

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

GREG DAVIS
Plaintiff

CIVIL ACTION NO. _____

VERSUS

JUDGE _____

**LAFAYETTE PARISH SCHOOL BOARD,
MARK BABINEAUX AND
TEHMI CHASSION**
Defendants

MAGISTRATE JUDGE _____

COMPLAINT FOR INJUNCTIVE RELIEF

NOW INTO COURT comes GREG DAVIS to seek permanent injunctive relief against Defendants, **Lafayette Parish School Board, Mark Babineaux and Tehmi Chassion** (hereinafter “Defendants”), for the following:

NATURE OF THIS ACTION

1.

This is a civil action under 42 U.S.C. § 1983 for permanent injunctive relief to prohibit Defendants from participating, in their capacity as members of the Lafayette Parish School Board, individually or collectively, in any vote to terminate the employment contract of the Lafayette Parish School System Superintendent, Pat Cooper, and to enforce the provisions La. R.S. 39:1312 which provides for a mandatory carry-over budget from the prior school year when a public body fails to adopt an annual budget prior to the end of its prior fiscal year.

2.

The Superintendent, Dr. Pat Cooper, is a full time employee of the Lafayette Parish School Board whose constitutionally protected property interest in his employment is being

impaired without due process as a result of the established bias of defendants, Mark Babineaux and Tehmi Chassion, as will be more fully shown in this Complaint.

3.

The Lafayette Parish School Board failed to adopt a budget prior to the end of its prior fiscal year [which ended June 30, 2014] and has failed to reauthorize a carry-over budget for the first six months of this fiscal year as mandated by the provisions of LRS 39:1312. The resulting budgetary and planning chaos has disrupted the ability of the Lafayette Parish School System, its administrators, faculty, employees, students and families to adequately prepare for the doors to open for the new school year on August 12, 2014. The impact of this failure and the resulting budget cuts and staff reduction will disproportionately fall upon the minority and disadvantaged students in the school system despite the fact that the school system reserve account (the “rainy day fund”) contains an unprecedented balance in excess of \$66 million and tax revenues continually rise.

JURISDICTION, AND VENUE

X.

This case arises under the United States Constitution and 42 U.S.C. § 1983. This Honorable Court possesses subject-matter jurisdiction over this action based upon 28 U.S.C. §§ 1331, 1343, and 1367. The injunctive relief sought is further authorized by Rule 65 of the Federal Rules of Civil Procedure.

5.

Venue is proper in this Honorable Court pursuant to 28 U.S.C § 1391(a)(1) as the actions giving rise to the claims herein have occurred within the Parish of Lafayette, Louisiana.

PARTIES

6.

Named Plaintiff herein is:

GREG DAVIS, a person of the full age of majority domiciled in Lafayette Parish, Louisiana.

7.

Named Defendants herein are:

LAFAYETTE PARISH SCHOOL BOARD, the elected governing body of the Lafayette Parish School System (hereinafter “**Board**” or “**School Board**”)

MARK BABINEAUX, a domiciliary of Lafayette Parish, Louisiana who serves as the elected member of the Lafayette Parish School Board for District 1 (hereinafter “**Babineaux**”); and

TEHMI CHASSION, a domiciliary of Lafayette Parish, Louisiana who serves as the elected member of the Lafayette Parish School Board for District 4 (hereinafter “**Chassion**”).

BACKGROUND

8.

The Lafayette Parish School System (“LPSS”) serves approximately 31,000 public school students.

9.

LPSS is governed by a nine member Board elected by the voters from each of its nine districts. La. R.S. 17:81(A)(1) defines the general powers of the Board as follows:

Each local public school board shall serve in a policymaking capacity that is in the best interests of all students enrolled in schools under the board's jurisdiction. When establishing board policies, each board shall prioritize student achievement, financial efficiency, and workforce development on a local, regional, and statewide basis. When choosing a local superintendent of schools, each board

shall select a leader who shall prioritize student achievement and act in the best interests of all students enrolled in schools under the board's jurisdiction.

10.

The Board selects the Superintendent to provide the professional education leadership for the System. The Superintendent shall have authority to employ teachers and shall see that the provisions of the state school law are complied with. LRS 17:81A(2).

11.

This Board contracted with Dr. Pat Cooper (“Dr. Cooper”) to be the Superintendent of LPSS which contract was effective January, 2012, for a term of four years ending in December, 2015.

12.

The contract provides for compensation and benefits, annual goals setting, annual performance review, scope of authority, and causes for termination (**Exhibit A**).

13.

Subsequent to the Board hiring Dr. Cooper to be the Superintendent of LPSS, the Louisiana Legislature redefined the scope of authority of the Superintendent and the Board to remove the authority from the Board and vest that authority in the Superintendent to hire-fire and to determine the compensation system for employees (Acts 2012, No. 1; now LRS 17:81(3), (4) and (6)).

14.

A majority of the Board has voted to authorize the appointment of Special Counsel to conduct an omnibus “investigation” of the Superintendent without specifying any particular acts or omissions of the Superintendent (**Exhibit B**). That majority includes Mark Babineaux and Tehmi Chassion.

15.

The Board's interim general counsel requested the approval of the Louisiana Attorney General for the appointment of the Special Counsel without any specification of the particular acts or omissions to be investigated (**Exhibit C**).

16.

La. R.S. 17:54(B)(1)(b)(iii) provides that, "Before a superintendent can be removed during the contract period, he shall have the right to written charges and a **fair hearing** before the board after reasonable written notice." This statute establishes the baseline standard for due process that is assured by the Fifth and Fourteenth Amendments of the United States Constitution.

17.

At the June 4, 2014 Board meeting, three members of the Board attempted to determine the acts or omissions of the Superintendent that were to be investigated but the same Board members who voted to authorize the investigation voted not to make any such disclosure. Similar requests were made at the July 2 and July 16, 2014 School Board meetings to no avail. Mark Babineaux and Tehmi Chassion have consistently avoided those disclosures (**Exhibit D**).

PROCEDURAL DUE PROCESS AND FAIR HEARING

18.

The basic requirement of constitutional due process is a fair and impartial tribunal, whether at the hands of a court, an administrative agency or a government hearing officer. The Supreme Court has consistently enforced this basic procedural right and held that decision makers are constitutionally unacceptable in the following circumstances: (1) where the decision maker has a direct personal, substantial, and pecuniary interest in the outcome of the case; (2)

where an adjudicator has been the target of personal abuse or criticism from the party before him; and (3) when a judicial or quasi-judicial decision maker has the dual role of investigating and adjudicating disputes and complaints. *Valley v. Rapides Parish School Board*, 118 F.3d 1047, 1052 (5th Cir. 1997)(citing *Baran v. Port of Beaumont Navigation Dist. of Jefferson County*, 57 F.3d 436, 444-446 (5th Cir. 1995)).

19.

A procedural defect arises when the decision makers have prejudged the facts to such an extent that their minds are “irrevocably closed” before actual adjudication. *Valley*, 118 F.3d at 1052 (citing *Baran*, 57 F.3d at 446).

20.

The movant must overcome two strong presumptions: (1) the presumption of honesty and integrity of the adjudicators; and (2) the presumption that those making decisions affecting the public are doing so in the public interest. *Valley*, 118 F.3d at 1052-1053. Yet, both the Fifth Circuit and the Supreme Court have recognized that a movant challenging the two presumptions may convince a court that “under a realistic appraisal of psychological tendencies and human weaknesses, conferring investigative and adjudicative powers on the same individuals poses such a risk of actual bias or prejudice that the practice must be forbidden if the guarantee of due process is to be adequately implemented.” *Valley*, 118 F.3d at 1053 (citing *Withrow v. Larkin*, 421 U.S. 35, 47 (1975)).

21.

The Supreme Court has held that in some instances, a school board's decision is a legislative decision—not adjudicative—such that the decision has significant governmental and public policy dimensions that allow it (the school board) to make decisions in the public interest

even if it is prejudiced to a particular party. Nevertheless, adjudicative decisions, or issues not of a legislative, policy or legal nature, should be free of bias or prejudice. Thus an adjudicative decision maker should be disqualified if he or she has prejudged disputed adjudicative issues. Moreover, in the context of school or college boards, appellate jurisprudence has favored recusing board members who display a bias or prejudice that would result in an unconstitutional decision. *Valley*, 118 F.3d at 1053.

HISTORY REPEATS ITSELF

22.

In 2003, Dr. James Easton (hereinafter “Easton”) was selected as Superintendent of LPSS.

23.

Easton became known as the “supermarket superintendent” for his direct one-on-one approach to the community.

24.

In 2005 following Hurricanes Katrina and Rita, Easton led LPSS in welcoming the influx of displaced Louisiana families to Lafayette while assuming the task of educating their children.

25.

On April 24, 2006, Dr. James Easton led the LPSS to Unitary Status after forty-one years of desegregation litigation.

26.

On June 20, 2007, the Board voted to buy out Easton’s contract without cause for the sum of \$280,000. Several of the six Board members who voted to terminate and buy-out the Easton

contract now support the “investigation” of Dr. Cooper. Babineaux and Chassion have joined that effort.

27.

Dr. Easton’s parting comments as Superintendent are equally applicable with regard to the current Board’s relationship with the current Superintendent:

“I want to say that I respect the board's right to choose its own superintendent. I don't want anyone to think that I am angry, or sad, or hurt by this situation. I understand politics. I have been around for a while, and I have seen politics played out in many arenas and, frankly, with much more skill than what I have observed in the last six months.

I do believe that this is a bad expenditure [the \$280,000.00 buy-out]. Obviously I am familiar with this system's financial status and we cannot afford to spend this money in this manner. When I signed my contract, I had every intention of fulfilling it. I do not make promises that I don't keep. I'm not hankering to leave this system; I don't intend to break my contract with this board. I would never turn my back on the boys and girls of this community. It is the board's decision to make this expenditure. It is the board's decision that I stop doing the work I promised to do. It's not the decision I would make, and I don't think it is the decision that the majority of this community would make, either.

I have come to care very much for Lafayette in my six years here. It has been difficult to watch the damage done over the past six months. I sincerely hope that this Board's inexperience does not cost this system any more money, respect or support in the community. Much ground has been covered, and I would hate for any more to be lost.”

28.

Following Easton’s buy-out, the Board appointed a retiring Deputy Superintendent as the interim Superintendent and finally as Superintendent all on short term contracts. Babineaux was an ardent supporter of that intermediate Superintendent whom he characterized as having assembled an administrative “Dream Team.” Babineaux served as President of the Board in 2011, the year in which the search and selection process that resulted in Dr. Cooper’s selection as Superintendent.

29.

In 2011, the composition of the Board changed due to the 2010 election results and a new five member majority emerged. It included newly elected Tehmi Chassion and was derisively referred to as the “Gang of Five” by one of the “Sore Four.” The “Sore Four” included Mark Babineaux, Greg Aubrey, Rae Trahan, and Tommy Angelle [who coined the “Gang of Five” moniker].

30.

The Gang of Five focused on systemic change to the “C” rated school system starting with the search and selection of a new Superintendent with a vision and a plan to lift Lafayette to an “A” rated system for all of its schools. Dr. Pat Cooper is that Superintendent, and he has implemented the “100% In, 100% Out Turnaround Plan” (hereinafter “Turnaround Plan”) resulting in wholesale challenges to the status quo.

31.

The Gang of Five adopted the Turnaround Plan proposed by Cooper. The pilot school selected to validate the Turnaround Plan was Northside High School which is in Tehmi Chassion’s electoral district. Chassion voted for the reconstitution of Northside.

32.

Community support for the school system preceded Dr. Cooper’s selection as Superintendent and remains extremely strong. Unfortunately, that support has not borne fruit due to the swing of Tehmi Chassion from the Gang of Five to the Sore Four as a result of his own personal agenda.

TEHMI CHASSION

32.

Defendant Tehmi Chassion (Chassion) was sworn in to his first term on the Board in January 2011 and participated as a Board member in the search and voted to select Dr. Cooper as the Superintendent effective January, 2012.

33.

Chassion voted to support the adoption and implementation of the Turnaround Plan developed for LPSS by the Superintendent in the early months of 2012.

34.

Chassion was a consistent supporter of the Superintendent until March 21, 2012, when Chassion was confronted with his possession of a grand master key for all LPSS facilities, which he utilized without charge or satisfaction of the liability insurance requirement.

35.

Chassion subsequently participated in a meeting with the Superintendent on behalf of his brother who represented a potential vendor for the LPSS group health plan but was disappointed that the Superintendent was unswayed by that relationship. Chassion later voted on the contract instead of recusing himself. This episode has been well documented in the press.

36.

In retaliation, Chassion has persistently attacked the Superintendent for hiring a new maintenance supervisor on the basis of his lack of a high school diploma. In one public meeting of the Board, Chassion stated that the only satisfactory resolution of the issue was the termination of the maintenance supervisor or the Superintendent. The maintenance supervisor remains employed and has significantly improved LPSS facilities.

37.

Chassion's actions with regard to the maintenance supervisor issue are contrary to the express prohibition adopted in Act 1 of 2012 (now La. R.S. 17:81P(1)), which provides:

"No board member shall act in an individual capacity to use the authority of his office or position as a member of the school board in a manner intended to interfere with, compel, or coerce any personnel decision made by the superintendent or a school principal, including the hiring, promotion, discipline, demotion, transfer, discharge, or assignment of work to any school employee."

38.

The Superintendent has filed a complaint with the Ethics Commission concerning Chassion resulting in a warning letter to Chassion. In addition, Chassion stated in a Board Meeting prior to that complaint that Dr. Cooper had filed a complaint at the same time Chassion's tires had been slashed.

39.

On February 5, 2014, Chassion phoned the police on the Superintendent during a school board meeting, alleging the Superintendent yelled in his ear, grabbed his shoulder, and spun him around in his swivel chair during an executive session. No charges were filed against the Superintendent following the police investigation and review by the prosecuting district attorney.

40.

On June 18, 2014, the School Board member evaluations of the Superintendent were tabulated and publically announced. The twenty-eight standards were to be graded on an eight point scale with a zero being "unsatisfactory," a one designating "needs improvement," and an eight as "distinguished."

41.

Chassion awarded twenty-three zeroes in the twenty-eight categories. The next highest number of zeroes was thirteen by Babineaux who is also named in this Complaint.

42.

Chassion awarded the lowest evaluation of any board members, including the “Sore Four,” whose scores ranged from 0.9 to 1.4. Chassion awarded a 0.2. The average score for all Board members was 3.5 which falls in the Average-to-Good range of the evaluation criteria.

MARK BABINEAUX

43.

Defendant Mark Babineaux (“Babineaux”) was President of the Board when the Superintendent selection process began in 2011, much to his disappointment. He was fully supportive of the status quo represented by the then Superintendent and his “Dream Team” administration.

44.

During the selection process, Babineaux resisted community input to the process.

43.

Babineaux went so far as to engineer the disqualification of Dr. Cooper as a candidate for the Superintendent position by directing the LPSS employee who was managing the selection process to contact Dr. Cooper to advise him that he could only be considered if he could start full time in January 2012. Dr. Cooper withdrew his application based upon that false information. When this maneuver was exposed, a 5-4 vote of the Board reinstated Dr. Cooper’s application with Babineaux voting against reinstatement.

44.

In the final vote for Superintendent taken December 14, 2011, Babineaux voted in favor of the candidate from the incumbent administration rather than Dr. Cooper.

45.

On April 4, 2013, Dr. Cooper exposed Babineaux for signing a construction management contract addendum without Board authorization committing LPSS to a 3.3 percent revenue share of any school system tax passed by parish voters within 30 months of the contract's signing. That contract's worth was potentially in the millions of dollars. Dr. Cooper was quoted in the newspaper report that broke this story:

“What got us into this pickle is because Mark Allen Babineaux ... signed this four days after the bond issue was defeated, and my question is what's up with that?” Cooper says. “Something is not right here. That provision basically binds us to a plan that was defeated by the public, not to mention it would cost [the school system] a whole lot of money.”

46.

On November 22, 2013, Dr. Cooper filed the following Complaint about Babineaux with the Louisiana Office of Disciplinary Counsel (ODC):

“I am lodging a notarized formal complaint against Lafayette Parish School Board Member, Mark Babineaux, based on his breaching the confidentiality of an Executive Session held on Oct. 16 ... dealing with a personnel item regarding me, Pat Cooper. The breach took place at a public school board meeting ... in open session on [Nov. 20]. Mr. Babineaux, in open session and documented by TV cameras broadcasting to the community and surrounding area, divulged the activities and comments that were discussed in the Executive Session.”

47.

In response to that Complaint, the chief disciplinary counsel for the ODC made the following comment in response to press inquiry about the Complaint:

“In general, a lawyer is a lawyer, and subject to the Rules of Professional Conduct at all times. So, a lawyer may engage in a certain conduct, and even if it has

nothing to do with the practice of law, it could still violate the rules. For example, a lawyer is caught in the possession of illegal drugs, that would violate the rules, even though drugs have nothing to do with the practice of law, it's a criminal act.”

48.

Babineaux's disdain for public participation in Board governance was articulated at its May 21, 2014, meeting when he characterized a LaPESC survey as “propaganda,” saying the only acceptable forum for public input should be held during each Board meeting's public comments period which is limited to three minutes.

49.

LaPESC is the Lafayette Public Education Stakeholders Council comprised of thirteen members, including LPSS, the Citizens Action Council, Concerned Citizens for Good Government, the Greater Lafayette Chamber of Commerce, the Greater Southwest LA Black Chamber of Commerce, 100 Black Men of Greater Lafayette, the Lafayette Parish Sheriff's Office, Pugh Family Foundation, the State of Greater Black Lafayette, the 705, United Way of Acadiana, UL Lafayette, and the Upper Lafayette Economic Development Foundation.

50.

LPSS was a founding member of LaPESC but later withdrew and only rejoined membership because Cooper saw the value of the public stakeholders and represented the School System as a reinstated member.

51.

Babineaux has frequently commented in Board meetings that Dr. Cooper is dismantling all that was working for the School System before Dr. Cooper arrived and implemented the Turnaround Plan.

52.

This was manifest in Babineaux's recommended budget cuts during the June 5, 2014, special meeting of the Board. Those recommendations prompted the following remarks by Cooper in response:

"I would ask the question of motivation to Mr. Babineaux. Is it quality education or some other reason for suggesting that we break state and federal law by not providing an alternative site thereby making life more difficult for teachers by sending the troubled students back into the regular classrooms to disrupt instruction?

Do you really want to cut out a very successful Community Relations Department that has done more to give transparency to the system than any other single thing?

Do you really want no textbooks and materials to carry us into common core?

Too many of our children are sick, mentally, emotionally, physically, and you want to cut out what is some of their only access to health care? We have had several suicide attempts and many threats, and you do not want us to provide for our children's mental health needs even though experts agree that is the most troubling problem for our youth?

As I stated in the beginning, some board members thoughtfully approached the task at hand, but these requests from Mr. Babineaux are absurd. I sincerely hope that we can keep personal animosity out of deciding what our children, teachers, and employees need and deserve."

53.

Babineaux has voted to reprimand Dr. Cooper in connection with his retention of the maintenance supervisor.

54.

Babineaux, an attorney, voted to authorize hiring special counsel to conduct an investigation of Cooper for as-yet undisclosed matters notwithstanding the express requirements of La. R.S. 42:263, which provides:

No parish governing authority ... parish school board, city school board, or other local or state board shall retain or employ any special attorney or counsel to represent it in any special matter or pay any compensation for any legal services whatever unless a real necessity exists, made to appear by a resolution thereof **stating fully the reasons for the action and the compensation to be paid.**

BUDGET

55.

The Superintendent is charged with responsibility for presenting a balanced budget to the School Board for approval. The process for the 2014-2015 school year began on April 15, 2014 with the first budget workshop. Fifteen meetings and fourteen balanced budget presentations later, there is no budget to advertise for public notice and input. Yet, fully staffed and equipped schools are supposed to open in a few days on August 12, 2014.

56.

There are two problems that have been created by the six member majority intent upon “investigating” the Superintendent and micro-managing administrative decisions through budget line items. Both problems are of the Board’s own making:

- a) They fired the District Attorney as general counsel after he concluded that there was no basis for an “investigation” and hired interim counsel to facilitate the “investigation” without ever stating the basis for the “investigation,” and
- b) They refuse to utilize any portion of the record \$66 million reserve fund, intend to pay teachers the highest bonus in the history of the school system and have flat lined tax collection revenue estimates despite consensus economic projections to the contrary.

57.

The six member majority of the Board has repeatedly voted to dismantle the Turnaround Plan rather than utilize the revenue sources available to them in this budget cycle. Their intent is to override the professional expertise and authority of their Superintendent and substitute their

own judgment. As a result, many of the cuts violate federal and state mandates and literally hundreds of staff positions may be terminated.

58.

The Superintendent has repeatedly warned of the ramifications of these Board actions to all students and that a disproportionate impact will be visited upon our most vulnerable student populations, the minority and at-risk communities.

59.

All of this could have been avoided if the Board had simply invoked Louisiana Revised Statute 39:1312 which provides for a mandatory carry-over budget from the prior school year as a result of its failure to adopt an annual budget prior to the end of its last fiscal year which ended June 30, 2014. Such a carry-over would provide a status quo budget for the last six months of this year which would coincide with the last months of this Board's term in office.

60.

Qualifying for the School Board election closes this month on August 22, 2014. The election is November 4, just three months away. There is no reason to dismantle the progress of the first year of the Turnaround Plan as a parting gesture by this dysfunctional Board. An example of the effect of the budget chaos created by this Board's failure to comply with RS 39:1312 is the narrative of the Carencro High principal attached hereto as **Exhibit E**.

INJUNCTION

61.

This action is for permanent injunctive relief, and the facts will support an application for a temporary restraining order and/or a preliminary injunction in the event that formal charges are delivered to the Superintendent by the Board pursuant to the investigation it has initiated or for

any interim circumstance that may arise. In either case, the test is irreparable harm that would result from the bias evidenced by the Defendants, Babineaux and Chassion.

62.

A preliminary injunction is an extraordinary remedy that should not be granted unless the movant demonstrates by a clear showing: (1) a substantial likelihood of success on the merits; (2) a substantial threat of irreparable harm if the injunction is not granted; (3) that the threatened injury to the party seeking the injunction outweighs any harm to the non-movant that may result from the injunction; and (4) that the injunction will not undermine or disserve the public interest. *Walgreen Co. v. Hood*, 275 F.3d 475, 477 (5th Cir. 2001); *Valley v. Rapides Parish School Bd.*, 118 F.3d 1047, 1051 (5th Cir. 1997).

63.

The Superintendent, Dr. Cooper, has a distinguished record as an educator and Superintendent in prior districts. He has never been reprimanded by a prior employer, never been the object of a police call or subjected to the avarice evidenced by certain members of the Board including the Defendants, Babineaux and Chassion. The damage to his reputation can be readily demonstrated by a simple Google search of his name.

64.

Irreparable harm will also be visited upon the Lafayette Parish School System by creating fear and doubt within the school system and in the prospect of recruiting a future Superintendent in light of the unwarranted tactics and attacks visited upon the present Superintendent by biased school board members whose own agendas supersede the purpose of their elective office.

65.

The entire Lafayette community suffers from the public dysfunction of the Board and certain of its members endangering our ability to adequately prepare the workforce necessary to preserve and support our unique culture and quality of life or to compete with other communities in the economic development arena.

66.

Perhaps most harmful is the example that would be set for our students if the good work of their Superintendent is overcome by the unchallenged personal bias and distortion of the employment and budget process by Defendants. It is the equivalent of school yard bullying that must be stopped.

67.

Because Defendants' conduct has caused and will continue to cause substantial damage to Plaintiff, Dr. Pat Cooper, and more importantly, the children the LPSS is charged with educating, Plaintiff is entitled to injunctive relief.

Wherefore, Plaintiff, Greg Davis, prays that after due proceedings be had:

1. That a permanent injunction issue against the **Lafayette Parish School Board** requiring it to comply with the provisions of LRS 39:1312 that "fifty percent of the amounts appropriated in the appropriation resolution for its 2013-2014 fiscal year be deemed reappropriated for the several objects and purposes specified in the 2013-2014 budget Board resolution.
2. That permanent injunction issue against **Mark Babineaux and Tehmi Chassion**, enjoining from participating in any vote related to the termination of contract of the Superintendent, Dr. Pat Cooper, based upon their personal bias; and

That Plaintiff have such other and further relief as the Court may deem just and proper.

Respectfully submitted,

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