PRIVATE PROPERTY RIGHTS UNDER SIEGE: HAS THE MERE SUGGESTION OF ECONOMIC DEVELOPMENT GREASED THE SKIDS FOR PRIVATE LAND GRABS IN AMERICA

Rawle Andrews Jr., Esq.*

Leroy Jones, Jr., JD**

Briefing Paper No. 05-02

"*Injustice anywhere is a threat to justice everywhere.*"[1]

The ever-thinning veil separating the "Haves" and the "Have Nots" in America arguably was torn on June 23, 2005 via the U.S. Supreme Court's 5-4 decision in *Kelo v. City of New London*.[2] In *New London*, the U.S. Supreme Court ruled that even local municipalities can use the powers of eminent domain to seize your private property for "economic development" (i.e., purely private use) under the Fifth Amendment to the U.S. Constitution (the "Takings Clause").[3] As Justice Sandra Day O'Connor's so eloquently stated in her dissenting opinion, the *New London* decision means: "Any property may now be taken for the benefit of another private party, but the fallout from this decision will not be random. The beneficiaries are likely to be those citizens with disproportionate influence and power in the political process, including large corporations and development firms".[4]

Although the precise reach of *New London* likely will be debated for years to come, the plain and simple truth is that every homeowner, small business owner, non-commercial investment property owner and residential tenant[5] in the United States just

---

* Mr. Andrews is Chairman of Andrews & Bowe, PLLP, a business law and government relations firm with attorneys practicing in Washington, DC and Chattanooga, TN, and governmental affairs personnel in Washington, DC. The views expressed herein are those of the authors and not necessarily those of Andrews & Bowe, its members or affiliates.

** Mr. Jones is the Director for Legislative and Regulatory Affairs of Andrews & Bowe, PLLP. Mr. Jones has over 17 years of experience in the federal legislative and regulatory process, including his services as a Legislative Aide on both the "Senate side", and the "House side" of Capitol Hill, and service as a Legislative Analyst at the Office of National Drug Control Policy ("ONDCP").

[1] Dr. Martin Luther King, Jr.'s Letter to Alabama Clergymen from the Birmingham Jail (April 16, 1963) (emphasis added).

[2] *Kelo v. City of New London*, No. 04-108 (U.S. June 23, 2005) (complete decision available online at http://straylight.law.cornell.edu/supct/html/04-108.ZS.html). Although the short hand name for this U.S. Supreme Court ("Court") decision likely will be "*Kelo*" in other publications, we have elected to refer to the ruling as "*New London*" so that the very name will serve as a call to *political action* for homeowners, small businesses and long-term residential tenants across this country reminiscent of the manner in which Yorktown, Gettysburg, the Alamo, and D-Day galvanized public opinion during critical stages in American history.

[3] U.S. Const. Amend. V ("[N]or shall *private property* be taken for *public use*, without just compensation").

[4] *See* note 2 (O'Connor, J., dissenting).

[5] Although *New London* appears to be aimed solely at private property *owners*, the Court's ruling also begs the question of what happens to the hundreds of million long-term residential tenants in row houses, duplexes and apartment buildings across this Country who invariably have been and will continue to be displaced (and further disenfranchised) when private property is seized by the government for *private* use under the guise of economic development. *Accord* I. Somin, *Robin Hood in Reverse: The Case Against*

Copyright © 2005 Andrews & Bowe, PLLP. All rights reserved.

lost a tangible stake in the America Dream. Nonetheless, we posit that all is not lost if, once and for all, homeowners and small businesses band together to hold lawmakers and property owner associations (e.g., homeowners associations and local chambers of commerce) accountable for both the maintenance and revitalization of our communities, and the battle for "just compensation"[6] due under the law is waged just as fiercely by private property owners as local ordinances and restrictive covenants are enforced by the so-called "The Powers That Be" when the grass supposedly is too high or a fence needs mending.

I. Was the American Dream only a "Dream"

New London involved a case of first impression for the Court, namely: whether economic development takings are constitutional? At least until *New London*, the easy answer was "No". Historically, U.S. constitutional jurisprudence generally held that the government could take private property only if it was intended for a public use, and then, only if the private property owner received just compensation for the property loss. As Justice O'Connor explains in her dissenting opinion in *New London*, the U.S. Supreme Court generally recognized three (3) kinds of Takings that comply with the public use requirement of the U.S. Constitution:

(a) Takings for public ownership, e.g., a road, a hospital, or a military base;[7]

(b) Takings for private parties that will convert the property for the public's use, e.g., a railroad, a public utility, or a stadium;[8] or,

(c) Takings for subsequent private use, but only under limited circumstances to combat existing or imminent threats to the community.[9]

Nonetheless, American courts, legal scholars and social scientists have been grappling with socioeconomic consequences of urban decay, "white flight" and gentrification for decades.[10] The difference now, however, is that local government no

---

Economic Development Takings, 1-2, 14-17 (Feb. 22, 2005) (www.cato.org/pubs/pas/pa535.pdf+Overcoming+Poletown:+County+of+Wayne+v.+Hathcock,+Economic+Development+Takings,+and+the+Future+of+Public+Use&hl=en&start=8).

[6] *See* note 2, *supra.* (O'Connor, J.); *see also* T. Merrill, "*The Economics of Public Use*," 72 Cornell L. Rev. 61, 85 (1986) (property values after a public taking are almost always higher than before the taking and the existing compensation formula allocates 100% of this surplus in the property to the entity taking the property and none to the dispossessed private property owner).

[7] *See* note 2, supra. (O'Connor, J., dissenting) (citing *Old Dominion Land Co.* v. *United States*, 269 U.S. 55 (1925); *Rindge Co.* v. *County of Los Angeles*, 262 U.S. 700 (1923).

[8] *Id.* (citing *National Railroad Passenger Corporation* v. *Boston & Maine Corp.*, 503 U.S. 407 (1992); *Mt. Vernon-Woodberry Cotton Duck Co.* v. *Alabama Interstate Power Co.*, 240 U.S. 30 (1916)).

[9] See, *e.g.*, *Berman* v. *Parker*, 348 U.S. 26, 28-29 (1954) (upholding public taking to eliminate the ill-effects of urban decay); *Hawaii Housing Authority* v. *Midkiff*, 467 U.S. 229, 232 (1984) (upholding a public taking to promote land ownership for the masses).

[10] *See generally E. Bickford, White Flight: The Effect of Minority Presence on Post World War II Suburbanization,* at *http://www.eh.net/Clio/Publications/flight.shtml*; Paley, *Regions' Fringes Draw a New 'White Flight': Calvert's Black Residents Feel Pushed Out by Newcomers*, Wash. Post, May 11, 2005 at § A-1.

longer has to articulate a viable public purpose to condemn private property. Without this vital check on the use of eminent domain, there is little doubt that private property rights and the freedom to live where one chooses is far from certain in the aftermath of *New London*.

A. *Berman* and Urban Renewal to Combat 'Blight'

As Justice O'Connor explains in the *New London* dissent, the Court entered the fray of questionable public takings for development by municipalities 50 years ago in *Berman* v. *Parker*.[11] In *Berman*, the Court permitted a public taking of a store within a rapidly deteriorating Washington, D. C. neighborhood even though a shop owner's store at issue in the case was not blighted.[12] In recognizing that over two thirds of the buildings in the area were dilapidated and beyond repair, the Court upheld Congress' determination that a taking was required because the neighborhood suffered from extreme poverty and had become "injurious to the public health, safety, morals, and welfare." As such, the "public interest" was substituted for the public use requirement, thereby permitting eminent domain as the only viable alternative to alleviate such injurious conditions to the community.[13]

Since *Berman*, legal scholars and social scientists have debated the merits *vel non* of *gentrification* as a proactive means of *revitalizing* urban areas before or at the onset of blight.[14] Despite the tenor of these often spirited debates, however, *New London* might have rendered such arguments purely academic because local governments are now empowered to seize private property *at will* absent specific legislative mandates to the contrary. In other words, the perception of gentrification (and the resulting whisper campaigns of its costs and benefits) seemingly has given way to the reality that *New London* might not be much different from "Old" London.

Modern day examples of these types of government-planned, economic developments in Urban America appear to include, high profile, mixed-use development projects in Atlantic City, New Jersey; Baltimore, Maryland; and Washington, DC to name a few.[15] Absent concerted political action at the state and local level, there is little that the newly defined power of eminent domain *at-will* might forever change the way we live and, in fact, where we live in the United States.

---

[11] 386 U.S. 26 (1954).

[12] *Id.* at 28, 30, 34.

[13] Id. at 28; *see also Midkiff*, 467 U.S. at 244 ("it is only the taking's purpose, and not its mechanics, that must pass scrutiny" under the U.S. Constitution).

[14] Compare J. Peter Byrne, *Two Cheers for Gentrification*, 46 How. L.J. 405 (2003) (embracing the term gentrification, and advocating the many public and private benefits of gentrification); *with*, j.a. powell & M. L. Spencer, *Giving Them the Old "One-Two": Gentrification and the K.O. of Impoverished Urban Dwellers of Color*, 46 How. L.J. 433 (2003).

[15] *See, e.g.*, Mirabella, *High Court Upholds Eminent Domain*, The Balt. Sun, June 24, 2005 at § 1-A (Headline); *Supreme Court backs municipal land grabs*, June 24, 2005 (www.cnn.com/2005/LAW/06/24/scotus.property); Hedgpeth, *Supreme Court Case Could Affect Baseball Stadium*, Feb. 23, 2005 at E-1 (discussing impact the New London decision might have on a new baseball stadium and the long-proposed Skyland Mall project in Southeast D.C.); Pritchard, Save us from Eminent Domain, Ventor cries, Atlantic County News, Feb. 22, 2005 (www.pressofatlanticcity.com/news/atlantic/022205VENTCOURT.cfm).

B. *Midkiff* and Social Engineering off the Mainland

Over 20 years ago, the Court revisited public takings in the context of another controversial, state-sponsored plan to redistribute the wealth in *Hawaii Housing Authority v. Midkiff*.[16] The Court in *Midkiff* upheld a public taking of private property in the state of Hawaii where nearly 50% of all non-public land was owned or controlled by just 72 private landowners. The Hawaii Legislature concluded that the oligopoly in land ownership was "skewing the State's residential fee simple market, inflating land prices, and injuring the public tranquility and welfare," and thus, enacted a public takings plan to redistribute title to the private land.

In upholding Hawaii's private land redistribution plan, the Court reaffirmed that "'one person's property may not be taken for the benefit of another private person without a justifying public purpose, even though compensation be paid.'"[17] Moreover, the Court in *Midkiff* remained faithful to the constitutional moorings by concluding that the public taking was necessary to eliminate an existing property condition (i.e., concentrated property ownership in the hands of a select few) that actually was harming the public interest.

C. *Poletown* was a shot heard 'round City Hall

1. Is what's good for GM still good for the rest of America?[18]

Though controversial, *Berman* and *Midkiff* could be rationalized away by the notion the public takings in those cases where formulated under extraordinary circumstances, such that further inaction by local government might well have been considered malfeasance or nonfeasance. All that changed dramatically at the state level during 1981.

In *Poletown Neighborhood Council v. City of Detroit*, [19] the cities of Detroit and Hamtramck, Michigan and General Motors forged a plan to condemn Poletown so General Motors could build a new Cadillac plant in its place. When announced, the controversial plan of was expected to produce more than 6,500 jobs and help restore economic vitality to the community. During March 1981, the Michigan Supreme Court upheld the public taking on the grounds that that bolstering Detroit's economy was so important Poletown could be eliminated as a whole.

Poletown was a landmark case in the use of eminent domain and is believed to be one of the first decisions by any court in the United States to authorize public takings strictly for "economic development", i.e., the promise of increased tax revenues,

---

[16] 467 U.S. 229 (1984).
[17] *Id.* at 241, 245 ((quoting *Thompson* v. *Consolidated Gas Util. Corp.*, 300 U.S. 55, 80 (1937)).
[18] This statement about the significance of General Motors' operations to the U.S. economy is attributed to then General Motors Chairman & CEO, Charles Wilson during a 1955 U.S. Senate hearing in which General Motor Corp. was summoned before the Congress to explain its 50% market share in the automobile industry.
[19] 410 Mich. 616, 304 N.W.2d 455 (1981); *compare Kelo v. City of New London*, 268 Conn. 1, 843 A.2d 500 (Conn. 2004), *affirmed*, No. 04-108 (U.S. June 23, 2005)

employment opportunities to boost the local economy.[20] Thereafter, various cities and towns across the United States relied on *Poletown* as a legal justification to condemn private property and then transfer it to private business interests based on the mere promise of increased revenues and the residual benefits to the community. Indeed, many commentators have observed that for nearly 25 years, *Poletown* has been the foundation of the most oppressive eminent domain practices sweeping the nation.[21]

2. *Poletown* is no longer good law

Ironically, almost a year to the date that the U.S. Supreme Court issued the *New London* decision, the Michigan Supreme Court unanimously reversed and overruled the *Poletown* decision as a "radical departure" from the protections written into the Constitution to protect individuals from abuses of power and the taking of their properties for other private parties in the case of *County of Wayne v. Hathcock*.[22] In rejecting its prior endorsement of economic development takings, the Michigan Supreme Court observed:

> The economic development rationale would validate practically ***any*** exercise of the power of eminent domain behalf of a private entity. After all, *if one's private property is forever subject to the government's determination that another private party would put one's land to a better use, then the ownership of real property is* ***perpetually threatened*** *by the expansion plans of any large discount retailer, 'megastore', or the like.*[23]

Interestingly enough, with all the talk recently about the vital importance of *federal* preemption[24] that the U.S. Supreme Court, on the narrowest of all possible margins, side- stepped an opportunity to make clear that the Takings Clause of the Fifth Amendment to the U.S. Constitution does *not* permit economic development takings. The most dramatic, immediate impact is likely to be seen in America's inner cities. Nonetheless, it remains to be seen whether or to what extent these expanded municipal

---

[20] 843 A.2d at 531 n. 39 (discussing the historical, legal significance of *Poletown*).

[21] *See, e.g.,* I. Somin, *Overcoming Poletown: County of Wayne v. Hathcock, Economic Development Takings, and the Future of Public Use*, 4 Mich. St. Law Rev. 1005 (2004); *see generally The Death of Poletown: The Future of Eminent Domain and Urban Development after the County of Wayne v. Hathcock*, Mich. St. Law. Rev. 2004:4 (Symposium Issue); *see also* T. Sandefur, *Eminent domain abuse*, Wash. Times, Feb. 20, 2005 (Commentary) (www.washingtontimes.com/commentary/20050219-092417-1856r.htm).

[22] 471 Mich. 445, 684 N.W.2d 765 (2004).

[23] *Id.* at 786 (emphasis added). In another twist of fate, the Michigan Supreme Court's decision in *Hathcock* (which overruled *Poletown*) means that the City of Detroit, *the birthplace of economic development takings*, apparently will be left out in the cold in the aftermath of U.S. Supreme Court's decision in *New London*.

[24] E.g., Private Securities Litigation Reform, Class Action Reform, Asbestos Litigation Reform Legislation, and Anti-Predatory Lending Legislation. *See also* King, *Taking on the Lenders and the Feds*, Wash Post., June 25, 2005, § A-1 (report on litigation brought by the Office of the Comptroller of the Currency (a national bank regulator) and certain large banks in a N.Y. federal court to stop N.Y. Attorney General's Eliot Spitzer's investigation of discriminatory mortgage lending practices in connection with the newly disclosed 2004 lending data under the federal Home Mortgage Disclosure Act) (*The Clearinghouse Ass'n, LLC v. Spitzer*, No: 1:05-cv-05629-SHS (S.D.N.Y. filed June 16, 2005).

powers will spillover into older *suburban* neighborhoods inside America's beltways, or whether suburbanites residing on the outskirts of the city will be able to elude the cross hairs of the developers' bulldozers.[25]

3. Private Property Rights are *still* Sacred in America[26]

"*Individual freedom finds tangible expression in property rights.*"[27]

In *Private Property Rights Deferred*,[28] we observed that "[f]rom the earliest days of our Republic, Americans have always believed in the inalienable rights to "life, liberty, and *property*." In fact, property rights were considered so sacred to the framers of our Constitution that they are protected in the original document,[29] as well as the Third,[30] Fourth,[31] and Fifth Amendments.[32] The Framers of the U.S. Constitution also went to great lengths to incorporate express limitations on the government's ability to impair property rights because "owning your own home" is an intensely personal experience in America that in many ways gives birth to your dreams and visions for the future, i.e., a house is not *merely* a home.[33]

We also suggested in *Private Property Rights Deferred* that the loss of one's home by wrongful foreclosure was so devastating that it could be likened to the well-recognized five stages of death.[34] In that instance we focused solely on the adverse impact of abusive mortgage lending and collection practices (i.e., predatory lending and mortgage servicing abuse). Following the decision in *New London*, there is little, if any, doubt that economic development takings in our cities and surrounding suburbs could

---

[25] The surest sign that you, as a homeowner or small business owner, have work to do is if you: (a) have never heard of the planning commission; (b) do not know who sits on the planning commission; and/or (c) are unaware how often or where the planning commission meets in your hometown.

[26] *See generally* R. Andrews & L. Jones, *Private Property Rights Deferred: Has Predatory Mortgage Servicing Destroyed the American Dream*, at 9-10 (May 24, 2005) http://ww1.prweb.com/prfiles/2005/05/23/243928/PrivatePropertyRightsArticle.pdf.

[27] *United States v. James Daniel Good Real Property*, 510 U.S. 43, 61 (1993).

[28] *See* note 19, *supra*.

[29] U.S. Const. Preamble ("secure the Blessings of Liberty to ourselves and *our* Posterity"); Art. 1, §§ 8, 10; Art. 4, § 2 (taxes, duties, imposts, excises, lands, commerce, bankruptcies, bills of credit, the exclusive rights of authors and inventors, contracts, debts, and engagements are expressly identified in the Constitution.

[30] U.S. Const. Amend. III ("No Soldier shall, in time of peace be quartered *in any house, without the consent of the Owner*, nor in time of war, but in a manner to be prescribed by law") (emphasis added). The Bill of Rights is made applicable to the States by the Fourteenth Amendment to the U.S. Constitution.

[31] U.S. Const. Amend. IV ("*The right of the people to be secure in their* persons, *houses*, papers, and effects, *against unreasonable searches and seizures*, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized").

[32] U.S. Const. Amend. V ("*No person shall be ... deprived* of life, liberty, or *property*, without due process of law; nor shall *private property* be taken for public use, without just compensation").

[33] *Accord* Special Field Orders No. 15 (Jan. 16, 1865) (Field Order issued by Union Gen. William T. Sherman granting 40 acres of tillable land and a mule to the freed slaves in accordance with President Abraham Lincoln's Emancipation Proclamation).

[34] *See* Elisabeth Kübler-Ross, M.D., *On Death and Dying* (1969) (this book introduced the five stages of dying).

give rise to comparable traumatic experiences for homeowners, dispossessed tenants and small businesses. In fact, this devastation could been seen on a much larger scale if, as in the *New London* and *Poletown* examples, whole neighborhoods and communities are uprooted by such improvident takings. This traumatic devolution might very well be expressed as follows:

The Five (5) Stages of Involuntary Home Loss

(1) **Denial** that your own elected officials are planning to take your home away and transfer it to a commercial enterprise;

(2) **Anger** about the fact that your home will be taken away;

(3) **Bargaining** as you mull over a series of dead-end options to save the home, including 11th hour attendance at civic association meetings, lawsuits and perhaps, even civil disobedience;

(4) **Depression** that all your hopes and dreams are being wiped out by persons you campaigned for and elected to public office; and,

(5) **Acceptance** that you are going to lose your home and receive a pittance in 'just compensation'.

II. General Observations and Practical Solutions

'A law that takes property from A and gives it to B . . . is against all reason and justice.'[35]

A. Homeowners and Local Entrepreneurs must forge an Alliance

It is of little consolation to the displaced and disenfranchised who are losing their properties, but private property advocates should take some solace in the fact that local government's power to condemn private property for any reason or absolutely no reason at all can only be accomplished with just compensation.[36] Although "just compensation" equals fair market value in theory, there are few econometric theories that have taken into consideration that the United States is experiencing one of the most significant real estate booms in American history.[37]

---

[35] *Calder* v. *Bull*, 3 Dall. 386, 388 (1798).
[36] *See* note 3, *supra.*
[37] *See generally Home $weet Home: Why we're going gaga over real estate*, Time, June 13, 2005 (Cover Story); Poniewozik, *America's House Party*, Time, June 13, 2005 at 16; *see also* Coy, *What the Mortgage Next Door Means*, Business Week Online, June 16, 2005 (www.businessweek.com/bwdaily/dnflash/jun2005/nf20050616_1189_db016.htm).

Consequently, the days of Old Math featuring "low-ball" appraisals on condemned private properties and municipal claims of over-burdening deficits to justify land grabs at fire sale prices should yield to the economic realities of ever-escalating real estate prices in America. Otherwise, *New London* virtually demands that present-day resources now allocated by homeowners and small businesses to combat takings must be *pooled* to retain competent professionals (including appraisers, attorneys and economic feasibility consultants) who capable of refuting blanket claims by public officials that present ownership has no right to share in the economic upside of these often traumatic public takings.[38]

B. *New London* is now a rallying cry for Political Action

It is an open secret in legal circles that difficult cases make perplexing law. Whether the public fall-out from *New London* registers such a result will be debated for years, but it should not be lost on anyone that homeowners and small businesses are squarely at odds with their local officials on the hotly contested subject of economic development takings. In the federal context, one can argue that John and Jane Q. Public are too far removed from the Capital Beltway to make a difference. We are not prepared to concede, however, that "You cannot fight City Hall" when it comes to the preservation of homes and small businesses at the local level.

Local politicians are in our midsts everyday--at the market, places of worship, barbershop & beauty salons and schools, and they are reaching out to the citizenry. Yet, far too often the only constituencies paying any attention to these key decision-makers are the real estate developers and moneyed interests that stand to benefit directly from public takings for purely private gain.

As such, there is no longer an excuse for private property owners to continue sitting on the sidelines when affirmative, political action is required, including:

1. Active Participation in "Neighborhood" Associations & Civic Groups

    - Attendance at meetings in mandatory

    - Civic association leaders must be held accountable for more than neighborhood maintenance and improvements

2. Voter Registration and Get Out The Vote ("GOTV") Drives

    - Attend and/or monitor Planning Commission meetings

    - Attend and/or monitor city, town and county council meetings

---

[38] Riley, *Land's not your land: Supreme Court rules government can seize homes from their owners for development*, Newsday Online, June 24, 2005 (www.newsday.com/news/nationworld/nation/ny-uscort244317082jun24,0,2814749.story?coll=ny-nationalnews-headlines).

- Vote them out of office if unaccountable to the public

3. Early Retention of Professionals to root out Eminent Domain Abuse
   - MAI designated Appraisers
   - Accountants & Economic Feasibility Consultants
   - Lawyers & Lobbyists
4. Willingness to monitor state and local development plans before approval
   - Filing objections to development plans before planning commissions and/or city, town and county councils
   - Gathering "impact testimony" to build a true "administrative" or "legislative" record that challenges, opposes or contradicts municipal findings in favor or purely economic development takings
5. Legal Action against municipalities, developers, etc.
   - Grass roots organizing
   - Does the proposed taking disproportionately affect a particular class of people (e.g., ethnic minorities or the elderly)
   - Building a "war chest" to litigate, if necessary

CONCLUSION

As we observed in *Private Property Rights Deferred*, "[n]ext to life and death, there are few, if any, human events that equal the condition of being a property owner with a tangible stake in today's reality and tomorrow's promise." Much of America's promise has now been lost in the wake of the *New London* decision. Eminent domain abuse (i.e., at will takings for any reason or no reason at all), such that it was before June 23, 205, is likely to surge in the wake of the *New London,* except in those jurisdictions where economic development takings are expressly prohibited by state law.

This briefing paper decries the concept of eminent domain *at-will* now seemingly authorized by *New London*, because these takings are likely to *processed* by local officials with little, if any, regard for the diverse rights and interests of countless homeowners, small businesses and long-term residential tenants across this country who will be dislocated and disenfranchised in favor of "those citizens with disproportionate influence and power in the political process, including large corporations and development firms."

The only legitimate means to stave off (or at least soften the blow) of these looming, multi-state land grabs is for homeowners and entrepreneurs to forge coalitions to ensure that our elected officials actually are accountable to the *public* (i.e., The People) when purportedly acting in the "public interest". Lest we forget, the power to take is a *not* a requirement to take, and *early retirement* for tone-deaf politicians is only an election away.

Rawle Andrews Jr., Esq.
Chairman

Leroy Jones, Jr., JD
Director of Government Relations

ANDREWS & BOWE, PLLP
1717 K Street, NW, Suite # 600
Washington, DC 20036
Phone: 202-349-3975 Fax: 410-510-1034
Email: ablaw2005@yahoo.com
URL: www.lobbylawfirm.com