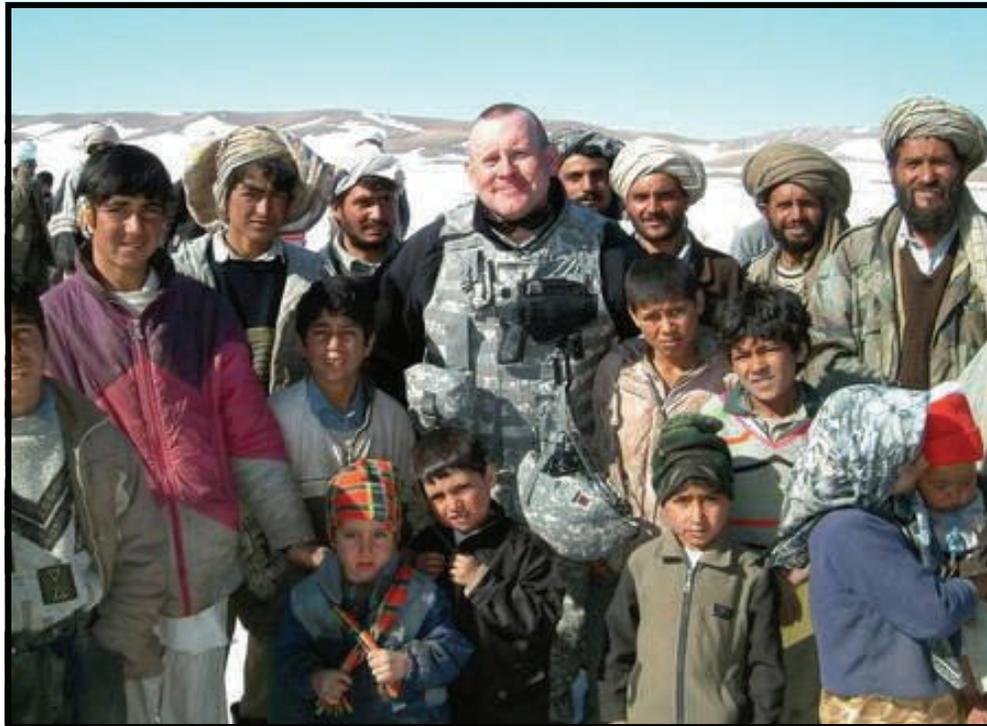




## KAISERSLAUTERN LEGAL INFORMER

### ***IN REMEMBRANCE OF JAMES L. WILEY, 1961-2008***



***The fall edition of the Kaiserslautern Legal Informer is dedicated to the memory of our departed friend and colleague, James L. Wiley, whose love of people animated our office and found new expression in Afghanistan.***

#### **by Steve Smith**

Jim Wiley, who served as Chief of Client Services for the Kaiserslautern Legal Services Center from 1999 until he deployed to Afghanistan in his Reserve capacity in the fall of 2007, created the "Kaiserslautern Legal Informer." This edition is dedicated to Jim.

News of Jim's untimely death in Afghanistan on 18 September 2008 hit us like a thunderbolt. As we have struggled to come to terms with the enormity of our loss, each of us has reflected long and hard on what Jim meant to this office, to our clientele, and to this community.

Jim's tremendous enthusiasm for serving Soldiers animated the Kaiserslautern Legal

Services Center, and inspired everyone who worked with him to put people first. Jim's enormous empathy for his clients and co-workers, his love of family, his mentoring, and his hospitality toward all who worked in our office were legendary. Jim had a heart as big as America.

Jim carried these same qualities with him on his deployment to Afghanistan, where he undertook many voluntary humanitarian missions, improving the lives of those he touched.

Jim will be deeply missed by all who served with him, and by all he served. Our hearts go out to his wife, Teresa, his daughters, Jamie, Ruth, and Sarah, and to his parents, James L. Wiley, Sr. and Ruth Wiley, in Oregon.

We will strive to carry on Jim's good work.



***United States Army  
Judge Advocate  
General's Corps -  
America's Oldest  
Law Firm***

## **Office of Soldiers Counsel Opens**

### **Representing wounded warriors in MEBs and PEBs...**

by Steve Smith

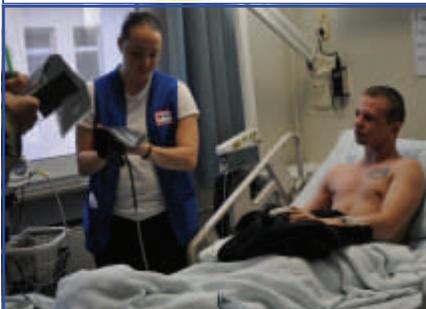
AFN television broadcasts repeated public service announcements these days by the Secretary of Defense, the various Service Secretaries, and the Joint Chiefs of Staff reminding us that the most important thing we do is take care of wounded warriors. No job is more important.

As part of the Army's continuing effort to take better care of wounded warriors, Warrior Transition Units (WTUs) have been set up in various communities in USAREUR. Kaiserslautern's WTU, which is located on the second and third floors of Building 3210 on Kleber Kaserne, just above the Kaiserslautern Legal Services Center, currently has 183 Soldiers assigned. Kaiserslautern's WTU is responsible for Kaiserslautern, Landstuhl, Baumholder, Wiesbaden, Vicenza, and the Benelux. Other WTUs are headquartered in Heidelberg and Vilseck.

To assist Soldiers who are going through the Medical Evaluation Board (MEB) and Physical Evaluation Board (PEB) process, each WTU has an Office of Soldiers Counsel. The Kaiserslautern WTU's Office of Soldiers Counsel is now open for business in Room 110 of the Kaiserslautern Legal Services Center. They can be reached at DSN 483-7463 or Civilian 0631-411-7463.

The Office of Soldiers Counsel's legal technician is Ms. Stacey Willard, a native of Crescent City, California. She is a retired USAF Master Sergeant, whose assignments included Goodfellow AFB, Texas, Kusan AFB, Korea, Kadena AFB, Okinawa, and Nellis AFB, Nevada. In addition, she was assigned to Ramstein's 435th ABW Legal Center for three years, where she handled legal assistance, claims, and military justice matters, so she is no stranger to the KMC.

We are fortunate to have this experienced "Legal Eagle" join our firm. For more information on the mission of the Office of Soldiers Counsel, see page 3.



*Stacey Willard is ready to take your calls...*

## ***Taking Care of Wounded Warriors***

### ***The mission of the new Office of Soldiers Counsel...***

by CPT Daniel Marposon

The Office of Soldiers Counsel (OSC) is dedicated to providing legal counsel and representation to Soldiers undergoing evaluation through the Army's Physical Disability Evaluation System (APDES). Soldiers Counsel are licensed, experienced attorneys with specialized training in the APDES process. Our mission is to support, advise, and represent Soldiers throughout the Medical Evaluation Board (MEB) & Physical Evaluation Board (PEB) process. OSCs represent wounded warriors, not commanders, by providing legal counsel and representation throughout the entire MEB/PEB disability evaluation process.

There are three key stages in the APDES process at which point Soldiers should consider seeking advice from an OSC:

- (1) Referral to a MEB (or receipt of a permanent P3 Profile).
- (2) Completion of MEB and receipt of a DA Form 3947 MEB report. You should be provided with, among other documents, the Narrative Summary (NARSUM), a new permanent profile, and your commander's memorandum; and
- (3) Receipt of an informal PEB Decision (DA Form 199) and Election of Rights.

Representatives from the OSC travel monthly or quarterly to WTU town hall meetings in the communities we serve to introduce ourselves and explain our services and speak individually with wounded warriors.

***NOTE: In addition to the new OSC in the Kaiserslautern Legal Services Center (see story on page 2), there is an OSC at Landstuhl Regional Medical Center, located in Building 3703, Room 509. That office can be reached at DSN 486-8907 or Civilian 06371-86-8907. CPT Marposon is the Soldiers Counsel at Landstuhl. The Paralegal NCO at the Landstuhl OSC is SFC Marvin Buckhalter.***

FOR MORE INFORMATION ON WOUNDED WARRIOR CARE, GO TO:

<http://www.warriorcare.mil>

<https://www.aw2.army.mil/index.html>

<http://www.army.mil/institution/organization/offices/eoh/wcto>

# The Tax Man Cometh...



**“What is the difference between a taxidermist and a tax collector?  
The taxidermist takes only your skin...”**

~ Mark Twain, *Notebook*, 1902

by Lauren Pope

If retailers can bring out the Christmas displays before Halloween, I can talk about tax season before W-2 forms come out in January. Dreaded tax season...it strikes fear in the heart. What do I need? Where do I go? How much will I have to pay? You needn't worry. Your friendly Legal Assistance Office is here to help.

Let's talk about what you should be doing now... yes... NOW.

First, if your child is entitled to a social security number and does not have one yet, get one now. This can be done in conjunction with the birth registration process through the Passport Office [Kleber Kaserne, Bldg. 3245, Room 103. DSN 483-8892 or Civilian 0631-411-8892] or by calling the Federal Benefits Unit at the American Consulate in Frankfurt [Civilian 069-7535-2440]. If your child does not have a social security number by tax time, you will not be able to claim that child on your tax return. You may get the number later and then amend your return, but that is double the work for

you, us, and the IRS. Plus, you may be allowing the government to hold on to more of your money for longer simply because you didn't plan ahead.

Second, if you plan to itemize deductions, own a rental property, or have your own business, you should be gathering and organizing your records now. The more organized you and your records are, the less time you will spend in our office and the more accurate your return will be. Additionally, since it is still 2008, your expenses are fresh in your mind and hopefully the receipts are still lying around somewhere.

Third, if you have not yet filed your tax return for 2007 or any other year, make an appointment with us to have that done now. You can make an appointment by calling DSN 483-8848 or Civilian 0631-411-8848. Our tax program coordinator, Mr. Donald Davis, and I are available to prepare your taxes or answer your tax questions. As a general rule, you must file a tax return every

year, regardless of whether you expect to owe or be owed money. So come see us and we will help you “get right with the Government.”

Fourth, if you will be deployed or unavailable during tax season and you would like your spouse to be able to file a tax return in your absence, have a power of attorney prepared now allowing that. A power of attorney can be created on a walk-in basis anytime our office is open. It must specifically say that the person to whom you give power of attorney can file taxes on your behalf. Or you can fill out IRS Form 2848, which can be downloaded from the IRS website: [www.irs.gov](http://www.irs.gov). That form requires no notarization.

Fifth, if you wish to make contributions to an IRA for tax year 2008, work on that now. If you don't already have an IRA, talk to your preferred financial institution about setting one up. If you already have an IRA, check to see how much you have contributed, and how much you want to contribute. Re-

member that the maximum contribution for 2008 is \$5,000 per person (\$6,000 if you are over 50) and you have until April 15, 2009, to make the deposit. The contribution limit may vary depending upon your individual situation, so don't hesitate to ask us if you have questions, before transferring the money.

Sixth, if you believe you will owe money, start saving now. **An extension to file does not equal an extension to pay.** All amounts due must be paid by April 15th or interest and penalties will begin accruing. The IRS does not mess around when it comes to “collections.”

I can hear it now... “I have too much to do this time of year to worry about my taxes.” Just keep in mind that a little effort now may go a long way toward making the upcoming tax season much brighter for you and your family. Legal Assistance is here to help, and is free, so come see us if you have tax questions or need help preparing returns or responding to “friendly” IRS notices.

## The Return of “The Donald”

by Steve Smith

If you are the kind of person who looks forward to tax season as much as you would to a root canal without anesthetic, I have good news for you.

Donald L. Davis, who served in the Kaiserslautern Legal Services Center from 2003 to 2007 as the 21st TSC's tax assistance program coordinator, is back.

“The Donald,” as he is affectionately known, brings over 20 years of tax experience to the table. I first met him in 1999 when I was serving as Chief of Legal Assistance for the 1st Infantry Division Office of the Staff Judge Advocate in Wuerzburg. Donald had run a network of financial planning offices in military communities

throughout Europe since the early 1980s, and had the kind of in-depth tax experience that can only be acquired over time. There wasn't a tax issue he wasn't already familiar with, or a tax problem he could not fix.



Donald joined the 21st TSC's client services team in the 2003 tax season, and in no time built up a large following of retirees

and other taxpayers with complicated returns involving foreign issues. Donald excels at helping chronic non-filers get caught up on back returns, and is a real wizard when it comes to using TaxWise software. He expertly trains and oversees our team of e-filers, and helped us launch our popular satellite tax assistance center at Landstuhl. He also assists taxpayers with state and Puerto Rican returns, and helps them respond to notices they receive from the IRS.

We're delighted to have the most experienced tax preparer in Europe back on our client services team. If you need tax assistance, make an appointment by calling DSN 484-8848 or Civilian 0631-411-8848.

### In other news at this hour...

- *The Kaiserslautern Legal Services Center has been recognized with both the Army Chief of Staff Award for Excellence in Legal Assistance for FY 2007 and The Judge Advocate General's Award for Excellence in Claims Support for FY 2007.*
- *21st TSC's law centers in Mannheim, the Netherlands, and Belgium also received both awards. The 21st TSC OSJA won four out of the five legal assistance awards and four out of the six claims awards in Europe in the FY 2007 competition, living up to our motto: "First in Support!"*
- *PFC Hannah Alojado, who works in the Criminal Law section of the Office of the SJA, won the 21st TSC Paralegal of the Year competition in September.*
- *Douglas Chicka, who served as a Labor Law Attorney for the Office of the SJA in Kaiserslautern from February 2007 to September 2008, was awarded the Achievement Medal for Civilian Service. Doug now works as a Contract Law Attorney for the Air Force on Rhine Ordnance Barracks.*



*The Ethics Corner...*    **GIFTS — PART II:**  
**GIFTS FROM OUTSIDE SOURCES**

by Jeannine Smith

In our last installment, we looked at the rules governing gifts between Federal/DoD employees. This time, our focus will be on gifts to Federal employees (or their families) from sources outside the Federal government.

For example, let's say that Bob, who works down the hall from you, wants to take you to lunch for your birthday. It so happens that Bob is actually an employee of XYZ Company (a contractor), and you're the Contracting Officer (Federal employee) who awarded the contract to XYZ Company. Is lunch considered a gift? If so, can you accept that gift?



Here is the general rule: DoD personnel (including their families) may **not** directly or indirectly accept or solicit for gifts (1) offered by a “prohibited source” or (2) given because of the Federal employee’s official position. Of course, there are exceptions, but let’s start by breaking down the general rule.

First – is it even a gift? Generally, a gift is anything with monetary value. But there are things that have monetary value that aren’t considered gifts, so maybe the best way to look at it is to see what a gift **isn’t**. By definition, the following are “non-gifts” and may be accepted without further analysis:

- Modest items of food and refreshments, such as soft drinks, coffee, and donuts, not part of a meal.
- Greeting cards and items of little intrinsic value, such as trophies, intended solely for presentation.
- Loans from banks and other financial institutions on terms generally available to the public.
- Opportunities and benefits, including favorable rates and commercial discounts available to the public, or large groups like all uniformed military personnel even if restricted geographically.
- Rewards and prizes given to competitors in contests and events, like random drawings open to the public.

If you, the Federal employee, are being offered something of value (like lunch) from someone outside the Federal government, and it isn’t one of the “non-gifts” listed above, then more than likely, it’s a gift. The next step is to look at whether it’s being offered by a “prohibited source” or is being given because of the Federal employee’s actual position.

So, what is a prohibited source? The official definition is that a prohibited source is any person who seeks official action from the employee’s agency, does or seeks to do business with his agency, conducts activities regulated by his agency, or has interests that may be substantially affected by the individual employee. In our example above, XYZ Company (and its employees) is a prohibited source because it’s a contractor doing business with your agency.

## ***GIFTS FROM OUTSIDE SOURCES... (continued)***

Federal employees also cannot accept gifts from sources outside the Federal government if the gift is being given because of the Federal employee's official position. For example, if the local Rotary Club offers to give you two tickets to the opera (valued at \$200), and the only reason you can think of for why they're offering this gift to you is that you're the Garrison Commander at Fort Snelling (which is adjacent to the Rotary Club's headquarters) and they want to foster good will with their neighbors, then you should probably decline the gift because it's being offered because of your official position.



Now that you know the rule, let's consider the exceptions.

-- Federal employees may accept gifts, other than cash, valued at \$20 or less per occasion and per source, not to exceed \$50 (per source) in a calendar year. So, in our example with Bob the Contractor, you could accept the gift of lunch, as long as the total amount of your lunch (to include drinks, dessert, appetizers – everything) does not exceed \$20. If you do accept this gift, you can only accept another \$30 worth of gifts (not to exceed \$20 per gift) from any employee of XYZ Company (not just Bob, since he is the "source") for the rest of the calendar year.

-- Federal employees may accept bona fide awards for meritorious public service offered by non-Federal entities, including prohibited sources, except for those whose interests may be substantially affected by the individual gift recipient. Some awards may require written determinations by DoD ethics counselors.

-- Federal employees may accept gifts given because of a family or personal relationship.

-- Federal employees may accept gifts offered (from other than prohibited sources) to a group of Federal personnel, as long as the offer does not distinguish on the basis of official position, pay or rank. Examples would include all members in a particular unit; all personnel who responded to a particular disaster; and all personnel injured in a particular disaster or event (such as the bombing of the U.S.S. Cole, the attack on the Pentagon, the Iraq or Afghanistan theater of operations).

-- Federal employees may accept gifts permitted under specific statutory authority, such as the Wounded Warrior Assistance Act. [More on this topic in our next Ethics Corner.]

Finally, you can pay fair market value for anything that is being offered to you as a gift – then it is no longer considered a gift.

Before accepting any gift, even if it's permitted under an exception, always consider the appearance issue. Ask yourself, does my acceptance of this gift create an appearance of impropriety? Would an outside observer conclude that the gift-giver is "buying" my influence or receiving favorable treatment by giving me the gift? If there is even an appearance of impropriety, a gift from an outside source should be declined. And remember, Federal employees should never solicit gifts.

For further information, contact your local Ethics Counselor.

**Note:** Jeannine Smith is a civilian attorney in the Civil Law Division of the 21st TSC OSJA.

## 21st TSC JAGs Visit Saarbrücken Regional Court...

by Joe Hall

On 30 October 2008, members of the 21<sup>st</sup> TSC Office of the Staff Judge Advocate were invited by the President of the Saarbrücken Regional Court, Herr Hans-Peter Freymann, for a briefing and an exchange of views on the structure and functions of the German civilian and the US Army legal systems. The German attendees included judges from the Saarbrücken Regional Court and the Regional Court in Zweibruecken, as well as the Prosecutor General for the State of Saarbrücken, Herr Sahn, and other prosecutors.

The 21<sup>st</sup> TSC Staff Judge Advocate is USAREUR's legal liaison authority to the German states of the Saarland, Rheinland/Pfalz, and Baden-Wuerttemberg. In that capacity, he and his office are responsible for building and maintaining good legal relations with host nation judicial officials and prosecutors at the local and state level. Those relations are designed to ensure that the NATO SOFA rights of

US Forces are protected and enforced in host nation investigative and judicial proceedings – and to ensure that close cooperation exists, so that timely and fair justice action can be taken in both US military and German criminal proceedings.

The purpose of this visit was to familiarize the 21<sup>st</sup> TSC attorneys with the overall structure of the German court system, and with the general administrative functions of the regional court. It also was an opportunity to brief the German hosts on the multi-faceted mission of the Army JAG Corps, and on the specific structure and legal mission of the 21<sup>st</sup> TSC Office of the Staff Judge Advocate. Presentations on criminal law topics by German Judge Klos and Prosecutor General Sahn also stimulated discussion on topics important to practicing criminal law attorneys, such as rules on “speedy trial,” use of “hearsay” evidence, the concept of guilty pleas, and the military judge’s duty to conduct an inde-

pendent inquiry into the “providency” of a plea.

The presentations were followed by a tour of the court building, and a delicious lunch with foods typical of the Saarland; the buffet was catered by the local German prison kitchen.

In his closing remarks, the 21<sup>st</sup> TSC Staff Judge Advocate, Colonel Corey Bradley, noted that the visit was important, “for by seeing how other legal systems work, we can better understand and improve our own system. The comparative views we shared and the knowledge we obtained will make us more sensitive and more competent when we are called upon to help others build the “rule of law” into their democratic institutions, as we are currently doing in Afghanistan.” He also thanked our German hosts for their warm hospitality and for the opportunity they provided for us to get to know, and learn from, each other.

Note: Joe Hall is Chief of International Law for 21st Theater Sustainment Command.



*German and American jurists got to know each other better at a special event held at the Saarbrücken Regional Court in October.*



*This unusual statue in the lobby of the Saarbrücken Regional Court bears the inscription: “God Protect the Law.”*

## Debt Collection — Keeping it Fair by CPT Daniel Curley

Have you received bills in the mail saying you are overdue on a payment? Have companies harassed you by repeatedly calling your home? If so, you should know your legal rights!

When creditors collect on overdue payments, they normally begin with form letters, then graduate to phone calls or personal visits, and then eventually to repossession of the purchased item, or even referral to a collection agency.

Normally the creditor will

first send out friendly “reminder” letters to let you, the consumer, know you are behind in your payments. Subsequent reminder letters usually contain harsher language, and stress the severity of non-payment. Although phone calls can be used to determine why payments are late, they cannot be used to harass the consumer in an attempt to collect the debt. The creditor usually threatens to repossess the item when payments are 30 to 60 days overdue and, ulti-

mately, will turn the account over to a lawyer or professional debt collector to continue collection efforts.

Although a debt collector is in the business of collecting debts for others, a guy looking like Dog the Bounty Hunter or a character out of “The Godfather” shouldn’t be paying you a visit. If they do, contact your local police department.

*...continued on page 10...*

## YOUR LANDLORD WANTS TO SELL THE HOUSE — MUST YOU MOVE?



by Joerg Modellmog

You have spent time (and maybe even some money if a broker was involved) finding a suitable place to live during your tour in Germany. The Army has delivered all your household goods to your new home for free, you have paid your security deposit, and you are enjoying your new neighborhood. Then, just when you think you are fully settled in, you learn that your landlord wants to sell the house you are living in. Your anxiety increases when you learn that the Army will not move you for free to another place. You start wondering: “will I have to move?”

The good news is that the sale of the premises does not terminate your residential lease (§566 of the BGB—the German Civil Code). By operation of law, the new owner assumes the position of the old landlord in the rental agreement. No new rental agreement needs to be concluded. The old one simply continues. The buyer takes the contract as he finds it.

The purchaser will only be considered the new owner once he is registered in the “Grundbuch” (Real Estate Register). The notarized purchase agreement does NOT make him the owner.

There are only two kinds of buyers: those who specifically buy houses that are already

rented, in order to pay off any mortgage with your rental payments, and those who buy the house in order to move in themselves later on. Only with the latter kind will you be faced with a termination notice due to personal need (“Eigenbedarfskündigung”).

Your original landlord (the seller) cannot terminate your lease for personal need because he has none—after all, he is selling his property. The law allows the landlord to terminate the lease only under an extraordinary hardship provision if he can prove he would lose at least 20% of the value of the house if it is rented out. That would be very hard to demonstrate in the rural KMC area.

What’s more, your landlord (the seller) cannot terminate on behalf of the buyer because the buyer must first be the recorded owner in order to claim personal need, in which case the buyer will be your landlord, leaving no legal standing for your prior landlord. Moreover, the seller generally also refuses to assign any rights to the buyer before the sale is recorded because if he does and the deal goes wrong, the seller will be legally worse off than before.

Assuming everything is done by the book and your new landlord sends you a VALID three-month statutory termination notice for personal need, following the recording of his

ownership rights in the Real Estate Register, you still may not have to leave!

According to §574b of the BGB, you can protest such termination on two grounds: either because the stated reasons for the termination are false or because you have a case of (social) hardship. The latter defense includes situations in which you cannot obtain adequate substitute housing under reasonable conditions (*e.g.*, you have a lot of children or your PCS is less than a year away). In weighing the different interests, your reason will generally prevail and the new owner will have to wait for you to PCS before he can move into his house.

Finally, if the premises have been sold, the new owner/landlord is responsible for paying back your rental security deposit at the end of the lease, even if the former owner/landlord did not transfer it to him (§566a of the BGB).

You can avoid all of the above by including a clause in your lease that suspends the landlord’s right to termination for personal need for a period not to exceed three years.

If you have questions about the legality of a termination notice or problems involving the sale of the rental home you are living in, call DSN 483-8848 or Civilian 0631-411-8848 to schedule an appointment with a Legal Assistance Attorney.



### KAISERSLAUTERN LEGAL SERVICES CENTER

**Building 3210  
Kleber Kaserne**

Legal Assistance 483-8848

Claims 483-8414

Tax Assistance 483-7688

International Affairs 483-8854

Soldiers Counsel 483-7463

Trial Defense Service 483-8165

Administrative Law 484-7450

Criminal Law 484-8311



**CPT Daniel Curley is the KLSC's new Legal Assistance Attorney. A graduate of the University of Connecticut and New England School of Law, he speaks fluent German, studied at the University of Heidelberg, and worked for a patent law firm in Munich.**

## Debt Collection – Keeping it Fair (continued from page 9)

Congress enacted the Fair Debt Collection Practices Act (FDCPA) to combat abusive debt collectors. Designed to limit harassing, misleading, and fraudulent contacts and communications with consumers, the FDCPA requires debt collectors to follow certain procedures. Within five days of contacting you, the debt collector must send you a letter stating the amount of the debt, the name of the creditor, and notice that you have 30 days to contest the validity of the debt. After 30 days, the collector will assume the debt is legitimate. You can prevent the collector from communicating with you by notifying the collector in writing that: (1) you refuse to pay; (2) you wish no further contact; and (3) you are represented by an attorney who should receive all future correspondence.

The FDCPA also prevents debt collectors from contacting you at work or at inconvenient times. In addition, debt collectors must refrain from contacting your spouse, friends, or relatives about the debt. The collector cannot falsely imply government affiliation and, if legal action is initiated, must sue the consumer where the consumer resides, where the contract was signed, or where the property is located. Also, the collector cannot make false threats about legal action. A violation of the FDCPA could be grounds for a private lawsuit against the collector, or as a counterclaim if the collector takes you to court.

If a debt is valid, paying it is the best policy. Failure to pay your just debts will adversely impact your credit report. Your military commander may also take administrative or disciplinary action against you if you fail to meet your financial obligations. Possible disciplinary actions include notice in your permanent record, denial of reenlistment, administrative separation, or punitive action under Articles 92, 123, 133, or 134 of the UCMJ.

So, remember, pay your valid debts, but don't let rogue debt collectors go unchecked. If you are the subject of abusive debt collection practices, contact your local legal assistance office.

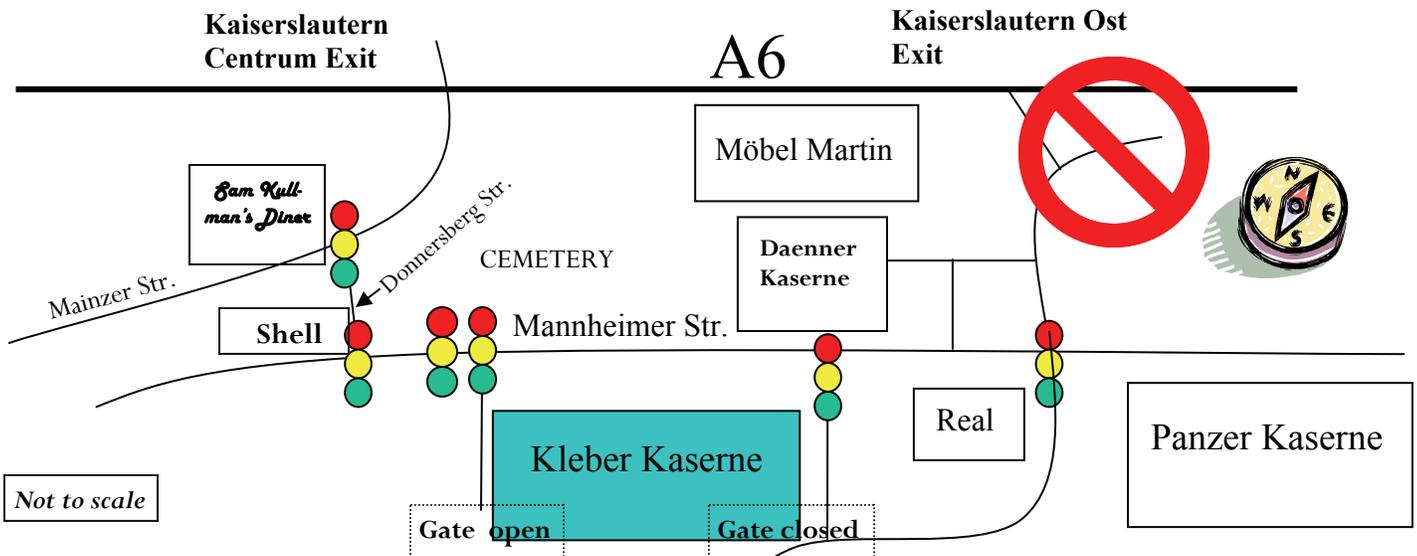
### NOTE!

**The Kaiserslautern Ost Autobahn exit is closed for construction this fall. Follow these directions to find the Kaiserslautern Legal Services Center...**



### Directions to Kleber Kaserne:

From Vogelweh, Ramstein, or Landstuhl take the A6 towards Mannheim. Take the Kaiserslautern Centrum exit and follow the priority road (Mainzer Strasse) into K-town. Turn left at the traffic light near Sam Kullman's diner, and left again at the Shell station. Head east on Mannheimer Strasse, passing the cemetery on your left, and some flower shops on your right. Turn right at the light at the west end of Kleber Kaserne, and follow the western perimeter of Kleber until you come to Gate 3. Follow the priority road through Kleber, turn left at the clinic, and park in the Shoppette parking lot. Bldg. 3210 is directly across from the Shoppette. Enter the end door of Bldg. 3210, closest to the Shoppette.



Not to scale