



**Effective Stewardship through Process Improvement:  
Investigation of Housing Fraud in a Section 8 Housing Choice Voucher Program**

**Problem Statement**

The City of Virginia Beach has no public housing. It does manage a Section 8 program through the Virginia Beach Department of Housing and Neighborhood Preservation (VBDHNP). The VBDHNP stands as the Public Housing Authority (PHA) for the City of Virginia Beach. Fraud within this program threatens the integrity of the program, creates a risk of loss of funding, creates vitality concerns within impacted neighborhoods and denies benefits to the deserving needy. The unique nature of housing fraud investigations creates the need to address housing fraud issues through a joint effort involving both the police and housing specialists.

**Scanning**

HUD rules provide for the termination of housing assistance for fraud involving the Section 8 Choice Housing Program, as well as for any other program violation. Program violations can include such actions as drug and alcohol use and abuse, unauthorized persons in the residence, crime by household members, absence from the residence, lease violations, eviction, failure to disclose supplemental income, failure to provide for a unit inspection, and abuse of other assistance programs.<sup>1</sup> Some of these violations might constitute actual criminal fraud under federal statutes.<sup>2</sup> Many rule violations will constitute grounds for the revocation of the benefit without incurring criminal liability.

The United States General Accounting Office's year 2001 Performance and Accountability Report on the United States Department of Housing and Urban Development identified both of HUD's major program areas-single family mortgage insurance and rental housing assistance-to be high risk as regards susceptibility to financial

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<sup>1</sup> Section 8 HUD reference 982.551

<sup>2</sup> 42 U.S.C. § 3544



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creates a situation wherein the local PHA, though tasked with additional responsibilities by HUD for the integrity of the programs they administer, is lacking in the authority to aggressively address any criminal fraud issues. The local PHA is totally reliant upon the local law enforcement agency for the criminal investigation of fraudulent recipients of benefits. The flip side of this coin is that the local law enforcement agency will require disclosure by the PHA of information concerning the recipient before a fraud investigation can be conducted. Any failure to cooperate from either side will hinder or preclude any criminal investigation.

**Analysis and Stakeholders**

The Department of Housing and Urban Development (HUD) is a primary stakeholder in any effort to reduce fraud within the City of Virginia Beach Section 8 Choice Housing Program. The funding to support the Section 8 Program is all HUD granted. The local PHA is tasked with effectively administering the program funding. HUD enforcement efforts are weighted towards high profile and high monetary impact fraud such as mortgage fraud, fraud within major urban redevelopment programs and instances of organized fraud. HUD has an interest in all instances of fraud involving HUD programs; but HUD investigative resources are inadequate to address individual instances of fraud at local levels as incurred with housing voucher programs. The concern of HUD, insofar as the City of Virginia Beach would be concerned, is defined by the provisions of the 1998 Housing Act as it regards the revocation of funding to under-performing PHA's. [A more comprehensive overview of the seriousness which HUD places on this concern can be found in an article written by Adam Stone in the September/October issue of the Journal of Housing and Community Development entitled "Risks and Rewards, pages 46-49]

The VBDHNP is also a major stakeholder in any effort to control fraud within the Section 8 Program in its role as the steward of the taxpayer. The City of Virginia Beach currently administers a operating budget of thirteen

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million dollars for the Section 8 Program.<sup>8</sup> Of this amount: 80% is dedicated to housing assistance payments (HAP) and 20% is used to cover administrative costs.<sup>9</sup> The VBDHNP is responsible for the internal integrity of the program. This internal integrity encompasses the screening of prospective recipients of HAP's and the monitoring of current recipients to ensure compliance with program rules and regulations. Any violation of any rule or regulation could result in the revocation of the HAP (an internal process involving a quasi-judicial hearing) or a referral for a criminal investigation that could result in a criminal prosecution in addition to the revocation of the HAP.

A loss of HUD funding would entail the loss of staff as currently supported by this funding. Loss of HUD funding would also ensure an effective loss of municipal control over low income housing within the city given that HUD would contract all current or at risk subsidies to another vendor. This would place the City of Virginia Beach in a position of being a bystander to many of the issues created by the existence of thousands of voucher housing units dispersed throughout the city.

Another impact of fraud upon VBDHNP staff is the morale issue created by an inability to effectively administer and police a program that they are responsible for. This situation is created by the bifurcated investigative and administrative process previously noted.

The citizens of the City of Virginia Beach are stakeholders for a variety of reasons. Their taxes support the Section 8 program. It is incumbent upon public agencies to ensure that tax dollars are spent wisely and for the purposes intended.

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<sup>8</sup> Backman, D., Effective Stewardship through Process Improvement: Investigation of Housing Fraud in a Section 8 Housing Choice Program, page 7

<sup>9</sup> Ibid

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The community at large also has a concern insofar as fraud investigation and enhanced screening for fraudulent applications may serve to control, offset or preclude any negative impacts that Section 8 program mobility has on the general health and vitality of Virginia Beach neighborhoods.

The impact that Section 8 programs have on neighborhoods is generally dependant upon the degree of "clustering" or geographic concentration of Section 8 housing . (Turner, M., Popkin, S. et al, 2000). Localities that have more restricted housing markets tend to have a greater degree of clustering. Turner, Popkin and Cunningham note that "the limited availability of affordable rental housing forces Section 8 recipients to cluster geographically"<sup>10</sup> While the degree of social instability created in neighborhoods tends to vary with jurisdictions; there are studies which suggest that the deconcentrating of poverty that occurs with Section 8 mobility can have a destabilizing impact on **neighborhoods**.( Glaster and Zobel, 1998), (Glaster, 1999) from a social disorder perspective as well as having a negative impact on property values (Lee, Culhane, and Wachter, 1999).

A cursory investigation on the impact of clustering in the City of Virginia Beach, conducted in October of 2001 revealed that in one Virginia Beach neighborhood a total of 26% of the total police call for service load for social disorder related calls for service were generated by a total of 5 households participating in the Section 8 program." While not a controlled study, it nevertheless underscores municipal concerns with clustering issues.

Given the nature of the housing market in Virginia Beach [increasing cost of affordable **housing**]<sup>12</sup>, the increasing

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<sup>10</sup> Turner, M., Popkin, S. and Cunningham, M. (2000) Section 8 Mobility and Neighborhood Health, The Urban Institute, 2000, page 30

<sup>11</sup> Internal document/correspondence with Mr. Andrew Friedman, Director of the VBDHNP dated November 15, 2001 entitled "Section 8 Issue, Search Request"

<sup>12</sup> Internal VBDHNP document entitled "Housing Profile", 2001, page 1

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polarization between high and low income levels in Virginia Beach<sup>13</sup> and the minimal growth in the value of the average HAP; it is expected that clustering will be an increasing concern in the fourteen thousand lower income housing units currently identified as "at risk" in regards to both physical and social blight urban issues.<sup>14</sup>

Future recipients would be impacted by enhanced investigative and enforcement efforts against fraud in the Section 8 Program. There are currently over one thousand eligible persons awaiting Section 8 benefits.<sup>15</sup> The removal of persons who are not entitled to benefits allows for the entry into the program of those persons who are. It should be noted that no actual savings is realized through a fraud investigation. The value of the HAP is simply diverted to a new recipient. Active fraud screening efforts help to ensure that benefits are directed to those persons most in need as well as to those willing to obey the rules of the program.

The last important stakeholder is the Virginia Beach Police Department. The police department will have to allocate police resources to conduct the investigations. Police resources would also have to be allocated for both prosecution hearings and the administrative hearing.

There has been a housing fraud program in place since 1995 wherein the Virginia Beach Police Department agreed to assist the VBDHNP in the investigation of fraud within the Section 8 Housing Assistance Payments Program (the precursor program prior to the implementation of the Section 8 Choice Housing Program in 1998).<sup>16</sup> This agreement

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<sup>13</sup> Internal City of Virginia Beach memorandum entitled "Census Data on Poverty", Catherine Whitesell, Director Management Services, page 2

<sup>14</sup> Internal document "Police/Code Enforcement Study on Neighborhood Efficacy", McClees, D., D.Backman and H.Hollobaugh, Joint VBPD/VBDHNP Housing study, Unpublished.

<sup>15</sup> Internal VBDHNP document entitled "Section 8 Housing Choice Voucher Program Data, 2002."

<sup>16</sup> Internal document from City Attorney R. Blow to Chief C. Wall dated November 15, 1995 titled "Section 8 Housing Assistance Payments Program-Enforcement"

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involved the assignment of Police Department Community Policing Officers to investigate allegations of fraud. This agreement did not involve any process for the investigation to proceed beyond assignment of the VBDHNP complaint to the community policing officers assigned to the precinct in which the suspect recipient resided. No other investigative process or program guidelines were instituted. That program did not produce a single prosecution for fraud involving the City of Virginia Beach's Section 8 Choice Voucher Program<sup>17</sup> and realized only 4 investigations in the year 2001.

It is believed that the chain of accountability for investigations that spans a total of 4 independent commands within the police department created a environment where the inconsistent application of procedures eroded investigative quality and precluded the development of any professional rapport between housing and police staff. This issue of consistency was aggravated by high turnover rates in community policing units. The independent nature of each precinct command left each precinct free to adopt it's own sense of priority for these investigations.

**Response**

This proposed policy program was developed pursuant to the Year 2002 Community Policing Grants and was designed as a pilot program which would utilize a team approach concept for the investigation of housing fraud within the Section 8 Program.. The goal of this program is to improve the vitality of Virginia Beach neighborhoods by ensuring the integrity of the Section 8 housing program.

The program was initiated on April 15, 2002 with one officer assigned to assist the Housing Specialists of the Department of Housing and Neighborhood Preservation (DHNP). Requests to investigate are initiated by the Housing Specialist. The process of target initiation being the sole responsibility of the Housing Specialist removes the police

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<sup>17</sup> Internal Report to The Chief of Police and Housing Director of the City of Virginia Beach titled, "Six Month Report regarding Section 8 Housing Fraud Program, October 25, 2002, Page 2



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from any risk of being accused of targeting an underclass population.<sup>18</sup> All investigations are initiated at the request of the VBDHNP. A police offense report was generated for each request. The police role is a reactive one, but it is designed to be a very aggressive reaction once the complaint is lodged by the Housing Specialist. An emphasis is placed on the pursuit of prosecutions for those who have committed housing fraud. This aggressive pursuit of criminal charges is designed to remove, forever, from any housing program, those who have defrauded a housing program. It should be noted that local PHA's lack the capability to access each others computer data banks. The only method currently available to ensure the effective tracking of housing fraud perpetrators is to obtain a criminal conviction, thereby placing them in the Criminal Justice data banks which can be accessed by any PHA via the NCJI (Non-Criminal Justice Interface). This helps to eliminate the possibility of a fraudulent recipient removed from one jurisdictions housing rolls from going to an adjoining jurisdiction and applying for benefits. This is a distinct possibility given the lack of networked data banks.

For purposes of ensuring a systematic and program orientated response the police related portion of this program is administered solely from the Fourth Police Precinct Community Policing Unit. This has eliminated the confusion that results from working with four individual commands as well as ensuring a sound degree of familiarity between both housing staff and police officers. The program resulting from this problem solving effort has one officer assigned on a part-time basis.

The VBDHNP, as a result of this program, now pursues a systematic screening of new applicants. The VBDHNP incurs an additional administrative expense with this process given that such screening must be done utilizing the NCJI via the Virginia State Police. NCJI access is billed at fifteen dollars **per inquiry**. The State Police has permitted the opening of an account for NCJI requests. Police access to Computerized Criminal History (CCH) checks only proceed upon a positive notation on a VBDHNP screening or as the result of a validated police investigation. This is designed to ensure compliance with state law regarding the confidentiality of computerized police records. Officers conduct local checks on all portabilities (voucher holders moving into Virginia Beach from other localities) and other requested screening.. Suspicious local data is referred to the VBDHNP for determination of initiation of a fraud investigation.

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<sup>18</sup> A search on the Google search engine for "Police targeting of the poor" produced over 112,000 hits

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This process is also utilized to allow local landlords to access the system for tenant screening. This ability enhances and existing **Landlord/Tenant** training program. The VBDHNP is allowed to pass on this access charge to the landlord making the request.

Training was provided to both police and housing employees. This has been instrumental towards ensuring the systematic application of housing policy. An important training issue involved the respective roles of both officers and housing staff during the course of administrative hearings. Officer training helped to ensure that their interaction in hearings would be restricted to a fact **finding/fact** presentation role.. Training for both officers and housing specialists is ongoing. An additional area of concern that was addressed in this program was the expense of sending officers to administrative hearings.

Housing Specialists received training in the presentation of evidence and testimony in a criminal court as well as their responsibility to direct the questioning of recipients during administrative hearings. They also received training in how to read and decipher criminal histories. The VBDHNP will also incur the additional expense of Housing Specialists attending criminal court proceedings.

The Chief Judge of the General District Court for the City of Virginia Beach was briefed on the new program by the officer assigned. This was done to ensure that the local judiciary was aware of the program in order to help ensure a consistent judicial response to housing matters brought before the courts.

This team approach allows for the addressing of the issue of fraud within the Section 8 Program from both a criminal and administrative perspective. The police officer handles the criminal investigation with the assistance of the Housing Specialist. The Housing Specialist resolves the administrative aspect of the fraud investigation with the assistance of the police officer. The administrative hearing is that part of the process where the housing subsidy is revoked. Not every administrative hearing that results in the revocation of the subsidy will result in a criminal charge, but every criminal charge will result in an administrative hearing seeking the revocation of the subsidy. The bifurcated nature of housing fraud sanctions, created by criminal statutes and HUD rules mandate a team approach if such anti-fraud efforts are to be successful.

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**Assessment**

The first 6 months under this program produced a total of 47 investigations for housing fraud in the Section 8 Program resulting in the revocation of benefits to a total of 23 recipients.<sup>19</sup> The total value of the HAP involved was in excess of one hundred fifty five thousand dollars over a one year period of time.<sup>20</sup> This represents investigative review of only 3.5% of the total number of Section 8 Vouchers outstanding in the City of Virginia Beach.<sup>21</sup>

A 12 month review denotes 80 investigations completed with 23 pending investigations, 11 arrests for benefit fraud, the first conviction for housing benefits fraud in the City of Virginia Beach, termination of benefits to 47 individuals and a diversion of over 300,000 dollars in housing assistance payments.

There is little doubt that the trend in federal housing programs is weighted towards the expansion of voucher subsidies managed by local housing agencies as opposed to publicly owner housing **complexes**. (Hussock) and (Stegman) with a substantial risk of loss of those housing subsidies for any jurisdiction determined by HUD to have mismanaged housing funding (Stone,2002). This program, developed through the SARA model, helps to ensure the integrity of the Section 8 Choice Housing Program in the City of Virginia Beach.

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<sup>19</sup> Internal Report to The Chief of Police and Housing Director of the City of Virginia Beach, Virginia titled, "Six Month Report regarding Section 8 Housing Fraud Program, October 25, 2002

<sup>20</sup> Ibid

<sup>21</sup> Ibid

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**Agency and Other Information**

The fraud investigation process developed pursuant to this problem solving effort is currently in effect in the City of Virginia Beach, Va. This program represents a continuation of the Virginia Beach Police Department's commitment to problem solving and the use of the SARA model in its efforts to provide quality services.

Contact information:

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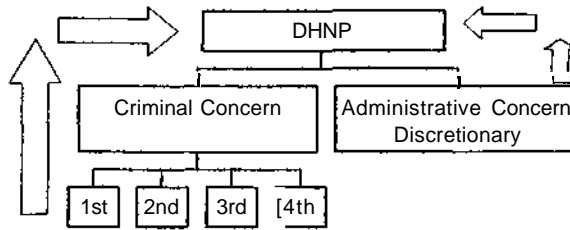
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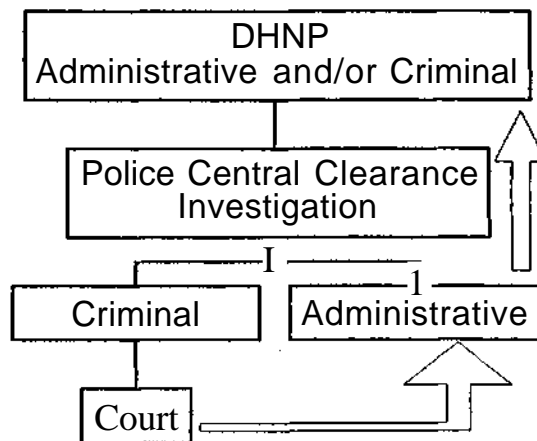
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## Previous Process



## Revised Process



# Effective Stewardship through Process Improvement

## Investigation of Housing Fraud in a Section 8 Housing Choice Program

by Lt. D.B. Backman, Virginia Beach Police Department

The concept of seeking out small interventions that produce significant results in relation to the resources involved remains the paramount philosophy of our efforts to enhance the safety and vitality of our neighborhoods. This philosophy has produced such resource conserving intervention tactics as common nuisance process and officer conducted environmental code enforcement for neighborhood drug blight and physical blight concerns.

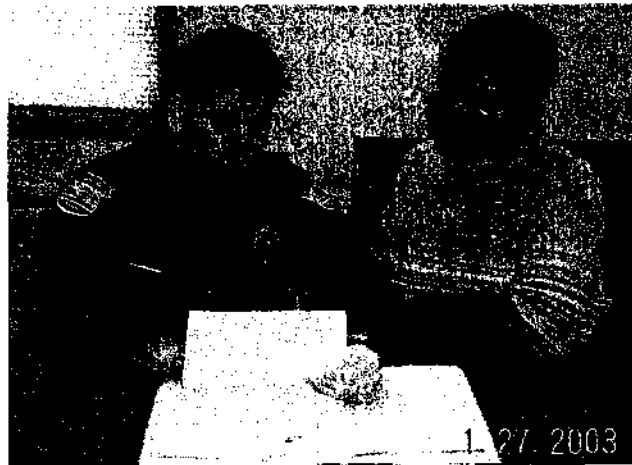
This same philosophy has recently been applied to the problem of fraud within a housing program with some encouraging results.

The Section 8 Housing Choice Program administered by the Virginia Beach Department of Housing and Neighborhood Preservation (VBDHNP) has 1,340 participating households with an approximate annual operating budget of \$ 11,000,000 dollars; of which 80 % is dedicated to housing assistance payments (HAP) with the remaining 20% assigned to administrative costs. Approximately 1, 623 children are in these participating households. There are over 960 persons currently on a waiting list to participate.

In Virginia, local housing authorities are tasked with the responsibility of reporting to law enforcement authorities any suspected fraud within the housing programs that they administer. A failure to do so

could constitute malfeasance, misfeasance, or nonfeasance in office. It is the responsibility of law enforcement to complete the investigation.

The Virginia Beach Police Department, beginning in 1995, tasked their community-policing officers with the investigation of allegations of hous-



ing fraud complaints. This decentralized approach, with the investigations tasked to one of four precinct community-policing units, did not produce a single prosecution for housing fraud.

In April of 2002, officers assigned to the Virginia Beach Police Department's Fourth Police Precinct and Housing Specialists of the VBDHNP developed a pilot program utilizing a team approach concept for the investigation of housing fraud within the Section 8 Housing Choice

Program. This program was designed to ensure the integrity of the Section 8 housing program and to create safer neighborhoods through an enhanced oversight of housing related community issues. The manpower resources committed by the police department consists of one officer assigned part-time.

Problem scanning identified several areas where minor enhancements of our existing process would most likely produce significant results: cross training for officers and housing specialists, improved screening processes for housing applicants, and a strictly controlled process of investigation initiation.

Community-policing officers working with the Housing Specialists, crafted several blocks of training covering such topic areas as program goals, investigative techniques, courtroom testimony procedures, administrative hearings, understanding computer criminal history print-outs, and a review of the applicable laws concerning fraud. Officers also met with the Chief Judge of the Virginia Beach General District Court prior to the program initiation to provide notice of the program implementation.

Written process was improved with a revision of the VBDHNP telephone information collection form which helped to reduce the amount of time required for the resolution of the average investigation of housing fraud to 32.5 days.

The screening process of applicants was significantly enhanced by a decision to utilize the NCJI system. Inquiries cost the VBDHNP fifteen dollars per inquiry; but this preven

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tive approach is believed to be of the utmost importance in enhancing and preserving the integrity of the Section 8 Choice Housing Program. This process is strictly controlled by the VBDHNP Housing Specialists and does not involve law enforcement unless the specialist suspects fraud.

The process of investigation initiation is strictly controlled and remains the sole preserve of the VBDHNP through its Housing Specialists. This process ensures that law enforcement is removed completely from the investigative targeting process. All requests for investigation are initiated in writing from the Housing Specialist. A police report is generated upon receipt of the request and the investigation is conducted by law enforcement. The results of the investigation are relayed back to the Housing Specialist for a determination regarding

the termination of the HAP and/or restitution. The criminal prosecution is the responsibility of the officer. Accordingly, the Housing Specialist is required to attend court proceedings and the officer is required to attend administrative hearings.

In the first six months of this program a total number of 47 investigations were completed. Twenty-three (49%) of those cases resulted in the termination of benefits. Twenty appeal hearings have been requested. The decision to terminate benefits has been upheld in every case. A total of six arrests for housing fraud were affected and the first conviction in the City of Virginia Beach for housing fraud (SC 18.2-186.2 -False statements in order to receive benefits) has been obtained. The total Housing Assistance Payment (HAP) diverted to new clients in the first six months is \$13,011.00 monthly which equates to \$156,132.00 yearly. The mean value of

the HAP is five \$519.00. The average is \$566.00. The total number of investigations initiated to date constitutes 3.5 % of the total Section 8 Program client base of 1340 households.

Beyond simple statistics is the realization that ineligible persons are being terminated from the housing program, thus freeing up significant amounts of new program funding for eligible persons to obtain housing, the reputation of the program is being enhanced, and the morale of city staff is improved.

For further information you may contact Lt. Douglas Backman or Officer Brendan Paulsen at (757) 474-8500.



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