UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Li Bo, c/o Wolfsdorf Rosenthal, LLP 1416 2nd Street Santa Monica, CA 90401	)	C/A No.: 1:22-cv-2331
[redacted]	)	

[redacted]

Plaintiffs,

v.

[redacted]

Defendants.

COMPLAINT

Plaintiffs invested more than $138,000,000 USD in the United States and created more than 2,770 jobs for lawful American workers. Based on their investment and job creation, each Plaintiff petitioned for an immigrant investor visa. And each visa petition was approved—years ago. Today, however, none has been issued an immigrant visa or a green card. Why? Every year Defendants waste tens of thousands of immigrant investor visas through bureaucratic inaction in contravention of congressional intent. There is a simple solution: this Court must order Defendants to authorize available visa numbers at the time State receives the approved visa petition form Homeland Security, not at the time of visa issuance. Afterall, this is what congress requires. For the reasons below, this Court should compel Defendants to take required actions

and prevent the loss of immigrant investor visas for the Plaintiffs and their derivative beneficiary family members.

PARTIES

1. Plaintiff [redacted] s a citizen and national of the People's Republic of China, who currently resides in Jiangsu, China.

2. [redacted]

275. [redacted]

278. Defendant Alejandro Mayorkas is the Secretary of the Department of Homeland Security ("DHS"). In his official capacity—the only capacity in which he is sued—he is charged with the administration of the Immigration and Nationality Act, including but not limited to forwarding approved Form I-526, Immigration Petitions by Alien Investors to the United States Department of State. 8 U.S.C. § 1154(d).

279. Defendant Antony Blinken is the Secretary of the United States Department of State ("DOS"). In his official capacity—the only capacity in which he is sued—he is charged with making available, allocating, and authorizing all remaining immigrant visas for Fiscal Year 2022 under 8 U.S.C. § 1153(b)(5) on or before September 30, 2022. 8 U.S.C. §§ 1153(b)(5), 1154(d); 22 C.F.R.§ 42.51(b).

VENUE AND JURISDICTION

280. This Court has subject matter jurisdiction over this case under 28 U.S.C. § 1331.

281. Under § 1331, this Court can hear causes of action under the Administrative Procedure Act ("APA") for unlawfully withheld agency actions. 5 U.S.C. § 706(1).

282. Similarly, under § 1331, this Court can hear causes of action under the APA challenging final agency actions that are arbitrary and capricious, unlawful, or in violation of procedure required by law. 5 U.S.C. § 706(2).

283. In addition to the remedies provided by the APA, this Court can remedy violations of the APA with declaratory relief under the Declaratory Judgment Act. 28 U.S.C. § 2201.

284. To the extent necessary, this Court has authority under the All Writs Act to issue "all writs necessary or appropriate in aid of [its] jurisdiction[] and aggregable to the usages and principles of law." 28 U.S.C. §1651.

285. Plaintiffs have exhausted all administrative remedies.

286. Joinder under Federal Rule of Civil Procedure 20 is appropriate in this case because all Plaintiffs challenge the Defendants' pattern and practices that lead to the wastage of thousands of immigrant visas for investors each fiscal year.

287. Specifically, DHS systematically fails to forward approved Forms I-526 to the DOS. This pattern and practice impacts nearly all Plaintiffs, and their challenges to the pattern and practice are identical.

288. And DOS systematically fails to allocate, assign, and authorize issuance of all available investor immigrant visas each fiscal year. This pattern and practice impact all Plaintiffs, and their challenges to the pattern and practice are identical.

289. Venue is appropriate in this Court for two reasons: (1) under 28 U.S.C. § 1391(e)(1)(B), DHS adjudicates and adjudicated all Forms I-526 at its immigrant investor program office, which is in the District of Columbia, and it is the office which has failed to forward approved Forms I-526 to the DOS upon their approval; and (2) under § 1391(e)(1)(B), DOS officials who are charged with allocating, assigning, and authorizing issuance of all available investor immigrant visas each fiscal year reside in the District of Columbia.

LEGAL BACKGROUND

290. This is a simple case of statutory interpretation with a simple solution.

291. Congress *requires* the United States Department of Homeland Security ("DHS") to forward an approved immigrant visa petition to the United States Department of State ("DOS") upon approval, and Congress *requires* the DOS to authorize a visa number for that approval and its derivatives upon receipt:

> The Attorney General [through its delegate DHS] shall, if he determines that the facts stated in the [immigrant visa] petition are true and that the alien [on] behalf of whom the petition is made . . . is eligible . . . approve the petition and forward one copy thereof to [DOS]. The Secretary of State shall then authorize the consular officer concerned to grant the preference status.

8 U.S.C. § 1154(b). This is the "[p]rocedure for granting immigrant status." *Id.*

292. The plain language of this statute—materially unaltered since 1952—requires authorization of a visa number when DOS receives the approved visa petition from DHS, not at the time of issuance.

293. This simple conclusion, however, is complicated by the numerical limitations congress also put on immigrant visas, and the discretion congress gives DOS to ensure efficient *issuance* of those authorized visas.

294. Plaintiffs provide a legal background of this labyrinthine process to put Plaintiffs' claims in context.

Preference Immigrant Visa Process

295. An "immigrant visa" gives its holder the right to be "lawfully admitted for permanent residence." *See* 8 U.S.C. §§ 1101(a)(16), (20).

296. Colloquially, lawful permanent residents are said to have "green cards."

297. Lawful permanent residence entitles a foreign national the "privilege of residing permanently in the United States," unfettered work authorization, and nearly unrestricted travel.

After five years in lawful permanent resident status, a foreign national may apply to naturalize to become a United States citizen. 8 U.S.C. § 1427.

298. Congress created two pools of immigrant visas. The first pool is unlimited; it is for "immediate relatives" and others. *See* 8 U.S.C. § 1151(b). The second pool is limited by "preferences."

299. Congress generally limits preference immigrant visas to three general categories: (1) family-based immigrant visas; (2) employment-based immigrant visas; and (3) diversity immigrant visas. 8 U.S.C. § 1151(a).

300. Congress further *numerically* limits immigrant visas by fiscal year ("FY") to non-immediate relatives.[1] It limits both the total number of immigrant visas available worldwide per FY, 8 U.S.C. § 1151(a), *and* the number of immigrant visas that one country may be allotted in a given FY. 8 U.S.C. § 1152(a)(2).

301. Congress intended the total family and employment-based immigrant visa numbers to fluctuate FY to FY based on the actual demand for family and employment-based immigrant visas through a roll-over formula. 8 U.S.C. §§ 1151(c)(3)(C), (d)(2)(C).

302. These total visa numbers per FY are further allocated to the subcategories within each immigrant visa type. *See, e.g.*, 8 U.S.C. § 1153(b)(1)-(5). For employment-based visas, congress *requires* the following allocation of the total number of immigrant visas available in any given FY:

Immigrant Visa Type	Congressional Allocation
EB1: Priority Workers	28.6%
EB2: Advanced Degrees and Exceptional Abilities	28.6%

[1] An immediate relative is the spouse, parent, or unmarried child under 21 of a United States citizen. 8 U.S.C. § 1151(b). Congress further does not limit the number of asylees and refugees who can acquire permanent residency. 8 U.S.C. § 1159. But these latter categories do not acquire "immigrant visas."

EB3: Skilled Workers, Professionals, and Other Workers	28.6%
EB4: Special Immigrants	7.1%
EB5: Immigrant Investors	7.1%

8 U.S.C. § 1153(b)(1)-(5). And if there is insufficient demand for a particular sub-category, the visa numbers allocated for a sub-category of employment-based immigrant visa will roll-over to another sub-category of employment-based immigrant visas.

303. These congressional allocations are then limited for individual foreign states. 8 U.S.C. § 1152.

304. Generally, no individual country may receive more than 7% "of the total number of such visas made available under such subsections in that fiscal year." 8 U.S.C. § 1152(a)(2).

305. The results of these calculations dictate the number of visas *available* for each FY.

306. If a foreign national wants one of these employment-based immigrant visas, they (or their employer) must first file a petition with DHS. *See generally* 8 U.S.C. § 1154(a).

307. DHS is required to investigate "the facts in each case." 8 U.S.C. § 1154(b).

308. And if DHS "determines that the facts stated in the petition are true and that the alien in behalf of whom the petition is made . . . is eligible," DHS "shall . . . approve the petition and forward one copy thereof to the Department of State." *Id.*

309. "The Secretary of State shall then authorize the consular officer concerned to grant the preference status." *Id.*

310. This "authorization" step is very important because, while a consular officer has absolute discretion whether to issue an immigrant visa, "the consular officer shall not grant such status until he has been authorized to do so." 8 U.S.C. § 1153(f).

311. While the authorization step is mandatory, congress did give DOS discretion about how to regulate authorization of such immigration visas to ensure orderly issuance of such immigrant visas:

> For purposes of carrying out the Secretary's responsibilities in the orderly administration of this section, [DOS] may make reasonable estimates of the anticipated numbers of visas to be issued during any quarter of any fiscal year . . . and to rely upon such estimates in authorizing the issuance of visas. [DOS] shall terminate the registration of any alien who fails to apply for an immigrant visa within one year following notification to the alien of the availability such visa, but the Secretary shall reinstate the registration of any such alien who establishes within 2 years following the date of notification of the availability of such visa that such failure to apply was due to circumstances beyond the alien's control.

8 U.S.C. § 1153(g).

312. Through regulation, DOS uses its authority under this provision to limit the number of immigrant visas that can be issued by both consulates and DHS to 27% of the total annual allotment for each of the first three fiscal quarters. 22 C.F.R. § 42.51(a). In the last quarter of the FY, however, DOS increases the rate of possible issuance to 10% of the total allotment per month. *Id.* This design ensures full issuance for fully subscribed categories because it adds up to 101% of total number of immigrant visas available per FY.

313. And State requires itself to allocate immigrant visas and so they can be issued in chronological order of their receipt by DHS: "[DOS] shall allocate immigrant visa numbers for use in connection with the issuance of immigrant visas and adjustments based on the chronological order of the priority dates." 22 C.F.R. § 42.51(b).

314. Once issued a visa, the foreign national may seek admission into the United States as a lawful permanent resident through a port of entry or adjustment of status in the United States.

DHS and DOS's Current Process

315. Contrary to the clear process that Congress created, DHS and DOS do not follow congress's clear commands.

316. First, DHS does not transfer one copy of approved petitions to DOS as a matter of course. In fact, like Plaintiffs, DHS often waits years to transfer approved petitions to DOS. This prevents the authorization of visa numbers to these petitions, which leads to visa wastage, significant gaps in time between approval and authorization of visa numbers—which leads to significant age-out problems for derivative beneficiary family members—and prevents DOS from accurately identifying demand for particular visa types.

317. Second, DOS has developed a paradigm where it does not authorize immigrant visas upon receipt of an approved petition; rather it waits to authorize immigrant visas until the consular officer issues the visas.

318. This means the number of immigrant visas that are available and authorized each FY are limited to the number of interviews that can be held at consulates. This leads to significant visa wastage because it puts the visa usage at the whims of local conditions on the ground.

319. For example in FY 2021, DHS and DOS wasted 15,567 EB-5 immigrant visas for Chinese nationals. Given that the backlog for this nationality and visa type exceeds 40,000, this was a huge loss. [should we not use the published number of 15,567?]

320. Plaintiffs seek to prevent a similar loss this FY, which ends on September 30, 2022, of approximately 11,000 EB-5 immigrant visas specifically for Chinese nationals.

Plaintiffs' Facts

321. Congress created the immigrant investor program in 1990 ("EB-5 Program"). *See* generally 8 U.S.C. § 1153(b)(5) (2020). At all times relevant, to acquire an EB-5 visa, a foreign

national had to invest $500,000 into a new commercial enterprise in a high unemployment or rural area and create 10 jobs. *Id.*

322. The program floundered for most of the 1990s and early 2000s. However, with the 2008 recession, the EB-5 Program became a rare and viable source of capital for investment.

323. Chinese investors led the way in the EB-5 program and the program became extremely popular amongst high-net worth Chinese seeking to educate their children in the United States and live the "American dream."

324. In FY 2009, Chinese nationals received 47% of all EB-5 visas; in FY 2014, Chinese nationals received 85% of EB-5 visas; and in FY 2019, Chinese nationals received 46% of EB-5 visas.

325. This recent downturn is a consequence of the significant backlogs based on the immigrant visa limitations described above.

326. In the fall of 2021, DOS announced the following numbers for employment-based immigrant visas for FY 2022:

Immigrant Visa Type	Individual Countries	Worldwide Numbers
EB1: Priority Workers	5,605	80,080
EB2: Advanced Degrees and Exceptional Abilities	5,605	80,080
EB3: Skilled Workers, Professionals, and Other Workers	5,605	80,080
EB4: Special Immigrants	1,392	19,880
EB5: Immigrant Investors	1,392	19,880
Total	19,599	280,000

See Department of State, Annual Numerical Limits for Fiscal Year 2022 (available at https://travel.state.gov/content/travel/en/legal/visa-law0/visa-statistics/immigrant-visa-statistics.html (Click on "Annual Numerical Limits for Fiscal Year 2022") (last visited Aug. 5, 2022)).

327. To date, upon information and belief, DOS has issued approximately 4000 EB-5 immigrant investor visas.

328. It is now the Fourth Quarter of FY 2022.

329. Plaintiffs are all Chinese nationals who have invested in the EB-5 program in 2016 and 2017.

330. They all have approved visa EB-5 visa petitions.

331. But DOS claims that there are not enough EB-5 immigrant visas available in FY 2022 to authorize visa numbers to any of them.

332. DOS currently claims that there are only FY 2022 EB-5 immigrant visas available to Chinese nationals who applied prior to November 22, 2015.

333. Upon information and belief, however, there are between 11,000 and 14,000 EB-5 immigrant visas remaining available for FY 2022. Based on the roll-over provisions and it being the fourth quarter of the Fiscal Year, all of these EB-5 immigrant visas numbers must be authorized for Chinese Nationals based on their early priority dates.

334. Upon information and believe, if DOS authorized these remaining EB-5 immigrant visa numbers prior to September 30, 2022, all of the Plaintiffs have priority numbers early enough that they would fall within that authorization of numbers.

335. DOS is required to authorize EB-5 visa numbers to Plaintiffs.

336. Without the authorization of these EB-5 visa numbers to Plaintiffs by September 30, 2022, they will suffer harm.

337. First, they will continue to wait for years under the DOS's current process. Over the last 7 years, the visa bulletin has only progressed by 18 months. From May 2014 when "Chinese retrogression" was first announced, until August 2022, the monthly Visa Bulletin has advanced

only to November 22, 2015. The Chinese Final Action Date, or cut-off date has been advanced at a snail's pace despite Congressionally allocated visas being available.

338. Second, failure to advance the Final Action Date, directly bars Plaintiffs' derivative children from "freezing" their age under the Child Status Protection Act because to freeze a a child's age under CSPA) a visa must be "available under the Final Action Date cut-off date. This failure to act results in the children to continue to age and be separated from their families. As a result, they will lose the ability to acquire an EB-5 immigrant visa through their parent's investment. The Child Status Protection Act is ineffective when children with approved immigrant visas wait so long for DOS to authorize visa numbers. However, if DOS authorized visa numbers on or by September 30, 2022, to Plaintiffs' children, their age could be frozen and they would no longer risk ageing out, regardless of how long it took for DOS to *issue* the EB-5 immigrant visas. Being able to keep their children in the family, is paramount to most Plaintiffs.

339. Third, wastage of 11000-14000 EB-5 immigrant visas will lead to additional malaise and despondency in the Chinese investor community. This will continue to drive down the amount of investment form Chinese nationals in the United States, and it will drive up the number of Chinese nationals seeking return of their current investments because they are sick and tired of waiting.

340. Fourth, Plaintiffs continue to have money at risk in the United States. Their investments that should have be done in 5 years now promise to be at risk for at least 10, 15 or even 20 years. This is a significant direct financial harm. Waiting 7 years to see the line move only 18 months means at this pace they may have to wait decades, while Regional Centers get to keep their money, whereas investors from other nations can have their money returned usually after 5 years. For these investors, there money cannot be returned because it has to be redeployed and put "at

risk" again since they can only redeem their investment when the Form I-829 Removal of Conditions application is filed, about two years after they land with green cards, or U.S. permanent resident status. Some Chinese EB-5 investors have already passed away waiting, and in most cases this is the end of the road for those who stand in line and seek to immigrate legally. It is clear that immigrants seeking to live in America must follow the correct immigration rules, which Plaintiffs have done, only to discover that the Congressionally mandated visas are being wasted.

341. Finally, the United States will suffer harm because it is failing to uphold its end of the bargain for the EB-5 program. Plaintiffs invested in good faith on the promise of a shot at an immigrant visa and the American Dream. But America has not upheld its end of the bargain for these Plaintiffs. Rest assured, American businesses have profited millions and millions of dollars off these investors, all they while they wait in nonimmigrant status in the US or outside the US altogether. Many of the major downtown developments that have been built are based on Direct Foreign Investment through the EB-5 program. Most of these investments are structured as very low interest, almost interest free loans, usually paying .025% or less return, and many have invested in high-risk projects, often losing some or all of their capital in failed projects. However, even if they lose their money, they can still get green cards, if the jobs are created and in most instances they have been or USCIS will not approve their petitions. Each and every one of plaintiffs waited years to have the EB-5 petitions reviewed and adjudicated and although approved, thew Department of state is refusing unlawfully to issue their green cards, while allowing the visas to be wasted.

FIRST CAUSE OF ACTION
(DHS Transfer to DOS – Unlawful Withholding or Unreasonable Delay)

342. Plaintiffs [redacted] all allegations above as though restated here.

343. DHS has a required, discrete duty to transfer approved immigrant visa petitions to DOS. USCIS has unlawfully withheld or unreasonably delayed transferring Plaintiffs' [redacted] 's approved petitions to DOS.

344. First, congress requires DHS to forward a copy of the approved Form I-526 petition to DOS upon approval:

> After an investigation of the facts in each case, and after consultation with the Secretary of Labor with respect to petitions to accord a status under section 1153(b)(2) or 1153(b)(3) of this title, the Attorney General shall, if he determines that the facts stated in the petition are true and that the alien in behalf of whom the petition is made is an immediate relative specified in section 1151(b) of this title or is eligible for preference under subsection (a) or (b) of section 1153 of this title, approve the petition and forward one copy thereof to the Department of State.

8 U.S.C. § 1154(b).

345. DHS approved all of the following Plaintiffs' Forms I-526 years ago, but it has yet to forward them to DOS:

Plaintiff	I-526 Receipt Number	Priority Date	Date of Approval
[redacted]	[redacted]	12/7/2016	3/6/2018
		9/6/2017	8/16/2018
		7/18/2016	10/24/2018
		11/14/2016	7/23/2018
		4/20/2016	7/27/2017
		9/7/2017	8/2/2018
		7/1/2016	5/25/2017
		9/27/2016	8/7/2019
		9/14/2017	10/8/2019
		11/28/2016	2/10/2020
		3/27/2017	7/10/2018
		9/26/2016	4/18/2018
		4/25/2017	7/19/2018
		8/7/2017	7/17/2018
		7/5/2016	1/28/2020
		12/7/2016	5/11/2020
		3/3/2016	8/16/2017
		9/28/2017	10/30/2018
		11/29/2016	6/12/2018
		5/25/2017	11/15/2018
		11/30/2017	10/8/2018
		12/7/2015	3/2/2017
		9/29/2017	3/11/2019
		10/21/2016	2/12/2020
		9/28/2016	3/27/2018
		9/28/2016	7/25/2018
		12/5/2016	4/26/2018
		7/19/2016	9/26/2017
		5/22/2017	9/26/2017
		9/16/2016	11/20/2019
		9/22/2016	10/16/2020
		9/30/2016	4/6/2018
		9/30/2016	9/20/2018

7/18/2017	10/17/2018
5/15/2017	10/23/2018
3/17/2017	4/22/2018
4/27/2017	6/20/2018
3/30/2017	5/23/2018
5/26/2016	1/23/2018
12/8/2016	3/4/2020
7/19/2016	1/5/2018
8/3/2016	12/1/2017
3/17/2017	1/31/2019
9/9/2016	9/20/2017
8/30/2017	10/9/2018
11/15/2016	5/17/2018
7/26/2016	6/25/2018
8/12/2016	8/24/2017
4/25/2017	8/9/2018

346. DHS has a ministerial, nondiscretionary duty to forward these approved petitions DOS and it has failed to do so.

347. To the extent DHS does not have a mandatory duty to forward one copy of the petitions upon approval, it has unreasonably delayed transfer of these petitions to DOS.

348. First, DHS's rule of reason for transferring the approved petition and underlying documents to the NVC is to transfer it immediately upon approval as reflected in the verbiage of standard approval notices.

349. USCIS has not followed its rule of reason here.

350. Second, Congress indicates an approval and transfer should be done contemporaneously by mandating the Agency approve *and* transfer in the same command.

351. USCIS has defied congressional intent.

352. Third, this delay impacts human health and welfare, not merely an economic interest.

353. Such failure to transfer prevents these Plaintiffs from getting visa numbers allocated by DOS, adds to the EB-5 Visa wastage, and increases the length of their delays.

354. Fourth, expediting transfer of Plaintiff's petition to DOS will not impact the DHS. They need only put it in the mail.

355. An order compelling DHS to transfer is in the public interest.

356. Finally, no impropriety need be found, but waiting a year to mail an approved petition to the DOS reaches a level of reckless disregard that is akin to bad faith.

357. This delay is not substantially justified.

358. This Court should order DHS to transfer "one copy thereof to the Department of State." 8 U.S.C. § 1154(b).

SECOND CAUSE OF ACTION
(DOS Visa Number Allocation – Unlawful Withholding)

359. All Plaintiffs re-allege all allegations above as though restated here. All Plaintiffs make this claim.

360. DOS has a required, discrete duty to authorize all available visa numbers upon receipt of the approved visa petitions.

361. Upon receipt of an approved visa petition, the "Secretary of State shall then authorize the consular officer concerned to grant the preference status." 8 U.S.C. § 1154(b).

362. Because we are in the last quarter of the Fiscal Year, DOS has authority to authorize all remaining FY 2022 EB-5 visa numbers to Plaintiffs and their derivatives:

Name Of Plaintiff	I-526 receipt number	NVC Number	Priority Date	Number of Derivatives
[redacted]	[redacted]	[redacted]	12/9/2015	2
			3/23/2016	1
			12/10/2015	3

	8/30/2017	2
	11/15/2016	2
	7/26/2016	0
	8/12/2016	0
	4/25/2017	2

363. All Plaintiffs are entitled to authorization of visa numbers.

364. In addition to congress requiring authorization of visa numbers to Plaintiffs and their derivatives, DOS recognizes its mandatory duty to allocate visa numbers to ensure issuance: "the Department shall allocate immigrant visa numbers for use in connection with the issuance of immigrant visas and adjustments of status . . ." 8 C.F.R. § 42.51(b).

365. While DOS must authorize these visa numbers by September 30, 2022, nothing requires a consular officer to issue an immigrant visa based on this authorization by the end of the FY 2022.

366. Congress does require that for other immigrant visas, such as Diversity Immigrant Visas, but it does not for EB-5 immigrant visas.

367. DOS has failed to take an agency action it is required to take. Its failure harms Plaintiffs because it increases their wait to acquire lawful permanent resident status, it wastes EB-5 immigrant visas, and it prolongs their required investment. Further, DOS's failure allows certain derivative beneficiary family members to "age-out," which prevents them from being able to immigrate with the rest of their family.

368. DOS's failure to authorize immigrant visas for Plaintiffs by the fourth quarter of FY 2022 is substantially justified.

369. This Court should compel DOS to authorize visa numbers for all Plaintiffs prior to September 30, 2022.

PRAYER FOR RELIEF

Plaintiffs pray that this Court do the following:

370. Take jurisdiction over this case;

371. Compel DHS to transfer all Plaintiffs with approved Forms I-526 to the DOS if they have not been transferred already within 7 days;

372. Compel DOS to authorize FY 2022 EB-5 immigrant visa numbers for all Plaintiffs on or by September 30, 2022;

373. Order DOS to process Plaintiffs' immigrant visa applications within 6 months and schedule interviews with all due haste;

374. Award attorneys' fees and costs under the Equal Access to Judgment Act or any other provision of law; and

375. Enter any relief necessary to ensure justice.

August 5, 2022

Respectfully submitted,

s/Bernard P. Wolfsdorf
BERNARD P. WOLFSDORF
CA Bar No. 107657
Wolfsdorf Rosenthal, LLP
1416 2nd Street
Santa Monica, CA 90401
Tel: (310) 570-4088

s/Brad Banias
BRAD BANIAS
Banias Law, LLC
Post Office Box 20789
Charleston, SC 29413
843.352.4272
brad@baniaslaw.com

Attorneys for Plaintiffs

Li