

STEPHEN D. GILL, P.C.
ATTORNEYS AT LAW

STEPHEN D. GILL†
†Also Admitted in Florida

440 PLAIN STREET, SUITE 6
MARSHFIELD, MA 02050

October 16, 2016

VIA CERTIFIED MAIL # 7015 0640 0001 7038 0936
RETURN RECEIPT REQUESTED # 9590 9403 0522 5173 7087 09
AND BY E-MAIL TO: marks.martins.mil
Mark S. Martins, Brigadier General, U.S. Army
Department of Defense
Office of the Chief Prosecutor of Military Commissions
1610 Defense Pentagon
Washington, DC 20301-1610

Re: Request pursuant to R.M.C. 703(e)(2)(F) to Military Judge Vance H. Spath, Colonel, U.S. Air Force, for Relief from an unlawful, extra-jurisdictional and otherwise invalid "subpoena" that purports to summon and require my attendance for deposition on October 17, 2016, in the military commission, *United States v. Abd Al-Rahim Al-Nashiri*.

Greetings, Brigadier General Martins:

I respectfully request that you convey this correspondence to Military Judge Vance H. Spath, Colonel, U.S. Air Force at 8:00 a.m. (EDT), on October 17, 2016, for his review, consideration and action in the above-referenced military commission. Please provide a copy of the same to Mr. Abd Al-Rahim Al-Nashiri's defense counsel.

To the extent that the same may be necessary under applicable law, if at all, this correspondence is intended by me to be a *Request for Relief* pursuant to R.M.C. 703(e)(2)(F) from an unlawful, extra-jurisdictional and otherwise invalid "subpoena."

Please note that I share the professional opinion of my attorney, Anthony P. Alessi, that the so-called "subpoena" which is the subject of this correspondence is unlawful, extra-jurisdictional and otherwise invalid. Consequently, I have not been "duly subpoenaed" within the meaning of 10 U.S.C. § 847(a)(1); *cf.*, R.M.C. 703(e)(2)(G)(ii). Accordingly, my non-appearance attendant to the so-called subpoena does not amount to (and should not be construed as amounting to) "refus[ing] or willfully neglect[ing] to appear at the time and place specified on the [so-called] 'subpoena.'" See R.M.C. 703(e)(2)(G)(ii). Rather, "a valid excuse reasonably appears," for my non-appearance, all as more fully discussed below. See *id.*

On October 13, 2016, within the Commonwealth of Massachusetts, I was presented with a number of papers at 475 Furnace Street, Marshfield, Massachusetts, which is the office of my attorney, Anthony P. Alessi. Some papers were delivered by Domini S. McDonald of Office of the Chief Prosecutor of Military Commissions, and some were delivered by Supervisory Deputy U.S. Marshal, Alison Hodgkins, of the U.S. Marshal's Service, District of Massachusetts.

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The same original papers are enclosed herewith and returned hereby to the Office of the Chief Prosecutor of Military Commissions as follows:

- (a) A one-page letter addressed to me as "LCDR Stephen Gill," (not as Mr. Stephen Gill) on letterhead of the Office of the Chief Prosecutor of Military Commissions Office of the Victim Witness Assistance Program, putatively signed by Karen V. Loftus, dated 12 October 2016;
- (b) A one-page paper bearing the heading: "SUBPOENA," putatively signed by Martins, Mark Steven, "subscribed at Guantanamo Bay, Cuba this 11th day of October 2016";
- (c) A letter addressed to me as "Stephen Dennis Gill," on letterhead of the Office of the Military Commissions, putatively signed by McCloud, Anthony Wade, dated 12 October 2016;
- (d) A one-page paper bearing the heading: "Witness Fees," on the letterhead of the Office of the Chief Prosecutor of Military Commissions, bearing the signature of Domini S. McDonald, dated 13 Oct 2016, together with United States Postal Service Postal Money Order Serial Number 23945056380, which I have since marked, "VOID"; and
- (e) A two-page paper bearing the heading: "Your Itinerary," dated Oct 13, 2016.

Of the above-listed papers presented to me, I note that the one bearing the heading: "SUBPOENA," (*i.e.*, item (b) above) purports to be a "subpoena" for deposition under R.M.C. 703(e)(2)(C) "...subscribed at Guantanamo Bay, Cuba [on the] 11th day of October, 2016." The same further purports to "summon[...] and require[...] me] to appear on the 17th day of October, 2016, at eight o'clock A.M. at Mark Center, Alexandria, VA," but, *inter alia*, fails to inform me of the "Name and Title of [the] Deposition Officer designated to take [the] deposition." This omission alone appears fatal. *See* R.C.M. 702(d)(1).

The law clearly provides that military commissions are without authority to subpoena a civilian witness like me to appear for deposition in a foreign jurisdiction such as Guantanamo Bay, Cuba. *See, e.g., United States v. Bennett*, 12 M.J. 463 (1982); *see also, United States v. Daniels*, 48 C.M.R. 655 (1974). Indeed, the 2011 Department of Defense Regulation for Trial by Military Commission (R.T.M.C.) provides: "A civilian may not be compelled by subpoena to leave the United States and travel to a foreign country; therefore, a subpoena issued to a civilian to testify at Guantanamo Bay may not be enforced in the United States." *Id.* at section 13-5b. Similarly, no such authority is granted under 10 U.S.C. § 949j(a). Of course, if I were to be ordered to active duty, then this military commission's authority to subpoena me to appear in Guantanamo Bay, Cuba, or elsewhere, certainly would be lawful.

However, the law is less clear as to whether military commissions have authority to subpoena a civilian witness to appear for a deposition by video teleconference (VTC) at a location outside the civilian witness' state of residence, or beyond the location in which the commission is ordered to sit, or beyond 100 miles from the place of hearing in capital cases of enemy combatants for violations of the law of war. *Accord*, 10 U.S.C. § 849(d) & (e); 10 U.S.C. § 948d; 10 U.S.C. § 949j(a)(2); *In re Yamashita*, 327 U.S. 1; 66 S. Ct. 340; 90 L. Ed. 499 (1946).

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I note that in addition to the foregoing, that section 13-5b of the R.T.M.C. also provides: "A civilian witness may be subpoenaed to testify at a military commission hearing from a site in the United States through remote audiovisual device (RAVD), *or* through a deposition scheduled pursuant to R.M.C. 702." *Id.* (Emphasis added). The same purports to differentiate between hearing testimony and deposition testimony.¹ In truth, however, both are pre-trial discovery, *i.e.*, deposition testimony, which is governed by R.M.C. 702 and other Pre-Trial Discovery Rules under Chapter VII of the Manual for Military Commissions, 2010 (M.M.C.)²

Indeed, the only testimony other than deposition testimony is trial testimony, which is governed by the Trial Procedure Rules under Chapters VIII and IX of the M.M.C. Accordingly, this part of section 13-5b of the R.T.M.C. conflicts with the M.M.C., and must be disregarded. See R.T.M.C. section 1-1a ("In the case of any conflict between this Regulation and the rules and procedures prescribed by the M.C.A. and M.M.C. the latter two will always be controlling over this Regulation.").

I note further that this part of section 13-5b of the R.T.M.C. also conflicts with the Military Commissions Act of 2009 (M.C.A.), and therefore, must be disregarded pursuant to the R.T.M.C. section 1-1a. Specifically, the part of the M.C.A. that conflicts with section 13-5b of the R.T.M.C., in pertinent part provides as follows:

(c) Construction of Provisions.—

The procedures for military commissions set forth in this chapter are based upon the procedures for trial by general courts-martial under chapter 47 of this title (the Uniform Code of Military Justice). Chapter 47 of this title does not, by its terms, apply to trial by military commission *except as specifically provided therein or in this chapter*, and many of the provisions of chapter 47 of this title are by their terms inapplicable to military commissions. The judicial construction and application of chapter 47 of this title, while instructive, is therefore not of its own force binding on military commissions established under this chapter.

(d) Inapplicability of Certain Provisions.—

¹ No such differentiation exists as to the process by which courts of the United States having criminal jurisdiction may lawfully compel witnesses to appear and testify for pre-trial discovery matters, including courts-martial under Uniform Code of Military Justice. *Cf.*, 10 U.S.C. § 849(d); *see also*, 10 U.S.C. § 949j(a)(2).

² Indeed, the so-called "subpoena" expressly purports to have been subscribed and issued pursuant to R.M.C. 703 of the Pre-Trial Discovery Rules under Chapter VII of the M.M.C. See *id.*

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(1) The following provisions of this title shall not apply to trial by military commission under this chapter:

(A) Section 810 (article 10 of the Uniform Code of Military Justice), relating to speedy trial, including any rule of courts-martial relating to speedy trial.

(B) Sections 831(a), (b), and (d) (articles 31(a), (b), and (d) of the Uniform Code of Military Justice), relating to compulsory self-incrimination.

(C) Section 832 (article 32 of the Uniform Code of Military Justice), relating to preliminary hearing.

(2) *Other provisions of chapter 47 of this title shall apply to trial by military commission under this chapter only to the extent provided by the terms of such provisions or by this chapter.*

10 U.S.C. § 948b (emphasis added).

Based on the foregoing, and on 10 U.S.C. § 949j(a)(2), it is clear that the certain provisions of the UCMJ pertaining to deposition testimony taken and presented by VTC apply here. Specifically, 10 U.S.C. § 849, in pertinent part, provides:

(d) A duly authenticated deposition taken upon reasonable notice to the other parties, so far as otherwise admissible under the rules of evidence, may be read in evidence or, *in the case of audiotape, videotape, or similar material, may be played in evidence before any military court or commission in any case not capital*, or in any proceeding before a court of inquiry or military board, if it appears—

(1) *that the witness resides or is beyond the State, Commonwealth, or District of Columbia in which the court, commission, or board is ordered to sit, or beyond 100 miles from the place of trial or hearing;*

...
(e) Subject to subsection (d), testimony by deposition *may be presented by the defense in capital cases.*³

Id. (Emphasis and footnote added).

³ With regard to limiting reception of depositions into evidence in capital cases to those for the defense, the Supreme Court held under the predecessor statute of 10 U.S.C. § 849, that this limitation was not applicable to trial of an enemy combatant by military tribunal for violations of Articles of War. See *In re Yamashita*, 327 U.S. 1; 66 S. Ct. 340; 90 L. Ed. 499 (1946).

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Clearly, deposition testimony taken and presented by VTC falls squarely within the meaning of "audiotape, videotape, or similar material... played in evidence before any military court or commission in any case not capital..." under 10 U.S.C. § 849(d). Further, as this is a capital case of an unprivileged enemy belligerent by military commission for violations of the law of war, Mr. Al-Nashiri and his defense counsel may not avail themselves of 10 U.S.C. § 849(e) to compel such deposition testimony to be taken and presented by VTC. *Cf., In re Yamashita, supra.*

Accordingly, whereas I reside in the Commonwealth of Massachusetts, or beyond the Commonwealth of Virginia, or beyond the place where this military commission is ordered to sit, i.e., Guantanamo Bay, Cuba, or beyond 100 miles from the place of the hearing i.e., Guantanamo Bay, Cuba, it appears that I cannot be "duly subpoenaed" or otherwise lawfully subpoenaed as a civilian witness to appear in the Commonwealth of Virginia for the purpose of having my deposition testimony taken and presented by VTC.

Despite this, I am amenable either (i) to appear in my civilian capacity pursuant to a lawful subpoena at a VTC location within 100 miles of my residence, such as the War College onboard Naval Base Newport, Rhode Island, as I first requested in August 2016, or (ii) to being ordered to active duty, and to appear in Guantanamo Bay, Cuba, as I first had requested in the alternative in August 2016.

Based on the foregoing, and to the extent that the same may be necessary under applicable law, if at all, I hereby respectfully request that Judge Spath grant this *Request for Relief* pursuant to R.M.C. 703(e)(2)(F) from the unlawful, extra-jurisdictional and otherwise invalid "subpoena," and either withdraw or modify the same in either manner set forth in the immediately preceding paragraph.

I hereby further respectfully request, pursuant to R.M.C. 703(e)(2)(G)(ii), that Judge Spath make a finding that my non-appearance attendant to the so-called subpoena is not a "refus[al] or [an act of] willfully neglect[ing] to appear at the time and place specified on the [so-called] 'subpoena,'" and further find that "a valid excuse reasonably appears," for my non-appearance.

Respectfully submitted,



Stephen D. Gill
For the Firm

Enclosures

cc: Karen V. Loftus, Director, VWAP (w/encls.)
Via e-mail only: [REDACTED]

SUBPOENA

The President of the United States, to Stephen Dennis Gill

(Name and Title of being Subpoenaed)

You are hereby summoned and required to appear on the 17th day of October, 2016, at eight o'clock A.M., at Mark Center, Alexandria, VA, (before _____)

(Place of Proceeding)

(Name and Title of Deposition Officer)

designated to take your deposition) (a Military Commission) (appointed by

Mr. Bruce MacDonald, Military Commission Convening Order 11-02, dated Sep 28, 2011

(Identification of Convening Order or Convening Authority)

to testify as a witness in the matter of United States vs Abd Al-Rahim Al-Nashiri

(Name of Case)

(and bring with you _____)

(Specific Identification of Documents or Other Evidence)

Failure to appear may result in you being taken into custody and brought before the Military Commission (_____)

under a Warrant of Attachment (MC Form 454) or imposition of other lawful sanctions.

Manual for Military Commission R.M.C. 703(e)(2)(G).

Bring this subpoena with you and do not depart from the proceeding without proper permission.

Subscribed at Guantanamo Bay, Cuba this 11th day of October, 2016

MARTINS.MARK.STEVEN. _____

Digitally signed by MARTINS.MARK.STEVEN
DN: cn=US, o=U.S. Government, email=MARTINS.MARK.STEVEN@US.A, c=USA
Date: 2016.10.11 17:13:30 -0400

(Signature (See R.M.C. 703 (e)(2)(C)))

The witness is requested to sign one copy of this subpoena and return the signed copy to the person serving the subpoena.

I hereby accept service of the above subpoena. - REFUSED TO SIGN -

Signature of Witness

NOTE: If the witness does not sign, complete the following:

Personally appeared before me, the undersigned authority, A. HODGKINS, SOUSM (US Marshal Service)who, being first duly sworn according to law, deposes and says that at MARSHFIELD, MA_____, he personally delivered to STEPHEN DENNIS GILL in person a duplicate of this subpoena.

Grade _____

Subscribed and sworn to before me at _____, this _____ day of _____

Grade _____

Official Status _____

Signature _____

MC FORM 453, JAN 2010



DEPARTMENT OF DEFENSE
 OFFICE OF THE CHIEF PROSECUTOR OF MILITARY COMMISSIONS
 OFFICE OF THE VICTIM WITNESS ASSISTANCE PROGRAM
 1610 DEFENSE PENTAGON
 WASHINGTON, DC 20301-1610

12 October 2016

LCDR Stephen Gill,

Please find attached a subpoena for you to appear at the Mark Center, in Alexandria VA, on Monday, 17 October 2016, at 0800, to provide Video Teleconference Testimony (VTC) in the case of the *United States vs. Abd al-Rahim Hussein Muhammed Abdu Al-Nashiri*. The Mark Center is located at 4800 Mark Center Drive, Alexandria VA, 22350. Mr. [REDACTED] will meet you at the Visitor's Center at 0730 to escort you to the VTC space. Mr. [REDACTED] can be reached at [REDACTED]

For all email communications, please courtesy copy [REDACTED]

Additionally, contact Ms. [REDACTED] at [REDACTED] or Ms. [REDACTED] at [REDACTED] for all travel and voucher arrangements, or by email at osd.pentagon.OMC.list.convening-authority-transportation@osd.pentagon.mil. Per the attached Invitational Travel Order, you will travel to the National Capital Region on 16 October 2016 and return home on 20 October 2016, unless released earlier from the Commissions' proceedings. Arrangements will be made for you to stay at the Hilton Alexandria Mark Center, 5000 Seminary Road, Alexandria, VA 22311, while you are in the National Capital Region. To provide testimony, you will be required to walk across the street from the hotel to the Mark Center and meet Mr. [REDACTED] at the Visitor's Center.

Please contact me or my staff at the [REDACTED] address, or at the above listed phone numbers.

Karen V. Loftus
 Director, VWAP

INTENDED FOR DESIGNATED RECIPIENT'S USE ONLY

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DEPARTMENT OF DEFENSE
OFFICE OF THE CHIEF PROSECUTOR OF MILITARY COMMISSIONS
 1610 DEFENSE PENTAGON
 WASHINGTON, DC 20301-1610

Witness Fees

M&IE	\$310.50
Taxi Fees	\$278.40
Witness Fees	\$200.00
TOTAL = \$788.90	

Delivered By:

[Signature]
 Signature

13 Oct 16
 Date

Dominic S. McDONNELL
 Printed Name

Received By:

[Signature]
 Signature

10/13/2016
 Date

STEPHEN D. GILL
 Printed Name

UNITED STATES POSTAL SERVICE

Serial Number: 23945056380

Postage: \$788.90

Pay to: STEPHEN D. GILL

Address: [Redacted]

Memo: Witness fees

City: Washington DC State: DC Zip: 20301

Postmark: 10/13/2016

Barcode: 000000800 20



DEPARTMENT OF DEFENSE
OFFICE OF MILITARY COMMISSIONS
1610 DEFENSE PENTAGON
WASHINGTON, DC 20301-1600

ORG: 5005
 Invitational Travel
 Order Number: DFTD70089
 Date: 12 October 2016

Stephen Dennis Gill
 [REDACTED]
 [REDACTED]

Mr. Gill:

You are invited to travel from Scituate, MA, to the National Capital Region on **16 October 2016**. You are further authorized to travel back to Scituate, MA, from the National Capital Region on **20 October 2016**. Early return is authorized. These orders formalize our prior conversations regarding this trip. The purpose of this travel is to provide Video Teleconference (VTC) testimony to a Military Commissions hearing.

The least expensive, unrestricted economy/coach accommodation is the standard for all passenger transportation modes IAW the Joint Travel Regulation (JTR). Authorized non-contract carrier when space on a contract flight is not available in time to accomplish travel purpose, the contract carrier's flight schedule is inconsistent with the JTR policies to travel during ordinary working hours, or a non-contract carrier offers a lower airfare available to the general public. Reimbursement of travel cost from Home of Record to NCR and return to Home of Record is authorized. Authorized reimbursement for Privately Owned Conveyance (POC) travel not to exceed the cost of constructed transportation. Reimbursement for actual lodging rate is authorized. Variation authorized when approved by the authorizing official. While en route and away from your home or place of business on the mission, your actual transportation expenses, including taxi/metro, and per diem expenses will be paid in accordance with the JTR. Receipts will be required to substantiate any claims for reimbursement for transportation. All taxi receipts will be required for reimbursement. One excess baggage authorized on first and last day of travel within carrier authorized size and weight limits.

Submission of a travel claim is required **within 5 days** after completion of travel. After 30 calendar days, allocated funds will be de-obligated for unfiled vouchers. Scan and email a copy of this Invitational Travel Order and all applicable receipts and submit to [REDACTED] or you may fax the entire packet to [REDACTED]. Your completed travel voucher will then be submitted to DFAS for payment.

Travel is chargeable to: [REDACTED]
 [REDACTED]
 [REDACTED]

Sincerely,

MCCLLOUD.ANTHONY.WADE. [REDACTED]

Anthony W. McCloud
 Logistics Branch Chief

Digitally signed by MCCLLOUD.ANTHONY.WADE
 DN: cn=US, o=425, ou=Department, email=anthony.wade@mil.mil, c=US
 Date: 2016.10.12 17:09:09 -0400

SVTC or other web-based communications are not sufficient to accomplish the travel objectives. FY17 funding is subject to availability of funds.

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Your Itinerary

Trip on Oct 16, 2016

Locator: HRVPPX

Date: Oct 13, 2016

Traveler **STEPHEN D GILL**
 Customer Number **Q3583RN**
 Agent **97**

----- IMPORTANT CHANGE -----
 IF TICKET NUMBER IS NOT REFLECTED ON THIS ITINERARY,
 THIS AIR RESERVATION WILL AUTOMATICALLY BE CANCELLED
 AT 72 HOURS PRIOR TO TRAVEL DATE IF APPROVAL OR
 ORDERS ARE NOT RECEIVED FOR TICKETING DUE TO AIRLINE
 FARE RULES. THE TRAVELER IS RESPONSIBLE FOR
 CANCELLING ALL ASSOCIATED HOTEL AND CAR RESERVATIONS
 TO AVOID ANY NO-SHOW PENALTIES.

Sunday, October 16, 2016

Confirmation HRVPPX

**Flight AMERICAN AIRLINES 2142**

DEPARTURE
BOSTON, MA
3:00 PM, Oct 16, 2016

ARRIVAL
WASHINGTON/NATL,DC
4:42 PM, Oct 16, 2016

Status Confirmed
 Class Coach Class - Y
 Duration 01:42 (Non-stop)
 Equipment Airbus Jet
 Meal Service None
 Reserved Seats 16A (Window)
 Notes DEP-TERMINAL B
 ARR-TERMINAL C
 ONEWORLD

Thursday, October 20, 2016

Confirmation HRVPPX

**Flight AMERICAN AIRLINES 2170**

DEPARTURE
WASHINGTON/NATL,DC
11:30 AM, Oct 20, 2016

ARRIVAL
BOSTON, MA
12:59 PM, Oct 20, 2016

Status Confirmed
 Class Coach Class - Y
 Duration 01:29 (Non-stop)
 Equipment Airbus Jet
 Meal Service None
 Reserved Seats 17F (Window)
 Notes DEP-TERMINAL C
 ARR-TERMINAL B
 DCA-BOS CHECK-IN WITH SHUTTLE TKT COUNTER IN TERMINAL B
 ONEWORLD

Name	Invoice / Ticket / Date	Base	Tax 1	Tax 2	Tax 3	Total
		USD 184.18	13.82US	8.00ZP	20.20XT	226.20
				Total Amount		226.20

GENERAL INFORMATION

 LOCAL OFFICE HOURS/ MONDAY - FRIDAY.

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GOVERNMENT RESERVATIONS.....800-756-6111
EMERGENCY ASSISTANCE 24 HOURS.....800-383-6732
...*****ATTENTION*****...
ORDERS ARE REQUIRED TO ISSUE AIRLINE TICKETS
FAX ORDERS TO 866-947-2401
EMAIL ORDERS TO PENTAGONFAX/AT/CWTSATOTRAVEL.COM
CWTSATOTRAVEL WILL NOT ISSUE AIRLINES TICKETS
WITHOUT A COPY OF ORDERS.
...*****...
TO COMPLETE A CUSTOMER SERVICE SURVEY GO TO
WWW.CWTSATOTRAVEL.COM.

** FOR AIRPORT SECURITY INFORMATION SEE WWW.TSA.GOV **

PLEASE VISIT WWW.CARLSONWAGONLIT.COM/AIRLINEBAGGAGEFEES
FOR BAGGAGE FEE INFORMATION. CHECK OPERATING CARRIER
FOR ALLOWANCE IF TRAVELING ON CODE SHARE FLIGHT.

RETURN UNUSED PAPER TICKETS-
CWTSATOTRAVEL
BLDG 2180, S 8TH AVE
FT MCCOY WI 54656
800-927-6343
.
CWTSATOTRAVEL GOVERNMENT RATES PROGRAM CONTAINS 11,061 HOTEL PROPERTIES.
.
DID YOU KNOW?
JTR 2400 MAKE THE USE OF THE COMMERCIAL TRAVEL OFFICE
MANDATORY FOR ALL OFFICIAL AIRLINE AND RENTAL CAR ARRANGEMENTS.
.
EQUALLY, CWTSATOTRAVEL WILL MAKE YOUR HOTEL RESERVATION WITH YOUR AIRLINE AND
CAR ARRANGEMENTS TO ENSURE ALL YOUR TRAVEL ARRANGEMENTS ARE TOGETHER ON ONE
ITINERARY!!! CWTSATOTRAVEL ALWAYS ENSURES YOU ARE STAYING AT FEMA APPROVED
PROPERTIES AT THE BEST AVAILABLE GOVERNMENT RATE.