

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

HAMPTON UNIVERSITY,)	
)	
Plaintiff,)	
)	
v.)	C/A No. _____
)	
)	
ACCREDITATION COUNCIL FOR PHARMACY EDUCATION,)	
Serve: Peter H. Vlasses)	
Executive Director, ACPE)	
20 North Clark Street)	
Suite 2500)	
Chicago, Illinois 60602-5109)	
)	
Defendant.)	

COMPLAINT

Plaintiff Hampton University (“Hampton”) files this action to reverse the decision of defendant Accreditation Council for Pharmacy Education (“ACPE”) placing the pharmacy education program at Hampton’s School of Pharmacy (“School”)¹ on probation, and establishing criteria and deadlines that are virtually impossible to meet, thereby ensuring that the School will lose its accreditation. In support of its Complaint, Hampton states the following:

SUMMARY OF CLAIM

This action is filed to protect both the excellent reputation and the accreditation status of Hampton University’s School of Pharmacy, one of the few historically black pharmacy programs in the nation. The School’s mission is to provide contemporary pharmaceutical education that produces highly-skilled pharmacists who deliver quality pharmaceutical care to the people of Virginia and the nation. ACPE’s recent arbitrary and capricious actions threaten that mission.

¹ In the discussion below, “program” and “School” are used interchangeably.

THE PARTIES

1. Hampton is a privately incorporated, 501(c)(3) non-profit, non-sectarian, co-educational, and historically black institution of higher education, with its principal place of business in Hampton, Virginia.

2. ACPE is a private, non-for-profit organization incorporated in Illinois. ACPE was formed in 1932 as the national accrediting agency addressing pharmacy degree programs. The founders were the American Association of Colleges of Pharmacy, American Pharmacists Association, and National Association of Boards of Pharmacy. The founders continue to this day to appoint ACPE's Board of Directors. Graduation from an ACPE-accredited PharmD program is recognized by licensing jurisdictions in the United States as meeting the education component of the licensing criteria. Specifically, graduation from an ACPE-accredited pharmacy program is a requirement for the practice of pharmacy in Virginia. *See* VA. CODE § 54.1-3312.

3. In 1952, the then-Commissioner of the U.S. Department of Education ("DoE") granted initial recognition of ACPE's meeting DoE's criteria. ACPE has continued to receive recognition by the Secretary of the DoE since that time, with the most recent full review in 2006-07. ACPE qualifies for DoE recognition, in that accreditation by an agency is a required element in enabling a degree program, in this case pharmacy, to establish eligibility to participate in funding programs under Title VII of the Department of Health and Human Services' Public Service Act.

JURISDICTION AND VENUE

4. Venue is proper in this Court because Hampton resides in this judicial district, and the events that form the basis of this action occurred in Virginia.

5. This Court has subject matter jurisdiction under one or more of the following statutory provisions: (i) 20 U.S.C. § 1099b(F), providing exclusive federal jurisdiction for disputes with recognized accrediting agencies; (ii) 28 U.S.C. § 1331, in that the action arises under the Constitution and Laws of the United States, including but not limited to the due process clause of the Fifth Amendment to the United States Constitution and the Higher Education Act (“HEA”) Amendment of 1992 as amended, 20 U.S.C. §§ 1001 *et seq.*, and 42 U.S.C. § 1983; and (iii) 28 U.S.C. § 1332(a), on the grounds that the amount in controversy exceeds \$75,000, and the parties are citizens of different states. This Court may issue declaratory relief pursuant to 28 U.S.C. § 2201 (A).

FACTS

Background

6. A university’s eligibility to receive federal and other funding, including financial aid for students, under the HEA is contingent upon the university’s continued membership in a recognized accredited association. *See* 34 CFR pt. 600. Thus, a loss of accreditation and/or a blight on a program’s accreditation status may sound the death knell for a pharmacy program at a small, private educational institution like Hampton that has a substantial number of its students receiving financial aid.

7. The School has been fully accredited by ACPE since June 2002. Until January 2009, the School has never been on probation.

8. In 2004, the School’s founding dean left to start another graduate program in pharmacy at a different institution. In partial response to her departure, at the time of its 2004 renewal, ACPE continued the School’s accreditation for only one year, instead of the usual two- or six-year periods.

9. In its June 24-27, 2004 Accreditation Action and Recommendation Report for Hampton, ACPE raised concerns with the adequacy of faculty resources and the number of faculty vacancies at the School.

10. In its February 1, 2005 Interim Report, however, ACPE noted the progress made by the School regarding faculty recruitment and retention, physical facilities and the more systematic approach for projection of capacity needs for practice experiences. In this report, ACPE encouraged the School to continue its efforts to expand the faculty, specifically identifying two additional positions that were recommended – but not expressly required – by the evaluation team.

11. In the June 23-25, 2005 Accreditation Action and Recommendation Report, ACPE again continued the School's accreditation for one year. ACPE gave the School a "cautionary notice" and requested an update on specific plans to increase the number of faculty lines to meet programmatic needs. This request did not provide any specific numbers, quotas or deadlines for new faculty member hirings.

12. In its July 3, 2006 Interim Report, ACPE maintained the cautionary notice it had issued to the School, but acknowledged the changes and progress at the School since the April 2005 Interim Report, including the status of faculty turnover and recruitment and progress regarding faculty development.

13. After an on-site visit in November 2006, ACPE recognized that the School had "a full complement of Pharmacy Practice faculty in place." Nevertheless, ACPE stated that the actual number of faculty members appeared inadequate to meet all of the School's needs. Again, ACPE provided Hampton with no specific numbers, quotas or deadlines for faculty hires that would be required to maintain accreditation.

14. In January 2007, ACPE withdrew the cautionary notice it had issued to the School “[b]ecause the School has demonstrated progress in addressing deficiencies identified during previous ACPE on-site evaluations.”

15. The School’s next comprehensive visit by ACPE was scheduled for sometime in spring 2008. On September 6, 2007, however, ACPE notified the School via email that it would prefer to postpone its review of the School until fall 2008.

16. At no time did ACPE indicate that it continued to have issues and/or concerns with the School’s pharmacy program. In fact, ACPE’s decision to delay the onset of the School’s annual review, based on ACPE’s own workload issues, led the School to believe that its pharmacy program was in compliance with ACPE’s standards and that its accreditation would be continued.

17. The School agreed to ACPE’s request to postpone the annual review.

18. On March 4, 2008, ACPE sent a letter to the School confirming that its comprehensive accreditation review was scheduled for fall 2008 and, therefore, the School’s present accreditation term which was set to expire on June 30, 2008, would be extended through January 31, 2009. By its own terms, this letter served as official notice of the change in the School’s accreditation term. ACPE’s letter contained no indication that the School’s situation had changed or that probationary status was at risk in January 2009.

19. In October 2008, ACPE’s evaluation team completed its on-site visit and issued its Report, indicating that: “In most areas the School has made reasonable progress since the last comprehensive site visit (in 2002). One notable exception, which was addressed in the report of the ACPE focused visit to the School in 2006, was the lack of progress in recruiting faculty.”²

² After the 2006 visit, as noted above, ACPE withdrew the cautionary notice it had previously issued to the School.

20. In the 2008 Report, ACPE also acknowledged that Hampton had made considerable effort during the past two years to recruit additional faculty, and to recruit faculty in particular disciplines.

21. Nevertheless, without providing any overall standards for the size of the faculty that it deemed to be appropriate, ACPE took issue with the lack of any faculty member with an academic background in the social/behavioral/administrative sciences (or similar discipline), and the fact that there was only one faculty member in the area of pharmaceuticals. Based on these evaluations and others, ACPE found that the School was not in compliance with Standard 24 – Faculty & Staff – Quantitative Factors, and was partially compliant with Standard 30 – Financial Resources – specifically tied to faculty salaries. The School was fully compliant with the other 28½ Standards recognized by ACPE.

22. In January 2009, ACPE’s Board of Directors met in Austin, Texas, and representatives from the School were invited to speak at the meeting on the issues described in paragraphs 18 and 21 above. This meeting was not a “hearing” as that term is defined under traditional due process principles. Indeed, according to the invitation to the meeting, the School’s Provost was advised, “Your appointment time includes a brief 15-minute presentation by you and your colleagues, which should be an update only to the information previously submitted to ACPE. No handouts will be distributed at the meeting.” Consistent with the brief time allotment provided, the School’s Dean and Provost presented for only about five minutes each and then answered a few questions.

23. At the January 2009 meeting, ACPE decided to place the School on probation. More specifically, ACPE determined that it would continue the School’s accreditation for only six more months, during which time the School would be on probation. ACPE subsequently

announced its decision to place the School on probation in its Report of the Proceedings and publicly on its website.

24. The DoE maintains regulations that accredited accrediting agencies, such as ACPE, must follow. DoE's regulation on due process, 34 C.F.R. § 602.25, requires that every accredited accrediting agency such as ACPE permit a "program the opportunity to appeal an adverse action and the right to be represented by counsel during that appeal."

25. DoE regulation 34 C.F.R. § 602.3 defines "adverse action" in part as any action that is "comparable" to "denial, withdrawal, suspension, revocation, or termination of accreditation."

26. Because ACPE's own Accreditation Manual, at section 9.2, recognizes that "[p]robation reflects a diminished accreditation status," ACPE's decision to place the School on probation is an "adverse action" as that term is defined by the DoE, entitling Hampton to an appeal right of ACPE's decision.

27. Accordingly, on February 24, 2009, Hampton's counsel sent a letter to ACPE's counsel formally requesting an appeal of ACPE's decision to place the School on probation.

28. In a subsequent conversation with ACPE's counsel on February 27, 2009, counsel for Hampton was informed that ACPE would not afford Hampton an opportunity to appeal ACPE's decision to place the School on probation.

Hampton Is Entitled to Know the Specific Standards to Which the School Is Being Held

29. ACPE's decision to place the School on probation with less than six months to address ACPE's concerns is unwarranted, unreasonable and unfair. Although ACPE concluded that the School is non-compliant with Standard 24 and partially compliant with Standard 30, neither of these conclusions has been tied to specific benchmarks.

30. The October 21-23, 2008 Evaluation Team Report fails to advise the School of the specific faculty size and make-up that would be necessary for the School to fulfill this standard to ACPE's satisfaction. Furthermore, the January 7-11, 2009 Accreditation Action and Recommendation Report fails to identify the "expectations of Standards 24 and 30" to which the School is being held. Indeed, Standard 24 contains no specific student-to-faculty ratios, no faculty experience benchmarks, nor any other concrete indicators of what the School must have or do in order to demonstrate that it possesses "a sufficient number of qualified full-time faculty and staff to effectively deliver and evaluate the professional degree program."

31. Among other things, ACPE's January 2009 decision to place the School on probationary status appears to ignore the reality that ACPE recognized just six months earlier, namely that there is "significant and unprecedented volatility" with respect to pharmacy educators and that "[r]ecruitment [is] more difficult for pharmaceuticals . . . and social/behavioral/administrative scientists." ACPE Update, July 21, 2008. Not surprisingly, these are precisely the areas of the School's faculty that ACPE has identified as being deficient.

32. Hampton needs to know precisely what is expected of the School in order to either demonstrate satisfaction of such requirements or grow the School's faculty to meet such requirements. ACPE's failure to provide that benchmark renders its decision to place the School on probation unreasonable and unenforceable.

Hampton Cannot Practically Address ACPE's Concerns While the School Is on Probation

33. For several years, Hampton has recognized the School's need for more faculty and has committed itself to recruiting additional faculty, but probationary status creates an impossible situation. With the stigma of probationary status, it will be virtually impossible for the School to attract faculty – much less excellent faculty – under the cloud of the public threat

that the pharmacy program will lose its accreditation in less than six months if a sufficient number of other faculty are not simultaneously and immediately recruited. Similarly, placing the School on probation effectively sends a message to existing faculty members that they should begin to look for employment elsewhere, because the School's days are numbered.

34. Another practical problem with ACPE's decision is that the time period for required action completely disregards the fundamental nature of the academic calendar. Indeed, because nearly all of the new faculty will have to be recruited from other institutions, it is entirely unreasonable to expect that these individuals would relocate mid-semester in time for the School to meet ACPE's June 2009 deadline, much less May 1, 2009, when the School must present its Interim Report.

35. ACPE's action also ignores the fact that numerous sources – most notably the task force formed by the Council of Faculties and the Council of Deans within the American Association of Colleges of Pharmacy – have recognized that there are substantial and systemic concerns nationally with the ability of pharmacy schools to recruit and retain faculty. And, in Hampton's case, the challenges of faculty recruitment are exacerbated by the paucity of African-Americans within the national pool of pharmacy educators (a mere 5.6%). While Hampton recruits on an equal opportunity basis, the simple fact remains that the School's faculty consists predominantly of African-Americans, which mirrors the School's predominantly African-American student population. Furthermore, as it relates to the practical realities of hiring additional faculty, ACPE's imposition of probationary status with less than six months to achieve compliance with ACPE's unstated expectations fails to recognize or account for the fact that the landscape of the entire U.S. economy has changed since the summer of 2008. The current state of economic instability that exists throughout the country makes it even less likely that new

faculty would accept the risk of joining the faculty of a school that is in jeopardy of being closed as a result of lack of accreditation.

36. Probationary status also threatens to destroy alumni morale, which may impair the School's ability to obtain financial support to hire and retain faculty. It also impairs the School's ability to obtain grant funding and insurance on favorable terms. Furthermore, probationary status is likely to spur the School's current pharmacy students to transfer elsewhere and to discourage newly accepted students from matriculating. All of these factors place the School in a position from which it cannot reasonably be expected to recover without the lifting of its probationary status.

37. Finally, despite its indication that the School's accreditation with probation status would be in effect until June 30, 2009 only, ACPE is requiring the School to present a detailed plan to address both the "faculty situation" and Hampton's "exit strategy" for the School if accreditation is withdrawn. This plan must be presented to ACPE in draft form by April 1, 2009, and in final form by May 1, 2009. Thus, in reality, the School was given only four months to hire enough new pharmacy faculty to meet ACPE's unspecified quota – all while the School is on probation – or else the School will lose its accreditation entirely and thus, effectively, be terminated as a viable entity.

ACPE's Treatment of Other, Similarly-Situated Programs Is Different From and Better Than Its Treatment of the School

38. ACPE has arbitrarily and unreasonably applied different and stricter standards to Hampton's pharmacy program than it has to pharmacy programs at other institutions, including the following:

39. In January 2006, ACPE placed the pharmacy program at Howard University ("Howard") – another historically black school – on probation for noncompliance with six of

ACPE's 30 standards. In doing so, ACPE found that Howard's pharmacy students were not progressing adequately towards their degrees; there were not enough faculty to handle the school's curriculum once it was revamped and brought up to ACPE standards; there were inadequate lecture hall and classroom facilities; there was no detailed statement of financial health; and there was a low passage rate for graduates taking the North American Pharmacy Licensure Examination ("NAPLEX"). In the summer of 2007, more than one year after being placed on probation, Howard's pharmacy program was restored to full accreditation.

40. In January 2007, ACPE placed the College of Pharmacy and Pharmaceutical Sciences at Florida A&M University ("FAMU") – again, another historically black institution – on probationary status through June 2008. ACPE required FAMU to demonstrate that it had adequate faculty to meet the school's needs, along with the appropriate budget to meet ACPE's standards. In addition, ACPE cited FAMU for a lack of assessments leading to curriculum improvements and lack of planning. With a full year's time available to it, FAMU was able to work through "the 21 accreditation findings from its previous ACPE site visit," and its pharmacy program's probation status was removed.

41. In January 2009, ACPE placed the College of Pharmacy at Xavier University of Louisiana ("Xavier") – yet another historically black institution – on probation based on lack of compliance with Standards 19, 24 and 28. Xavier's difficulties with faculty recruitment and retention started as far back as April 2003, when ACPE conducted a comprehensive on-site visit. At that time, Xavier's accreditation term was reduced from six to two years. From 2003 until January 2009, ACPE continued to express concerns over Xavier's recruitment and retention of qualified faculty, as well as the adequacy of Xavier's facilities in meeting programmatic needs and the communications between Xavier's administration and faculty. In 2007, ACPE also

expressed concern over the NAPLEX passage rate of Xavier's students, which had dropped between 2004 and 2006.

42. Furthermore, according to ACPE, there were two pharmacy programs in 2008 that were partially or non-complaint with two standards but which received six-year accreditation terms. And, there were seven programs with three or more deficiencies that received two-year terms.

COUNT I ACPE FAILED TO FOLLOW ITS OWN RULES

43. Hampton incorporates by reference the allegations contained in paragraphs 1 through 42 of the Complaint as if fully set forth herein.

44. ACPE failed to follow its own rules consistently and/or failed to promulgate rules that allowed for a fair and impartial procedure before placing the School on probation.

45. In reviewing an accrediting agency's decision-making process, the primary focus is on whether the accrediting body's internal rules provide a fair and impartial procedure and whether the association followed its own rules and policies in reaching its decision. *Wilfred Acad. of Hair & Beauty Culture v. SACS*, 957 F.2d 210, 214 (5th Cir. 1992); *Florida Coll. of Bus. v. Accrediting Council for Indep. Colls. & Sch.*, 954 F. Supp. 256, 258 (S.D. Fla. 1996). An accreditation decision should be overturned if, in reaching such decision, the agency was unable, or unwilling, to follow its own rules and policies and to provide meaningful due process.

46. ACPE's own Accreditation Manual provides: "Generally, if after one year of notification of *non-compliance*, the program fails to demonstrate adequate progress towards achieving compliance with ACPE standards, ACPE will place the program on probation." Accreditation Manual (§ 9.1) (emphasis added). Furthermore, the Accreditation Manual provides: "A professional degree program ... that has been granted accreditation, and after failure

to be in compliance with a standard or standards after the time frame set forth in 9.1, will be given the accreditation status of Probation. Accreditation Manual (§ 9.2). And, Department of Education Regulations require that ACPE “consistently apply and enforce its standards” See 34 C.F.R. § 602.18.

47. Because the ACPE Board decided that the School was in non-compliance only with Standard 24 in January,³ and because ACPE did not afford the School the opportunity to demonstrate adequate progress toward achieving compliance after at least one year, ACPE failed to follow its own rules and policies when it arbitrarily decided to place the School on probation with less than six months to correct any deficiencies.

48. Hampton has been irreparably harmed by ACPE’s failure to follow its own rules and policies. Hampton is entitled to declaratory and injunctive relief, as well as monetary damages.

COUNT II
ACPE DENIED HAMPTON COMMON LAW DUE PROCESS

49. Hampton incorporates by reference the allegations contained in paragraphs 1 through 48 of the Complaint as if set forth fully herein.

50. Accreditation bodies, including ACPE, must afford common law due process to member institutions. Essential elements of common law due process include meaningful notice and a meaningful opportunity to be heard.

51. Common law due process requires ACPE to provide Hampton with clear, detailed and specific information regarding any alleged deficiencies in its pharmacy program, as well as an opportunity to appeal any adverse accreditation decision taken against one of Hampton’s programs.

³ According to ACPE’s Accreditation Manual (§ 12.4), “[t]he report generated by the evaluation team ... is not a definitive accreditation report, but an interim, evaluative step in the accreditation process.”

52. Common law due process further requires that ACPE treat Hampton's pharmacy program the same as other similarly-situated programs in terms of notice, probationary status duration and accreditation, and steps to be taken to return to full accreditation.

53. ACPE denied Hampton common law due process by failing to follow its own rules, procedures and policies, when ACPE, by way of example and not limitation: failed to provide the School with any numbers, quotas or deadlines for faculty hiring necessary to comply with Standard 24 to ACPE's satisfaction; misled Hampton into believing that its pharmacy program would remain fully accredited; placed the School on probation for alleged deficiencies that were smaller in scope and weight than those of other pharmacy programs at other institutions that remained fully accredited; required Hampton to rectify the alleged deficiencies in its pharmacy program in a shorter time period than allowed to other pharmacy programs with the same or greater number of alleged deficiencies; provided Hampton a *de minimus* amount of time to be heard on an issue of great importance; placed the School on probation, thereby preventing it from being able to hire additional faculty for the pharmacy program because of the School's probation status; and refused to provide Hampton the opportunity to appeal ACPE's decision to place the School on probation. Indeed, ACPE has offered no indication as to why the School's situation has been deemed to be so egregious that the School is not being afforded at least one year to "demonstrate adequate progress toward achieving compliance," as ACPE has stated is "generally" the case. *See Accreditation Manual* (§ 9.1). ACPE's position in this regard is inconsistent with its concomitant position that its decision to place the School on probation is so insignificant as not to entitle Hampton the right to appeal the adverse decision, as is required by law.

54. As a result of ACPE's violations, Hampton has suffered and continues to suffer damages which are not possible to ascertain at this time. Hampton is also entitled to declaratory and injunctive relief.

**COUNT III
ACPE ACTED ARBITRARILY AND CAPRICIOUSLY
WHEN IT PLACED THE SCHOOL ON PROBATION**

55. Hampton incorporates by reference the allegations contained in paragraphs 1 through 54 of the Complaint as if set forth fully herein.

56. ACPE has arbitrarily and unreasonably applied different and stricter standards to Hampton than to other institutions. ACPE has offered no indication as to why the School's situation has been deemed to be so egregious that the School is not being afforded at least one year to "demonstrate adequate progress toward achieving compliance," as ACPE has stated is "generally" the case. *See Accreditation Manual* (§ 9.1).

57. ACPE's failure to treat pharmacy programs consistently in terms of invoking probation or granting re-accreditation based on non- or partial compliance, as well as the duration of the probationary period, establishes that ACPE's actions in placing the School on probation with less than six months to rectify the situation is arbitrary and unreasonable.

58. As a result of ACPE's actions and violations, Hampton has and continues to suffer damages. The School is also entitled to declaratory and injunctive relief.

**COUNT IV
ACPE VIOLATED HAMPTON'S RIGHTS UNDER 42 U.S.C. § 1983**

59. Hampton incorporates by reference the allegations contained in paragraphs 1 through 58 of the Complaint as if set forth fully herein.

60. ACPE, while acting under color of law, deprived Hampton of a federally protected right, privilege or immunity (including, but not limited to, the right to due process) in

violation of 42 U.S.C. § 1983. ACPE's admitted "official custom and/or policy" deprived Hampton of such federally protected rights.

61. ACPE violated Hampton's due process rights in reaching its decision to place the School on probation while failing to comply with ACPE rules and policies, and also by failing to afford Hampton the opportunity to appeal the adverse accreditation action taken by ACPE, in violation of its rules and policies and/or federal law.

62. Hampton has been irreparably harmed by ACPE's failure to follow its own rules and policies and/or federal law. Hampton is entitled to declaratory and injunctive relief, as well as monetary damages.

HAMPTON'S HARM

63. As a direct and proximate result of each of the wrongful actions described herein, Hampton has suffered, and will continue to suffer, irreparable harm and severe damage to: its and the School's reputation; its and the School's academic standing and ranking; its and the School's ability to attract and retain excellent faculty, staff and students; its and the School's ability to obtain grants and other funding; as well as other damages that cannot presently be quantified.

64. Hampton is entitled to a temporary restraining order and preliminary injunction under Federal Rule of Civil Procedure 65 and the common law.

PRAYER FOR RELIEF

WHEREFORE, Hampton requests the following:

A. A judgment declaring that:

1. ACPE failed to follow its own rules and policies when it placed Hampton's School of Pharmacy on probation under the circumstances described above, and failed to offer the School an opportunity to appeal that adverse decision, as required by DoE regulations, and thus that the action is null and void;

2. ACPE violated Hampton's fundamental due process rights in placing Hampton's School of Pharmacy on probation, and thus that the action is null and void;

3. ACPE's decision to place Hampton's School of Pharmacy on probation was arbitrary and capricious, and thus that the action is null and void.

B. Issuance of a preliminary and permanent injunction supplemental to the above declarations:

1. Enjoining ACPE from notifying the Secretary of Education or any other person or entity of its decision to place Hampton's School of Pharmacy on probation or, if such notice has been provided, requiring ACPE to withdraw it;

2. Removing notification of ACPE's having placed Hampton's School of Pharmacy on probation from the ACPE website, literature and any other ACPE publications;

3. Rescinding Hampton's School of Pharmacy's probationary status; and

4. Enjoining ACPE from revoking Hampton's School of Pharmacy's accreditation status or taking any other adverse action against Hampton's School of Pharmacy for two years.

C. Compensatory damages in an amount that presently cannot be calculated, but in an amount not less than \$100,000;

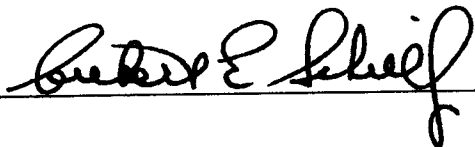
D. Attorneys' fees, for violation of 42 U.S.C. § 1983;

E. Attorneys' fees and other expenses of litigation; and

F. Any other relief the Court deems appropriate.

Respectfully submitted.

HAMPTON UNIVERSITY

By:  _____

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