

## Public Hearing Notice

---

The Clarke County Board of Supervisors will conduct three public hearings in the Berryville Clarke County Government Center Main Meeting Room, 101 Chalmers Court, 2nd Floor, Berryville, VA, on Tuesday, September 19, 2023, at 6:30 pm, or as soon thereafter as the matter may be heard, to hear public comment on the following:

**PH 2023-10:** (CC2023-02) Text amendments to Chapter 17-Fire, Emergency Medical Services (EMS) & Emergency Management. The amendments replace the term “Director” with “Chief”, making the head of the county department the “Chief”. The amendments also provide the Chief with authorities granted to Chiefs found in the Code of Virginia. Language included also names the County Administrator as the Director of Emergency Management and the Chief as the Coordinator of Emergency Management to be consistent with the recently adopted Emergency Operations Plan.

Information regarding the above matters is available to the public in Clarke County Administration and on the County website. Any person desiring to speak on the above matters should appear at the appointed time and place. Written copies of statements are requested but not required. Clarke County does not discriminate on the basis of handicapped status in admission to its programs and activities. Accommodations will be made for handicapped persons upon prior request.

Chris Boies – County Administrator

# Clarke County Board of Supervisors

---



**Berryville Voting District**  
**Matthew E. Bass**  
(540) 955-5175

**Millwood Voting District**  
**Terri T. Catlett-Vice Chair**  
(540) 837-2328

**Russell Voting District**  
**Doug Lawrence**  
(540) 955-2144

**Buckmarsh Voting District**  
**David S. Weiss – Chair**  
(540) 955-2151

**White Post Voting District**  
**Bev B. McKay**  
(540) 837-1331

**County Administrator**  
**Chris Boies**  
(540) 955-5175

To: Board of Supervisors

From: Chris Boies

Re: September Public Hearing-Text Amendments to Chapter 17

Date: August 18, 2023

As directed by the Board at the August 15, 2023 meeting, staff has advertised a public hearing on various text amendments to Chapter 17 Fire, Emergency Medical Services (EMS), and Emergency Management. The text amendments include three primary areas of changes:

**Chief Title:** All references to "Director" in the chapter are replaced with "Chief". Per the Code of Virginia, the head of a county fire department shall be known as the chief (see attached memo to County Attorney and his response). Language has also been added in Section 17-2 to make evident that the Chief has no jurisdiction over the internal affairs of a volunteer company.

**Chief Authorities:** As recommended by the County Attorney, language has been added to Section 17-5.D clarifying that the Chief has authorities granted by Code of Virginia 27-15.1, 27-17, and 27-17.1. These authorities allow the Chief to manage an incident including maintaining order, directing the actions of firefighters and fire equipment, entering buildings, and remaining on the scene for the purpose of protecting property.

**Emergency Management:** At the May 16, 2023 Board of Supervisors meeting, the Board approved an updated Emergency Operations Plan. That plan slightly changed the titles of personnel assigned with emergency management responsibilities. Specifically, the County Administrator shall serve as the County's Director of Emergency Management (this is a designation recognized by the Commonwealth) and the Director of Fire & EMS shall serve as the County's Coordinator of Emergency Management. The coordinator position handles day-to-day emergency management activities while the director has certain authorities and responsibilities during an emergency.

# Chapter 17 Fire, Emergency Medical Services (EMS), and Emergency Management, Department Of

## Table of Contents

Chapter 17 Fire, Emergency Medical Services (EMS), And Emergency Management, Department Of.....	2
Code of Virginia References.....	2
§17-1 Establishment of the Department of Fire, Emergency Medical Services (EMS), and Emergency Management.....	2
§17-2 Appointment of <del>the Chief</del> a Director of Fire and Emergency Medical Services (EMS).....	2
§17-3 <del>Appointment of a Coordinator of</del> Emergency Management .....	3
§17-4 Responsibilities of the Department.....	3
§17-5 Responsibilities of the <del>Chief</del> Director.....	3
§17-6 Fire and EMS Commission .....	4
§17-7 Recognition of Providers of Fire and Emergency Services .....	5
§17-8 Entities of County Fire and EMS Division responsible to the Department.....	5
§17-9 Personnel Responsibility and Authority .....	6
§17-10 Obedience to orders of the senior officer in charge at the scene of accidents, disasters, and other fire, medical, and rescue oriented incidents .....	6
§17-11 Service fee for ambulance transport.....	7
Amendments Chapter 17 .....	8

## Chapter 17 Fire, Emergency Medical Services (EMS), and Emergency Management, ~~Department Of~~

---

[HISTORY: Adopted by the Board of Supervisors of Clarke County 10-21-2014 as Chapter 17 of the 1997 Code as. Amendments noted where applicable.]

### Code of Virginia References

§ 18.2-414.1. Obstructing members of rescue squad in performance of mission; penalty.

§ 27-14. Ordinances as to fire/EMS departments, etc.

§ 27-15.1. Authority of chief, ~~director~~ or other officer in charge when answering alarm or operating at an emergency incident; penalty for refusal to obey orders.

§ 27-23.6. Provision of fire-fighting or emergency medical services.

§ 44-146.19. Powers and duties of political subdivisions.

### *§17-1 Establishment of the Department of Fire, Emergency Medical Services (EMS), and Emergency Management*

- A. In order to help ensure the protection of citizens, visitors, and property of Clarke County, the firefighting, emergency medical services (EMS), and emergency management services are organized under a Department of Fire, Emergency Medical Services (EMS), and Emergency Management (“the Department”). These services shall be provided by using both County-employed and volunteer company firefighters and EMS personnel. As such, the County-recognized volunteer fire-fighting and EMS entities shall be deemed an instrumentality of the County and shall receive the full benefit and protections of the law while acting in that capacity.
- B. In order to effectively carry out the provisions of Subsection A of this section, the Department shall be organized to coordinate all fire, EMS, and emergency management and preparedness services within the County.
- C. The Department shall be composed of the County officials and County-employed staff (“the Staff”) of the Department, and the volunteer fire and EMS companies. The volunteer fire and EMS companies are recognized as entities of the Department and are an integral part of the County’s public safety program.

### *§17-2 Appointment of the Chief ~~a Director of Fire and Emergency Medical Services (EMS)~~*

- A. The County Administrator shall appoint the head of the Department, who shall be known as the “Chief”. ~~a Director of Fire and Emergency Medical Services (EMS) (“the Director”)~~ ~~to head the Department and to~~ The Chief shall carry out the responsibilities set forth in §17.5. The Chief shall have no jurisdiction over the internal affairs of the volunteer

companies. The ~~Chief Director~~ shall report to the County Administrator and the Department Staff shall report to the ~~Chief Director~~.

### *§17-3 ~~Appointment of a Coordinator of Emergency Management~~*

- A. The County Administrator shall serve as the County's ~~Director~~ ~~Coordinator~~ of Emergency Management. The responsibilities of the ~~Director~~ ~~Coordinator~~ of Emergency Management may be delegated to the ~~Director~~ at the discretion of the County Administrator.
- B. The Chief shall serve as the County's Coordinator of Emergency Management and shall provide general management of the planning, preparation, and response for any disaster which impacts the County and requires implementation of the County's emergency operations plan.

### *§17-4 Responsibilities of the Department*

- A. The Department shall be responsible for coordinating and managing the services and functions as described above in §17-1 and in the sections below.
- B. The Department may employ Staff to perform a variety of functions to support fire, EMS, and emergency management services. These functions include but are not limited to firefighting, emergency medical services/EMT, volunteer recruitment/retention, grant writing, and administrative services. The ~~Chief Director~~ shall manage and oversee the Staff unless otherwise designated by the County Administrator.

### *§17-5 Responsibilities of the ~~Chief Director~~*

- A. The ~~Chief Director~~ shall carry out the responsibilities and general management of the Department, shall establish and enforce Departmental policies, procedures, and guidelines consistent with this Chapter for the administration and operation of the Department. The ~~Chief Director's~~ specific responsibilities shall be as assigned by the County Administrator.
- B. The ~~Chief Director~~ shall have management oversight of the Department's Staff. Management oversight of the volunteer companies and volunteer staff shall be the responsibility of the chiefs of the individual companies and their respective governing boards.
- C. The ~~Chief Director~~ shall make periodic recommendations to the County Administrator and Board of Supervisors on how to effectively provide the best fire and emergency services available based on risk management principles within the parameters established by the Board for fiscal management and emergency response service level objectives. Any recommendations proposed by the ~~Chief Director~~ that will have a substantive impact on the County's emergency response system or infrastructure impacting service delivery shall be reviewed by the Fire and EMS Commission prior to presenting the recommendations to the Board of Supervisors. The results of the Commission's review shall also be provided to the Board of Supervisors.

- D. The ~~Chief~~Director shall serve as a senior officer for fire and/or EMS and shall have the authority to take command of an incident on an as-needed basis in the absence of, or directed by, a volunteer chief. The ~~Chief~~Director shall possess the skills, training, and certifications necessary to serve as a senior fire officer, senior EMS officer, or both. The Chief shall have the authorities granted by the Code of Virginia §27-15.1, §27-17, and §27-17.1.

#### *§17-6 Fire and EMS Commission*

- A. The Board of Supervisors shall appoint a Fire and EMS Commission (“the Commission”) to provide planning-level oversight of the Fire and EMS systems in the County; to oversee strategic planning efforts; and to provide a mechanism for collaboration and coordination among the ~~Chief~~Director, the County Sheriff, volunteer companies, and the Board of Supervisors on issues impacting fire, EMS, and emergency management services.
- B. The Commission shall work in coordination with the ~~Chief~~Director on these issues, and the ~~Chief~~Director shall provide staff support to the Commission. Membership Composition; Term. The Commission shall consist of eight (8) members including:
- One (1) member of the Board of Supervisors;
  - The Clarke County Sheriff;
  - One (1) representative from each of the volunteer fire and EMS companies; and
  - Three (3) citizens-at-large representing consumers of fire and EMS services.

The three (3) volunteer fire and EMS company representatives shall serve one-year terms and shall be appointed by the Board of Supervisors with recommendation to be provided by the volunteer companies.

The three (3) citizens-at-large shall be appointed for initial terms of one (1) year, two (2) years, and three (3) years and thereafter for four (4) year terms.

The Sheriff shall serve a term coterminous with the term of office.

The Board of Supervisors shall appoint a representative annually at or shortly after its annual organizational meeting to serve a one-year term.

- C. Responsibilities of the Commission. The Commission shall have the following specific responsibilities to be completed in cooperation with the ~~Chief~~Director:
1. Develop and maintain a Fire & EMS Strategic Plan.
  2. Annually review the Emergency Operations Plan (EOP) and provide recommendations on changes to the Board of Supervisors.
  3. Review and advise on implementation strategies for policy and protocol changes for Fire & EMS operations.

4. Provide platform for resolving policy and protocol disputes among the companies, the career staff, and/or with the emergency communications center.
5. Review and provide recommendations on budgetary matters including recommending the use of funding and service agreements.
6. Evaluate compliance with established performance objectives and develop recommendations to address deficiencies.
7. Support and promote annual emergency preparedness exercises.
8. Evaluate other related issues as requested by the Board of Supervisors.

The Commission shall also review and provide recommendations on any proposals by the ~~Chief Director~~ that will have a substantive impact on the County's emergency response system or infrastructure impacting service delivery.

### *§17-7 Recognition of Providers of Fire and Emergency Services*

- A. Volunteer organizations. The following volunteer organizations are hereby recognized as entities of the Clarke County Department of Fire, Emergency Medical Services (EMS), and Emergency Management and are hereby permitted to provide fire and EMS services in Clarke County:
  1. John H. Enders Fire Company and Rescue Squad
  2. Boyce Volunteer Fire Company
  3. Blue Ridge Volunteer Fire and Rescue Company 8
- B. Other organizations and groups. The following organizations and groups are hereby recognized as non-jurisdictional entities that are hereby permitted to provide fire and EMS services in Clarke County:
  1. Mount Weather Emergency Operations Center.
  2. Entities responding to Clarke County emergencies in accordance with mutual aid agreements.
- C. Response areas. Each of the organizations listed in §17-7(A) shall be assigned response areas that provide the best services to the citizens of the County. Response areas shall be determined among the volunteer companies and a written copy of the response areas shall be provided to the ~~Chief Director~~, who shall maintain the copy and make it available to the Emergency Communications Center, Commission, and the general public. Response areas may be reviewed and updated periodically. Non-jurisdictional entities listed in §17-7(B) may be assigned a response area if determined to be appropriate by the volunteer companies.

### *§17-8 Entities of County Fire and EMS ~~Division responsible to the Department~~*

- A. Each of the organizations listed in §17-7(A) and (B) shall coordinate their operations and activities with the Department and shall carry out their assigned tasks to the best of their ability.
- B. Each volunteer organization listed in §17-7(A) shall appoint a chief who shall be responsible for the overall direction and control of fire and EMS activities using federally-mandated NIMS protocols within the organization's respective first due response areas. Additionally, the chief shall ensure that the organization complies with all of the provisions of applicable laws, ordinances, and standard operating procedures/guidelines in coordination with the Department and shall advise and communicate the organization's operations and activities with the ~~Chief~~ Director.
- C. The fire and EMS Staff, when responding to calls, shall follow all applicable federal, state, and local regulations and will function under the same standards incorporating NIMS as noted in subsection B above.

#### *§17-9 Personnel Responsibility and Authority*

- A. All officially recognized members of the organizations listed in §17-7(A) and (B) shall perform their respective duties, as outlined in the standard operating procedures/guidelines and applicable laws and ordinances, to the best of their ability.
- B. All officially recognized members of the organizations listed in §17-7(A) and (B) shall be subject any procedures and practices established by the Board of Supervisors.
- C. While performing in their official capacity, each of the members of the organizations and groups listed in in §17-7(A) and (B) shall have the authority to carry out their respective assignments as provided for in applicable laws, ordinances, and standard operating procedures/guidelines.
- D. While performing in their official capacity and acting within the guidelines of the Department, each of the members of the organizations and groups listed in in §17-7(A) and (B) shall be afforded all of the privileges, rights, and remedies available to them under the law.

#### *§17-10 Obedience to orders of the senior officer in charge at the scene of accidents, disasters, and other fire, medical, and rescue oriented incidents*

Every person present at the scene of any fire, medical, or rescue emergency shall be obedient to the orders of the senior officer in charge in any matter related to fire/medical/rescue matters; freedom of fire and EMS company, personnel, and apparatus to perform their duties or to function properly; and the maintenance of order at or near the scene of the emergency.

It shall be unlawful for any person to disobey any such order of the senior officer in charge.



The senior officer in charge shall have the authority to cause the arrest of persons who disobey such orders and to hold them in custody until the incident or danger is abated, at which time the violator shall be dealt with according to law.

*§17-11 Service fee for ambulance transport*

Code of Virginia References (§18.2-414.1; §27-14; 15.1; and 23.6; §44-146.19; §32.1-111.14; §38.2-3407.9)

*A. Purpose.*

A service fee is hereby established for basic life support transport (BLS), advanced life support level 1 transport (ALS 1), advanced life support level 2 transport (ALS 2), and for ground transportation mileage on each person being transported by an emergency services organization that is authorized to provide emergency medical services in accordance with this Chapter.

*B. Definitions.*

As used in this article, the following terms shall have the meanings indicated:

1. Advanced life support level 1 (ALS 1) – Medical treatment or procedures provided to a patient beyond the training of an EMT-Basic as defined by the National Emergency Medicine Services (EMS) Education and Practice Blueprint for the Emergency Medical Technician – Basic (EMT-Basic), but not ALS 2.
2. Advanced life support level 2 (ALS 2) – Advanced life support services provided to a patient, including one or more of the following medical procedures:
  - a. Defibrillation/cardioversion
  - b. Endotracheal intubation
  - c. Cardiac pacing
  - d. Chest decompression
  - e. ~~Intraosseous~~ Intraosseous line

- f. Administration of three or more medications

*C. Fee Schedule.*

The schedule of fees for emergency ambulance transport services shall be set by resolution of the Clarke County Board of Supervisors and may be updated from time to time.

*D. Billing.*

1. Clarke County or its agent shall generate a bill for ambulance transports whose point of origin is within the boundaries of Clarke County. Billing, payment, and collection policies shall be established by resolution of the Board of Supervisors.
2. Clarke County may contract with a third-party that shall be designated as the County's agent for billing and related services.
3. Emergency medical services organizations shall submit information required for the County or its agent to generate a bill for such services including but not limited to call sheets/patient care reports. Due to the fact that patient care information is highly confidential under several state and Federal laws, such information will remain the responsibility of the organization responding to individual calls. Information shared under this subsection shall be that information reasonably necessary to accomplish the billing process or other arrangement as mutually agreed to by the providing agency and the County.

## Amendments Chapter 17

2014-10-21

Chapter 17 Added CC-2014-3

2015-01-20

Chapter 17 Fire, Emergency Medical Services (EMS), and Emergency Management, Department Of, Amendment to establish a service fee for ambulance transport. CC-2015-01

2016-09-20

Chapter 17 §17-6 Fire and EMS Commission B. Membership Composition

# Clarke County Board of Supervisors



**Berryville Voting District**  
**Matthew E. Bass**  
(540) 955-5175

**Millwood Voting District**  
**Terri T. Catlett-Vice Chair**  
(540) 837-2328

**Russell Voting District**  
**Doug Lawrence**  
(540) 955-2144

**Buckmarsh Voting District**  
**David S. Weiss – Chair**  
(540) 955-2151

**White Post Voting District**  
**Bev B. McKay**  
(540) 837-1331

**County Administrator**  
**Chris Boies**  
(540) 955-5175

To: Robert Mitchell, Jr., County Attorney

From: Chris Boies

Re: Fire-EMS Director Title

Date: July 19, 2023

The Board of Supervisors has asked me to research legal issues surrounding the title of the county employee who oversees our Department of Fire, EMS, & Emergency Management. I have presented below facts pertaining to this issue, followed by legal questions.

Clarke County has established a Fire Department in accordance with Code of Virginia § 27-6.02 through the adoption of Code of Clarke County § 17-1.

## § 27-6.02. Provision of firefighting services.

A. Any county, city, or town may provide firefighting services to its citizens by (i) establishing a fire department as a department of government pursuant to § [27-6.1](#) or (ii) contracting with or providing for the provision of firefighting services by a fire company established pursuant to § [27-8](#).

## §17-1 Establishment of the Department of Fire, Emergency Medical Services (EMS), and Emergency Management

A. In order to help ensure the protection of citizens, visitors, and property of Clarke County, the firefighting, emergency medical services (EMS), and emergency management services are organized under a Department of Fire, Emergency Medical Services (EMS), and Emergency Management ("the Department"). These services shall be provided by using both County-employed and volunteer company firefighters and EMS personnel. As such, the County-recognized volunteer fire-fighting and EMS entities shall be deemed an instrumentality of the County and shall receive the full benefit and protections of the law while acting in that capacity.

B. In order to effectively carry out the provisions of Subsection A of this section, the Department shall be organized to coordinate all fire, EMS, and emergency management and preparedness services within the County.

C. The Department shall be composed of the County officials and County-employed staff

("the Staff") of the Department, and the volunteer fire and EMS companies. The volunteer fire and EMS companies are recognized as entities of the Department and are an integral part of the County's public safety program.

Clarke County has established through Code of Clarke County § 17-2 that the person heading the Department shall have the title of Director of Fire and Emergency Medical Services. There have been discussions over the years of whether the title should be Director or Chief. Some of the volunteer fire companies have opposed the Chief title out of fear that the County is attempting to take over the combination system.

#### §17-2 Appointment of a Director of Fire and Emergency Medical Services (EMS)

A. The County Administrator shall appoint a Director of Fire and Emergency Medical Services (EMS) ("the Director") to head the Department and to carry out the responsibilities set forth in §17.5. The Director shall report to the County Administrator and the Department Staff shall report to the Director.

The Code of Virginia §27-6.1 refers to the head of a fire department established by the governing body as "the chief". It appears that our Director title is in conflict with this section of the Code of Virginia.

#### § 27-6.1. Establishment of fire department; chiefs, officers, and employees.

The governing body of any county, city, or town may establish a fire department as a department of government and may designate it by any name consistent with the names of its other governmental units. The head of such fire department shall be known as "the chief." As many other officers and employees may be employed in such fire department as the governing body may approve.

The Code of Virginia §27-15.1, §27-17, and §27-17.1 provide officers responding to fire calls certain legal authorities while on the scene of an incident. This raises the question of whether our Director has these authorities while on the scene of an incident.

§ 27-15.1. Authority of chief or other officer in charge when answering alarm; penalty for refusal to obey orders.

While any fire department or fire company is in the process of answering an alarm where there is imminent danger or the actual occurrence of fire or explosion or the uncontrolled release of hazardous materials that threaten life or property and returning to the station, the chief or other officer in charge of such fire department or fire company at that time shall have the authority to (i) maintain order at such emergency incident or its vicinity, including the immediate airspace; (ii) direct the actions of the firefighters at the incident; (iii) notwithstanding the provisions of §§ 46.2-888 through 46.2-891, keep bystanders or other persons at a safe distance from the incident and emergency equipment; (iv) facilitate the speedy movement and operation of emergency equipment and firefighters; (v) cause an investigation to be made into the origin and cause of the incident; and (vi) until the arrival of a police officer, direct and control traffic in person or by deputy and facilitate

the movement of traffic. The fire chief or other officer in charge shall display his firefighter's badge or other proper means of identification. Notwithstanding any other provision of law, this authority shall extend to the activation of traffic control signals designed to facilitate the safe egress and ingress of emergency equipment at a fire station. Any person or persons refusing to obey the orders of the chief or other officer in charge at that time is guilty of a Class 4 misdemeanor. The chief or other officer in charge shall have the power to make arrests for violation of the provisions of this section. The authority granted under the provisions of this section may not be exercised to inhibit or obstruct members of law-enforcement agencies or emergency medical services agencies from performing their normal duties when operating at such emergency incident, nor to conflict with or diminish the lawful authority, duties, and responsibilities of forest wardens, including but not limited to the provisions of Chapter 11 (§ 10.1-1100 et seq.) of Title 10.1. Personnel from the news media, such as the press, radio, and television, when gathering the news may enter at their own risk into the incident area only when the officer in charge has deemed the area safe and only into those areas of the incident that do not, in the opinion of the officer in charge, interfere with the fire department or fire company, firefighters, or emergency medical services personnel dealing with such emergencies, in which case the chief or other officer in charge may order such person from the scene of the emergency incident.

#### § 27-17. Entry of buildings on fire and premises adjoining.

The chief of any fire department or fire company or other authorized officer in command at a fire or medical emergency, and his subordinates, upon his order or direction, shall have the right at any time of the day or night to enter any building or upon any premises where a fire is in progress, or any building or premises adjacent thereto for the purpose of extinguishing the fire.

#### § 27-17.1. Remaining on premises after fire extinguished.

The chief or other authorized officer of any fire department or fire company in command at a fire, and his subordinates upon his order or direction, shall have the right to remain at the scene of fire, including remaining in any building or house, for purposes of protecting the property and preventing the public from entry into the premises, until such reasonable time as the owner may resume responsibility for the protection of the property.

#### Legal Questions:

1. Does Clarke County's use of the "Director" title conflict with Code of Virginia §27-6.1, and if so, are there any legal concerns or liability associated with this conflict?
2. Does the Clarke County Director of Fire and Emergency Medical Services have the legal authorities found in Code of Virginia §27-15.1, §27-17, and §27-17.1 when in command of an incident? If not, what are the legal concerns or liability associated with this person being in command of an incident and using those authorities?
3. If there are concerns related to Questions 1 & 2 above, are there any county code changes that would alleviate those concerns short of changing the title from director to chief?

----- Forwarded Message -----

From: "Robert Mitchell" <[rmitchell@hallmonahan.com](mailto:rmitchell@hallmonahan.com)>

To: "Chris Boies" <[cboies@clarkecounty.gov](mailto:cboies@clarkecounty.gov)>

Sent: Sunday, July 30, 2023 12:04:58 PM

Subject: RE: Director Title

Chris:

This will confirm our recent telephone discussion on this matter.

As you have noted, Va. Code §27-6.1 specifically calls for the head of the department to be known as "the chief". To call the head of the department "director" would not be in conformity with the statute. In and of itself, it is probably not a significant issue to use "director".

However, the provisions of Va. Code §'s 27-15.1, 27-17, and 27-17.1 , give powers to the head of the department ("Chief") or "other officer in charge" to be in control of any event. I do not think that "other officer in charge" is talking about the head of the department, but rather another officer in charge in the absence of the Chief.

There could be a legal issue raised in a dispute over how an event was handled when the person in charge was not a "Chief".

It is my recommendation that the head of the department have the title of "Chief".

Also, I noted that the County Code does not track the provisions of Va. Code §'s 27-15.1, 27-17, and 27-17.1. I would suggest that that be done.

Regards,

Bob

Robert T. Mitchell, Jr.

HALL, MONAHAN, ENGLE, MAHAN & MITCHELL

P. O. Box 848

Winchester, Virginia 22604

540-662-3200 Telephone

540-662-4304 Fax

E-MAIL [rmitchell@hallmonahan.com](mailto:rmitchell@hallmonahan.com)