

**National Indian Gaming Commission  
U.S. Department of the Interior**

**Strategic Plan  
For Fiscal Years 2014-2018**

**Regulatory Compliance ★ Gaming Integrity**

I am pleased to share with you the Strategic Plan: 2014-2018 of the National Indian Gaming Commission (“NIGC,” “Commission,” or “Agency”). This document outlines the Commission’s goals and measures by which we will assess our success over the next several years. This Strategic Plan replaces the FY 2009-2014 Plan.



We must continue to build a stronger, more effective agency. As this document outlines, we will strive to do so in very specific ways. We will strengthen our collaboration with tribal and state governments as well as other Federal agencies to enable effective regulation of Indian gaming. By facilitating tribal participation in the development of the NIGC policies, regulations, and other matters affecting tribes, we will strive to build strong government-to-government relationships, as well as increase effectiveness and efficiency within the NIGC. We will promote tribal self-sufficiency by offering opportunities for tribal governments and tribal gaming operations to continue to increase their proficiency and knowledge through technical assistance and training. We will also continue to review our regulations based on the changing needs and challenges within the Indian gaming community to ensure consistency and an up-to-date regulatory framework. Finally, we will hold ourselves to the highest standards of transparency and accountability, providing the public and tribal governments insight into our processes and decision-making.

The governmental entities regulating Indian gaming have grown along with the industry. In addition to the Commission, there are approximately 256 tribal gaming commissions serving as regulators of their gaming operations. There are also 28 states that provide varying levels of regulatory support to fulfill their responsibilities pursuant to the Indian Gaming Regulatory Act (“IGRA”) and tribal-state compacts. In addition to the NIGC, tribal and state regulatory agencies, the Department of the Interior (“DOI”), the Department of Justice (“DOJ”), the Federal Bureau of Investigation (“FBI”), the Internal Revenue Service and the Department of the Treasury all implement and enforce laws that impact Indian gaming and are used to ensure that tribes are the primary beneficiaries of Indian gaming. The NIGC coordinates with all of these governmental entities to fulfill Congress’ mandates in IGRA.

The Commission’s Strategic Plan for Fiscal Years 2014-2018 focuses primarily on improving coordination and collaboration with other Federal agencies; improving coordination and collaboration with tribes; continuing and expanding tribal consultation; providing training and technical assistance to tribal gaming commissions and operations; conducting ongoing regulatory reviews; finalizing current regulatory revisions; examining and assessing the efficiency and effectiveness of the Commission; and enhancing the NIGC’s information-technology infrastructure.

It is my pleasure to submit the NIGC’s Strategic Plan. Please feel free to contact us with your comments at [www.nigc.gov](http://www.nigc.gov).

Sincerely,

A handwritten signature in blue ink that reads "Tracie L. Stevens".

Tracie L. Stevens  
Chairwoman

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### MISSION

The NIGC's primary mission is to work within the framework created by the Indian Gaming Regulatory Act (IGRA) for the regulation of gaming activities conducted by sovereign Indian tribes on Indian lands to fully realize IGRA's goals: (1) promoting tribal economic development, self-sufficiency and strong tribal governments; (2) maintaining the integrity of the Indian gaming industry; and (3) ensuring that tribes are the primary beneficiaries of their gaming activities.

### VISION

The Commission's vision is to adhere to the principles of good government, including transparency and agency accountability; to promote fiscal responsibility; to operate with consistency and clarity to ensure fairness in the administration of IGRA; and to respect the capabilities and responsibilities of each sovereign Indian tribe in order to fully promote tribal economic development, self-sufficiency and strong tribal governments.

### HISTORY

IGRA was enacted to support and promote tribal economic development, self-sufficiency and strong tribal governments through the operation of gaming on Indian lands. The Act provides a regulatory framework to shield Indian gaming from corruption, and to ensure that the games offered are fair and honest and that tribes are the primary beneficiaries of gaming operations. The Act created the Commission to protect tribal gaming as a means of generating revenue for tribal communities. IGRA placed the Commission within the Department of the Interior (DOI), but also provided it with independent Federal regulatory authority.

The Commission monitors tribal gaming activity, inspects gaming premises, conducts background investigations and audits of Class II gaming operations (and Class III gaming operations, upon request or as provided by applicable law, such as tribal gaming ordinances and tribal-state compacts). The Commission also provides technical assistance and training to tribal gaming commissions and operations and, when appropriate, undertakes enforcement actions.

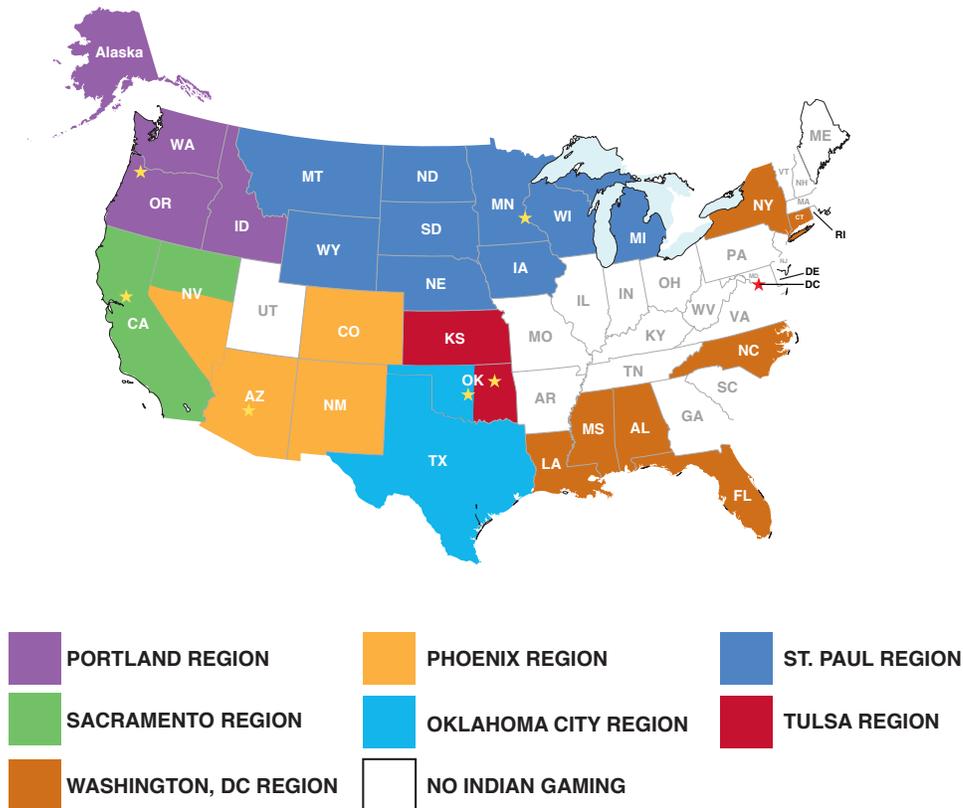
The Commission fulfills its responsibilities under IGRA by:

- ★ regulating and monitoring certain aspects of Indian gaming;
- ★ coordinating its regulatory responsibilities with tribal regulatory agencies through the review and approval of tribal gaming ordinances and management agreements;
- ★ reviewing the backgrounds of individuals and entities to ensure the suitability of those seeking to manage Indian gaming;
- ★ overseeing and reviewing the conduct and regulation of Indian gaming operations;
- ★ referring law enforcement matters to appropriate tribal, Federal and state entities; and
- ★ when necessary, undertaking enforcement actions for violations of IGRA, NIGC's regulations and tribal gaming ordinances, including imposing appropriate sanctions for such violations.

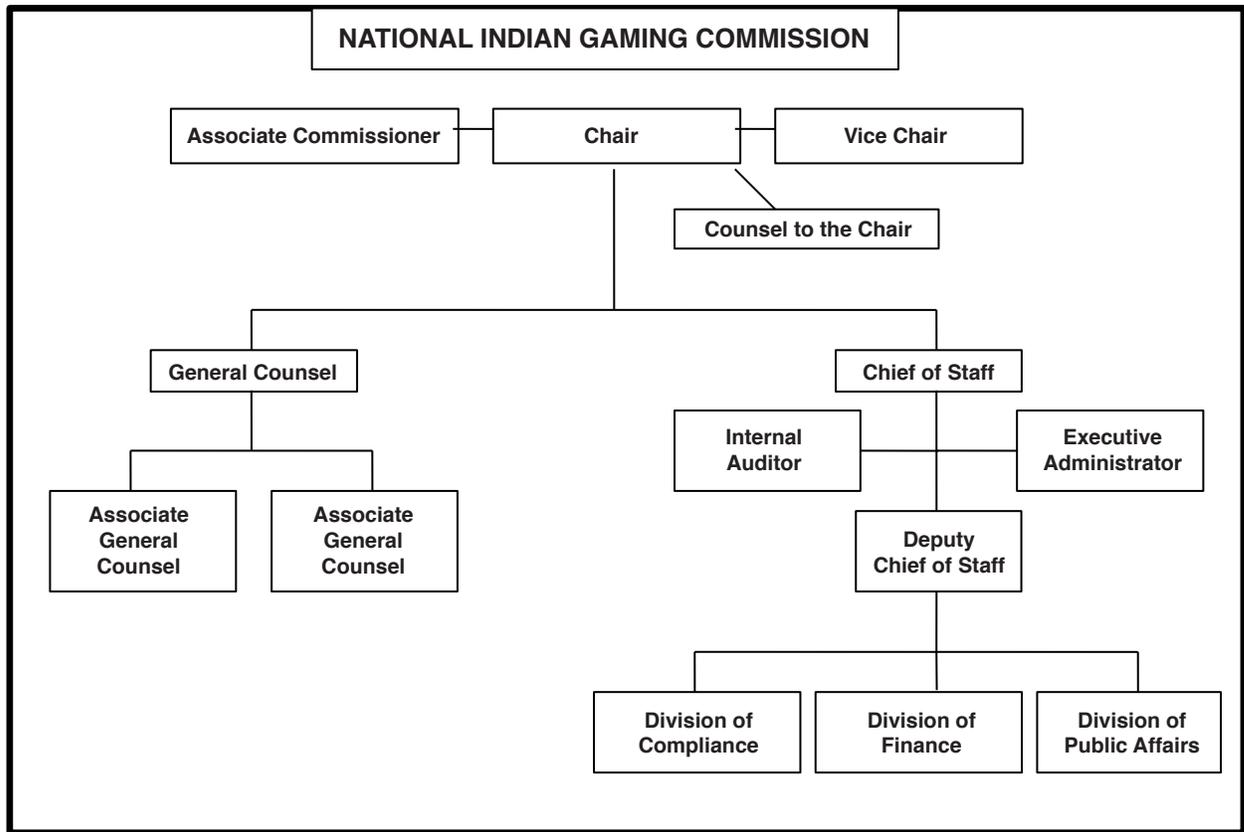
As the Commission fulfills these responsibilities, it pays close attention to any indications of corrupting influences, such as those posed by organized crime and persons known to be attracted to cash-intensive industries, such as gaming.

## Commission Structure

The Commission provides Federal oversight to 421 tribally owned, operated or licensed gaming establishments operating in 28 states. The Commission maintains its headquarters in Washington, DC, and has seven regional offices and three satellite offices. The Commission is divided into four separate divisions with a combined staff of over 100 full-time employees, as of 2012. Approximately half of the Commission staff is assigned to headquarters in Washington, DC, with the remaining staff assigned to regional offices located in Portland, OR; Sacramento, CA; Phoenix, AZ; St. Paul, MN; Tulsa, OK; Washington, DC; and Oklahoma City, OK; and satellite offices in Rapid City, SD; Temecula, CA; and Flowood, MS.



The Commission established its field offices to improve the level and quality of services it provides to tribes, and to enhance its ability to communicate, collaborate and interact with tribes located within each office's geographic region. The field offices are vital to carrying out the statutory responsibilities of the Commission. By having auditors and compliance officers close to tribal gaming facilities, the Commission seeks to facilitate compliance with the Act and better relationships with tribal leaders, officials and regulatory personnel. In addition to auditing and investigative activities, the field staff provides technical assistance and training to promote a better understanding of gaming controls within the regulated industry, and to enhance cooperation and compliance to ensure the integrity of gaming operations.



**OVERVIEW OF THE FY 2014 - 2018 PLAN**

Development of the NIGC Strategic Plan is a collaborative effort to ensure that all stakeholders have an opportunity to participate in establishing agency-wide strategies based on the Commission's priorities.

This document provides a concrete basis for establishing strategic goals, and outlines those strategies by which the Agency will achieve those goals. This document will also address how the NIGC will prioritize the allocation of its budgetary, personnel and other resources.

The NIGC Strategic Plan focuses on the four priorities of the Commission and strategies, which are seen as key for agency improvement over the next five years. The Performance and Accountability Report outlined the Commission's four priorities and were included in the NIGC Budget Justification for FY 2013. The Commission identified management and performance priorities in four areas:

- consulting and building relationships with tribal governments;
- providing technical assistance and training;
- continuing its regulatory review; and
- reviewing its internal operations.

Based upon these priorities, the NIGC developed goals and strategies designed to ensure that the NIGC uses its resources to implement, support and monitor the four priorities. All strategies listed here are essential to successful implementation of the NIGC Strategic Plan.

### GOALS

Strategic goals assert the general direction the agency wants to take to realize its mission and vision. Each goal reflects an area of focus for improving performance across the agency. The NIGC developed the following five goals:

1. Continue the Assistance, Compliance and Enforcement ("ACE") initiative;
2. Improve technical assistance and training for stakeholders;
3. Improve and update the NIGC's regulations;
4. Improve consultation, communication and relationship building with tribal regulatory authorities, and federal and state agencies; and
5. Increase efficiency, transparency and accountability.

### STRATEGIES

Strategies represent the critical link between planning and implementation. They describe how the agency is going to achieve each goal. The NIGC developed 12 strategies for achieving the goals.

### PERFORMANCE MEASURES

As the NIGC implements its goals and strategies, it is useful to monitor various performance measures so that the Commission can evaluate progress toward achieving its goals.

As with any agency there are many possible choices that may be used to measure performance. The NIGC will focus on key measures to guide success in achieving the strategic plan goals.

### GOAL 1

#### CONTINUE THE ASSISTANCE, COMPLIANCE AND ENFORCEMENT ("ACE") INITIATIVE

The basic principle in enforcing IGRA is through ACE: Assistance, Compliance, and Enforcement, in that order. The ACE approach to enforcement is consistent with the NIGC's priorities. This approach prevents foreseeable problems through effective communication, training and technical assistance, and compliance efforts.

The first step of this initiative is to provide assistance to achieve compliance with IGRA and the NIGC regulations. The Agency will respond to changes in the Indian gaming industry, anticipate the needs of stakeholders regarding such changes, and expand the Agency's understanding and resources to serve gaming tribes in regard to the changes. The Agency will continue to provide technical assistance and training to tribes to enhance compliance and reduce the potential for future violations. The Agency will work with Tribes to ensure compliance with IGRA by communicating with Tribes early in the process if there is a potential compliance issue and working with Tribes to resolve compliance issues voluntarily so that enforcement action is taken only when necessary.

The NIGC is expanding its public awareness and outreach to gaming tribes through the ACE initiative. The initiative helps connect gaming tribes with a broad array of technical assistance and trainings offered by the NIGC.

## Strategy 1

Increase the availability of technical assistance available and provided to tribes, gaming commissions, and gaming operations.

Supporting Performance Measures	2014 - 2018 Target
Number of voluntary audit technical assistance requests.	350
Number of technical assistance sessions provided to tribal gaming commissions to enhance success in maintaining compliance with IGRA.	Developing baseline

## Strategy 2

Provide timely responses to Tribes on audit findings and IGRA violations to allow adequate time for corrective action and voluntary compliance.

Supporting Performance Measures	2014 - 2018 Target
Percent of NIGC staff compliance with informing, assisting, and providing technical assistance to Tribes within established internal deadlines in regard to audit findings and compliance issues.	Developing baseline

## Strategy 3

Conduct site visits, audits and evaluations, with particular focus on improvements in tribal internal control systems to maintain the integrity of the gaming industry.

Supporting Performance Measures	2014 - 2018 Target
Number of audits and evaluations of tribal gaming facilities completed annually.	20
Number of IGRA/NIGC regulation compliance reviews completed annually to assist in voluntary compliance by tribal gaming operations.	Developing baseline
Number of tribal gaming facility site visits completed annually.	500
Percent of MICS audit exceptions satisfactorily resolved by tribal gaming operations as a result of an audit or evaluation conducted by the NIGC.	70%
Percent of tribal gaming facility audited financial statements and management letters received in compliance within timelines.	99%
Percent of quarterly fees worksheets received in compliance with timelines.	99%

## GOAL 2

### IMPROVE TECHNICAL ASSISTANCE AND TRAINING FOR STAKEHOLDERS

In partnership with the Indian gaming industry and other Federal agencies, we will provide technical assistance and training to tribes within all NIGC regions through targeted training events, site visits, and inquiries. We will build on the agency's information technology infrastructure to offer training and technical assistance opportunities through the agency's website, web portal, or online.

To improve the training program's effectiveness and improve participants' response to trainings offered, the NIGC plans to update and revise course content so that it is immediately applicable and engaging for participants.



Sacramento Regional training event

#### Strategy 1

Provide guidance, technical assistance, training, and other forms of assistance to tribes to build and sustain the capability to prevent, respond to, and recover from weaknesses in internal controls and violations of IGRA and NIGC regulations.

Supporting Performance Measures	2014 - 2018 Target
Proactively respond to tribal needs and industry changes by modifying course offerings, and methods of providing technical assistance.	Feedback reviewed annually
Percent of respondents who "agree" or "strongly agree" that the training they have received from the NIGC has assisted them with the work they do.	90%
Number of technical assistance sessions provided to tribal gaming commissions to enhance success in maintaining compliance with IGRA.	Developing baseline

Strategy 2

Provide opportunities for tribes located within all NIGC regions to participate in trainings.

Supporting Performance Measures	2014 - 2018 Target
Number of training events held annually.	70
Percent of tribes who attended annual training events .	70%
Number of site visit technical assistance events provided annually.	12
Number of attendees attending training events annually.	2000
Percent of attendees satisfied with training (indicating such by surveys at training events).	85%

**GOAL 3  
IMPROVE AND UPDATE THE NIGC's REGULATIONS**

The Agency will continue the regulatory review implemented in 2010, by continuing to improve and update the NIGC's regulations after meaningful consultation with stakeholders. We will respond to issues and changes in the Indian gaming industry by addressing present needs and anticipating needs and expanding our understanding and resources for gaming tribes. For the benefit of the gaming tribes, efforts will be directed towards ensuring gaming equipment, associated products and services, games and the rules governing their play are commensurate with that of the overall gaming industry. We will maintain Tribal Advisory Committees as needed to establish collaborative rulemaking.

Strategy 1

Finalize and implement new and revised regulations developed through the regulatory review process.

Supporting Performance Measures	2014 - 2018 Target
Number of Tribal Advisory Committee meetings held annually.	As needed
Continue to inform Tribes of new regulations through the use of NIGC's website and other media outlets, including social media.	Annually reviewed
Percent of trainings provided to agency staff and Tribes to enhance understanding of new and revised regulations.	100%
Conduct ongoing evaluations of regulations to determine the need for regulatory updates and changes through consultations, Tribal Advisory Committee meetings, Tribal Gaming Working Group meetings, and input received from agency staff and Tribes.	Annually reviewed

**GOAL 4  
IMPROVE CONSULTATION, COMMUNICATION AND RELATIONSHIP BUILDING WITH  
TRIBAL REGULATORY AUTHORITIES, AND FEDERAL AND STATE AGENCIES**

The Agency will identify methods of communicating information to tribal gaming operators, regulators and government officials that will provide for meaningful, timely and respectful consultations; improve transparency, accountability, collaboration and participation; and continue to enhance and build upon relationships with tribal, Federal and state regulatory authorities and/or agencies.

Communication and other assistance services are integral to the NIGC's support of this strategic goal. The NIGC's processes help ensure services are accurate and responses are timely. The NIGC is also developing surveys and other metrics that will assist in gauging gaming tribes and stakeholders' needs.

**Strategy 1**

Conduct meaningful consultations with tribes on NIGC proposals for regulations, rulemaking, legislation, guidance, policy formulation or actions that may have a substantial, direct effect on one or more tribes, on the relationship between tribes and the Federal government, or on the distribution of power and responsibilities between tribes and the Federal government.

Supporting Performance Measures	2014 - 2018 Target
Percent of gaming tribes and their officials, and employees attending consultations.	80%
Adoption and full implementation of the NIGC's tribal consultation policy.	By 2014
Conduct meaningful tribal consultations in conjunction with national and widely attended meetings to conserve tribal and Agency resources.	Developing baselines

**Strategy 2**

Implement the NIGC's responsibilities under the Open Government Initiative as defined by the Office and Management Budget's Open Government Directive of 2009 and improve the NIGC website to provide information about the agency and its work.



A tribal regulator addresses the Commission at a consultation in Washington State.

Supporting Performance Measures	2014 - 2018 Target
Number of increased opportunities for tribes to engage and collaborate with the agency through a forum for feedback through the NIGC website and social media platforms.	Developing baseline
Continue to improve the quality, quantity and timeliness of information made available to Tribes through the Tribal Access Portal (TAP).	By 2016
Regularly inform tribes of Agency financial resources (Gross Gaming Revenue, Agency Budget, etc.).	Annual Reporting
Percent of users satisfied with the amount and type of information available on the agency's website.	90%

Strategy 3

Coordinate and collaborate with tribal regulatory authorities, and federal and state agencies using a variety of mechanisms.

Supporting Performance Measures	2014 - 2018 Target
Develop a system for referrals to and from relevant federal regulatory authorities and agencies.	By 2015
Continue to develop partnerships via MOUs with tribal regulatory authorities, and federal and state agencies to promote efficiency.	Ongoing
Percent of tribal regulatory authorities who said that the NIGC was doing a "good" or "very good" job of fulfilling its mission of improving and building relationships (indicating such by surveys).	90%



Employees of the NIGC prepare to deliver staff reports to the Commission during a public commission meeting.

### GOAL 5

#### INCREASE EFFICIENCY, TRANSPARENCY AND ACCOUNTABILITY

The Commission is committed to building a transparent, high-performance agency. This goal is enhanced by developing personnel related policies, improving technology resources, recruiting and retaining a highly diverse, skilled and motivated workforce, and ensuring that staff is well-equipped with tools and training to work effectively and creating staff performance plans. Within the Agency, the Agency will develop annual budgets and develop policies and procedures as needed. The Commission will improve management and operations by providing ongoing oversight, evaluation and analysis of the NIGC's policies through regular communications between management and staff, refining the Agency's personnel performance-measurement system so that work is clearly related to mission goals and performance measures, implementing an information technology (IT) modernization program to support networked information and shared-data resources and ensuring that the NIGC's financial resources are allocated in the most efficient and effective manner.

#### Strategy 1

Update and further develop policies that enhance Agency employees' ability to perform their jobs effectively.

Supporting Performance Measures	2014 - 2018 Target
Percent of employees receiving trainings on new policies and employee awareness programs.	100%
Percent compliant with mandatory staff training.	100%
Maintain up-to-date human resource policies and procedures.	Annually reviewed
Develop an Action Plan to respond to employee feedback generated by the Employee Viewpoint Survey.	Feedback Reviewed

#### Strategy 2

Implement and monitor a performance measurement system to enhance employee performance.

Supporting Performance Measures	2014 - 2018 Target
Implement new performance measurement system.	By 2014
Implement new career development policy.	By 2014
Percent of employees who received training regarding individual performance management responsibilities.	100%
Number of performance management goals achieved within their set timeline.	Developing baseline

Strategy 3

Develop and maintain more integrated information systems and processes that support the NIGC staff and functions.

Supporting Performance Measures	2014 - 2018 Target
Meet all federally required IT security regulations.	100%
Implement and realize Agency cost savings and increased IT resources.	By 2015 Annually reviewed
Increase the number of communication forums for all users.	Developing baseline

KEY FACTORS

The following are key external factors that the Commission has identified which could significantly and adversely affect the ability of the Commission to achieve its strategic goals:

- An important element of the Commission's vision is that Indian tribes are the primary beneficiaries of gaming revenues. As mentioned previously, these revenues have played a vital role in the economic development of Indian tribes. A sharp downturn in the local or national economy could adversely affect the gaming public's amount of disposable income, thereby reducing Indian gaming patronage and resulting in a decrease in Indian gaming revenues.
- The Commission is comprised of a Chair and two Commissioners. To take certain regulatory actions, the Commission can act only if there is a quorum of two Commissioners. The sudden and unexpected departure of two Commissioners would impact the ability of the Commission to act until such time as two new Commissioners are appointed.
- The Commission is a very small agency, with approximately 100 full-time employees. Extensive litigation against the Commission would result in a shift of limited agency resources, normally used to perform its normal regulatory oversight functions (e.g., reviews of management contracts and tribal gaming ordinances, drafting of Indian land opinions, etc.) to instead perform litigation defense work.
- Commission personnel often have to drive long distances to remote locations of the country in order to perform site visits of Indian gaming facilities. Prolonged, severe weather conditions in certain parts of the country may prevent Commission personnel from conducting site visits, consultations, and other mission-oriented travel. Increased travel costs may also influence such travel.

- Certain statutory limitations inhibit the Commission's ability to achieve its vision of shielding tribes from corrupting influences. For example, Title 25, United States Code, § 2713 authorizes the Commission to levy and collect appropriate civil fines for any violation of IGRA against a tribal operator of an Indian game or a management contractor engaged in Indian gaming. The Commission, however, lacks the statutory authority to bring enforcement actions against certain other persons or entities affiliated with Indian gaming, such as unscrupulous third-party vendors, developers, and organized crime figures or other corrupting influences.
- The Commission maintains cooperative relationships with other Federal agencies. In those circumstances when the Commission has to rely on these other agencies for factual information or documentation, the Commission may be inhibited in its ability to make timely determinations. Similarly, when the Commission is requested by other Federal investigatory agencies to postpone enforcement actions while they conduct their own criminal and/or civil investigations, the Commission's regulatory activities may be delayed.
- Finally, a key external factor that may adversely impact the Commission's ability to achieve its strategic goals is the lack of a "Seminole fix." The United States Supreme Court in *Seminole Tribe of Florida v. Florida*, 517 U.S. 44 (1996) concluded that Congress could not waive States' immunity from suit by Indian tribes for failing to negotiate compacts in good faith, thus shifting the balance of power in tribal-state compact negotiations. As a result, some tribes have not achieved the full benefit of the IGRA scheme. This places a greater Class II compliance oversight burden on the Commission.



The NIGC is participating in a number of tradeshows to increase opportunities for tribes.

Mission	Goal Strategy
<p>To work within the framework created by the Act for the regulation of gaming activities conducted by sovereign tribes on Indian lands to fully realize IGRA's goals: (1) promoting tribal economic development, self-sufficiency and strong tribal governments; (2) maintaining the integrity of the Indian gaming industry; and (3) ensuring that tribes are the primary beneficiaries of their gaming activities.</p>	<p><b>Continue the Assistance, Compliance and Enforcement ("ACE") initiative</b></p>
	<ul style="list-style-type: none"> <li>• Increase the availability of technical assistance available and provided to tribes, gaming commissions, and gaming operations</li> </ul>
	<ul style="list-style-type: none"> <li>• Provide timely responses to Tribes on audit findings and IGRA violations to allow adequate time for corrective action and voluntary compliance</li> </ul>
	<ul style="list-style-type: none"> <li>• Conduct site visits, audits and evaluations, with particular focus on improvements in tribal internal control systems to maintain the integrity of the gaming industry</li> </ul>
	<p><b>Improve technical assistance and training for stakeholders</b></p>
	<ul style="list-style-type: none"> <li>• Provide guidance, technical assistance, training, and other forms of assistance to tribes to build and sustain the capability to prevent, protect against, respond to, and recover from weaknesses in internal controls and violations of IGRA and NIGC regulations</li> </ul>
	<ul style="list-style-type: none"> <li>• Provide opportunities for tribes located within all NIGC regions to participate in trainings</li> </ul>
	<p><b>Improve and update the NIGC's regulations</b></p>
	<ul style="list-style-type: none"> <li>• Finalize and implement new and revised regulations developed through the regulatory review process</li> </ul>
	<p><b>Improve consultation, communication and relationship building with tribal regulatory authorities, and federal and state agencies</b></p>
	<ul style="list-style-type: none"> <li>• Conduct meaningful consultations with tribes on NIGC proposals for regulations, rulemaking, legislation, guidance, policy formulation or actions that may have a substantial direct effect on one or more tribes, on the relationship between tribes and the Federal government, or on the distribution of power and responsibilities between tribes and the Federal government</li> </ul>
	<ul style="list-style-type: none"> <li>• Implement the NIGC's responsibilities under the Open Government Initiative as defined by the Office and Management Budget's Open Government Directive of 2009 and improve the NIGC website to provide information about the agency and its work</li> </ul>
	<ul style="list-style-type: none"> <li>• Coordinate and collaborate with tribal regulatory authorities, and Federal, and state agencies using a variety of mechanisms</li> </ul>
	<p><b>Increase efficiency, transparency and accountability</b></p>
<ul style="list-style-type: none"> <li>• Update and further develop policies that enhance the Agency's employees ability to perform their jobs effectively</li> </ul>	
<ul style="list-style-type: none"> <li>• Implement and monitor a performance measurement system to enhance employee performance</li> </ul>	
<ul style="list-style-type: none"> <li>• Develop and maintain more integrated information systems and processes that support the NIGC staff and functions</li> </ul>	



**National Indian Gaming Commission  
U.S. Department of the Interior**

For further information, visit the National Indian Gaming Commission website at:

**[www.nigc.gov](http://www.nigc.gov)**

or contact

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