

MIDLANT Legal Compass

Guiding Warfighters through Legal and Ethical Waters

INSIDE THIS ISSUE:

Key Points on In-Service Transition for Transgender Service Members	2
Termination of Leases by Order to Government Housing	4
Commanding Officers' Authority and Protected Health Information	6
Online Special Powers of Attorney	7
A Refresher on Use of Blood Alcohol Content (BAC) for Disciplinary Purposes	8
Updates to the UCMJ	9
MIDLANT Adjudged Court-Martial Sentences	10
MIDLANT Board of Inquiry Results	12
Command Services POCs	13

Basic Legal Information for Command TRIADs and individual Sailors.

This edition of the Legal Compass discusses In-Service Transition for Transgender Service Members, Termination of Leases by Order to Government Housing, Commanding Officers' Authority and Protected Health Information, Online Special Powers of Attorney, A Refresher on Use of Blood Alcohol Content for Disciplinary Purposes, and Updates to the UCMJ. For the most up-to-date guidance and advice, contact your local RLSO MIDLANT Command Services Office.

As always, we end with our Courts-Martial and Board of Inquiry results. This provides a snapshot of the cases completed this quarter and their results. For questions about these cases, please contact either the Trial Department or the SJA to Commander, Navy Region Mid-Atlantic (CNRMA).

If you seek additional information or have a topic suggestion, please contact our Legal Compass Editor, the Command Services Department Head, LCDR Erik Carlson.

Very Respectfully,
 /S/
 Lawrence D. Hill, Jr.
 CAPT, JAGC, USN
 Commanding Officer, RLSO MIDLANT

The primary mission of Region Legal Service Office Mid-Atlantic (RLSO MIDLANT) is to provide prosecution, command services, and legal assistance support to eligible commands and persons in support of Fleet operational readiness.

The *MIDLANT Legal Compass* is a periodic newsletter published by the RLSO MIDLANT Command Services Department.



Key Points on In-Service Transition for Transgender Service Members

By Command Services Extern, Ms. Stefani Gillenwater

On June 30, 2016, the Secretary of Defense announced the Pentagon has ended the ban on transgender people openly serving in the military. He stated that “[e]ffective immediately, transgender Americans can serve openly, and they no longer can be discharged or otherwise separated from the military just for being transgender.” The new policy allows transgender service members to openly acknowledge their gender identity and allows commanders to work with the service member and a military medical provider to implement a gender transition plan that meets the individual’s medical requirements and unit readiness requirements. The policy is being revised to allow the Military Services to recruit new transgender personnel no later than July 1, 2017.

BACKGROUND

- Sex is the assignment made at birth as male or female, based on anatomy. Gender identity is an individual’s internal sense of being male or female.
- Gender dysphoria is a medical diagnosis that refers to distress that some transgender individuals experience due to a mismatch between their gender and their sex assigned at birth.
- Broadly, the term “transgender person” refers to individuals whose internal sense of being male or female (gender identity) is different from the sex they were assigned at birth.

COMMANDER’S ROLES AND RESPONSIBILITIES

The commanding officer is responsible for evaluating a service member’s request for gender transition in accordance with DoDI 1300.28 and Service regulations. If, after reviewing the request for gender transition, the commanding officer determines the request is incomplete, the commander must notify the service member of the discrepancy in writing, as soon as practicable, but not later than 30 days after receipt.

The commanding officer must also respond, in writing, to any request for medical treatment or an exception to policy associated with gender transition. The CO must respond as soon as practicable, but not later than 90 days after receiving a complete request. The response must include notice of any action taken by the commanding officer and must be provided to both the service member and the military medical provider. At any time prior to the change of a service member’s gender marker in the personnel data system, the commanding officer may modify a previously approved plan for transition.

A commander must return an incomplete request to transition gender via written notice no later than 30 days after receipt.

A commander must respond to a completed request to transition gender no later than 90 days after receipt.

For more information on this new policy, please contact your command's SJA, RLSO MIDLANT Command Services Department, or the SCCC.

Upon approval of a request for gender transition, the service member, military medical provider, and the command will work together to craft and implement a plan for changing the gender marker. Upon reaching the point in the transition plan where the military medical provider recommends changing the service member's gender marker, and upon receiving the requisite legal documentation from the service member, the commander will approve the request to change the service member's gender in the personnel data system. The service member can then take the commander's approval, along with the legal documentation, to the personnel administrative office to obtain the change to the gender marker. Once the gender marker has been changed in the personnel data system, the commanding officer shall apply uniform, grooming, BCA, PRT, berthing, bathroom, and other standards to reflect the gender marker in the service member's personnel data system.

There are several factors that a commanding officer should consider in making the decision to approve a service member's request for gender transition. For example, the commanding officer should consider the impact transitioning may have on deployability and duty station assignment because not all duty stations can support gender transition and gender transition may lead to periods of non-deployability. One resource available to assist commanding officer's in approving gender transition is the Service Central Coordination Cell (SCCC). The SCCC is a group of multi-disciplinary experts created to provide advice and assistance to commanders with regard to service by transgender service members.

With the assistance of the SCCC and others, the commanding officer, service member, and military medical provider can work together to develop a plan that meets both the individual's needs and unit readiness requirements.

For additional guidance regarding the policy on transgender service, contact your command's SJA, RLSO MIDLANT Command Services Department, or the SCCC, available at: us_navy_sccc@navy.mil.

References:

- DoD Transgender Handbook
 - SECNAVINST 1000.11
 - USN Transgender and Gender Transition CO's Toolkit
 - NAVADMIN Interim Guidance for Service of Transgender Navy Personnel
 - Transgender Announcement Briefing Card
 - Navy's Updated Transgender Policy: Ten Things You Need to Know
-

Termination of Leases by Order to Government-Housing

By LT Aaron Spencer, JAGC, USN

Under the Servicemembers Civil Relief Act and many state laws, active-duty servicemembers have the ability to terminate a lease with no penalty due to deployment or PCS orders. But what if a Sailor is not deploying or executing a PCS? What if the Sailor is just in over his head with bills and cannot afford his apartment, or if the apartment is in a high crime area and it has been broken into several times, or if the discord between roommates has reached the point that it is detrimental to the good order and discipline of the unit?

In some states, commanding officers have another option. Provisions of law in states like Virginia (Va. Code Ann. § 55-248.21:1), Florida (Fla. Stat. Ann. § 83.682), Louisiana (La. Rev. Stat. Ann. § 9:3261), and Pennsylvania (51 Pa. Cons. Stat. Ann. § 7315.1) will allow a Sailor to terminate a lease without penalty if ordered by his command to government-supplied quarters.

What is my Military Authority?

A commanding officer has broad legal authority to regulate the conduct of the Sailors in his charge through lawful orders that relate to their military obligations. This will include all activities that affect or are necessary to accomplish the military mission and safeguard the morale, discipline, and usefulness of a command.

What are “Government-Supplied Quarters?”

The short answer is that government-supplied quarters are those living situations which result in the loss of BAH. This will include living on the ship, in barracks, or in PPV housing.

What Do I Need to Do?

The commanding officer issues an order similar to the following:

1. You are hereby directed to move into government-supplied quarters. Such direction is made to maintain your individual military readiness.
2. Within 5 days you are to provide written notice to your landlord that pursuant to the [insert applicable state law] your lease is being terminated. Such notice to your landlord must be in writing with a copy to your immediate supervisor. The notice shall include a copy of this order and provide for a termination date effective not less than 30 days after the first date on which the next rental payment is due following the delivery of the notice.
3. For further guidance you may seek assistance from Navy Housing or the Regional Legal Service Office, Legal Assistance Department.

***BLUF:** “[S]ome states ... will allow a sailor to terminate a lease without penalty if ordered by his command to government-supplied quarters.”*

This order should be accompanied by a Page 13 administrative counseling detailing the reason for the order (i.e. not physically safe due to environmental hazard, threat from crime, or financial situation places the Sailor at risk of loss of security clearance).

What Does My Sailor Need to Do?

The Sailor must provide his landlord a physical letter notifying the landlord that he is terminating his lease and on what day the lease will terminate. The letter should also include the legal basis for termination and have a copy of the order attached. This notice is effective 30 days after the first date on which the next rent payment is due. Also note that this will only work for the Sailor who has been ordered to government-supplied quarters, not for any roommates or dependents on the actual lease.

What Can the Landlord Take from my Sailor?

The landlord cannot charge any early termination fees or penalties; however, the Sailor will still be liable for any damages beyond “normal wear and tear.”

What Else Should I Consider?

Removing a Sailor from an unsafe environment or from an apartment that he cannot afford will have an immense positive impact on that Sailor’s safety, morale, discipline, and usefulness to the command.

However, an order to government-supplied quarters should only be undertaken as a last recourse. We have a duty to coexist with the communities around us and over-use of this legal option could very well lead landlords and business people to lobby their representatives to seek a change in the law. There are no provisions in the law requiring the Sailor to stay in government-supplied quarters for a specified length of time, but at minimum a six-month stay is recommended to give the Sailor time to get on his feet and receive appropriate counseling and guidance. This also ensures the Sailor will not go back into town to rent another place immediately, hence, running the risk that the community will think the provision is just a legal back door to let a Sailor walk away from his obligations rather than a tool to aid in military readiness.

If you or your Sailors have any questions, contact your Staff Judge Advocate or the local Legal Assistance Department for further guidance.

“The Sailor must provide his landlord a physical letter notifying the landlord that he is terminating his lease and on what day the lease will terminate. The letter should also include the legal basis for termination and have a copy of the order attached.”

Commanding Officers' Authority and Protected Health Information

By LT Regina Davis-Niles, JAGC, USN, SJA, Naval Medical Center, Portsmouth

The health and fitness of active-duty personnel is on the radar of every commanding officer because of the impact it can have on unit or command manning, safety, and mission readiness. Under the Department of Defense Health Information Privacy Regulation, (Regulation) commanding officers may receive protected health information (PHI) of the Armed Forces personnel under their command when deemed necessary to ensure the proper execution of the military mission. Commanding officers have authority to request PHI from both Military Treatment Facilities (MTF), as well as civilian medical facilities. Additionally, the Regulation affords commanding officers broad discretion as to when they can request an active-duty member's PHI. Common purposes for which PHI may be used or received by a commanding officer include: to determine a member's fitness for duty, mission, or order; to report a casualty in any military operation or activity, and to carry out any other activity necessary to the proper execution of the mission of the Armed Forces. A commanding officer's authority to use and receive PHI may be delegated when done so in writing and the delegation is provided to the entity controlling the PHI, often the MTF or civilian medical facility Health Information Privacy and Portability Act (HIPAA) Officer or health care provider.

While a commanding officer may have authority to access an active-duty member's PHI; however, certain records receive additional protection in terms of how they may be used. For example, substance abuse rehabilitation program (SARP) counseling records may not be introduced against an active-duty member at a court-martial except as authorized by a court order or, if the active-duty member introduces the records first. This extra protection from disciplinary or punitive action is to encourage members to seek out and obtain treatment for substance abuse issues. However, such treatment and counseling records may be presented during administrative separation proceedings since those forums are not considered to be disciplinary or punitive. Similarly, a crime victim's PHI receives additional protection. In most cases, the victim must consent to the disclosure of their PHI before it can be released to a third party, including a CO or law enforcement, unless the disclosure is authorized by a court order.

Recently, the chances a commanding officer may need to access to a Sailor's PHI increased with the Secretary of the Navy memorandum titled, "Disability Evaluation System Dual Processing", published on 1 June 2016. This memorandum modified the dual processing procedures for active-duty personnel undergoing both the physical evaluation board process (PEB) and involuntary administrative separation for misconduct that authorizes an Other than Honorable characterization of discharge. The memo requires a convening authority to submit a doctor's opinion to the separation authority regarding whether the medical condition that caused referral into the Disability Evaluation System (DES) contributed to the basis for which a member is being separated. Previously, such

"[A] commanding officer's need to access and receive a sailor's PHI has increased with the Secretary of the Navy memorandum titled, 'Disability Evaluation System Dual Processing' that was published on 1 June 2016."

-DoD 6025.18-R

-SECNAVINST
5300.28E

- SECNAV
Memorandum of 1
June 16,
"Disability
Evaluation System
Dual Processing"

medical opinions were only required for traumatic brain injury and post-traumatic stress disorder cases regardless of whether or not they were referred to the DES.

Determining who to contact at an MTF concerning PHI requests can be confusing. MTF Legal Departments are always a good place to start and we are more than happy to serve as the communication link between the Fleet and MTF. The Naval Medical Center, Portsmouth Legal Department can be reached at 757-953-5452.

Online Special Powers of Attorney

By RLSO Midlant Legal Assistance Staff

Service members no longer have to go to the Region Legal Service Office (RLSO) to obtain a Special Power of Attorney. Now, they can create and print their own Special Powers of Attorney at http://www.jag.navy.mil/legal_services/SPOA.htm and then have their documents notarized by either (1) legal officers at their command who are notary qualified, (2) a civilian notary, or (3) their local RLSO. Effective 1 October 2016, RLSO MIDLANT will only draft Special Powers of Attorney for service members in exceptional circumstances. However, RLSO MIDLANT will continue providing notary services for Special Powers of Attorney drafted by individual service members.

Please note that each online form gives service members the option to draft each Special Power of Attorney for a military notary or for a civilian notary. If service members draft their own Special Powers of Attorney to be notarized at RLSO MIDLANT, **they must generate those Special Powers of Attorney for a civilian notary in the state of Virginia by checking the box that says "Use Civilian Notary" and selecting the state of Virginia.**

Special Powers of Attorney now available online.

A Refresher on Use of Blood Alcohol Content (BAC) for Disciplinary Purposes

By LT Chelsea King, JAGC, USN

The misuse and abuse of alcohol is not a new problem for the Navy. However, misuse of BAC levels when disciplining Sailors can result in overturned non-judicial punishments (NJP) and “no basis” determinations at administrative separation boards. While commands desire to hold their Sailors accountable and impose punishment for alcohol use on-duty and for other alcohol-related incidents, it’s important to follow proper procedures. The following is a refresher on using BAC for disciplinary purposes.

Alcohol Detection Devices

OPNAVINST 5350.8, Use of Hand-held Alcohol Detection Devices (ADD), lays out the proper procedure for using random ADD tests in order to promote safety, awareness, and the responsible use of alcohol. It also clearly states ADDs may not be used as a basis to impose discipline upon a service member through NJP or as a basis for administrative separation. Proper use of ADDs involves random checks as part of a larger plan, like a random sampling of Sailors in a duty status. When a commanding officer orders Sailors undergo an ADD inspection, it is a lawful order, and if refused, could lead to NJP.

Fit for Duty Determinations

Fit for duty determinations, as governed by BUMEDINST 6120.20C, may be used to determine whether a Sailor can safely and effectively perform his or her duties by examining if the Sailor is under the influence of drugs or alcohol. Like the use of ADDs, the purpose of a fit for duty determination is safety. Therefore, using the BAC results from a blood test or urinalysis collected during a fit for duty determination as a basis for discipline is not permitted.

Best Practice

The best practice for use of a positive ADD hit or a failed fit for duty test is as a basis for a probable cause search. These test failures and other extrinsic evidence of alcohol use—like the smell of alcohol and a disheveled appearance—may be relied upon by a commanding officer to determine whether probable cause exists to issue a search authorization. If probable cause is determined, then a command authorized search and seizure (CASS) should be issued to order a search in the form of a breathalyzer test or search of the person if relevant. Then, the command can build an actionable case for NJP using the BAC from the CASS.

When in doubt, contact a command services judge advocate at RLSO MIDLANT to talk through your command’s options and advise on how to best proceed towards discipline.

***BLUF:** “The best way to transform the positive ADD hit and failed fit for duty tests is to use those failures and other extrinsic evidence of alcohol use ... as the basis for a probable cause search.”*

-OPNAVINST
5350.8

-BUMEDINST
6120.20C

Updates to the UCMJ

By Navy JAG Corps, Code 20

On 16 September 2016, the President signed Executive Order (EO) 13740 implementing numerous changes to the Manual for Courts-Martial (MCM). Additionally, the Joint Service Committee on Military Justice (JSC) will release Supplementary Materials accompanying the MCM that amend a number of Discussion paragraphs and certain portions of the Analysis appendix.

Major changes include:

- R.C.M. 307(c)(3) and Pt. IV, ¶160: Require that a specification alleging an Art. 134 violation expressly allege a terminal element.
- R.C.M. 701(e) and 703(a): Require defense counsel to request any interview with a victim of a sex-related offense through the victim's counsel, and to conduct interviews with certain persons present.
- Pt. IV, ¶¶43.c.(5)(b) and 44.b.(2)(d): Reflect the elimination of consensual sodomy as an Art. 125 offense.
- Pt. IV, ¶¶45, 45b, and 45c: provide elements, explanations, and sample specifications for Articles 120, 120b, and 120c, and implement the FY14 NDAA's enactment of the mandatory minimum sentence of dismissal or dishonorable discharge for rape and sexual assault and rape and sexual assault of a child.
- Pt. IV, ¶190: Establishes the offense of indecent conduct, which, unlike the earlier offense of indecent acts with another, does not require the presence of another person.

Effective date:

All changes to the MCM were effective as of 16 September 2016 with two exceptions. First, the changes will not make punishable any act done or omitted prior to 16 September. Second, any non-judicial punishment proceeding, restraint, preliminary hearing, referral of charges, trial in which arraignment occurred, or other action commenced prior to the signing of the EO shall not be invalidated by the new rules and, if still in progress, shall proceed as if the new rules had not yet come into effect.

The EO and Supplementary Materials will be posted on the JSC webpage – <http://jsc.defense.gov>.

These updates should be kept in mind instead of the now out-of-date version in the Manual for Courts-Martial (MCM).

RLSO MIDLANT Adjudged Court-Martial Sentences
July – September 2016

General Courts-Martial

At a General Court-Martial in Norfolk, Virginia, an E-3 was charged with sexual assault and false official statement. On 8 July 2016, the panel of members returned a verdict of not guilty to all charges.

At a General Court-Martial in Norfolk, Virginia, an E-7 pled guilty, pursuant to a pretrial agreement, to five specifications of child rape and four specifications of sexual abuse of a child. On 14 July 2016, the Military Judge sentenced him to a dishonorable discharge, reduction in rank to paygrade E-1, total forfeitures of pay and 9 years and 10 months confinement. Pursuant to the pretrial agreement, if the service member fails to complete a sex offender treatment program while in confinement, he will have to serve 15 years confinement.

At a General Court-Martial in Groton, Connecticut, an E-3 was charged abusive sexual contact, indecent exposure, and assault consummated by a battery. On 21 July 2016, the panel of members returned a verdict of not guilty to all charges.

At a General Court-Martial in Norfolk, Virginia, an E-7 pled guilty pursuant to a pretrial agreement to two specifications of assault consummated by a battery and one specification of drunk and disorderly conduct. On 17 August 2016, the Military Judge sentenced him to reduction in rank to paygrade E-4 and confinement for 9 months. Pursuant to the pretrial agreement, all confinement greater than 60 days is to be suspended and remitted.

At a General Court-Martial in Norfolk, Virginia, an E-6 was charged with sexual assault. On 30 August 2016, pursuant to a pretrial agreement, the Accused pled guilty to one specification of assault consummated by battery. The Military Judge sentenced him to 170 days of confinement, a bad conduct discharge, and reduction in rank to E-1. The pretrial agreement had no effect on the adjudged sentence.

At a General Court-Martial in Norfolk, Virginia, an E-7 pled guilty pursuant to a pretrial agreement to four specifications of violating an order, one specification of false official statement, one specification of adultery, and one specification of assault consummated by a battery. On 7 September 2016, the Military Judge sentenced him to reduction in rank to paygrade E-5, forfeiture of pay of \$1,583 per month for three months and confinement for 89 days. Pursuant to the pretrial agreement, all confinement greater than 30 days is to be suspended and remitted, all adjudged forfeitures in excess of \$500 per month for 2 months will be remitted, and any reduction below the paygrade of E6 will be remitted.

At a General Court-Martial in Norfolk, Virginia, an E-7 was found guilty of sexual assault. On 16 September 2016, the Members sentenced him to 6 years confinement and a dishonorable discharge.

At a General Court-Martial in Norfolk, Virginia, an E-4 pled guilty to involuntary manslaughter and obstruction of justice. He was tried for the greater offenses of 2nd degree murder and 3rd degree murder. On 21 September 2016 the Military Judge acquitted him of the greater offenses. On 22 September 2016 the Military Judge sentenced him to 42 months confinement and a dishonorable discharge.

At a General Court-Martial in Groton, Connecticut, an E-7 was found guilty of sexual abuse of a child and indecent exposure. On 23 September 2016, the Members sentenced him to 8 months confinement and a dishonorable discharge.

Special Courts-Martial

At a Special Court-Martial in Norfolk, Virginia, an E-3 pled guilty, pursuant to a pretrial agreement, to one specification of abusive sexual contact. On 18 July 2016, the Military Judge sentenced him to be confined for 175 days. The pretrial agreement had no effect on his sentence.

At a Special Court-Martial in Norfolk, Virginia, an E-2 was tried for two specifications of failure to obey order or regulation violating a lawful general order and two specifications of aggravated assault. On 9 August 2016, a panel of Members returned a verdict of guilty to one specification of failure to obey o a lawful general order and not guilty to aggravated assault. He was sentenced to no punishment.

At a Special Court-Martial in Norfolk, Virginia, an E-2 was tried for failure to obey a lawful order, indecent exposure, and assault. On 31 August 2016, the Military Judge returned a verdict of guilty to all charges and sentenced him to 1 year confinement and a Bad-Conduct Discharge.

RLSO MIDLANT Board of Inquiry Results
July – September 2016

During a Board of Inquiry (BOI) held on 27 July 2016, an O-6 was ordered to show cause for retention due to misconduct under Articles 92, 120, and 133 and substandard performance of duty. The BOI found that the member committed misconduct and recommended that the member be separated with an Other Than Honorable characterization of service.

During a BOI held on 31 August 2016, an O-3 was ordered to show cause for retention due to misconduct under Articles 92, 107, 133, and 134 and substandard performance of duty. The BOI found that the member committed misconduct and recommended that the member be retained.

During a BOI held on 06 September 2016, an O-3 was ordered to show cause for retention due to substandard performance of duty. The BOI found that the member committed misconduct and recommended that the member be separated with an Honorable characterization of service.

During a BOI held on 12 September 2016, an O-3 was ordered to show cause for retention due to substandard performance of duty. The BOI found that the member committed misconduct and recommended that the member be retained.

During a BOI held on 15 September 2016, an O-3 was ordered to show cause for retention due to misconduct under Articles 92, 133, and 134 and substandard performance of duty. The BOI found that the member committed misconduct and recommended that the member be retained.

RLSO MIDLANT
COMMAND SERVICES TEAM

HAMPTON ROADS AOR

RLSO Command Services Department
(757-444-1266)

- [LCDR Erik Carlson](#) (DH)
- [LNCS Kristine Skupnik](#) (LCPO)
- [LT Bob Liu](#)
- [LT Josh Foote](#)
- [LT Christian Colburn](#)

Post-Trial Processing Division

- [Ms. Aubrey Lombardi](#) (757-341-4568)

NAVSTA Norfolk SJA

- [LT Aaron Shepard](#) (757-322-3066)

NAS Oceana / Dam Neck Annex SJA

- [LT Chelsea King](#) (757-433-2950)

JEB Little Creek-Fort Story SJA

- [LT Dennis Harbin](#) (757-462-8737)

Naval Weapons Station Yorktown SJA

- [LT Courtney London](#) (757-322-2832)

NSA Hampton Roads SJA

- [LCDR Erik Carlson](#) (757-322-3065)

TPU NORFOLK SJA

- [LT Jacob Fisch](#) (757-444-3594)
- [LN1 Veronica Watkins](#) (757- 444-3864)

NORTHEAST AOR

RLSO MIDLANT DET Groton
(860-694-3361)

- [CDR Christopher Greer](#) (OIC)
- [LCDR Ken Magee](#) (AOIC)
- [LT Michael McBride](#)
- [LTJG Nora Lopopolo](#)
- [LTJG Arun Inbavazhvu](#)

NSB New London SJA

- [LT Tom Lopez](#) (860-694-4739)

NAVSTA Newport SJA

- [LT Taylor Hart](#)(401-841-2609)

NSY Portsmouth SJA

- [LT Barbara Colberg](#)
(401) 841-3766, Ext 201

NWS Earle/NSA Lakehurst/NSA
Mechanicsburg/NSA Philadelphia
SJA

- [LT Sean Geary](#)
(732-866-2576)

RLSO Mid-Atlantic welcomes suggestions for articles and recommendations for improvement. For addition to the RLSO Legal Compass distribution list or to make suggestions or recommendations, please email: erik.a.carlson1@navy.mil

**Region Legal
Service Office Mid-
Atlantic**

9620 Maryland
Avenue
Suite 201
Norfolk, VA 23511

