and discipline because (1) he was under no obligation to do so and (2) the record does not indicate whether the commander was even aware of the allegation or investigation.<sup>3</sup>

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<sup>3</sup> Even assuming the commander was aware, as noted *supra* SSgt Addison's supervisor and first sergeant both directed him to report the crime to civilian authorities rather than involve military law-enforcement officials.

As a civilian unburdened with any duty to the military, Detective Renfroe was akin to *Day's* civilian 911 dispatcher. Like a dispatcher, the detective essentially took a call, made contact with Appellant, and in the course of that contact received a false statement. Unlike a civilian 911 dispatcher, however, Detective Renfroe was under no obligation to pass on Appellant's statements to on-base personnel functioning on behalf of the command. Simply put, Detective Renfroe's official interest in Appellant had nothing to do with Appellant's military status -- instead, the record establishes only that the detective was investigating a crime committed in violation of state laws and that his interest was in enforcing those laws. The Government's failure to establish that the military had a substantial interest in Appellant's court-martial necessitates a reversal of his Article 107 conviction. *See Tefteau*, 58 M.J. at 69; *see also United States v. Morgan*, 65 M.J. 616, 620 (N-M. Ct. Crim. App. 2007), *review denied*, 65 M.J. 447 (C.A.A.F. 2007) (holding an accused's statements to civilian police were not official where the accused was on leave at the time of the statement and where the civilian investigation was limited to enforcing state laws). To paraphrase assistant trial counsel, Detective Renfroe was a civilian detective conducting a civilian investigation of alleged fraud suffered by civilian businesses.

### **Conclusion**

The Government failed to meet its burden of proving that the Valdosta Police Department Witness Statement was an "official" document for the purposes of Article 107, UCMJ. The circumstances leading up to and surrounding Appellant's statement do not bear a clear and direct relationship to his duties, as the alleged fraud was initiated off-base and involved civilian businesses and utilities. Further, the evidence established that there was not a substantial military interest in the investigation, as that investigation (1) was initiated and conducted by civilian authorities, (2) was not conducted parallel to a military investigation, and (3) did not feature a predictable and necessary nexus to on-base persons performing official military functions on behalf of the command. Even when viewed in the light most favorable to the prosecution, the Government failed to prove beyond a reasonable doubt that Appellant signed an "official" record or document, or made any "official" statements to Detective Renfroe.

**WHEREFORE**, Appellant requests this Honorable Court set aside Charge I and its specification, and order a rehearing on the sentence.

A handwritten signature in black ink, appearing to read 'Shane A. McCammon', with a long horizontal flourish extending to the right.

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