

**ADMINISTRATIVE OFFICE OF THE U.S. COURTS
DEFENDER SERVICES OFFICE, TRAINING DIVISION**

FEDERAL DEFENDER INVESTIGATOR AND PARALEGAL SEMINAR

Hilton Chicago – South Michigan Avenue
Chicago, Illinois
May 3-5, 2016

FINAL AGENDA

Tuesday, May 3, 2016

- 7:30 – 8:30 a.m.** **Registration & Continental Breakfast – Salon A3/A4 Foyer**
- 8:30 – 8:45 a.m.** **Welcome and Opening Remarks – Salon A3/A4**
Carol Brook, Executive Director, Illinois Federal Defender Program, Inc., Chicago, IL
Lisa Porcari, Attorney Advisor, Defender Services Office, Training Division, Washington, DC
- 8:45 – 10:15 a.m.** **Plenary: Unconscious Bias in the Defense Team – Salon A3/A4**
Jeffery Robinson, Deputy Legal Director and Director of the Center for Justice, American Civil Liberties Union, New York, NY
Defense team members see evidence of both conscious and unconscious racial bias almost every day in the behavior of prosecutors, judges, and police. However, we do not often look in the mirror at our own behaviors to see if racial bias impacts the way we do our jobs.
- 10:15 – 10:30 a.m.** **Break**
- 10:30 – 11:45 a.m.** **Concurrent Sessions**
- Supreme Court Update – Salon A1**
Paul Rashkind, Chief of the Appellate Division, Office of the Federal Public Defender, Miami, FL
This session provides an update on recent developments in the Supreme Court and its decisions affecting federal criminal practice, as well as issues currently under consideration. Always enlightening and entertaining, this session’s content is tailored to the needs and interests of paralegals and investigators.

2. **Bureau of Prisons Update: Practical Tips if Your Client Faces Incarceration in Federal Prison – Salon A2**

David Merchant, Assistant Federal Defender, Federal Defenders of Montana, Billings, MT

This session will provide practical tips if your client faces federal imprisonment. It will include factors to consider for your client to obtain a federal sentence at the least restrictive facility possible and receive the earliest feasible release date. In addition, the session will give an overview of BOP programs and eligibility requirements. **Note: This session will be repeated at 2:45 p.m.**

3. **Investigating and Documenting Your Veteran Client's History – Salon A5**

Art C. Cody, Captain USN (Ret.), Legal Director, Veterans Defense Program, New York State Defenders Association, Albany, NY

Military Veterans undergo an experience far removed from the vast majority of those who sit in judgment of them in the Criminal Justice system. The military experience, particularly if it involves combat, indelibly shapes the veteran and often has significant causal or mitigation implications relating to a charged offense. At the core, the defense community's role in a veteran's case is to tell that vet's story -- to translate this uncommon experience into a human narrative that engenders the comprehension of a prosecutor, judge, and jury and evokes their compassion. This practical presentation will assist that effort by exploring the veteran experience, the "typical" veteran, veteran-client interaction, sources of documentary and testimonial evidence, military mitigation, and military culture playing out in the civilian world. Art Cody is a retired Navy Captain with over 30 years of military experience. His legal practice has focused on capital mitigation. Please join him in this session that provides practical assistance on how to effectively investigate a veteran's background.

4. **Challenging Conspiracy Liability – Salon A3/A4**

Rene Valladares, Federal Public Defender, Office of the Federal Public Defender, Las Vegas, NV

Heidi Ojeda, Assistant Federal Public Defender, Office of the Federal Public Defender, Las Vegas, NV

This presentation will discuss why conspiracy charges are so dangerous for our clients, the basic elements of conspiracy, common defenses, practice tips on how to manage a conspiracy case, including pre-trial litigation, how to handle co-conspirators, and how to handle big-paper conspiracy cases.

11:45 a.m. – 1:15 p.m. Lunch

1:15 – 2:30 p.m.

Concurrent Sessions

- 1. The Making of an Investigator . . . What Would You Do? – Salon A1**
Kevin W. McClain, McClain Investigations, LTD, Centralia, IL
In this highly interactive session, seasoned Private Investigator Kevin McClain will show us how to think outside the box. You will hear from the client, you will see the evidence first hand, you will follow along to the crime scene, and you will listen to the undercover videos and taped witness interviews. Through step-by-step group discussion, analysis and questioning, good critical thinking skills will emerge and help determine "what to do" in these actual case studies. This session will review different methodologies and strategies that every investigator and paralegal needs to know and practice, regardless of their years of experience or lack thereof. After this presentation you will be trained to ask yourself at every step of the case, "What would you do?"
- 2. The Architecture of Writing - Reports and More – Salon A5**
Lubna Debbini, Investigator, Office of the Alternate Defender, County of Orange, Santa Ana, CA
This session will help you create reports, emails, memos, and social histories in a clear, concise, and polished manner. We will cover structural attributes of documents such as layout, organization, and visual aids. We will also discuss setting the stage, introducing characters, and telling compelling stories. By thinking ahead about the document you are creating, its intended audience, and the information you want to convey, you will minimize the stress of writing and maximize the impact of your work. Participants in this session are welcome to continue on with the "Interior Design of Writing" presentation after the break.
- 3. The Four Magic Words of Interviewing for Mitigation and the Four-Part System That Makes Them Magical – Salon A2**
Jim Tibensky, Non-Capital Mitigation Specialist (Ret.), Illinois Federal Defender Program, Inc., Chicago, IL
The highly effective methods of Motivational Interviewing can make anyone a better interviewer, a better listener and a better communicator. This session will present those techniques along with some reasons why they work so well. It will also show you how to make Motivational Interviewing work for you.
- 4. Understanding and Using Geolocation Data as Evidence – Salon A3/A4**
K. Gus Dimitrelos, Senior Forensics Certified Expert, Cyber Forensics 360, Davie, FL
Location-based data is critical in all cases to prove client and alibi whereabouts and accounts as well as disprove witness or case data. Using live case data, the presenter will educate the audience about various types of geolocation data evidence (e.g., Call Detail Records, AppChat, Wi-Fi connections, social graphing and event stamping), and why it is critical to discover what geolocation evidence the government collected and, more importantly, missed.

****1:15-5:15 p.m.**

Special Hands-On Concurrent Session

Digital Device Forensics: Hands-On Training, Session 1, Part 1 – Lake Michigan

Kevin DeLong, Vice President of Mobile Forensics, AccessData/Syntricate, Lindon, UT

Jerry Grant, Digital Forensics Investigator, Federal Public Defender, Office of the Federal Public Defender, Rochester, NY

Digital Device Forensics is a seven-hour hands-on introductory course designed specifically for federal defender investigators and paralegals. The first half of the training will teach you the basics of how to review and analyze mobile device evidence that has been processed by the government or by an independent forensic examiner. Using two popular free tools (Mobile Phone Examiner Plus (MPE+) Investigator and Cellebrite Reader) participants will learn how to search and tag potentially relevant evidence for their case, and how to generate reports for attorneys and other defense team members. The second half of the training will focus on how to review and analyze historical cell site location information that the government has obtained from phone companies through sealed applications and orders. The session will include instruction on how cell phone technology works, covering 1G, 2G, and 3G technologies, and how call detail records (CDR) obtained from phone companies can include geolocation information that can be used to create maps showing the approximate location of a cell phone during a period of time. During the class, students will analyze sample CDRs to better understand the factors to consider when assessing the accuracy of this type of data in a case.

****NOTE:** Part 2 of this session will take place the following day, from 9:00 a.m. to noon. Selection of the participants will be determined prior to the program.

2:30 – 2:45 p.m.

Break

2:45 – 4:00 p.m.

Concurrent Sessions

1. **Bureau of Prisons Update: Practical Tips if Your Client Faces Incarceration in Federal Prison – Salon A2**

David Merchant, Assistant Federal Defender, Federal Defenders of Montana, Billings, MT

This session will provide practical tips if your client faces federal imprisonment. It will include factors to consider for your client to obtain a federal sentence at the least restrictive facility possible and receive the earliest feasible release date. In addition, the session will give an overview of BOP programs and eligibility requirements. **Note: This is a repeat of this morning's presentation.**

2. **Partnering Up With Your Smartphone and the Internet for Fieldwork and Witness Investigations – Salon A3/A4**

Bruni Marrero, Trainer of Investigators and Paralegal Staff,

The Legal Aid Society, Criminal Defense Practice, New York, NY

Learn how to make your investigations easier in the field through this survey of applications and web sites available and accessible on smartphones.

3. **Using Community Mapping in Criminal Defense – Salon A1**
Jeffrey Eno, Non-Capital Mitigation Specialist, Illinois Federal Defender Program, Inc., Chicago, IL
James Garbarino, Ph.D., Professor of Psychology, Loyola University Chicago, Chicago, IL
 Using case studies primarily involving the effects of trauma, the presenters will explain how to use community mapping (the visual representation of data to assess various risk factors in a specific community) as a tool in sentencing mitigation and other aspects of your cases.

4. **The Interior Design of Writing – Reports and More – Salon A5**
Lubna Debbini, Investigator, Office of the Alternate Defender, County of Orange, Santa Ana, CA
 This session will build on the “Architecture of Writing” session by delving into the details contained within your documents. We will cover proper punctuation (when and how to use commas, semicolons, colons, different fonts, parentheses, and more) and grammar (nouns, pronouns, adjectives, adverbs, appropriate verb tenses, and transitional phrases). In addition, we will discuss cadence, active vs. passive voice, and other concepts such as effective styles for reports, memos, social histories, and emails. We will also review the right way to describe a person, vehicle, or scene. This hands-on session will engage attendees with exercises designed to sharpen their skills. **Note:** While attendance at the “Architecture of Writing” session is not a pre-requisite to this session, it is strongly recommended.

4:00-4:15 p.m.

Break

4:15-5:15 p.m.

Plenary: What’s New in Electronic Surveillance – Salon A3/A4

*Hanni Fakhoury, Assistant Federal Public Defender,
Office of the Federal Public Defender, Oakland, CA*

Technological advances have given law enforcement powerful new tools to conduct surveillance. While techniques like cell site tracking are widely known to the defense community, newer technologies like IMSI catchers or “stingrays,” Network Investigative Techniques (“NIT”) and databases like Hemisphere have only recently come to light after being shrouded in government secrecy. This presentation will provide an overview of these technologies and discuss how to discover whether they’ve been used in your case.

Wednesday, May 4, 2016

9:00 – 10:15 a.m.

Plenary: Learning from Wrongful Convictions to Prevent Miscarriages of Justice: One Exoneree's Story – Salon A3/A4

Juan Rivera, Exoneree, Chicago, IL

David Asma, Chief Investigator, Lake County Public Defender's Office, Waukegan, IL

Steven Art, Esq., Loevy & Loevy, Chicago, IL

Jon Loevy, Esq., Loevy & Loevy, Chicago, IL

Hear from exoneree Juan Rivera about the critical role that competent defense investigations play in preventing and undoing wrongful convictions. Mr. Rivera will be accompanied by civil rights attorneys Jon Loevy and Steve Art, who represented him in his wrongful conviction case, and David Asma, an investigator who worked on Mr. Rivera's first criminal prosecution. This presentation will examine the common sources of error in wrongful prosecutions and provide suggestions on how to approach, challenge and overcome these miscarriages of justice.

10:15 – 10:30 a.m.

Break

10:30 – 11:45 a.m.

Concurrent Sessions

1. **Creating a Defense Team That Is More Than the Sum of its Parts – Salon A1**

Betsy Wilson, Supervising Mitigation Specialist, Sentencing Advocacy Group, Evanston, IL

Whether you are the only person working with an attorney on a case, or you are one of several professionals with varying roles, true team work helps your client, and fosters a good working environment. The creation of an effective team requires more than gathering a group of qualified people. Instead, teams must work deliberately to ensure that the members are truly working together rather than individually performing their own unconnected tasks. This presentation will discuss common barriers to effective teamwork, and essential steps to creating an effective team.

2. **Social History Records 101: Just Three Sticks – Salon A2**

Vickie Piontkowski, Mitigation Specialist, Office of the Federal Public Defender, Pittsburgh, PA

Designed for those who are less experienced in the area of mitigation, this session will review which types of records you should consider gathering, and tips for successfully obtaining them from various sources. In addition, using several case studies, the instructor will demonstrate what information you can uncover when reviewing the records you have obtained - information that clients and their family members may know nothing about, or be reluctant to disclose.

3. **Child Pornography Cases: Defenses and Mitigation – Salon A5**
John Ellis, Supervisory Attorney, Federal Defenders of San Diego, Inc., San Diego, CA
 This presentation covers investigating child pornography cases from arrest through sentencing. It begins with a discussion of our typical client, followed by how data is stored and recovered on digital devices; the government investigation process; possible defenses; and mitigation strategies.

4. **Online Investigation: Software, Searches, and Social Media – Salon A3/A4**
Victor Gomez, Investigator, Office of the Federal Defender, Santa Ana, CA
 The presenter will review various online sources that can provide information relevant to criminal defense investigations. In addition, participants will learn how to find information on popular social media sites, and how to access free or low-cost software to aid in their investigations.

11:45 a.m. – 1:15 p.m. Lunch

1:15 – 2:30 p.m. Concurrent Sessions

1. **Selective Prosecution and Selective Enforcement: A Case Study – Salon A3/A4**
Galia Amram, Assistant Federal Public Defender, Office of the Federal Public Defender, San Francisco, CA
Sheree Cruz-Laucirica, Paralegal, Office of the Federal Public Defender, San Francisco, CA
Steven Koeninger, Research and Writing Attorney, Office of the Federal Public Defender, San Francisco, CA
 Learn more about challenging racially biased prosecutions and law enforcement tactics. This session will include a legal overview of selective prosecution and selective enforcement challenges, a discussion of investigative strategies for proving these claims, and a discussion of best practices for paralegals in handling such multi-defendant and/or document-intensive litigation.

2. **Forensic Accounting Part I: Dealing With What You Don't Have – Salon A5**
Janet McHard, CPA, CFE, MAFF, CFF, Founding Partner, McHard Accounting Consulting, LLC, Albuquerque, NM
Beth Mohr, CFE, CAMS, MPA, PI, McHard Accounting Consulting, LLC, Albuquerque, NM
 This session will address spoliation of evidence, *Brady* issues, getting beyond the basics with bank statements, and making meaningful discovery requests for financial documents.

3. **Social History Records 201: The Spirited Horse – Salon A2**

Vickie Piontkowski, Mitigation Specialist, Office of the Federal Public Defender, Pittsburgh, PA

Designed for those with experience in mitigation work, this session will highlight types of records that are sometimes overlooked in records gathering, and tips for successfully obtaining them. Using case studies, the instructor will demonstrate what information you can uncover in these records. Participants are encouraged to discuss with the group any challenges they have encountered in locating particular documents.

4. **Organizing Discovery in Large Document Cases – Salon A1**

Kalei Achiu, National Litigation Support Paralegal,

Defender Services Office, Training Division, Oakland, CA

Bruce Johnson, Investigator, Office of the Federal Public Defender, Anchorage, AK

Alex Roberts, National Litigation Support Paralegal,

Defender Services Office, Training Division, Oakland, CA

Kelly Scribner, Assistant National Litigation Support Paralegal,

Defender Services Office, Training Division, Oakland, CA

Though no one size fits all, as each office and district are different, there are tools and strategies that can assist you in organizing your large document cases. Because discovery now comes in so many formats, it is critical to have a conversation with the government about the form in which discovery is produced. Knowing from where the data is coming, whether there are proprietary formats involved, and how much information you will ultimately get all determines what technology will be the best fit in each case. In multi-defendant cases, defense teams must consider the possible need for collaboration balanced with work product that cannot be shared with others. The presenters will discuss these considerations and more in this primer on effective analysis, organization and review of discovery.

****1:15-5:15 p.m.**

Special Hands-On Concurrent Session

Digital Device Forensics: Hands-On Training, Session 2, Part 1 – Lake Michigan

Kevin DeLong, Vice President of Mobile Forensics, AccessData/ Synticate, Lindon, UT

Jerry Grant, Digital Forensics Investigator, Office of the Federal Public Defender,

Rochester, NY

Digital Device Forensics is a seven-hour hands-on introductory course designed specifically for federal defender investigators and paralegals. The first half of the training will teach you the basics of how to review and analyze mobile device evidence that has been processed by the government or by an independent forensic examiner. Using two popular free tools (Mobile Phone Examiner Plus (MPE+) Investigator and Cellebrite Reader), participants will learn how to search and tag potentially relevant evidence for their case, and how to generate reports for attorneys and other defense team members. The second half of the training will focus on how to review and analyze historical cell site location information that the government has obtained from phone companies through sealed applications and orders. The session will include instruction on how cell phone technology works, covering 1G, 2G, and 3G technologies, and how call detail records (CDR) obtained

from phone companies can include geo-location information that can be used to create maps showing the approximate location of a cell phone during a period of time. During the class, students will analyze sample CDRs to better understand the factors to consider when assessing the accuracy of this type of data in a case.

****NOTE:** Part 2 of this session will be the following day, from 8:30 a.m. to 11:30 a.m. Selection of the participants will be determined prior to the program.

2:30 – 2:45 p.m. Break

2:45 – 4:00 p.m. Concurrent Sessions

1. **Ethics: Staying on the Straight and Narrow While Getting the Goods in a Social Media World – Salon A3/A4**

*Herbert Duzant, Investigator, Office of the Federal Public Defender, Las Vegas, NV
Jim Strupp, Investigator, Office of the Federal Public Defender, Portland, OR
Kevin Tate, Assistant Federal Defender, Federal Defenders of Western North Carolina, Charlotte, NC (Moderator)*

In this panel discussion we will address ethical issues that commonly arise in the work of paralegals and investigators, including the ethical implications of using social media as an investigative tool. Participants are encouraged to prepare questions in advance to submit to the panel.

2. **Forensic Accounting Part II: Dealing with What You Do Have – Salon A5**

*Janet McHard, CPA, CFE, MAFF, CFF, Founding Partner, McHard Accounting Consulting, LLC, Albuquerque, NM
Beth Mohr, CFE, CAMS, MPA, PI, McHard Accounting Consulting LLC, Albuquerque, NM*

This session will address calculation of loss for sentencing and restitution, addressing forfeiture cases with financial documents, and money laundering issues in non-financial cases. **Note:** Participants need not have attended Forensic Accounting Part I in order to attend this session.

3. **Investigating Illegal Reentry Defenses – Salon A1**

Hena Mansori, Supervising Attorney, Heartland Alliance’s National Immigrant Justice Center

Juan Hernandez, Investigator, Office of the Federal Public Defender, San Antonio, TX
Learn how to effectively investigate your client’s immigration record in order to mount a collateral challenge to an underlying removal order, get information about the client’s removal history from the immigration courts as well as from the Department of Homeland Security, and spot infirmities in that history that may give rise to a challenge of a prior removal order. This presentation will also include a discussion of investigating citizenship in order to establish a defense to the alienage requirement of an illegal reentry charge. A foreign born client’s claim of U.S. citizenship through a U.S. citizen parent or grandparent requires extensive family

history research of the U.S. citizen ancestor going back decades to gather witness testimonials and documentary evidence as required by the immigration statutes.

4:00 - 4:15 p.m.

Break

4:15 - 5:15 p.m.

Plenary: Manufactured Terror - Identifying and Understanding Counterterrorism Stings - Salon A3/A4

Trevor Aaronson, Author, The Terror Factory, St. Petersburg, FL

Since the 9/11 terrorist attacks, more than 200 people have been prosecuted in federal courts following FBI counterterrorism stings. These aggressive operations, which use an undercover informant or agent, provide people on the fringes, many with mental illnesses, the means and opportunity to become what we now term terrorists. This law enforcement strategy -- known variously as "preemption," "prevention," and "disruption" -- skirts the line of entrapment and raises serious questions about religious profiling, the use of informants, parallel construction, and human rights violations.

Thursday, May 5, 2016

8:30 – 9:45 a.m.

Concurrent Sessions

1. **Anatomy of a Sentencing Video Part I – Salon A5**
Doug Passon, Esq., President & Creative Director, D Major Films, LLC, Phoenix, AZ
Doug Passon, attorney and nationally recognized sentencing video expert, takes one sample case and demonstrates, step by step, the process he uses to create the mitigation video for that case. Topics include: working with attorneys to develop the legal and factual theories and themes that will serve as the foundation of the mitigation movie, planning and executing on-camera interviews, gathering and/or creating the crucial secondary images that will add layers of emotion and credibility, developing a soundtrack, and organizing and editing your footage, including a few simple editing tips for a more polished and professional finished product. Time permitting, at the end, Passon will show the video for the case in its entirety. He will also provide participants with an online link to view the video again and have it for future reference. **Note:** This presentation will be conducted over two consecutive sessions.

2. **Interviewing: Getting the Most Out of Difficult Witnesses and Difficult Situations – Salon A3/A4**
Madeline Larsen, Investigator, Office of the Federal Public Defender, Oakland, CA
Bruce Johnson, Investigator, Office of the Federal Public Defender, Anchorage, AK
This talk will focus on how to get the most out of your witness interviews. We will cover different approaches to different types of witnesses; strategies for improving your chances of getting the interview; planning for and maximizing rejection; and tips for successfully handling language, cultural, intellectual and other challenges you may encounter. We'll end with an open discussion where participants can share their best tips and suggestions for successful interviewing.

3. **Managing Proprietary Discovery Formats – Salon A1**
Kalei Achiu, National Litigation Support Paralegal, Defender Services Office, Training Division, Oakland, CA
Alex Roberts, National Litigation Support Paralegal, Defender Services Office, Training Division, Oakland, CA
Kelly Scribner, Assistant National Litigation Support Paralegal, Defender Services Office, Training Division, Oakland, CA
Discovery is increasingly produced in proprietary formats that are unfamiliar to defense teams and difficult to use. The presenters will discuss the pros and cons of utilizing the proprietary players sometimes provided by the government when discovery is produced, how to best use these players to extract the information you want, and how to create or request alternative formats that are more useable by the typical client. Having a better understanding of the advantages and disadvantages of various file formats will allow you to better manage your data and get the most out of the discovery you receive.

4. **Legal Research for the Paralegal and Investigator – Salon A2**
Steven Koeninger, Research and Writing Attorney, Office of the Federal Public Defender, San Francisco, CA
This presentation will explain essential components of thorough legal research, as well as tips for making your research more efficient. Topics of discussion will include the concept of precedent (e.g., binding authority versus persuasive authority), effective use of Westlaw (and Lexis), and valuable research resources beyond Westlaw and Lexis.

9:45 – 10:00 a.m. Break

10:00 – 11:15 a.m. Concurrent Sessions

1. **Analyzing Police Documents – Salon A3/A4**
John Conroy, Senior Investigator, Roderick and Solange MacArthur Justice Center, Northwestern University Pritzker School of Law, Chicago, IL
In his previous career as an award-winning investigative reporter, Conroy exposed police torture and two police shootings where the evidence contradicted the official version of events. Using CPD documents you'll learn rules to live by in deconstructing police reports and uncovering evidence that can help your case.
2. **Social Media and Web-Based Evidence Capture – Salon A1**
Jim Strupp, Investigator, Office of the Federal Public Defender, Portland, OR
Facebook, YouTube, emails – social media can offer a wealth of valuable information for the defense, but only if it can be presented properly. This presentation will discuss methods of searching social media sites, capturing social media sites in a verifiable manner, and use of social media sites for investigation, trial prep and in the courtroom.
3. **Anatomy of a Sentencing Video Part II – Salon A5**
Doug Passon, Esq., President & Creative Director, D Major Films, LLC, Phoenix, AZ
Doug Passon, attorney and nationally recognized sentencing video expert, takes one sample case and demonstrates, step by step, the process he uses to create the mitigation video for that case. Topics include: working with attorneys to develop the legal and factual theories and themes that will serve as the foundation of the mitigation movie, planning and executing on-camera interviews, gathering and/or creating the crucial secondary images that will add layers of emotion and credibility, developing a soundtrack, and organizing and editing your footage, including a few simple editing tips for a more polished and professional finished product. Time permitting, at the end, Passon will show the video for the case in its entirety. He will also provide participants with an online link to view the video again and have it for future reference. **Note:** This presentation will be conducted over two consecutive sessions.

11:15 – 11:30 a.m. Break

- 11:30 a.m. – 12:30 p.m.** **Plenary: DNA Evidence in Wrongful Convictions – Salon A3/A4**
Greg Hampikian, Ph.D., DNA Expert, Director of the Idaho Innocence Project, Professor of Biology, Boise State University, Boise, ID
DNA has taught us many lessons about both rightful and wrongful prosecution. Dr. Hampikian will show examples of both from his hundreds of cases working with the wrongfully convicted, police, and defense investigators.
- 12:30 p.m.** **Closing Remarks – Salon A3/A4**
Lisa Porcari, Attorney Advisor, Defender Services Office, Training Division, Washington, DC